



# Child Protection Policy

Governor Committee: **Full Governing**

Author: **Mr A Mackenzie**

Issue Date: **7 October 2021**

Review Date: **October 2022**

## CHILD PROTECTION

This policy has been adapted from the Hertfordshire County Council Children's Services Model Child Protection Policy for Schools. The model policy was issued in September 2021 and is due for review in September 2022.

This policy is available on the College website, in the staff common room or staff desktop and upon request from the College Office.

## POLICY REVIEW

This policy will be reviewed in full by the Governing Body no less than annually.

The policy was last reviewed and agreed by the Governing Body in October 2021

It is due for review in October 2022.



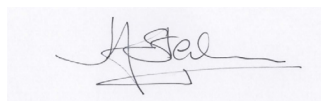
Date 7th October 2021

**Mr David Woods**  
(Principal)



Date 7th October 2021

**Mrs Marie Roberts**



Date 7th October 2021

**Mr John Stenhouse**  
(Joint Chairs of Governors)

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Throughout this policy document reference is made to the Designated Safeguarding Lead (DSL) – this includes the Designated Safeguarding Lead and Deputy Designated Safeguarding Leads.

Furthermore, any references to 'staff' within this policy includes all volunteers as well as staff employed by the College

## MISSION STATEMENT

Inspiring knowledgeable, enquiring, caring global citizens through excellence in education.

## EQUALITY STATEMENT

The Governors and staff at Hockerill Anglo-European College (Hockerill or the College) are committed to providing a safe and happy learning environment, promoting equality and diversity and ensuring the well-being of all members of the community. It is their clear intention to promote good behaviour and to exercise their responsibilities in ensuring the safeguarding and welfare of all students and staff within the community.

## INTRODUCTION

Safeguarding is defined as “protecting children from maltreatment, preventing impairment of children’s health or development, ensuring that children are growing up in circumstances consistent with the provision of safe and effective care and taking action to enable all children to have the best outcomes”. ([Working Together to Safeguard Children](#), (DfE, 2018), page 6)

## SAFEGUARDING POLICIES

This policy is one of a suite of College safeguarding policies, all of which are in place to protect and promote the welfare of our students.

- Attendance
- Behaviour
- Child Protection
- Complaints
- Countering Bullying
- Curriculum
- First aid
- Health and Safety
- Online Safety
- Out of College Trips and Procedures
- Safer Recruitment
- Special Educational Needs and Disability
- Staff Code of Conduct
- Substance Use and Misuse
- Supporting Students with Medical Conditions
- Whistleblowing

In particular, this policy should be read in conjunction with the following document:

- DfE: [Keeping Children Safe in Education](#) (KCSiE) (September 2021) (Part One and Annex A) (Appendix 1)

**Additional Policies and references**

- Data Protection
- [Hertfordshire Safeguarding Children Partnership | Hertfordshire County Council](#)
- [Hertfordshire Children's Services: Children Missing from Education \(CME\) and linked Guidance and Referral Form](#)
- [National Minimum Standards for Boarding](#)

All staff are provided with access to these documents and are informed whenever updates are made.

All staff should be aware of systems within the College which support safeguarding, and these are explained to them as part of staff induction. This should include the:

- Child Protection Policy, which should amongst other things also include the policy and procedures to deal with child on child abuse
- behaviour policy (which should include measures to prevent bullying, including cyberbullying, prejudice-based and discriminatory bullying)
- staff code of conduct policy
- safeguarding response to children who go missing from education (within the behaviour policy)
- role of the designated safeguarding lead (including the identity of the designated safeguarding lead and any deputies).
- copy of Part One of Keeping children safe in education (2021) and should be signed to say it has been read and understood.
- Annex A (condensed version of Part one of KCSiE) (DfE 2021). This will be provided to staff who may find the content more accessible.

**Purpose of a Child Protection Policy**

- To inform staff, parents and governors about the College's responsibilities for safeguarding children.
- To enable everyone to have a clear understanding of how these responsibilities should be carried out.

**Hertfordshire Safeguarding Children Partnership Procedures**

The College follows the procedures established by the Hertfordshire Safeguarding Children Partnership (HSCP); a guide to procedure and practice for all agencies in Hertfordshire working with children and their families.

<https://hertsscb.proceduresonline.com/index.htm>

**College Staff**

- All College staff have a responsibility to provide a safe environment in which children can learn.
- College staff are particularly well placed to observe outward signs of abuse, changes in behaviour and failure to develop because they have daily contact with children.
- All College staff will receive appropriate safeguarding children training (which is updated regularly – Hertfordshire Safeguarding Children Partnership advises every three years), so that they are knowledgeable and aware of their role in the early recognition of the indicators of abuse or neglect and

of the appropriate procedures to follow. In addition, all staff members should receive safeguarding and child protection updates (for example, via email, e-bulletins and staff meetings), as required, but at least annually, to provide them with relevant skills and knowledge to safeguard children effectively.

- Temporary staff will be made aware of the safeguarding policies and procedures by the Designated Safeguarding Lead including the Child Protection Policy and staff Code of Conduct.

### **Principles of the Child Protection Policy**

- Establish and maintain an ethos and culture where children feel secure, are encouraged to talk, and are listened and responded to when they have a worry or concern.
- Establish and maintain an ethos and culture where College staff feel safe, are encouraged to talk and are listened and responded to when they have concerns about the safety and well-being of a child.
- Ensure children know that there are adults in the College whom they can approach if they are worried.
- Ensure that children, who have additional/unmet needs are supported appropriately. This could include referral to Early Help Services or Child Protection 'Contact' (as referred to in the model policy) to specialist services if they are a child in need or have been / are at risk of being abused and neglected.
- Consider how children may be taught about safeguarding, including online, through teaching and learning opportunities, as part of providing a broad and balanced curriculum. Refer to KCSiE (DfE 2021), pg. 31-33
- Staff members working with children are advised to maintain an attitude of 'it could happen here' and 'it could be happening to this child', where safeguarding is concerned. When concerned about the welfare of a child, staff members should always act in the interests of the child.

### **Implementation, Monitoring and Review of the Child Protection Policy**

The policy will be reviewed at least annually by the governing body. It will be implemented through the College's induction and training programme, and as part of day to day practice. Compliance with the policy will be monitored by the DSL and through staff performance measures.

## **STATUTORY FRAMEWORK**

In order to safeguard and promote the welfare of children, the College will act in accordance with the following legislation and guidance:

- The Children Act 1989
- The Children Act 2004
- Children and Social Work Act 2017
- Education Act 2002 (Section 175/157)

Outlines that Local Authorities and School Governing Bodies have a responsibility to "ensure that their functions relating to the conduct of school are exercised with a view to safeguarding and promoting the welfare of children who are its pupils".

- Hertfordshire Safeguarding Children Partnership Procedures Manual (Electronic)
- Keeping Children Safe in Education (DfE, September 2021)
- Working Together to Safeguard Children (DfE 2018)
- The Education (Pupil Information) (England) Regulations 2005

- Sexual Offences Act (2003)
- Section 26, The Counter Terrorism and Security Act 2015 (PREVENT duty)
- Female Genital Mutilation Act 2003 (Section 74, Serious Crime Act 2015)
- Anti-social Behaviour, Crime and Policing Act 2014 (makes it a criminal offence to force someone to marry. Includes taking someone overseas to force them to marry (whether or not the forced marriage takes place).
- Serious Violence Strategy 2018
- Sexual violence and sexual harassment between children in schools and colleges (DfE 2017)

As a member of the Boarding Schools Association (BSA) the College carries out its responsibilities to comply with the [BSA Commitment to Care Charter](#) (see Appendix 14)

## THE DESIGNATED SAFEGUARDING LEAD

Governing bodies and proprietors should ensure an appropriate senior member of staff, from the College leadership team, is appointed to the role of Designated Safeguarding Lead.

During term time the DSL and or deputies (or the Principal) will always be available (during College hours) for College staff to discuss any safeguarding concerns.

Staff who need to discuss a concern during holiday time may contact the DSL or deputy. For issues arising outside of College hours / academic time (including weekends) staff should refer to the 'Weekend Programme', which includes the 'on duty' DSL who will be one of the following:

- Mr David Woods (Principal)
- Mr William Conolly (Director of Boarding / Deputy DSL)
- Mr Alasdair Mackenzie (Vice Principal / DSL)
- Ms Alison McCulloch (Executive SENDCo / Deputy DSL)

Contact may be by phone, email or in person. An incident can also be recorded on CPOMS.

Staff should refer to the safeguarding page provided in the Staff Planner (Page 3) or the Safeguarding Leads poster (displayed in all staff areas) for contact details. If none of the above are available staff should contact the Police directly if they believe a child is at risk of immediate harm.

- The Designated Safeguarding Lead (DSL) is:  
Alasdair Mackenzie  
Vice Principal  
mackenziea@hockerill.com
- The Deputy Designated Safeguarding Leads (DDSL) are:  
Lucy Tinnirello  
Head of Student Health and Wellbeing  
tinnirello@hockerill.com

Alison McCulloch  
 Assistant Principal (Executive SENDCo)  
 mccullocha@hockerill.com

William Conolly  
 Assistant Principal (Director of Boarding)  
 conollyw@hockerill.com

The broad areas of responsibility for the Designated Safeguarding Lead are:

- Managing Child Protection Contact Referrals and cases
- Contacting the Child Protection Consultation Hub when advice is needed regarding child protection concerns which possibly meet the threshold for statutory intervention
- Completing Child Protection Contact Referrals for all cases of suspected abuse or neglect where there is a significant risk of harm to the child/young person, Police where a crime may have been committed and to the Channel\* programme where there is a radicalisation concern  
 \*Channel is part of the Government's Prevent strategy
- Liaise with the Principal to inform them of issues - especially ongoing enquiries under Section 47 of the Children Act 1989 and Police investigations
- Act as a source of support, advise and provide expertise to staff on matters of safety and safeguarding and when deciding whether to make a Child Protection Contact by liaising with relevant agencies
- Support staff who make Child Protection Contact Referrals and other service referrals
- Share information with appropriate staff in relation to a child's looked after (CLA) legal status (whether they are looked after under voluntary arrangements with consent of parents or on an Interim Care Order or Care Order) and contact arrangements with birth parents or those with parental responsibility.
- Ensure they have details of the CLA's social worker and the name of the virtual school Head Teacher in the authority that looks after the child.
- Alison McCulloch is the Designated Teacher with responsibility for child looked after (CLA) / post child looked after (post CLA)

### **Training - KCSiE (DfE, 2021)**

The Designated Safeguarding Lead should undergo formal training every two years. In addition to this training, their knowledge and skills should be refreshed (for example via e-bulletins, meeting other DSLs, or taking time to read and digest safeguarding developments) at least annually.

The designated safeguarding lead should also undertake Prevent awareness training at least every three years. Training should provide the designated safeguarding leads with a good understanding of their own role, how to identify, understand and respond to specific needs that can increase the vulnerability of children, as well as specific harms that can put children at risk, and the processes, procedures and responsibilities of other agencies, particularly children's social care, so they:

- Understand the assessment process for providing early help and statutory intervention, including local criteria for action and local authority children's social care referral arrangements



- Have a working knowledge of how Hertfordshire conduct a child protection case conference and a child protection review conference and be able to attend and contribute to these effectively when required to do so
- Understand the importance of the role the designated safeguarding lead has in providing information and support to children social care in order to safeguard and promote the welfare of children
- Understand the lasting impact that adversity and trauma can have, including on children's behaviour, mental health and wellbeing, and what is needed in responding to this in promoting educational outcomes
- Are alert to the specific needs of children in need, those with special educational needs and disabilities (SEND), those with relevant health conditions and young carers
- Understand the importance of information sharing, both within the College, and with the safeguarding partners, other agencies, organisations and practitioners (full details in Chapter one of [Working Together to Safeguard Children](#))
- Understand and support the College with regards to the requirements of the Prevent duty and are able to provide advice and support to staff on protecting children from the risk of radicalisation
- Are able to understand the unique risks associated with online safety and be confident that they have the relevant knowledge and up to date capability required to keep children safe whilst they are online at school
- Can recognise the additional risks that children with special educational needs and disabilities (SEND) face online, for example, from online bullying, grooming and radicalisation and are confident they have the capability to support children with SEND to stay safe online
- Obtain access to resources and attend any relevant or refresher training courses and encourage a culture of listening to children and taking account of their wishes and feelings, among all staff, in any measures the College may put in place to protect them.

### **Raising Awareness**

The Designated Safeguarding Lead should:

- Ensure all staff including part time, contractors, volunteers and supply staff are aware of the College's policies, that these are understood and used appropriately
- Work with the governing body to ensure that the College's Child Protection Policy is reviewed annually, and the procedures and implementation are updated and reviewed regularly
- Ensure the Child Protection Policy is available publicly and that parents are aware that advice regarding early help and child protection concerns could be sought from the Consultation Hub and the Child Protection Contact form. Referrals about suspected abuse or neglect may be made.
- Ensure parents are aware of the College's statutory role regarding safeguarding of children.
- Link with Hertfordshire Safeguarding Children's Partnership (HSCP) to make sure staff are aware of training opportunities and the latest local policies on safeguarding.
- Help promote educational outcomes by sharing the information about the welfare, safeguarding and child protection issues that children who have or have had a social worker are experiencing with teachers and the College's Senior Leadership Team.
- Ensure that when children leave the College, the file for safeguarding and any child protection information is sent to any new school/college as soon as possible but transferred securely and separately

from the main pupil file. The file should not be sent until the child is physically attending the new school.

- Obtain proof that the new school/education setting has received the safeguarding file for any child transferring and then destroy any information held on the child unless the case is currently open and in line with data protection guidelines (see Record Keeping Guidance on Hertfordshire Grid for Learning for further information)
- Consider if it would be appropriate to share any information with the new school in advance of a child leaving. For example, information that would allow the new school to continue supporting victims of abuse and have that support in place for when the child arrives.

## THE MANAGEMENT OF SAFEGUARDING

The Governing Body must ensure that they comply with their duties under legislation. They must also have regard to this guidance to ensure that the policies, procedures and training in their school is always effective and complies with the law.

The Governing Body has a senior board level (or equivalent) lead to take leadership responsibility for the College's safeguarding arrangements.

- The nominated Governor for Child Protection is:  
Dr Robin Saunders  
He can be contacted via the Clerk to the Governors:  
Mrs Katie Coxon  
katie.coxon@clerks.hertsforlearning.co.uk  
clerk@hockerill.com

### **The responsibilities placed on the Governing Body include:**

- ensuring there are appropriate policies and procedures in place in order for appropriate action to be taken in a timely manner to safeguard and promote children's welfare. For example by having a Child Protection Policy in place
- ensuring the College has an appropriate staff code of conduct policy
- ensuring all staff have read Part One\* and Annex B of Keeping Children Safe in Education (DfE 2021) and understand their responsibilities to promote the welfare of and safeguard children  
\*To aid understanding some staff will be able to read Annex A in place of Part One
- ensuring information regarding the role and identity of the Designated Safeguarding Lead (and any deputies), is provided to all staff on induction
- Headteachers and principals should ensure that the above policies and procedures, adopted by governing bodies and proprietors, and particularly concerning referrals of cases of suspected abuse and neglect, are followed by all staff.
- Ensure that the College contributes to multi-agency working in line with statutory guidance Working Together to Safeguard Children (DfE,2018).
- New safeguarding partners and child death review partner arrangements are in place

- Should understand the local criteria for action and the local protocol for assessment and ensure they are reflected in their own policies and procedures. They should also be prepared to supply information as requested by the three safeguarding partners
- Schools and colleges should work with social care, the police, health services and other services to promote the welfare of children and protect them from harm. This includes providing a coordinated offer of early help when additional needs of children are identified and contributing to inter-agency plans to provide additional support to children subject to child protection plans.
- Ensuring arrangements are in place that set out clearly the principles for sharing information within the College and with the three safeguarding partners, other organisations, agencies and practitioners as required.
- Ensure child protection files are transferred to the new College as soon as possible, ensuring secure transit, and confirmation of receipt should be obtained
- Ensure that all staff undergo child protection training (including online safety) at induction. The training should be regularly updated. Induction and training should be in line with advice from the local three safeguarding partners (HSCP) 3 years.
- All staff should receive regular safeguarding and child protection updates (for example, via email, e-bulletins, staff meetings) as required, and at least annually
- Opportunity should therefore be provided for staff to contribute to and shape safeguarding arrangements and the Child Protection Policy.
- Ensure that children are taught about safeguarding, including online safety. The College should consider this as part of providing a broad and balanced curriculum. Relationships and Sex Education and Health Education (for all pupils in state-funded schools) has been mandatory since September 2020.
- The Governors should prevent people who pose a risk of harm from working with children by adhering to statutory responsibilities to check staff who work with children, taking proportionate decisions on whether to ask for any checks beyond what is required and ensuring volunteers are appropriately supervised.
- Ensure the College has written recruitment and selection policies and procedures in place and at least one of the persons who conducts an interview has completed safer recruitment training
- Should ensure there are procedures in place (as described in Part 4 of KCSiE) to manage concerns and allegations against staff including volunteers and supply staff
- There must be procedures in place to make a referral to the Disclosure and Barring Service (DBS) if a person in regulated activity has been dismissed or removed due to safeguarding concerns or would have been had they not resigned. (refer to Type of DBS checks in KCSiE (DfE 2021) pg. 57.
- All staff should be clear about the College's policy and procedures with regard to child on child abuse.
- Where there is a safeguarding concern, ensure the child's wishes and feelings are taken into account when determining what action to take and what services to provide. Systems should be in place for children to express their views and give feedback. Ultimately, all systems and processes should operate with the best interests of the child at heart.
- Ensuring that all of the Designated Safeguarding Leads undergo formal child protection training every two years, in line with KCSiE and HSCP procedures, and receive regular, at least annual, safeguarding updates via e-bulletins, meeting other DSLs, or taking time to read and digest safeguarding

developments, for example.

- Prioritising the welfare of children and young people and creating a culture where staff are confident to challenge senior leaders over any safeguarding concerns.
- Ensuring appropriate filters and appropriate monitoring systems are in place to safeguard children from potentially harmful and inappropriate online material. Additional information to support governors is provided in Part 2 of KCSiE (DfE 2021).

## WHEN TO BE CONCERNED

Knowing what to look for is vital for the early identification of abuse and neglect. All staff should be aware of the indicators of abuse and neglect so that they are able to identify cases of children who may be in need of help or protection.

### Abuse

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

<b>Physical abuse</b>	
A form of abuse which may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm to a child. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child	
Indicators in a child/ young person	
Bruises – shape, grouping, site, repeat or multiple	Withdrawal from physical contact
Bite-marks – site and size Burns and Scalds – shape, definition, size, depth, scars	Aggression towards others, emotional and behaviour problems
Improbable, conflicting explanations for injuries or unexplained injuries	Frequently absent from school
Untreated injuries	Admission of punishment which appears excessive
Injuries on parts of body where accidental injury is unlikely	Fractures
Repeated or multiple injuries	Fabricated or induced illness

### Emotional abuse

The persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. It may involve conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate.

It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability as well as overprotection and limitation of exploration and learning or preventing the child from participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyberbullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.

#### Indicators in a child/ young person

Self-harm	Over-reaction to mistakes / Inappropriate emotional responses
Chronic running away	Abnormal or indiscriminate attachment
Drug/solvent abuse	Low self-esteem
Compulsive stealing	Extremes of passivity or aggression
Makes a disclosure	Social isolation – withdrawn, a 'loner' Frozen watchfulness particularly pre school
Developmental delay	Depression
Neurotic behaviour (e.g. rocking, hair twisting, thumb sucking)	Desperate attention-seeking behaviour

### Neglect

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

### Indicators in a child/ young person

Failure to thrive - underweight, small stature	Low self-esteem
Dirty and unkempt condition	Inadequate social skills and poor socialisation
Inadequately clothed	Frequent lateness or non-attendance at school
Dry sparse hair	Abnormal voracious appetite at school or nursery
Untreated medical problems	Self-harming behaviour
Red/purple mottled skin, particularly on the hands and feet, seen in the winter due to cold	Constant tiredness
Swollen limbs with sores that are slow to heal, usually associated with cold injury	Disturbed peer relationships

<b>Sexual abuse</b>	
Involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing, and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse. 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 child on child abuse) in education and all staff should be aware of it and of their Colleges policy and procedures for dealing with it.	
<b>Indicators in a child/ young person</b>	
Self-harm - eating disorders, self-mutilation and suicide attempts	Poor self-image, self-harm, self-hatred
Running away from home	Inappropriate sexualised conduct
Reluctant to undress for PE	Withdrawal, isolation or excessive worrying
Pregnancy	Sexual knowledge or behaviour inappropriate to age/stage of development, or that is unusually explicit
Pain, bleeding, bruising or itching in genital and /or anal area	Sudden changes in schoolwork habits, become truant
Sexually exploited or indiscriminate choice of sexual partners	

If staff have any concerns about a child's welfare, they should act on them immediately. If staff have a concern, they should follow this policy and speak to one of the Designated Safeguarding Leads. The Designated Safeguarding Leads are most likely to have a complete safeguarding picture and be the most appropriate person to advise on the response to a safeguarding concern.

**Any staff member should be able to make a Child Protection Contact Referral to Children's Services if necessary.**

All staff should be aware of the process for making Child Protection Contact Referrals to Children's Services 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 - from abuse or neglect) that may follow a Contact Referral, along with the role they might be expected to play in such assessments.

Staff should not assume a colleague or another professional will take action and share information that might be critical in keeping children safe. They should be mindful that early information sharing is vital for

effective identification, assessment and allocation of appropriate service provision.

**Options will then include:**

- Managing any support for the child internally via the College's own pastoral support processes
- Completing a Families First Assessment or making a request for early help support
- A Child Protection Contact Referral for statutory services, for example as the child might be in need of services, or suffering / likely to suffer significant harm from abuse or neglect

**Extra Familial Harm (formerly contextual Safeguarding)**

Safeguarding incidents and/or behaviours can be associated with factors outside the College and/or can occur between children outside the College. All staff, but especially the Designated Safeguarding Leads should be considering 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.

**A child centred and coordinated approach to safeguarding**

Safeguarding and promoting the welfare of children is everyone's responsibility. In order to fulfil this responsibility effectively, each professional 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.

Schools and their staff form part of the wider safeguarding system for children. This system is based on the principle of providing help for families to stay together where it is safe for the children to do so, and looking at alternatives where it is not, whilst acting in the best interests of the child at all times.

**Children who may require early help (known as Families First in Hertfordshire)**

Families First is Hertfordshire's strategy for early help for families. A directory of early help services is available at [www.hertfordshire.gov.uk/familiesfirst](http://www.hertfordshire.gov.uk/familiesfirst) which will help practitioners and families find information and support to prevent escalation of needs and crisis.

All staff should be aware of the early help process, and understand their role in identifying emerging problems, sharing information with other professionals to support early identification and assessment of a child's needs. It is important for children to receive the right help at the right time to address risks and prevent issues escalating. This also includes staff monitoring the situation and feeding back to the Designated Safeguarding Leads any ongoing/escalation of concerns so that consideration can be given for a Child Protection Contact Referral to Children's Services if the child's situation doesn't appear to be improving.

If early help is appropriate, the Designated Safeguarding Leads will generally lead on liaising with other agencies and setting up a Families First Assessment as appropriate.

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

- has special educational needs (whether or not they have a statutory Education, Health and Care Plan)
- has a mental health need
- is a young carer



- is showing signs of being drawn in to anti-social or criminal behaviour, including gang involvement and association with organised crime groups or county lines
- is frequently missing/goes missing from care or from home
- is at risk of modern slavery, trafficking, sexual or criminal exploitation
- is at risk of being radicalised or exploited
- has a family member in prison, or is affected by parental offending
- is in a family circumstance presenting challenges for the child, such as drug and alcohol misuse, adult mental health issues and domestic abuse
- is misusing drugs or alcohol themselves
- has returned home to their family from care
- is at risk of 'honour'-based abuse such as Female Genital Mutilation or Forced Marriage
- is a privately fostered child
- is persistently absent from education, including persistent absences for part of the school day

College staff members should be aware of the main categories of maltreatment: physical abuse, emotional abuse, sexual abuse and neglect as well as being aware of the indicators of maltreatment and specific safeguarding issues so that they are able to identify cases of children who may be in need of help or protection.

### **Children with special educational needs and disabilities:**

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 impairment without further exploration
- Assumptions that children with SEN and disabilities can be disproportionally impacted by things like bullying, without outwardly showing any signs
- Communication barriers and difficulties
- Reluctance to challenge carers, (professionals may over empathise with carers because of the perceived stress of caring for a disabled child)
- Disabled children often rely on a wide network of carers to meet their basic needs and therefore the potential risk of exposure to abusive behaviour can be increased
- A disabled child's understanding of abuse
- Lack of choice/ participation
- Isolation

### **Child on child abuse (child on child)**

All staff should be aware that safeguarding issues can manifest themselves via child on child abuse. This is most likely to include, but may not be limited to:

- Bullying (including cyberbullying)
- Physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm
- Sexual violence, such as rape, assault by penetration and sexual assault

- Sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment, which may be stand-alone or part of a broader pattern of abuse
- Up-skirting, 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
- Sexting (also known as sharing nudes or semi-nudes)
- Initiation/hazing type violence and rituals

All staff should be aware that abuse is abuse and child on child abuse will never be tolerated or passed off as "banter", "just having a laugh" or "part of growing up". Furthermore, they should recognise the gendered nature of child on child abuse (i.e. that it is more likely that girls will be victims and boys' perpetrators), but that all child on child abuse at Hockerill (and in society) is unacceptable and will be taken seriously.

In order to minimise the risk of child on child abuse, the College:

- Provides a developmentally appropriate PSHE and RSE curriculum which develops students' understanding of acceptable behaviour and keeping themselves safe
- Has systems in place for any student to raise concerns with staff, knowing that they will be listened to, believed and valued
- Ensures victims, perpetrators and any other child affected by child on child abuse will be supported
- Develops robust risk assessments where appropriate (e.g. using the Risk Assessment Management Plan and Safety and Support Plan tools)
- Has relevant policies in place (e.g. Behaviour Policy).

Where there is an allegation or concern that a child has abused others, Section 4.4 of the Hertfordshire Safeguarding Children Partnership Procedures Manual, 'Children Who Abuse Others':

[http://hertsscb.proceduresonline.com/chapters/p\\_chil\\_abuse.html](http://hertsscb.proceduresonline.com/chapters/p_chil_abuse.html) provides guidance to the Designated Safeguarding Leads and all staff.

Staff should also refer to Part five of KCSiE (DfE 2021) – 'Child on child sexual violence and sexual harassment':

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

### **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. Risk indicators include:

- Increased absence from school
- Change in friendships or relationships with older individuals or groups
- Significant decline in performance
- Signs of self-harm or significant change in wellbeing
- Signs of assault or unexplained injuries
- Unexplained gifts/new possessions

Designated Safeguarding Leads and staff can also refer to the Schools Toolkit for further guidance about the characteristics of young people and their vulnerability to Child Sexual Exploitation and Child Criminal Exploitation on the HGFL; <https://thegrid.org.uk/safeguarding-and-child-protection/child-protection/specific-safeguarding-issues/child-sexual-and-criminal-exploitation>

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

Both CSE and CCE are forms of abuse and both occur where an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a child into sexual or criminal activity. Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including gender, sexual identity, cognitive ability, physical strength, status, and access to economic or other resources. In some cases, the abuse will be in exchange for something the victim needs or wants and/or will be to the financial benefit or other advantage (such as increased status) of the perpetrator or facilitator. The abuse can be perpetrated by individuals or groups, males or females, and children or adults. The abuse can be a one-off occurrence or a series of incidents over time and range from opportunistic to complex organised abuse. It can involve force and/or enticement-based methods of compliance and may, or may not, be accompanied by violence or threats of violence. Victims can be exploited even when activity appears consensual and it should be noted exploitation as well as being physical can be facilitated and/or take place online. More information including definitions and indicators are included in Annex B KCSiE DfE 2021.

### **Mental Health**

All staff should be aware that mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation. Only appropriate trained professionals should attempt to make a diagnosis of a mental health problem. Staff, however, are well placed to observe students day-to-day and identify those whose behaviour suggests that they may be experiencing a mental health problem or be at risk of developing one.

If staff have a mental health concern about a child that is also a safeguarding concern, immediate action should be taken by following the procedures in this policy and speaking to the schools Designated Safeguarding Leads.

### **Prevent: Safeguarding Children and Young People from Radicalisation**

Children can be vulnerable to extreme ideologies and radicalisation. Similar to protecting children from other forms of harm and abuse, protecting children from radicalisation must be part of all school and college safeguarding approaches.

All schools and colleges are subject to the Prevent Duty under Section 26 of the Counter Terrorism and Security Act 2015 (the CTSA 2015), in the exercise of their functions to have “due regard to the need to prevent people from being drawn into terrorism.” Page 133 KCSiE (DfE 2021).

There are signs and vulnerability factors that may indicate a child is susceptible to radicalisation or is in the process of being radicalised. It is possible to protect vulnerable people from extremist thinking and intervene to safeguard those at risk of radicalisation. Staff must be alert to changes in children’s behaviour, which

could indicate that they may be in need of Prevent support. They must act proportionately to the concern using the Prevent 'notice, check, share' approach, which may lead to the Designated Safeguarding Leads making a Prevent referral.

Local Hertfordshire County Council guidance on Prevent is featured at 6.25 of the Hertfordshire Safeguarding Children's Partnership CP procedures

[https://hertsscb.proceduresonline.com/chapters/p\\_prevent\\_guide.html](https://hertsscb.proceduresonline.com/chapters/p_prevent_guide.html)

This guidance outlines the specific duties in Hertfordshire. This guidance also features advice on making a Prevent referral.

### **Domestic Abuse**

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

All children can witness and be adversely affected by domestic abuse in the context of their home life where domestic abuse occurs between family members. See Appendix 4 for information regarding Operation Encompass.

### **DEALING WITH A DISCLOSURE**

(See Appendix 12 Hockerill Concerns Flow Chart for more guidance)

If a student confides in a member of staff and requests that the information is kept secret, it is important that the member of staff tells the child in a manner appropriate to the child's age/stage of development that they cannot promise confidentiality – instead they must explain that they may need to pass information to other professionals to help keep the child or other children safe.

If a child discloses that he or she has been abused in some way, the member of staff/volunteer should:

- Listen to what is being said without displaying shock or disbelief
- Accept what is being said
- Allow the student to talk freely
- Reassure the student, but not make promises which might not be possible to keep
- Never promise a student that they will not tell anyone - as this may ultimately not be in the best interests of the child.
- Reassure him or her that what has happened is not his or her fault
- Stress that it was the right thing to tell
- Listen, only asking questions when necessary to clarify what is being said.
- Not criticise the alleged perpetrator
- Explain what has to be done next and who has to be told

- Make a written record (see Record Keeping) using CPOMS
- Pass the information to the Designated Safeguarding Lead without delay (if a Designated Safeguarding Lead is not available, staff must inform a senior member of staff or complete a child protection contact referral if this disclosure indicates that the child may be at risk of immediate harm and/or have been suffered significant harm to ensure reporting to Police and/or Children's Services where necessary is not delayed)

CPOMS must be used for all record keeping.

### **Third Party Disclosures**

It's everyone's responsibility to report concerns related to children and make referrals to Children Services and the Police if suspected that a child has been abused or is at risk of abuse.

Therefore, when safeguarding concerns are shared with the Designated Safeguarding Lead in a school by a parent or member of the public, it is important to note that there is equal responsibility by the complainant to report the matter also directly rather than assume the responsibility is that of the school. If unsure of how to do this speak to the Designated Safeguarding Lead / Principal and they will advise accordingly.

### **Support**

Dealing with a disclosure from a student, and safeguarding issues can be stressful. The member of staff/volunteer should, therefore, consider seeking support for themselves and discuss this with the Designated Safeguarding Lead.

If a College staff member receives a disclosure about potential harm caused by another staff member, they should see "Allegations involving school staff/volunteers" below

## **RECORD KEEPING**

All practitioners should be confident of the processing conditions under the Data Protection Act 2018 and the GDPR which allow them to store and share information for safeguarding purposes, including information, which is sensitive and personal, and should be treated as 'special category personal data'.

All concerns, discussions and decisions made and the reasons for those decisions should be recorded in writing. If in doubt about recording requirements staff should discuss with the Designated Safeguarding Lead.

When a student has made a disclosure, the member of staff should:

- Record as soon as possible after the conversation by completing an 'Incident' on CPOMS (Child Protection Online Management System): [hockerill.cpoms.net](http://hockerill.cpoms.net)
- Ensure the date, time, place is recorded, and any noticeable non-verbal behaviour and the words used by the child.
- Use the body map on CPOMS 'Add Incident' to indicate the position of any injuries and a clear

description of the injury.

- Record statements and observations rather than interpretations or assumptions.
- Not destroy the original records in case they are needed by a court.
- Ensure all records are available to be given to the Designated Safeguarding Lead promptly. No copies should be retained by the member of staff.

The Designated Safeguarding Lead will ensure that all safeguarding records are managed in accordance with the Education (Pupil Information) (England) Regulations 2005.

Where children leave the College, the Designated Safeguarding Lead should ensure their child protection file is transferred to the new school or college as soon as possible, ensuring secure transit, confirmation of receipt should be obtained. For schools, this should be transferred separately from the main pupil file. Receiving schools and colleges should ensure key staff such as Designated Safeguarding Lead and SENCOs or the named person with oversight for SEN in a college, are aware as required. If the child has an allocated social worker, they will also inform them of the change of school.

In addition to the child protection file, the Designated Safeguarding Lead should also consider if it would be appropriate to share any information with the new school or college in advance of a child leaving. For example, information that would allow the new school or college to continue supporting victims of abuse and have that support in place for when the child arrives.

When it is not possible to forward files (such as when the student leaves education or attends a higher education organisation) they will be archived securely until the students' 25th birthday. At this point files will be destroyed.

Any requests to view Child Protection files should be made to the nominated Governor for Child Protection. The College follows Hertfordshire County Council's School Safeguarding Practice Guidance: Pupil Safeguarding Records and will ensure compliance with GDPR when handling such requests.

See 'Safeguarding records', (The Herts Grid)

<https://thegrid.org.uk/safeguarding-and-child-protection/child-protection/safeguarding-records>

## CONFIDENTIALITY

Safeguarding children raises issues of confidentiality that must be clearly understood by all staff at Hockerill.

- All staff in schools, both teaching and non-teaching staff, have a responsibility to share relevant information about the protection of children with other professionals, particularly the investigative agencies.
- Staff who receive information about children and their families in the course of their work should share that information only within appropriate professional contexts.

## COLLEGE PROCEDURES

Please see Appendix 1: KCSiE (DfE 2021) pg.23

If any member of staff is concerned about a child, he or she must inform the Designated Safeguarding Lead. The Designated Safeguarding Lead will decide whether the concerns should be raised to Children's Services and if deemed to have met the threshold a Child Protection Contact Referral will be completed. If a Child Protection Contact Referral to Children's Services is made the Designated Safeguarding Lead will discuss the referral with the parents, unless to do so would place the child at further risk of harm.

While it is the Designated Safeguarding Leads role to make Child Protection Contact Referrals, any staff member can make a Child Protection Contact Referral to Children's Services if a child is in immediate danger or is at risk of harm (for example a concern that a family might have plans to carry out FGM, Forced Marriage etc). In these circumstances a Child Protection Contact Referral should be made to Children's Services and/or the Police immediately. Where Child Protection Contact Referrals are made by another member of staff, the Designated Safeguarding Lead should be informed as soon as possible.

If a teacher (persons employed or engaged to carry out teaching work at schools and other institutions in England), in the course of their work in the profession, discovers that an act of Female Genital Mutilation (FGM) appears to have been carried out on a girl under the age of 18 the teacher must report this to the police via 101. This is a mandatory reporting duty. KCSiE (DfE 2021) pages 131-132:

If the allegations raised are against other children, the College should follow Section 4.4 of the Hertfordshire Safeguarding Children Partnership Procedures Manual – Children Who Abuse Others. Please see the College's anti-bullying policy for more details on procedures to minimise the risk of child on child abuse.

The member of staff must record information regarding the concerns on the same day using CPOMS. The recording must be a clear, precise and a factual account of any verbal disclosures and observations.

Particular attention should be paid to the attendance and development of any child about whom the College has concerns, or who has been identified as being the subject of a Child Protection Plan and a written record will be kept.

If a student who is/or has been the subject of a Child Protection Plan changes school, the Designated Safeguarding Lead will inform the social worker responsible for the case and transfer the appropriate records to the Designated Safeguarding Lead at the receiving school, in a secure manner, and separate from the student's academic file.

The Designated Safeguarding Lead is responsible for making the Senior Leadership Team aware of trends in behaviour that may affect student's welfare. If necessary, training will be arranged.

## COMMUNICATION WITH PARENTS

Hockerill Anglo-European College will ensure the Child Protection Policy is available publicly. This policy is available on the Policies section of the College website, in Reception or upon request from the College

Office.

Parents should be informed prior to a Child Protection Contact Referral, unless it is considered to do so might place the student at increased risk of significant harm by:

- The behavioural response it prompts, for example a child being subjected to abuse, maltreatment or threats / forced to remain silent if alleged abuser informed.
- Leading to an unreasonable delay.
- Leading to the risk of loss of evidential material.

The College may also consider not informing parent(s) where this would place a member of staff at risk). The College will endeavour to ensure that parents understand the responsibilities placed on Hockerill staff for safeguarding children.

Where reasonably possible the College will hold more than one emergency contact number for each student on roll. KCSiE (DfE 2021) pg. 26.

Further guidance around information sharing can be located within "Information sharing Advice for practitioners providing safeguarding services to children, young people, parents and carers" (DfE, 2018) <https://www.gov.uk/government/publications/safeguarding-practitioners-information-sharing-advice>

## ALLEGATIONS OF ABUSE MADE AGAINST ADULTS WHO WORK WITH CHILDREN AND YOUNG PEOPLE

An allegation is any information which indicates that a member of staff may have:

- 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 which indicates he or she would pose a risk of harm to children
- Behaved or may have behaved in a way that indicated they may not be suitable to work with children.

This relates to members of staff, supply staff and volunteers who are currently working in any school regardless of whether the school is where the alleged abuse took place. Allegations against a teacher who is no longer teaching should be referred to the police. Historical allegations of abuse should also be referred to the police.

### **What staff should do if they have concerns about another member of staff who may pose a risk of harm to children / allegations against a professional**

- If staff have safeguarding concerns, or an allegation is made about another member of staff (including supply staff and volunteers) posing a risk of harm to children, this is to be referred to the Principal.
- Where the Principal is the subject of an allegation, the Joint Chairs of Governors be informed. They should discuss the allegation immediately with the Local Authority Designated Officer(s) LADO.

Staff may consider discussing any concerns with the Designated Safeguarding Lead and if appropriate, make



any referral via them.

The Joint Chairs of Governors at the College are:

Mrs Marie Roberts  
robertsm@hockerill.com

Mr John Stenhouse  
stenhousej@hockerill.com

In the absence of the Joint Chairs of Governors, the Vice Chair should be contacted. The Vice Chair of Governors at the College is:

Mr Stephen Beach  
beachs@hockerill.com

The Joint Chairs of Governors and the Vice Chair of Governors may also be contacted through the Clerk to the Governors.

The Clerk to the Governors is:

Mrs Katie Coxon  
katie.coxon@clerks.hertsforlearning.co.uk

The person to whom an allegation is first reported should take the matter seriously and keep an open mind. They should not investigate or ask leading questions if seeking clarification; it is important not to make assumptions. Confidentiality should not be promised and the person should be advised that the concern will be shared on a 'need to know' basis only.

Actions to be taken include making an immediate written record of the allegation using the informant's words – including time, date and place where the alleged incident took place, brief details of what happened, what was said and who was present. This record should be signed, dated and immediately passed on to the Principal.

The recipient of an allegation must not unilaterally determine its validity, and failure to report it in accordance with procedures is a potential disciplinary matter.

The Principal / Chair of Governors will not investigate the allegation itself, or take written or detailed statements, but will assess whether it is necessary to refer the concern to the Local Authority Designated Officer (LADO).

Threshold Guidance may be used to inform this decision:

[https://hertsscb.proceduresonline.com/chapters/p\\_manage\\_alleg.html](https://hertsscb.proceduresonline.com/chapters/p_manage_alleg.html)

Children's Services – 0300 123 4043

SOOHS (Out of Hours Service-Children's Services) – 0300 123 4043

If the allegation meets any of the four criteria set out at the start of this section, contact should always be made with the Local Authority Designated Officer without delay.

If it is decided that the allegation requires a child protection strategy meeting or joint evaluation meeting, this will take place in accordance with section 4.1 of the Hertfordshire Safeguarding Children Partnership Procedures Manual.

If it is decided it does not require a child protection strategy meeting or joint evaluation meeting, the LADO will provide the employer with advice and support on how the allegations should be managed.

The Principal should, as soon as possible, following briefing from the Local Authority Designated Officer inform the subject of the allegation.

For further information see

Hertfordshire Safeguarding Children Partnership Procedures Manual Section 5.1.5 "Managing Allegations Against Adults who work with Children and Young People".

Where a staff member feels unable to raise an issue with their employer/through the whistleblowing procedure or feels that their genuine concerns are not being addressed, other whistleblowing channels may be open to them:

- Children's Services 0300 123 4043
- 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 08:00 – 20:00, Monday to Friday and email: [help@nspcc.org.uk](mailto:help@nspcc.org.uk)

What College staff should do if they have concerns about safeguarding practices within the College?

- All staff and volunteers should feel able to raise concerns about poor or unsafe practice and potential failures in the College's safeguarding arrangements.
- Appropriate whistleblowing procedures, which are suitably reflected in staff training and staff behaviour policies, should be in place for such concerns to be raised with the College's Senior Leadership Team.

### **Safer working practice**

To reduce the risk of allegations, all staff should be aware of safer working practice and should be familiar with the guidance contained in the College's Code of Conduct policy and the Safer Recruitment Consortium document "Guidance for safer working practice for those working with children and young people in education settings" (May 2019) and also Addendum April 2020 available at

<https://www.saferrecruitmentconsortium.org/>

The document seeks to ensure that the responsibilities of school leaders towards children

and staff are discharged by raising awareness of illegal, unsafe, unprofessional and unwise behaviour. This includes guidelines for staff on positive behaviour management in line with the ban on corporal punishment (School Standards and Framework Act 1998).

Please see the College's Staff Code of Conduct policy for more information.

HSCP escalation and complaints procedure link

[https://hertsscb.proceduresonline.com/chapters/p\\_resolution\\_disagree.html](https://hertsscb.proceduresonline.com/chapters/p_resolution_disagree.html)

APPENDIX 1



# **Keeping children safe in education 2021**

**Statutory guidance for schools and  
colleges**

**September 2021**

## **Part one: Safeguarding information for all staff**

### **What school and college staff should know and do**

#### **A child centred and coordinated approach to safeguarding**

1. Schools and colleges and their staff are an important part of the wider safeguarding system for children. This system is described in the statutory guidance Working Together to Safeguard Children.
2. Safeguarding and promoting the welfare of children is everyone's responsibility. Everyone who comes into contact with children and their families has a role to play. In order to fulfil this responsibility effectively, all practitioners should make sure their approach is child-centred. This means that they should consider, at all times, what is in the best interests of the child.
3. No single practitioner can have a full picture of a child's needs and circumstances. If children and families are to receive the right help at the right time, everyone who comes into contact with them has a role to play in identifying concerns, sharing information and taking prompt action.
4. Safeguarding and promoting the welfare of children is defined for the purposes of this guidance as:
  - protecting children from maltreatment;
  - preventing the 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.
5. Children includes everyone under the age of 18.

#### **The role of school and college staff**

6. School and college staff are particularly important, as they are in a position to identify concerns early, provide help for children, promote children's welfare and prevent concerns from escalating.
7. All staff have a responsibility to provide a safe environment in which children can learn.

8. **All** staff should be prepared to identify children who may benefit from early help.<sup>4</sup> 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.

9. **Any staff member** who has **any** concerns about a child's welfare should follow the processes set out in paragraphs 55-70. Staff should expect to support social workers and other agencies following any referral.

10. Every school and college should have a designated safeguarding lead who will provide support to staff to carry out their safeguarding duties and who will liaise closely with other services such as children's social care.

11. The designated safeguarding lead (and any deputies) are most likely to have a complete safeguarding picture and be the most appropriate person to advise on the response to safeguarding concerns.

12. The Teachers' Standards 2012 state that teachers (which includes headteachers) should safeguard children's wellbeing and maintain public trust in the teaching profession as part of their professional duties.<sup>5</sup>

### What school and college staff need to know

13. **All** staff should be aware of systems within their school or college which support safeguarding and these should be explained to them as part of staff induction. This should include the:

- child protection policy, which should amongst other things also include the policy and procedures to deal with peer on peer abuse;
- behaviour policy (which should include measures to prevent bullying, including cyberbullying, prejudice-based and discriminatory bullying);<sup>6</sup>
- staff behaviour policy (sometimes called a code of conduct);
- safeguarding response to children who go missing from education; and
- role of the designated safeguarding lead (including the identity of the designated safeguarding lead and any deputies).

<sup>4</sup> Detailed information on early help can be found in Chapter 1 of [Working Together to Safeguard Children](#).

<sup>5</sup> The [Teachers' Standards](#) apply to: trainees working towards QTS; all teachers completing their statutory induction period (newly qualified teachers [NQTs]); and teachers in maintained schools, including maintained special schools, who are subject to the Education (School Teachers' Appraisal) (England) Regulations 2012.

<sup>6</sup> All schools are required to have a behaviour policy (full details are here). If a college or chooses to have a behaviour policy it should be provided to staff as described above.

Copies of policies and a copy of Part one (or Annex A, if appropriate) of this document should be provided to **all** staff at induction.

14. **All** staff should receive appropriate safeguarding and child protection training (including online safety) at induction. The training should be regularly updated. In addition, all staff should receive safeguarding and child protection (including online safety) updates (for example, via email, e-bulletins and staff meetings), as required, and at least annually, to provide them with relevant skills and knowledge to safeguard children effectively.

15. **All** staff should be aware of their local early help<sup>7</sup> process and understand their role in it.

16. **All** staff should be aware of 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 they might be expected to play in such assessments.<sup>8</sup>

17. **All** staff should know what to do if a child tells them he/she is being abused, exploited or neglected. Staff should know how to manage the requirement to maintain an appropriate level of confidentiality. This means only involving those who need to be involved, such as the designated safeguarding lead (or a deputy) and children's social care. Staff should never promise a child that they will not tell anyone about a report of any form of abuse, as this may ultimately not be in the best interests of the child.

18. All staff should be able to reassure victims 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 abuse, sexual violence or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report.

## What school and college staff should look out for

### Early help

19. **Any** child may benefit from early help, but all school and college staff should be particularly alert to the potential need for early help for a child who:

- is disabled or has certain health conditions and has specific additional needs;

<sup>7</sup> Detailed information on early help can be found in Chapter 1 of [Working Together to Safeguard Children](#)

<sup>8</sup> More detailed information on statutory assessments can be found in Chapter 1 of [Working Together to Safeguard Children](#).

- has special educational needs (whether or not they have a statutory Education, Health and Care Plan);
- has a mental health need;
- is a young carer;
- is showing signs of being drawn in to anti-social or criminal behaviour, including gang involvement and association with organised crime groups or county lines;
- is frequently missing/goes missing from care or from home;
- is at risk of modern slavery, trafficking, sexual or criminal exploitation;
- is at risk of being radicalised or exploited;
- has a family member in prison, or is affected by parental offending;
- is in a family circumstance presenting challenges for the child, such as drug and alcohol misuse, adult mental health issues and domestic abuse;
- is misusing drugs or alcohol themselves;
- has returned home to their family from care;
- is at risk of 'honour'-based abuse such as Female Genital Mutilation or Forced Marriage;
- is a privately fostered child; and
- is persistently absent from education, including persistent absences for part of the school day.

### Abuse and neglect

20. **All** staff should be aware of indicators of abuse and neglect. Knowing what to look for is vital for the early identification of abuse and neglect (see paragraphs 26-30), and specific safeguarding issues such as child criminal exploitation and child sexual exploitation (see paragraphs 32-39) so that staff are able to identify cases of children who may be in need of help or protection.

21. If staff are unsure, they should **always** speak to the designated safeguarding lead, or deputy.

22. **All** school and college staff should be aware that abuse, neglect and safeguarding issues are rarely standalone events and cannot be covered by one definition or one label alone. In most cases, multiple issues will overlap with one another, therefore staff should always be vigilant and always raise any concerns with their designated safeguarding lead (or deputy).

23. **All** staff should be aware that safeguarding incidents and/or behaviours can be associated with factors outside the school or college and/or can occur between children



outside of these environments. **All** staff, but especially the designated safeguarding lead (and deputies) should consider whether children are at risk of abuse or exploitation in situations outside their families. Extra-familial harms take a variety of different forms and children can be vulnerable to multiple harms including (but not limited to) sexual exploitation, criminal exploitation, sexual abuse, serious youth violence and county lines.

24. **All** staff should be aware that technology is a significant component in many safeguarding and wellbeing issues. Children are at risk of abuse online as well as face to face. In many cases abuse will take place concurrently via online channels and in daily life. Children can also abuse their peers online, this can take the form of abusive, harassing, and misogynistic messages, the non-consensual sharing of indecent images, especially around chat groups, and the sharing of abusive images and pornography, to those who do not want to receive such content.

25. In all cases, if staff are unsure, they should always speak to the designated safeguarding lead (or deputy).

#### Indicators of abuse and neglect

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

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

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

29. **Sexual abuse:** involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing, and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse. 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 their school or college's policy and procedures for dealing with it, (see paragraph 49).

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

## Safeguarding issues

31. **All** staff should have an awareness of safeguarding issues that can put children at risk of harm. Behaviours linked to issues such as drug taking and or alcohol misuse, deliberately missing education and consensual and non-consensual sharing of nude and semi-nude images and/or videos<sup>9</sup> can be signs that children are at risk. Other safeguarding issues all staff should be aware of include:

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

32. Both CSE and CCE are forms of abuse that occur where an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a child into

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<sup>9</sup> Consensual image sharing, especially between older children of the same age, may require a different response. It might not be abusive – but children still need to know it is illegal- whilst non-consensual is illegal and abusive. [UKCIS](#) provides detailed advice about sharing of nudes and semi-nude images and videos.

taking part in sexual or criminal activity, in exchange for something the victim needs or wants, and/or for the financial advantage or increased status of the perpetrator or facilitator and/or through violence or the threat of violence. CSE and CCE can affect children, both male and female and can include children who have been moved (commonly referred to as trafficking) for the purpose of exploitation.

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

33. Some specific forms of CCE can include children being forced or manipulated into transporting drugs or money through county lines, working in cannabis factories, shoplifting or pickpocketing. They can also be forced or manipulated into committing vehicle crime or threatening/committing serious violence to others.

34. Children can become trapped by this type of exploitation as perpetrators can threaten victims (and their families) with violence, or entrap and coerce them into debt. They may be coerced into carrying weapons such as knives or begin to carry a knife for a sense of protection from harm from others. As children involved in criminal exploitation often commit crimes themselves, their vulnerability as victims is not always recognised by adults and professionals, (particularly older children), and they are not treated as victims despite the harm they have experienced. They may still have been criminally exploited even if the activity appears to be something they have agreed or consented to.

35. It is important to note that the experience of girls who are criminally exploited can be very different to that of boys. The indicators may not be the same, however professionals should be aware that girls are at risk of criminal exploitation too. It is also important to note that both boys and girls being criminally exploited may be at higher risk of sexual exploitation.

Further information about CCE including definitions and indicators is included in Annex B.

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

36. CSE is a form of child sexual abuse. Sexual abuse may involve physical contact, including assault by penetration (for example, rape or oral sex) or nonpenetrative acts such as masturbation, kissing, rubbing, and touching outside clothing. It may include non-contact activities, such as involving children in the production of sexual images, forcing children to look at sexual images or watch sexual activities, encouraging children to behave in sexually inappropriate ways or grooming a child in preparation for abuse including via the internet.

37. CSE can occur over time or be a one-off occurrence, and may happen without the child's immediate knowledge e.g. through others sharing videos or images of them on social media.

38. CSE can affect any child, who has been coerced into engaging in sexual activities. This includes 16 and 17 year olds who can legally consent to have sex. Some children may not realise they are being exploited e.g. they believe they are in a genuine romantic relationship.

39. Further information about CSE including definitions and indicators is included in Annex B.

### Female Genital Mutilation (FGM)

40. Whilst **all** staff should speak to the designated safeguarding lead (or deputy) with regard to any concerns about female genital mutilation (FGM), there is a specific **legal duty on teachers**.<sup>10</sup> If a teacher, in the course of their work in the profession, discovers that an act of FGM appears to have been carried out on a girl under the age of 18, the teacher **must** report this to the police. See Annex B for further details.

### Mental Health

41. **All** staff should be aware that mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation.

42. Only appropriately trained professionals should attempt to make a diagnosis of a mental health problem. Education staff, however, are well placed to observe children day-to-day and identify those whose behaviour suggests that they may be experiencing a mental health problem or be at risk of developing one.

43. Where children have suffered abuse and neglect, or other potentially traumatic adverse childhood experiences, this can have a lasting impact throughout childhood, adolescence and into adulthood. It is key that staff are aware of how these children's experiences, can impact on their mental health, behaviour, and education.

44. Schools and colleges can access a range of advice to help them identify children in need of extra mental health support, this includes working with external agencies. More information can be found in the [mental health and behaviour in schools guidance](#), colleges may also wish to follow this guidance as best practice. Public Health England has produced a range of resources to support secondary school teachers to promote positive health, wellbeing and resilience among children. See [Rise Above](#) for links to all materials and lesson plans.

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<sup>10</sup> Under section 5B(11) (a) of the Female Genital Mutilation Act 2003, "teacher" means, in relation to England, a person within section 141A(1) of the Education Act 2002 (persons employed or engaged to carry out teaching work at schools and other institutions in England).

45. If staff have a mental health concern about a child that is also a safeguarding concern, immediate action should be taken, following their child protection policy, and speaking to the designated safeguarding lead or a deputy.

#### Peer on peer abuse (child on child)

46. **All** staff should be aware that children can abuse other children (often referred to as peer on peer abuse). And that it can happen both inside and outside of school or college and online. It is important that all staff recognise the indicators and signs of peer on peer abuse and know how to identify it and respond to reports.

47. All staff should understand, that even if there are no reports in their schools or colleges it does not mean it is not happening, it may be the case that it is just not being reported. As such it is important if staff have **any** concerns regarding peer on peer abuse they should speak to their designated safeguarding lead (or deputy).

48. It is essential that **all** staff understand the importance of challenging inappropriate behaviours between peers, many of which are listed below, that are actually abusive in nature. Downplaying certain behaviours, for example dismissing sexual harassment as “just banter”, “just having a laugh”, “part of growing up” or “boys being boys” can lead to a culture of unacceptable behaviours, an unsafe environment for children and in worst case scenarios a culture that normalises abuse leading to children accepting it as normal and not coming forward to report it.

49. Peer on peer abuse is most likely to include, but may not be limited to:

- bullying (including cyberbullying, prejudice-based and discriminatory bullying);
- abuse in intimate personal relationships between peers;
- physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (this may include an online element which facilitates, threatens and/or encourages physical abuse);
- sexual violence,<sup>11</sup> such as rape, assault by penetration and sexual assault; (this may include an online element which facilitates, threatens and/or encourages sexual violence);
- sexual harassment,<sup>12</sup> such as sexual comments, remarks, jokes and online sexual harassment, which may be standalone or part of a broader pattern of abuse;

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<sup>11</sup> For further information about sexual violence see Annex B.

<sup>12</sup> For further information about sexual harassment see Annex B.

- causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party;
- consensual and non-consensual sharing of nude and semi-nude images and/or videos<sup>13</sup> (also known as sexting or youth produced sexual imagery);
- upskirting,<sup>14</sup> which typically involves taking a picture under a person's clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm; and
- initiation/hazing type violence and rituals (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element).

50. **All** staff should be clear as to the school's or college's policy and procedures with regard to peer on peer abuse and the important role they have to play in preventing it and responding where they believe a child may be at risk from it.

### Serious violence

51. **All** staff should be aware of the indicators, which may signal children are at risk from, or are involved with serious violent crime. These may include increased absence from school, a change in friendships or relationships with older individuals or groups, a significant decline in performance, signs of self-harm or a significant change in wellbeing, or signs of assault or unexplained injuries. Unexplained gifts or new possessions could also indicate that children have been approached by, or are involved with, individuals associated with criminal networks or gangs and may be at risk of criminal exploitation (see paragraphs 33-35).

52. **All** staff should be aware of the range of risk factors which increase the likelihood of involvement in serious violence, such as being male, having been frequently absent or permanently excluded from school, having experienced child maltreatment and having been involved in offending, such as theft or robbery. Advice for schools and colleges is provided in the Home Office's [Preventing youth violence and gang involvement](#) and its [Criminal exploitation of children and vulnerable adults: county lines guidance](#).<sup>15</sup>

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<sup>13</sup> UKCIS guidance: [Sharing nudes and semi-nudes advice for education settings](#)

<sup>14</sup> For further information about 'upskirting' see Annex B.

<sup>15</sup> For further information about county lines see Annex B

### Additional information and support

53. Departmental advice [What to Do if You Are Worried a Child is Being Abused - Advice for Practitioners](#) provides more information on understanding and identifying abuse and neglect. Examples of potential indicators of abuse and neglect are highlighted throughout the advice and will be particularly helpful for school and college staff. The [NSPCC](#) website also provides useful additional information on abuse and neglect and what to look out for.
54. **Annex B** contains important additional information about specific forms of abuse and safeguarding issues. School and college leaders and those staff who work directly with children should read the annex.

### What school and college staff should do if they have concerns about a child

55. Staff working with children are advised to maintain an attitude of **‘it could happen here’** where safeguarding is concerned. When concerned about the welfare of a child, staff should always act in the **best** interests of the child.
56. If staff have **any concerns** about a child’s welfare, they should act on them **immediately**. See page 23 for a flow chart setting out the process for staff when they have concerns about a child.
57. If staff have a concern, they should follow their own organisation’s child protection policy and speak to the designated safeguarding lead (or deputy).
58. Options will then include:
- managing any support for the child internally via the school’s or college’s own pastoral support processes;
  - undertaking an early help assessment;<sup>16</sup> or
  - making a referral to statutory services,<sup>17</sup> for example as the child might be in need, is in need or suffering, or is likely to suffer harm.

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<sup>16</sup> Further information on early help assessments, provision of early help services and accessing services is in Chapter 1 of [Working Together to Safeguard Children](#).

<sup>17</sup> Chapter 1 of [Working Together to Safeguard Children](#) sets out that the safeguarding partners should publish a threshold document that should include the criteria, including the level of need, for when a case should be referred to local authority children’s social care for assessment and for statutory services under section 17 and 47. Local authorities, with their partners, should develop and publish local protocols for assessment. A local protocol should set out clear arrangements for how cases will be managed once a child is referred into local authority children’s social care.

59. The designated safeguarding lead or a deputy should always be available to discuss safeguarding concerns. If in exceptional circumstances, the designated safeguarding lead (or deputy) is not available, this should not delay appropriate action being taken. Staff should consider speaking to a member of the senior leadership team and/or take advice from local children's social care. In these circumstances, any action taken should be shared with the designated safeguarding lead (or deputy) as soon as is practically possible.

60. Staff should not assume a colleague, or another professional will take action and share information that might be critical in keeping children safe. They should be mindful that early information sharing is vital for the effective identification, assessment, and allocation of appropriate service provision, whether this is when problems first emerge, or where a child is already known to local authority children's social care (such as a child in need or a child with a protection plan). [Information Sharing: Advice for Practitioners Providing Safeguarding Services to Children, Young People, Parents and Carers](#) supports staff who have to make decisions about sharing information. This advice includes the seven golden rules for sharing information and considerations with regard to the Data Protection Act 2018 (DPA) and UK General Data Protection Regulation (UK GDPR). DPA and UK GDPR do not prevent the sharing of information for the purposes of keeping children safe and promoting their welfare. If in any doubt about sharing information, staff should speak to the designated safeguarding lead or a deputy. Fears about sharing information **must not** be allowed to stand in the way of the need to safeguard and promote the welfare of children.

## Early help

61. 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 practitioner. 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.

## Statutory children's social care assessments and services

62. Concerns about a child's welfare should be referred to local authority children's social care. Where a child is suffering, or is likely to suffer from harm, it is important that a referral to children's social care (and if appropriate the police) is made immediately. Referrals should follow the local referral process.

63. Children's social care assessments should consider where children are being harmed in contexts outside the home, so it is important that schools and colleges



provide as much information as possible as part of the referral process. This will allow any assessment to consider all the available evidence and enable a contextual approach to address such harm. Additional information is available here: [Contextual Safeguarding](#).

64. The online tool [Report Child Abuse to Your Local Council](#) directs to the relevant local children's social care contact number.

### **Children in need**

65. 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 a child who is disabled. 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.

### **Children suffering or likely to suffer significant harm:**

66. Local authorities, with the help of other organisations as appropriate, have a duty to make enquiries under section 47 of the Children Act 1989 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. This includes all forms of abuse and neglect, female genital mutilation, or other so-called 'honour'-based abuse, forced marriage and extra-familial harms like radicalisation and sexual exploitation.

### **What will the local authority do?**

67. Within one working day of a referral being made, a local authority social worker should acknowledge its receipt to the referrer and make a decision about the next steps and the type of response that is required. This will include determining whether:

- the child requires immediate protection and urgent action is required;
- any services are required by the child and family and what type of services;
- the child is in need and should be assessed under section 17 of the Children Act 1989. Chapter one of [Working Together to Safeguard Children](#) provides details of the assessment process;
- 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 of the Children Act 1989. Chapter one of [Working Together to Safeguard Children](#) provides details of the assessment process; and

- further specialist assessments are required to help the local authority to decide what further action to take.
68. The referrer should follow up if this information is not forthcoming.
69. If social workers decide to carry out a statutory assessment, staff should do everything they can to support that assessment (supported by the designated safeguarding lead (or deputy) as required).
70. 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.

### Record keeping

71. **All** concerns, discussions and decisions made, and the reasons for those decisions, should be recorded in writing. Information should be kept confidential and stored securely. It is good practice to keep concerns and referrals in a separate child protection file for each child.

Records should include:

- a clear and comprehensive summary of the concern;
  - details of how the concern was followed up and resolved;
  - a note of any action taken, decisions reached and the outcome.
72. If in doubt about recording requirements, staff should discuss with the designated safeguarding lead (or deputy).

### Why is all of this important?

73. It is important for children to receive the right help at the right time to address safeguarding risks, prevent issues escalating and to promote children's welfare. Research and serious case reviews have repeatedly shown the dangers of failing to take effective action.<sup>18</sup> Further information about serious case reviews can be found in Chapter four of [Working Together to Safeguard Children](#). Examples of poor practice include:

- failing to act on and refer the early signs of abuse and neglect;
- poor record keeping;

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<sup>18</sup>An analysis of serious case reviews can be found at [gov.uk/government/publications/analysis-of-serious-case-reviews-2014-to-2017](https://www.gov.uk/government/publications/analysis-of-serious-case-reviews-2014-to-2017).

- failing to listen to the views of the child;
- failing to re-assess concerns when situations do not improve;
- not sharing information with the right people within and between agencies;
- sharing information too slowly; and
- a lack of challenge to those who appear not to be taking action.

### **What school and college staff should do if they have safeguarding concerns about another staff member**

74. Schools and colleges should have processes and procedures in place to manage any safeguarding concerns about staff members (including supply staff, volunteers, and contractors). If staff have safeguarding concerns or an allegation is made about another member of staff (including supply staff, volunteers, and contractors) posing a risk of harm to children, then:

- this should be referred to the headteacher or principal;
- where there are concerns/allegations about the headteacher or principal, this should be referred to the chair of governors, chair of the management committee or proprietor of an independent school; and
- in the event of concerns/allegations about the headteacher, where the headteacher is also the sole proprietor of an independent school, or a situation where there is a conflict of interest in reporting the matter to the headteacher, this should be reported directly to the local authority designated officer(s) (LADOs). Details of your local LADO should be easily accessible on your local authority's website.

Further details can be found in Part four of this guidance.

### **What school or college staff should do if they have concerns about safeguarding practices within the school or college**

75. All staff and volunteers should feel able to raise concerns about poor or unsafe practice and potential failures in the school's or college's safeguarding regime and know that such concerns will be taken seriously by the senior leadership team.

76. Appropriate whistleblowing procedures should be put in place for such concerns to be raised with the school's or college's senior leadership team.

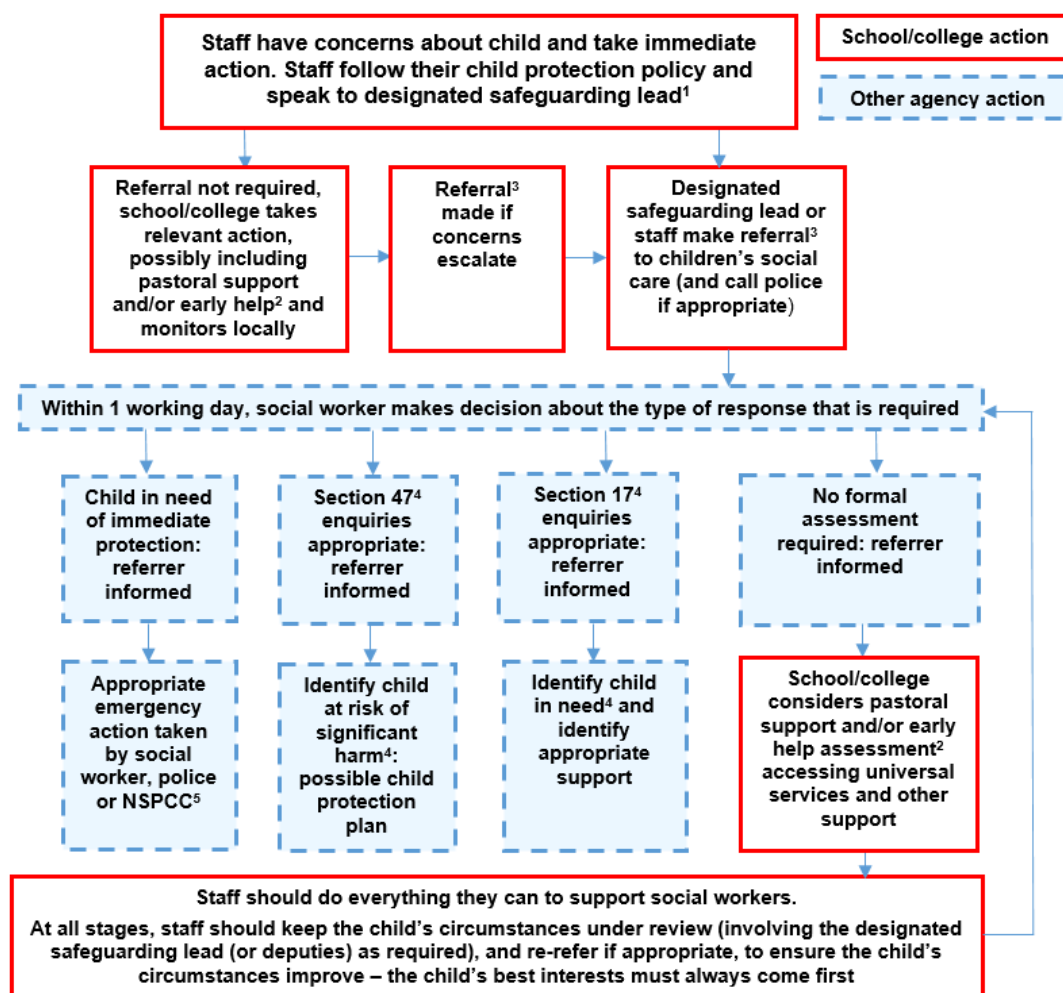
77. Where a staff member feels unable to raise an issue with their employer, or feels that their genuine concerns are not being addressed, other whistleblowing channels are open to them:

- general guidance on whistleblowing can be found via: [Advice on Whistleblowing](#)
- the [NSPCC's what you can do to report abuse dedicated helpline](#) is available as an alternative route for staff who do not feel able to raise concerns regarding child protection failures internally, or have concerns about the way a concern is being handled by their school or college. 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).<sup>19</sup>

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<sup>19</sup> Alternatively, staff can write to: National Society for the Prevention of Cruelty to Children (NSPCC), Weston House, 42 Curtain, Road, London EC2A 3NH.

## Actions where there are concerns about a child



<sup>1</sup> In cases which also involve a concern or an allegation of abuse against a staff member, see Part Four of this guidance.

<sup>2</sup> 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.

<sup>3</sup> 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](#).

<sup>4</sup> 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](#).

<sup>5</sup> This could include applying for an Emergency Protection Order (EPO).

## Annex A: Safeguarding information for school and college staff

The following is a condensed version of Part one of Keeping children safe in education. It can be provided (instead of Part one) to those staff who do not directly work with children, if the governing body or proprietor think it will provide a better basis for those staff to promote the welfare of and safeguard children.

### The role of school and college staff

1. Safeguarding and promoting the welfare of children is **everyone's** responsibility. **Everyone** who comes into contact with children has an important role to play.
2. School and college staff are particularly important as they are in a position to identify concerns early, provide help for children, promote children's welfare and prevent concerns from escalating. It is important all staff (including those who do not work directly with children) recognise the important role they play in protecting children.

### What school and college staff need to know

3. For the purposes of safeguarding, a child is anyone under the age of 18. Safeguarding and promoting the welfare of children is defined for the purposes of this guidance as:
  - protecting children from maltreatment;
  - preventing impairment of children's mental and physical health or development;
  - ensuring that children grow up in circumstances consistent with the provision of safe and effective care; and
  - taking action to enable all children to have the best outcomes.

#### All staff should:

- be aware of the systems in their school or college which support safeguarding, and these should be explained to them as part of staff induction. As a minimum this Annex and the child protection policy should be shared with staff at induction;
- receive appropriate safeguarding and child protection training (including online safety) which is regularly updated. In addition, all staff should receive safeguarding and child protection updates (including online safety) (for example, via emails, e-bulletins and staff meetings), as required, and at least annually, to provide them with the skills and knowledge to safeguard children effectively;
- know the identity of the designated safeguarding lead (and any deputies) and how to contact them;

- know what to do if a child tells them they are being abused or neglected. This includes understanding they should never promise a child that they will not tell anyone else about a report of abuse, as this is unlikely to be in the best interests of the child; and,
- should be able to reassure all victims 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 abuse, sexual violence or sexual harassment, nor should a victim ever be made to feel ashamed for making a report.

## What school and college staff should look out for

### Abuse and neglect

4. Knowing what to look for is vital to the early identification of abuse and neglect. **All** staff should be aware of indicators of abuse and neglect, including exploitation, so that they are able to identify cases of children who may be in need of help or protection.
5. If staff are unsure, they should always speak to the designated safeguarding lead (or deputy).

### Forms of abuse and neglect

6. **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 by other children or adults, in a family or in an institutional or community setting by those known to them or, more rarely, by others.
7. **Physical abuse:** a form of abuse that may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm to a child.
8. **Emotional abuse:** the persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. It may involve conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.
9. **Sexual abuse:** involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example, rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually

inappropriate ways, or grooming a child in preparation for abuse. Sexual abuse can take place online, and technology can be used to facilitate offline abuse. Sexual abuse is not solely perpetrated by adult males. Females can also be abusers 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 their school or colleges policy and procedures for dealing with it.

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

11. All staff should be aware that child sexual and child criminal exploitation are forms of child abuse.

### Safeguarding issues

12. All staff should have an awareness of safeguarding issues that can put children at risk of harm. Behaviours linked to issues such as drug taking, alcohol misuse, deliberately missing education, serious violence (including that linked to county lines), radicalisation and consensual and non-consensual sharing of nude and semi-nude images and/or videos<sup>127</sup> (also known as youth produced sexual imagery) put children in danger.

### Peer on peer abuse

13. All staff should be aware that children can abuse other children (often referred to as peer on peer abuse). It can happen both inside and outside of school/college and online. It is important that all staff recognise the indicators and signs of peer on peer abuse and know how to identify it and respond to reports.

14. All staff should be clear as to the school or college's policy and procedures with regards to peer on peer abuse. Peer on peer abuse is most likely to include, but may not be limited to:

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<sup>127</sup> Consensual image sharing, especially between older children of the same age, may require a different response. It might not be abusive – but children still need to know it is illegal- whilst non-consensual is illegal and abusive. [UKCIS](#) provides detailed advice about sharing of nudes and semi-nude images and videos.



- bullying (including cyberbullying, prejudice-based and discriminatory bullying);
- abuse in intimate personal relationships between peers;
- physical abuse which can include hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm;
- sexual violence, such as rape, assault by penetration and sexual assault;
- sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment;
- non-consensual sharing of nude and semi-nude images and/or videos;
- causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party;
- upskirting, which typically involves taking a picture under a person's clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification or cause the victim humiliation, distress or alarm; and
- initiation/hazing type violence and rituals (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element).

#### What school and college staff should do if they have concerns about a child

15. Staff working with children should maintain an attitude of '**it could happen here**' where safeguarding is concerned. When concerned about the welfare of a child, staff should always act in the **best interests** of the child.

16. Staff should not assume a colleague or another professional will take action and share information that might be critical in keeping children safe.

17. If staff have **any concerns** about a child's welfare, they should act on them immediately. They should follow their school or college's child protection policy and speak to the designated safeguarding lead (or deputy). In the absence of the designated safeguarding lead staff should speak to a member of the school or college's senior leadership team.

18. The designated safeguarding lead (or deputy) will generally lead on next steps, including who else, if anyone, in the school or college should be informed and whether to pass a concern to children's social care and/or the police. In some instances, staff may be expected to support the children social care assessment process. If this is the case, the designated safeguarding lead (or deputy) will support them.

**Why is all of this important?**

19. It is important for children to receive the right help at the right time to address risks and prevent issues escalating. Research and serious case reviews have repeatedly shown the dangers of failing to take effective and immediate action. Examples of poor practice includes failing to act on and refer the early signs of abuse and neglect.

**What school and college staff should do if they have safeguarding concerns about another staff member who may pose a risk of harm to children**

20. If staff have safeguarding concerns about another member of staff (including volunteers, supply staff, tradespersons and visitors) they should speak to the headteacher or to another member of the school's or college's senior leadership team.

**What school or college staff should do if they have concerns about safeguarding practices within the school or college**

21. All staff and volunteers should feel able to raise concerns about poor or unsafe practice and potential failures in the school's or college's safeguarding regime, and know that such concerns will be taken seriously by the senior leadership team.

22. Appropriate whistleblowing procedures should be in place for concerns to be raised with the school or college's senior leadership team. Where staff feel unable to raise an issue with their employer or feel that their genuine safeguarding concerns are not being addressed [NSPCC whistleblowing advice line](#) is available. Staff can call 0800028 0285 – 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.

## Annex B: Further information

Annex B contains important additional information about specific forms of abuse and safeguarding issues. School and college leaders and those staff who work directly with children should read this annex.

As per Part one of this guidance, if staff have any concerns about a child's welfare, they should act on them immediately. They should follow their own organisation's child protection policy and speak to the designated safeguarding lead (or deputy).

**Where a child is suffering, or is likely to suffer from harm, it is important that a referral to children's social care (and if appropriate the police) is made immediately.**

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## Child abduction and community safety incidents

Child abduction is the unauthorised removal or retention of a minor from a parent or anyone with legal responsibility for the child. Child abduction can be committed by parents or other family members; by people known but not related to the victim (such as neighbours, friends and acquaintances); and by strangers.

Other community safety incidents in the vicinity of a school can raise concerns amongst children and parents, for example, people loitering nearby or unknown adults engaging children in conversation.

As children get older and are granted more independence (for example, as they start walking to school on their own) it is important they are given practical advice on how to keep themselves safe. Many schools provide outdoor-safety lessons run by teachers or by local police staff.

It is important that lessons focus on building children's confidence and abilities rather than simply warning them about all strangers. Further information is available at: [www.actionagainstabduction.org](http://www.actionagainstabduction.org) and [www.clevernevergoes.org](http://www.clevernevergoes.org).

## Children and the court system

Children are sometimes required to give evidence in 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-year olds](#) and [12-17 year olds](#).

The guides explain each step of the process, support and special measures that are available. There are diagrams illustrating the courtroom structure and the use of video links is explained.

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. This may be useful for some parents and carers.

## Children missing from education

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 can also be a sign of child criminal exploitation including involvement in county lines. It may indicate mental health problems, risk of substance abuse, risk of travelling to conflict zones, risk of female genital mutilation, 'honour'-based abuse or risk of forced marriage. Early intervention is

necessary to identify the existence of any underlying safeguarding risk and to help prevent the risks of a child going missing in future. Staff should be aware of their school's or college's unauthorised absence and children missing from education procedures.

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

Approximately 200,000 children in England and Wales have a parent sent to prison each year. These children are at risk of poor outcomes including poverty, stigma, isolation and poor mental health. The National Information Centre on Children of Offenders, [NICCO](#) provides information designed to support professionals working with offenders and their children, to help mitigate negative consequences for those children.

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

We know that different forms of harm often overlap, and that perpetrators may subject children and young people to multiple forms of abuse, such as criminal exploitation (including county lines) and sexual exploitation.

In some cases the exploitation or abuse will be in exchange for something the victim needs or wants (for example, money, gifts or affection), and/or will be to the financial benefit or other advantage, such as increased status, of the perpetrator or facilitator.

Children can be exploited by adult males or females, as individuals or in groups. They may also be exploited by other children, who themselves may be experiencing exploitation – where this is the case, it is important that the child perpetrator is also recognised as a victim.

Whilst the age of the child may be a contributing factor for an imbalance of power, there are a range of other factors that could make a child more vulnerable to exploitation, including, sexual identity, cognitive ability, learning difficulties, communication ability, physical strength, status, and access to economic or other resources.

Some of the following can be indicators of both child criminal and sexual exploitation where children:

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

Children who have been exploited will need additional support to help maintain them in education.

CSE can be a one-off occurrence or a series of incidents over time and range from opportunistic to complex organised abuse. It can involve force and/or enticement-based methods of compliance and may, or may not, be accompanied by violence or threats of violence.

Some additional specific indicators that may be present in CSE are children who:

- have older boyfriends or girlfriends; and
- suffer from sexually transmitted infections, display sexual behaviours beyond expected sexual development or become pregnant.

Further information on signs of a child's involvement in sexual exploitation is available in Home Office guidance: [Child sexual exploitation: guide for practitioners](#)

## County lines

County lines is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs using dedicated mobile phone lines or other form of “deal line”. This activity can happen locally as well as across the UK - no specified distance of travel is required. Children and vulnerable adults are exploited to move, store and sell drugs and money. Offenders will often use coercion, intimidation, violence (including sexual violence) and weapons to ensure compliance of victims.

Children can be targeted and recruited into county lines in a number of locations including schools (mainstream and special), further and higher educational institutions, pupil referral units, children's homes and care homes.

Children are also increasingly being targeted and recruited online using social media. Children can easily become trapped by this type of exploitation as county lines gangs can manufacture drug debts which need to be worked off or threaten serious violence and kidnap towards victims (and their families) if they attempt to leave the county lines network.

A number of the indicators for CSE and CCE as detailed above may be applicable to where children are involved in county lines. Some additional specific indicators that may be present where a child is criminally exploited through involvement in county lines are children who:

- go missing and are subsequently found in areas away from their home;
- have been the victim or perpetrator of serious violence (e.g. knife crime);

- are involved in receiving requests for drugs via a phone line, moving drugs, handing over and collecting money for drugs;
- are exposed to techniques such as 'plugging', where drugs are concealed internally to avoid detection;
- are found in accommodation that they have no connection with, often called a 'trap house or cuckooing' or hotel room where there is drug activity;
- owe a 'debt bond' to their exploiters;
- have their bank accounts used to facilitate drug dealing.

Further information on the signs of a child's involvement in county lines is available in guidance published by the [Home Office](#).

### **Modern Slavery and the National Referral Mechanism**

Modern slavery encompasses human trafficking and slavery, servitude and forced or compulsory labour. Exploitation can take many forms, including: sexual exploitation, forced labour, slavery, servitude, forced criminality and the removal of organs.

Further information on the signs that someone may be a victim of modern slavery, the support available to victims and how to refer them to the NRM is available in the Modern Slavery Statutory Guidance. Modern slavery: how to identify and support victims - GOV.UK ([www.gov.uk](http://www.gov.uk))

### **Cybercrime**

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

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

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

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

Note that **Cyber Choices** does not currently cover 'cyber-enabled' crime such as fraud, purchasing of illegal drugs on-line and child sexual abuse and exploitation, nor other areas of concern such as on-line bullying or general on-line safety.

Additional advice can be found at: [Cyber Choices](#), ['NPCC- When to call the Police'](#) and [National Cyber Security Centre - NCSC.GOV.UK](#)

## Domestic abuse

The Domestic Abuse Act 2021 received Royal Assent on 29 April 2021. The Act introduces the first ever statutory definition of domestic abuse and recognises the impact of domestic abuse on children, as victims in their own right, if they see, hear or experience the effects of abuse. The statutory definition of domestic abuse, based on the previous cross-government definition, ensures that different types of relationships are captured, including ex-partners and family members. The definition captures a range of different abusive behaviours, including physical, emotional and economic abuse and coercive and controlling behaviour. Both the person who is carrying out the behaviour and the person to whom the behaviour is directed towards must be aged 16 or over and they must be "personally connected" (as defined in section 2 of the 2021 Act).

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. The government will issue statutory guidance to provide further information for those working with domestic abuse victims and perpetrators, including the impact on children.

All children can witness and be adversely affected by domestic abuse in the context of their home life where domestic abuse occurs between family members. Experiencing 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.



Young people can also experience domestic abuse within their own intimate relationships. This form of peer on peer abuse is sometimes referred to as 'teenage relationship abuse'. Depending on the age of the young people, this may not be recognised in law under the statutory definition of 'domestic abuse' (if one or both parties are under 16). However, as with any child under 18, where there are concerns about safety or welfare, child safeguarding procedures should be followed and both young victims and young perpetrators should be offered support. The Act's provisions, including the new definition, will be commenced over the coming months.

### **Operation Encompass**

[Operation Encompass](#) operates in all police forces across England. It helps police and schools work together to provide emotional and practical help to children. The system ensures that when police are called to an incident of domestic abuse, where there are children in the household who have experienced the domestic incident, the police will inform the key adult (usually the designated safeguarding lead) in school before the child or children arrive at school the following day. This ensures that the school has up to date relevant information about the child's circumstances and can enable immediate support to be put in place, according to the child's needs. Operation Encompass does not replace statutory safeguarding procedures. Where appropriate, the police and/or schools should make a referral to children's social care if they are concerned about a child's welfare. More information about the scheme and how schools can become involved is available on the Operation Encompass website.

### **National Domestic Abuse Helpline**

Refuge runs the National Domestic Abuse Helpline, which can be called free of charge and in confidence, 24 hours a day on 0808 2000 247. Its website provides guidance and support for potential victims, as well as those who are worried about friends and loved ones. It also has a form through which a safe time from the team for a call can be booked.

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

- [NSPCC- UK domestic-abuse Signs Symptoms Effects](#)
- [Refuge what is domestic violence/effects of domestic violence on children](#)
- [Safelives: young people and domestic abuse.](#)
- [Domestic abuse: specialist sources of support - GOV.UK \(www.gov.uk\)](#) (includes information for adult victims, young people facing abuse in their own relationships and parents experiencing child to parent violence/abuse)

- [Home : Operation Encompass](#) (includes information for schools on the impact of domestic abuse on children)

## Homelessness

Being homeless or being at risk of becoming homeless presents a real risk to a child's welfare. The designated safeguarding lead (and any deputies) should be aware of contact details and referral routes into the Local Housing Authority so they can raise/progress concerns at the earliest opportunity. Indicators that a family may be at risk of homelessness include household debt, rent arrears, domestic abuse and anti-social behaviour, as well as the family being asked to leave a property. Whilst referrals and/or discussion with the Local Housing Authority should be progressed as appropriate, and in accordance with local procedures, this does not, and should not, replace a referral into children's social care where a child has been harmed or is at risk of harm.

The Homelessness Reduction Act 2017 places a new legal duty on English councils so that everyone who is homeless or at risk of homelessness will have access to meaningful help including an assessment of their needs and circumstances, the development of a personalised housing plan, and work to help them retain their accommodation or find a new place to live. The following factsheets usefully summarise the new duties: [Homeless Reduction Act Factsheets](#). The new duties shift focus to early intervention and encourage those at risk to seek support as soon as possible, before they are facing a homelessness crisis.

In most cases school and college staff will be considering homelessness in the context of children who live with their families, and intervention will be on that basis. However, it should also be recognised in some cases 16 and 17 year olds could be living independently from their parents or guardians, for example through their exclusion from the family home, and will require a different level of intervention and support. Children's social care will be the lead agency for these children and the designated safeguarding lead (or a deputy) should ensure appropriate referrals are made based on the child's circumstances. The Department and the Ministry of Housing, Communities and Local Government have published joint statutory guidance on the provision of accommodation for 16 and 17 year olds who may be homeless and/or require accommodation: [here](#).

## So-called 'honour'-based abuse (including Female Genital Mutilation and Forced Marriage)

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. It is important to be aware of this dynamic and additional risk factors when deciding what form of safeguarding action to take. All forms of HBA are abuse (regardless of the motivation) and should be handled and escalated as such. Professionals in all agencies, and individuals and groups in relevant communities, need to be alert to the possibility of a child being at risk of HBA, or already having suffered HBA.

### Actions

If staff have a concern regarding a child who might be at risk of HBA or who has suffered from HBA, they should speak to the designated safeguarding lead (or deputy). As appropriate, the designated safeguarding lead (or deputy) will activate local safeguarding procedures, using existing national and local protocols for multi-agency liaison with police and children's social care. Where FGM has taken place, since 31 October 2015 there has been a mandatory reporting duty placed on **teachers**<sup>128</sup> that requires a different approach (see following section).

### FGM

FGM comprises all procedures involving partial or total removal of the external female genitalia or other injury to the female genital organs. It is illegal in the UK and a form of child abuse with long-lasting harmful consequences.

#### FGM mandatory reporting duty for teachers

Section 5B of the Female Genital Mutilation Act 2003 (as inserted by section 74 of the Serious Crime Act 2015) places a statutory duty upon **teachers**, along with regulated health and social care professionals in England and Wales, to report to the police where they discover (either through disclosure by the victim or visual evidence) that FGM appears to have been carried out on a girl under 18. Those failing to report such cases may face disciplinary sanctions. It will be rare for teachers to see visual evidence, and they should **not** be examining pupils or students, but the same definition of what is meant by "to discover that an act of FGM appears to have been carried out" is used for all professionals to whom this mandatory reporting duty applies. Information on when and how to make a report can be found at: [Mandatory reporting of female genital mutilation procedural information](#).

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<sup>128</sup> Under Section 5B(11)(a) of the Female Genital Mutilation Act 2003, "teacher" means, in relation to England, a person within section 141A(1) of the Education Act 2002 (persons employed or engaged to carry out teaching work at schools and other institutions in England).

Teachers **must** personally report to the police cases where they discover that an act of FGM appears to have been carried out.<sup>129</sup> Unless the teacher has good reason not to, they should still consider and discuss any such case with the school's or college's designated safeguarding lead (or deputy) and involve children's social care as appropriate. The duty does not apply in relation to at risk or suspected cases (i.e. where the teacher does not discover that an act of FGM appears to have been carried out, either through disclosure by the victim or visual evidence) or in cases where the woman is 18 or over. In these cases, teachers should follow local safeguarding procedures. The following is a useful summary of the FGM mandatory reporting duty: [FGM Fact Sheet](#).

Further information can be found in the [Multi-agency statutory guidance on female genital mutilation](#) and the [FGM resource pack](#) particularly section 13.

### Forced marriage

Forcing a person into a marriage is a crime in England and Wales. A forced marriage is one entered into without the full and free consent of one or both parties and where violence, threats or any other form of coercion is used to cause a person to enter into a marriage. Threats can be physical or emotional and psychological. A lack of full and free consent can be where a person does not consent or where they cannot consent (if they have learning disabilities, for example). Nevertheless, some perpetrators use perceived cultural practices as a way to coerce a person into marriage. Schools and colleges can play an important role in safeguarding children from forced marriage.

The Forced Marriage Unit (FMU) has created: Multi-agency practice guidelines: handling cases of forced marriage (pages 32-36 of which focus on the role of schools and colleges) and, Multi-agency statutory guidance for dealing with forced marriage, which can both be found at <https://www.gov.uk/guidance/forced-marriage>. School and college staff can contact the Forced Marriage Unit if they need advice or information: Contact: 020 7008 0151 or email [fm@fcdo.gov.uk](mailto:fm@fcdo.gov.uk).

### Preventing radicalisation

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

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<sup>129</sup> Section 5B(6) of the Female Genital Mutilation Act 2003 states teachers need not report a case to the police if they have reason to believe that another teacher has already reported the case.

- **Extremism**<sup>130</sup> is the vocal or active opposition to our fundamental values, including democracy, the rule of law, individual liberty and the mutual respect and tolerance of different faiths and beliefs. This also includes calling for the death of members of the armed forces.
- **Radicalisation**<sup>131</sup> refers to the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups.
- **Terrorism**<sup>132</sup> is 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.

There is no single way of identifying whether a child is likely to be susceptible to an extremist ideology. Background factors combined with specific influences such as family and friends may contribute to a child's vulnerability. Similarly, radicalisation can occur through many different methods (such as social media or the internet) and settings (such as within the home).

However, it is possible to protect vulnerable people from extremist ideology and intervene to prevent those at risk of radicalisation being radicalised. 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. 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.

The school's or college's designated safeguarding lead (and any deputies) should be aware of local procedures for making a Prevent referral.

### The Prevent duty

All schools and colleges are subject to a duty under section 26 of the Counter-Terrorism and Security Act 2015 (the CTSA 2015), in the exercise of their functions, to have "due

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<sup>130</sup> As defined in the Government's Counter Extremism Strategy

<https://www.gov.uk/government/publications/counter-extremism-strategy>.

<sup>131</sup> As defined in the Revised Prevent Duty Guidance for England and Wales.

<https://www.gov.uk/government/publications/prevent-duty-guidance/revised-prevent-duty-guidance-for-england-and-wales>

<sup>132</sup> As defined in the Terrorism Act 2000 (TACT 2000) <http://www.legislation.gov.uk/ukpga/2000/11/contents>

regard<sup>133</sup> to the need to prevent people from being drawn into terrorism".<sup>134</sup> This duty is known as the Prevent duty.

The Prevent duty should be seen as part of schools' and colleges' wider safeguarding obligations. Designated safeguarding leads and other senior leaders in schools should familiarise themselves with the revised [Prevent duty guidance: for England and Wales](#), especially paragraphs 57-76, which are specifically concerned with schools (and also covers childcare). Designated safeguarding leads and other senior leaders in colleges should familiarise themselves with the [Prevent duty guidance: for further education institutions in England and Wales](#). The guidance is set out in terms of four general themes: risk assessment, working in partnership, staff training, and IT policies.

## Channel

Channel is a voluntary, confidential support programme which focuses on providing support at an early stage to people who are identified as being vulnerable to being drawn into terrorism. Prevent referrals may be passed to a multi-agency Channel panel, which will discuss the individual referred to determine whether they are vulnerable to being drawn into terrorism and consider the appropriate support required. A representative from the school or college may be asked to attend the Channel panel to help with this assessment. An individual's engagement with the programme is entirely voluntary at all stages.

The designated safeguarding lead should consider if it would be appropriate to share any information with the new school or college in advance of a child leaving. For example, information that would allow the new school or college to continue supporting victims of abuse or those who are currently receiving support through the 'Channel' programme, and have that support in place for when the child arrives.

Statutory guidance on Channel is available at: [Channel guidance](#).

## Additional support

The Department has published further advice for schools on the [Prevent duty](#). The advice is intended to complement the Prevent guidance and signposts to other sources of advice and support.

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<sup>133</sup> According to the Prevent duty guidance 'having due regard' means that the authorities should place an appropriate amount of weight on the need to prevent people being drawn into terrorism when they consider all the other factors relevant to how they carry out their usual functions.

<sup>134</sup> "Terrorism" for these purposes has the same meaning as for the Terrorism Act 2000 (section 1(1) to (4) of that Act).

The Home Office has developed three e-learning modules:

- [Prevent awareness e-learning](#) offers an introduction to the Prevent duty.
- [Prevent referrals e-learning](#) supports staff to make Prevent referrals that are **robust, informed** and with **good intention**.
- [Channel awareness e-learning](#) is aimed at staff who may be asked to contribute to or sit on a multi-agency Channel panel.

[Educate Against Hate](#), is a government website designed to support school teachers and leaders to help them safeguard their students from radicalisation and extremism. The platform provides free information and resources to help school staff identify and address the risks, as well as build resilience to radicalisation.

For advice specific to further education, the Education and Training Foundation (ETF) hosts the [Prevent for FE and Training](#). This hosts a range of free, sector specific resources to support further education settings comply with the Prevent duty. This includes the Prevent Awareness e-learning, which offers an introduction to the duty, and the Prevent Referral e-learning, which is designed to support staff to make robust, informed and proportionate referrals.

The ETF Online Learning environment provides online training modules for practitioners, leaders and managers, support staff and governors/Board members outlining their roles and responsibilities under the duty.

### Peer on peer/ child on child abuse

Children can abuse other children (often referred to as peer on peer abuse) and it can take many forms. It **can** happen both inside and outside of school/college and online. It is important that all staff recognise the indicators and signs of peer on peer abuse and know how to identify it and respond to reports. This **can** include (but is not limited to): bullying (including cyberbullying, prejudice-based and discriminatory bullying); abuse within intimate partner relationships; physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm; sexual violence and sexual harassment; 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 forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party; upskirting and initiation/hazing type violence and rituals. Addressing inappropriate behaviour (even if it appears to be relatively innocuous) **can** be an important intervention that helps prevent problematic, abusive and/or violent behaviour in the future.

## **Sexual violence and sexual harassment between children in schools and colleges**

### **Context**

Sexual violence and sexual harassment can occur between two children of any age and sex from primary to secondary stage and into colleges. It can also occur online. It can also occur through a group of children sexually assaulting or sexually harassing a single child or group of children.

Children who are victims of sexual violence and sexual harassment will likely find the experience stressful and distressing. This will, in all likelihood, adversely affect their educational attainment and will be exacerbated if the alleged perpetrator(s) attends the same school or college. Sexual violence and sexual harassment exist on a continuum and may overlap, they can occur online and face to face (both physically and verbally) and are never acceptable.

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 ever be made to feel ashamed for making a report.

Staff should be aware that some groups are potentially more at risk. Evidence shows girls, children with special educational needs and disabilities (SEND) and LGBT children are at greater risk.

Staff should be aware of the importance of:

- challenging inappropriate behaviours;
- making clear that sexual violence and sexual harassment is not acceptable, will never be tolerated and is not an inevitable part of growing up;
- not tolerating or dismissing sexual violence or sexual harassment as “banter”, “part of growing up”, “just having a laugh” or “boys being boys”; and,
- challenging physical behaviours (potentially criminal in nature), such as grabbing bottoms, breasts and genitalia, pulling down trousers, flicking bras and lifting up skirts. Dismissing or tolerating such behaviours risks normalising them.

## **What is sexual violence and sexual harassment?**

### **Sexual violence**

It is important that school and college staff are aware of sexual violence and the fact children can, and sometimes do, abuse their peers in this way and that it can happen



both inside and outside of school/college. When referring to sexual violence we are referring to sexual violence offences under the Sexual Offences Act 2003<sup>135</sup> as described below:

**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. (Schools should be aware that sexual assault covers a very wide range of behaviour so a single act of kissing someone without consent, or touching someone's bottom/breasts/genitalia without consent, can still constitute sexual assault.)

**Causing someone to engage in sexual activity without consent:** A person (A) commits an offence if: s/he intentionally causes another person (B) to engage in an activity, the activity is sexual, B does not consent to engaging in the activity, and A does not reasonably believe that B consents. (This could include forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party.)

**What is consent?**<sup>136</sup> 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, e.g. to vaginal but not anal sex or penetration with conditions, such as wearing a condom. Consent can be withdrawn at any time during sexual activity and each time activity occurs. Someone consents to vaginal, anal or oral penetration only if s/he agrees by choice to that penetration and has the freedom and capacity to make that choice.<sup>137</sup> Further information about consent can be found here: [Rape Crisis England & Wales - Sexual consent](#)

- a child under the age of 13 can never consent to any sexual activity;

<sup>135</sup> [Legislation.gov.uk](http://legislation.gov.uk).

<sup>136</sup> It is important school and college staff (and especially designated safeguarding leads and their deputies) understand consent. This will be especially important if a child is reporting they have been raped or sexually assaulted in any way. More information: [here](#).

<sup>137</sup> [PSHE Teaching about consent](#) from the PSHE association provides advice and lesson plans to teach consent at Key stage 3 and 4.

- the age of consent is 16;<sup>138</sup>
- sexual intercourse without consent is rape.

## Sexual harassment

When referring to sexual harassment we mean ‘unwanted conduct of a sexual nature’ that can occur online and offline and both inside and outside of school/college. When we reference sexual harassment, we do so 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 sexualised environment.

Whilst not intended to be an exhaustive list, sexual harassment 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 (schools and colleges should be considering when any of this crosses a line into sexual violence - it is important to talk to and consider the experience of the victim) and displaying pictures, photos or drawings of a sexual nature; and
- online sexual harassment. This may be standalone, or part of a wider pattern of sexual harassment and/or sexual violence.<sup>139</sup> It may include:
- consensual and non-consensual sharing of nude and semi-nude images and/or videos.<sup>140</sup> As set out in [UKCIS Sharing nudes and semi-nudes: advice for education settings working with children and young people](#) (which provides detailed advice for schools and colleges) taking and sharing nude photographs of U18s is a criminal offence;

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<sup>138</sup> It is important to differentiate between consensual sexual activity between children of a similar age and that which involves any power imbalance, coercion or exploitation. Due to their additional training, the designated safeguarding lead (or deputy) should be involved and generally speaking leading the school or college response. If in any doubt, they should seek expert advice.

<sup>139</sup> [Project deSHAME](#) from Childnet provides useful research, advice and resources regarding online sexual harassment.

<sup>140</sup> Consensual image sharing, especially between older children of the same age, may require a different response. It might not be abusive – but children still need to know it is illegal- whilst non-consensual is illegal and abusive.

- sharing of unwanted explicit content;
- upskirting (is a criminal offence<sup>141</sup>);
- sexualised online bullying;
- unwanted sexual comments and messages, including, on social media;
- sexual exploitation; coercion and threats.

### Upskirting<sup>142</sup>

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

### The response to a report of sexual violence or sexual harassment

The initial response to a report from a child is incredibly important. How the school or college responds to a report can encourage or undermine the confidence of future victims of sexual violence and sexual harassment to report or come forward. Schools and colleges not recognising, acknowledging or understanding the scale of harassment and abuse and/or downplaying of some behaviours can actually lead to a culture of unacceptable behaviour. 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 ever be made to feel ashamed for making a report.

If staff have a concern about a child or a child makes a report to them, they should follow the referral process as set out from paragraph 55 in Part one of this guidance. As is always the case, if staff are in any doubt as to what to do they should speak to the designated safeguarding lead (or a deputy).

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<sup>141</sup> [The Voyeurism \(Offences\) Act 2019](#) which amends the Sexual Offences Act 2003 to make upskirting a specific offence of voyeurism. The Act came into force on 12 April 2019.

<sup>142</sup> Additional information can be found at [GOV.UK](#).

### Toolkits

- [Childnet - STAR SEND Toolkit equips, enables and empowers educators with the knowledge they need to support young people with special educational needs and disabilities.](#)
- [Childnet - Just a joke? provides lesson plans, activities, a quiz and teaching guide designed to explore problematic online sexual behaviour with 9-12 year olds.](#)
- [Childnet - Step Up, Speak Up a practical campaign toolkit that addresses the issue of online sexual harassment amongst young people aged 13-17 years old.](#)
- [Preventing Harmful Sexual Behaviour toolkit by the Lucy Faithfull Foundation, the toolkit contains links to useful information, resources and support, including practical tips to prevent HSB.](#)
- [NSPCC - Harmful sexual behaviour framework](#) An evidence-informed framework for children and young people displaying HSB.
- [Contextual Safeguarding Network – Beyond Referrals - Schools](#) levers for addressing HSB in schools.

### Additional advice and support

#### Abuse

- [What to do if you're worried a child is being abused](#) – DfE advice
- [Domestic abuse: Various Information/Guidance](#) - Home Office (HO)
- [Faith based abuse: National Action Plan](#) - DfE advice
- [Relationship abuse: disrespect nobody](#) - Home Office website
- [Tackling Child Sexual Abuse Strategy](#) – Home Office policy paper
- [Together we can stop child sexual abuse](#) – HM Government campaign

#### Bullying

- [Preventing bullying including cyberbullying](#) - DfE advice

#### Children missing from education, home or care

- [Children missing education](#) - DfE statutory guidance
- [Child missing from home or care](#) - DfE statutory guidance
- [Children and adults missing strategy](#) - Home Office strategy

**Children with family members in prison**

- [National Information Centre on Children of Offenders](#) - Barnardo's in partnership with HM Prison and Probation Service

**Child Exploitation**

- [Trafficking: safeguarding children](#) - DfE and HO guidance
- [Care of unaccompanied and trafficked children](#) – DfE statutory guidance
- [Modern slavery: how to identify and support victims](#) – HO statutory guidance

**Drugs**

- [Drug strategy 2017](#) - Home Office strategy
- [Information and advice on drugs](#) - Talk to Frank website
- [Drug and Alcohol education — teacher guidance & evidence review](#) – PSHE Association website

**(so called) “Honour Based Abuse” including FGM and forced marriage**

- [Female genital mutilation: information and resources-](#) Home Office guidance
- [Female genital mutilation: multi agency statutory guidance](#) - DfE, DH, and HO statutory guidance
- [Forced marriage](#) - Forced Marriage Unit (FMU) statutory guidance
- [FGM resource pack](#) – HM Government guidance

**Health and Well-being**

- [Fabricated or induced illness: safeguarding children](#) - DfE, DH, HO
- [Rise Above: Free PSHE resources on health, wellbeing and resilience](#) - Public Health England
- [Medical-conditions: supporting pupils at school](#) - DfE statutory guidance
- [Mental health and behaviour](#) - DfE advice

**Homelessness**

- [Homelessness: How local authorities should exercise their functions](#) - Ministry of Housing, Communities & Local Government guidance

**Private fostering**

- [Private fostering: local authorities](#) - DfE statutory guidance

### Radicalisation

- [Prevent duty guidance](#)- Home Office guidance
- [Prevent duty: additional advice for schools and childcare providers](#) - DfE advice
- [Educate Against Hate website](#) - DfE and Home Office advice
- [Prevent for FE and Training](#) - Education and Training Foundation (ETF)

### Violence

- [Serious violence strategy](#) - Home Office Strategy
- [Factors linked to serious violence and how these factors can be used to identify individuals for intervention](#) – Home Office
- [Youth Endowment Fund](#) – Home Office
- [Gangs and youth violence: for schools and colleges](#) - Home Office advice
- [Ending violence against women and girls 2016-2020 strategy](#) - Home Office strategy
- [Violence against women and girls: national statement of expectations for victims](#) - Home Office guidance
- [Sexual violence and sexual harassment between children in schools and colleges](#)- DfE advice

## APPENDIX 2

Links to all Policies & documents:

### Child Protection Policy

Part One of DfE document 'Keeping Children Safe in Education' (Sept 2021)

Appendix 1 of Hockerill Child Protection Policy

<https://haec.sharepoint.com/:b:/r/sites/StaffBriefingTeam9/Shared%20Documents/General/Key%20Safeguarding%20Documents/Keeping%20Children%20Safe%20in%20Education%202021.pdf?csf=1&web=1&e=8YdSx3>

<https://tinyurl.com/3yf4z8na>

Details of Designated Safeguarding Leads

Page 3 of College Staff Planner, posters in the Staffroom, every classroom and Appendix 3 (Pages 70-71) of Hockerill Child Protection Policy

[https://www.hockerill.com/uploads/asset\\_file/3\\_1262\\_child-protection-policy.pdf](https://www.hockerill.com/uploads/asset_file/3_1262_child-protection-policy.pdf)

Guidance for Safer Working Practice for those Working with Children and Young People in Educational Settings (May 2019)

<http://www.lscb.org.uk/wp-content/uploads/GSWP-May-2019-final.pdf>

What to do if you're worried a child is being abused

<https://tinyurl.com/2frpufhd>

<https://haec.sharepoint.com/:f:/r/sites/StaffBriefingTeam9/Shared%20Documents/General/Key%20Safeguarding%20Documents?csf=1&web=1&e=SXKvEv>

Working together to safeguard children

<https://tinyurl.com/24fzh7jn>

<https://haec.sharepoint.com/:f:/r/sites/StaffBriefingTeam9/Shared%20Documents/General/Key%20Safeguarding%20Documents?csf=1&web=1&e=kslOga>

Staff Code of Conduct

[https://www.hockerill.com/uploads/asset\\_file/3\\_1468\\_staff-code-of-conduct.pdf](https://www.hockerill.com/uploads/asset_file/3_1468_staff-code-of-conduct.pdf)

Whistleblowing Policy


ICT Acceptable Use Agreement

Appendix 3 of Hockerill Online Safety Policy (November 2019-November 2021)

[https://www.hockerill.com/uploads/asset\\_file/3\\_1120\\_onlnesafety20web.pdf](https://www.hockerill.com/uploads/asset_file/3_1120_onlnesafety20web.pdf)

All College staff, volunteers and Governors are valued members of the Hockerill community. Everyone is expected to set and maintain the highest standards for their own performance, to work as part of a team and to be an excellent role model for children.

All College staff, volunteers and Governors should:

- Place the safety and welfare of children above all other considerations.
- Treat all members of the College community, including students, parents, colleagues and governors with consideration and respect.
- Adhere to the principles and procedures contained in the policies in our safeguarding portfolio and in teaching and learning policies.
- Treat each child as an individual and make adjustments to meet individual needs.
- Demonstrate a clear understanding of and commitment to non-discriminatory practice.
- Recognise the power imbalances between students and staff, and different levels of seniority of staff and ensure that power and authority are never misused.
- Understand that Hockerill staff are in a position of trust and that sexual relationships with a school pupil constitutes an offence.
- Be alert to, and report appropriately, any behaviour that may indicate that a child is at risk of significant harm.
- Encourage all children to reach their full potential.
- Never condone inappropriate behaviour by children or staff.
- Take responsibility for their own continuing professional development.
- Refrain from any action that would bring the College into disrepute.
- Value themselves and seek appropriate support for any issue that may have an adverse effect on their professional practice. \* 

☐ Yes

☐ No, I require further advice



## APPENDIX 3

### 'When to call the Police' guidance

The National Police Chiefs' Council- When to call the police guidance (Page 23 of KCSIE 2021)

This advice covers incidents on school and college premises where students have potentially committed a crime. It provides guidance on what schools and colleges should bear in mind when considering contacting the police. This advice covers the following situations:

- Assault
- Criminal damage
- Cyber crime
- Drugs
- Harassment
- Sexual offences
- Theft
- Weapons

This advice aims to support schools and college to make defensible decisions when considering whether to involve the police. Further guidance can be found at <https://www.npcc.police.uk/documents/Children%20and%20Young%20people/When%20to%20call%20the%20police%20guidance%20for%20schools%20and%20colleges.pdf>

## APPENDIX 4

- Operation Encompass – Information sharing from Police regarding Domestic Abuse notifications (2nd December 2019)
- Children Missing from Education

### **Operation Encompass Safeguarding Statement:**

- Our school is part of Operation Encompass. This is a police and education early intervention safeguarding partnership which supports children and young people who experience Domestic Abuse.
- Operation Encompass means that the police will share information about Domestic Abuse incidents with our school PRIOR to the start of the next school day when they have been called to a domestic incident.
- Our parents are fully aware that we are an Operation Encompass school.
- The Operation Encompass information is stored in line with all other confidential safeguarding and child protection information.
- The Key Adult has also led training for all school staff and Governors about Operation Encompass, the prevalence of Domestic Abuse and the impact of this abuse on children. We have also discussed how we can support our children following the Operation Encompass notification.
- We are aware that we must do nothing that puts the child/ren or the non-abusing adult at risk.
- The Designated Safeguarding Lead will report on Operation Encompass in the annual safeguarding report to Governors. All information is anonymised for these reports.
- The Key Adult has used the Operation Encompass Toolkit to ensure that all appropriate actions have been taken by the school.

### **The College's Key Adults are the Designated Safeguarding Leads.**

Children missing from education in accordance with setting attendance policy

All children, regardless of their circumstances, are entitled to an efficient, full time education which is suitable to their age, ability, aptitude and any special educational needs they may have. Children missing education are children of compulsory school age who are not registered pupils at a school and are not receiving suitable education otherwise than at a school. Children missing education are at significant risk of underachieving, being victims of harm, child sexual exploitation or radicalisation, and becoming NEET (not in education, employment or training) later in life.

Department for Education guidance makes it clear that in carrying out this duty, local authorities must have in place arrangements for joint working and information sharing with other local authorities and partner agencies. It also states that all agencies which come into contact with children must cooperate with the local authority's arrangements for identifying children thought to be missing from education.

Separate guidance is available for schools on Herts Grid for Learning; about the legitimate removal of pupils from a school roll. A child legitimately removed from roll is not in most cases missing from education and all schools, including academies and independent schools are legally required to notify the local authority when they remove/plan to remove a child from their roll.

## APPENDIX 5

### **Ofsted School Inspection Handbook (September 2021)**

This handbook is primarily a guide for inspectors on how to carry out school inspections. However, it is made available to schools and other organisations to ensure that they are informed about the processes and procedures of inspection. It seeks to balance the need for consistency in inspections with the flexibility required to respond to the individual circumstances of each school.

On publication of this Child Protection Policy, September 2021, the CPSLO Service has decided to provide the hyperlink only to the Ofsted School Inspection Handbook rather than the document in its entirety, due to the potential for updates to the content.

<https://www.gov.uk/government/publications/school-inspection-handbook-eif/schools-inspection-handbook-for-september-2021>

## APPENDIX 6

### Sexual violence and sexual harassment between children in schools and colleges guidance (2021)

This is advice provided by the Department for Education (the department). Its focus is child on child sexual violence and sexual harassment at schools and colleges. The advice covers children of all ages, from primary through to secondary stage and into colleges and online. For the purposes of this advice, a child is anyone under the age of 18. Whilst the focus of the advice is on protecting and supporting children, schools and colleges should of course protect any adult students and engage with adult social care, support services and the police as required.

The advice sets out what sexual violence and sexual harassment is, how to minimise the risk of it occurring and what to do when it does occur or is alleged to have occurred.

The advice highlights best practice and cross-references other advice, statutory guidance and the legal framework.

It is for individual schools and colleges to develop their own policies and procedures. It is important that policies and procedures are developed in line with their legal obligations, including the Human Rights Act 1998 and the Equality Act 2010, especially the Public Sector Equality Duty, and their local multi-agency safeguarding arrangements. It is important that schools and colleges consider how to reflect sexual violence and sexual harassment in their whole College approach to safeguarding and in their Child Protection Policy.

On publication of this Child Protection Policy, September 2021, the CPSLO Service has decided to provide the hyperlink to the document rather than the document in its entirety, due to the potential for updates to the content.

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/999239/SVSH\\_2021.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/999239/SVSH_2021.pdf)

## APPENDIX 7

### **Online Safety Guidance**

On publication of this Child Protection Policy, September 2021, the CPSLO Service has decided to signpost to the document rather than provide the document in its entirety, due to the potential for updates to the content.

Annex D: KCSiE (DfE,2021) for national guidance

Hertfordshire Guidance:

<https://thegrid.org.uk/safeguarding-and-child-protection/online-safety/online-safety-national-guidance>

## APPENDIX 8

Covid guidance into new academic year 2021-2022)

On publication of this Child Protection Policy, September 2021, the CPSLO Service has decided to provide the hyperlink to the document rather than the document in its entirety, due to the potential for updates to the content.

<https://www.gov.uk/government/collections/guidance-for-schools-coronavirus-covid-19>

## APPENDIX 9

### **GDPR, Data Protection and Freedom of Information**

#### **Annex D KCSIE 2021**

If schools subscribe to the Herts for Learning GDPR Toolkit or Enhanced Data Protection Officer Service, schools can contact the service desk for guidance.

Schools can also contact their legal providers.

Further information can be accessed at; <https://ico.org.uk/for-organisations/>

APPENDIX 10

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# SAFEGUARDING GUIDE FOR VISITORS

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October 2020



## APPENDIX 2



## Guidelines for Visitors to the College

These guidelines are based on those laid down in the following statutory guidance documents:

- Keeping Children Safe in Education (September 2020)
- Boarding schools: National Minimum Standards (2015)

The Governing Body assures all visitors a warm, friendly and professional welcome to Hockerill Anglo-European College, whatever the purpose of their visit. The College has a legal duty of care for the health, safety, security and wellbeing of all students and staff. This duty of care incorporates the duty to 'safeguard' all students from subjection to any form of harm, abuse or nuisance. It is the responsibility of the Governing Body and senior staff to ensure that this duty is uncompromised at all times. In performing this duty, the Governing Body recognises that there can be no complacency where child protection and safeguarding procedures are concerned. The College therefore requires that all visitors (without exception) comply with the following guidelines. Failure to do so may result in the visitor's escorted departure from the College site.

The aim of these guidelines is to safeguard all children under the College's responsibility both during College hours and out of College hours activities which are arranged by the College.

These guidelines establish a clear protocol and procedure for the admittance of external visitors to the College which is understood by all staff, governors, visitors and parents and conforms to child protection and safeguarding guidelines.

### Where and to whom the guidelines apply

The College has responsibility for its students anywhere on the College site (i.e. within the College boundary fence), during normal College hours, during after- College activities and on College-organised (and supervised) off-site activities. The guidelines apply to:

- All staff employed by the College
- All external visitors entering the College site during the College day or for after College activities (including peripatetic tutors, welfare support workers, sports coaches, former students and topic-related visitors)
- All governors of the College
- All parents and volunteers
- Other education related personnel
- Building & maintenance and all other independent contractors visiting the College premises
- Independent contractors who may transport students on minibuses or in taxis

## Protocol and Procedures

### Visitors to the College during the College day

- All visitors to the College may be asked to bring formal photo identification with them at the time of their visit (unless they are named on the approved visitors list as set out below). They must follow the procedure below:
  - Once on site, all visitors must report to reception first. No visitor is permitted to enter the College via any other entrance under any circumstances.
  - At reception, all visitors must state the purpose of their visit and who has invited them. They should be ready to produce formal identification upon request.
  - All visitors will be asked to sign the Visitors' Record Book which is kept in reception at all times, making note of their name, organisation, who they are visiting, and car registration.
  - All visitors will be required to wear an identification badge – the badge must remain visible throughout their visit.
  - All visitors should be asked to familiarise themselves with the College's Child Protection procedures by reading the Safeguarding flyer (Appendix 1).
  - Visitors will either be escorted to their point of contact or their point of contact will be asked to come to reception to receive the visitor.
  - The contact will then be responsible for them while they are on site.
  - The visitor must not be allowed to move about the site unaccompanied unless they are registered on the Approved Visitor List.

### Visitors outside of College Hours

The College reception is open from 0830 until 1700 (Monday to Friday) and 0830 until 1230 on Saturdays. Outside of these hours the following procedure should be followed:

- By pre-arrangement, scheduled visitors can be met in reception, issued with visitor lanyards and signed in.
- Visitors to the Boarding Houses can sign in and out at the Boarding House.

In both of the cases above, visitors **must be** supervised by College staff at all times whilst they are on site.

### Approved Visitor List

The College will hold an Approved Visitor List for visitors who frequently visit the College site to undertake work within the College (including supply staff and Governors).

The Adult Vetting Officer is responsible for the process of approving visitors for this list. Visitors on the Approved Visitor List must follow the usual procedure on entry to the premises (i.e. come to reception and sign in the Visitors' Record Book).

A copy of the Approved Visitor List will be held in the College Office.

Any queries should be referred to the Head of Human Resources who is responsible for the Single Central Record

New additions to the Approved Visitors List will be made aware of the visitors' guidelines as part of their induction. This induction is overseen by the Adult Vetting Officer.

**Contractors Working on Site**

Contractors engaging in regulated activity (See Keeping Children Safe in Education (DfE 2020) for further details) will require an enhanced DBS certificate including barred list information.

Students should not be allowed in areas where contractors are working, not least for health and safety reasons, so these workers should have no contact with students. However, it may be impossible to control this and there may be occasions when contractors do come into contact with children (such as when entering or leaving the site).

The College will ensure arrangements are in place for any contract staff who may come into contact with students (and meet the frequency criteria and are unsupervised), are checked by the contractor in the same way as College employees.

Should the College have difficulty obtaining written confirmation from the contractor that they have satisfactorily completed the relevant checks, the College will request to carry out the relevant checks itself with approval from the contractor and individual.

An exception to this is where a contractor is on the College site for the purpose of a meeting scheduled with the Principal and/or Chair of Governors. As this is a one-to-one meeting and will involve no unsupervised contact with students, written confirmation that the checks have been carried out is not needed.

However, if the contractor then has contact with students, they should not be left unattended, but should be supervised at all times whilst on the College site. These contractors should still sign in and sign out when visiting the premises.

**Visiting Staff from Overseas**

The College will ensure arrangements are in place to make sure that any visiting staff who come into contact with students (and meet the frequency criteria and are unsupervised) are checked by means of:

- Providing a recent Police Check from their country of residence
- Satisfying the College that they are aware of and in compliance with the College's own safeguarding arrangements

**Behaviour of Visitors**

We expect parents and other visitors to behave in a reasonable way towards members of College staff and the wider school community at all times. Intimidating, threatening or abusive behaviour, or violence against staff or other members of the school community, including other parents and students, will not be tolerated. All members of the College community have a right to expect that their school is a safe place in which to work, learn and live. There is no place for any form of abuse, threatening behaviour or violence in our school.

If a visitor behaves in an unacceptable way towards a member of the school community, the Principal or appropriate senior staff will seek to resolve the situation. This may include asking the visitor to leave the College campus if the visitor's behaviour continues to be unacceptable. If appropriate, the College's complaints procedures may be followed by the visitor. Where all procedures have been exhausted, and aggression or intimidation continue, or where the circumstances otherwise require it, a visitor may be banned by the Principal from the College for a period of time, subject to review.

#### **CCTV**

Hockerill Anglo-European College uses closed circuit television (CCTV) and the images produced to prevent or detect crime and to monitor the school buildings and grounds in order to provide a safe and secure environment for its students, staff and visitors, and to prevent loss or damage to school property. Signs are placed in key locations to indicate that CCTV images are being recorded.

#### **Visitors Departure from College**

On departing the College, visitors must leave via reception and:

- enter their departure time in the Visitors' Record Book alongside their arrival entry
- return the identification badge to reception

#### **Visitors to Residents on Site**

College staff who are resident on site are subject to the conditions stated in their *Letting Agreement* and must be mindful of their responsibilities regarding visitors at all times. Arrangements for any visitors who will be staying overnight in staff accommodation must be approved by the Principal and reported to the Premises Department using the *Residential Visitors Form* (Appendix 2).

One-off visitors must follow the arrangements stated above and sign in at reception during office hours. They must not be unaccompanied at any time. Outside office hours, they must follow the arrangements detailed above.

Regular visitors to staff accommodation who are not staying overnight should be accompanied or included on the College's Single Central Record as a Volunteer with the necessary safeguarding checks in place and must have signed the Resident on Site contract.

#### **Unknown/Uninvited Visitors to the College**

Any visitor to the College site who is not wearing an identity badge should be challenged politely to enquire who they are and their business on the College site. Visitors should then be escorted to reception to sign the Visitors' Record Book and be issued with an identity badge. The procedures under "Visitors to the College" above will then apply.

In the event the visitor refuses to comply, they should be asked to leave the site immediately and the Principal should be informed promptly. The Principal (or Senior Leadership team member if the Principal is not available) will consider the situation and

decide if it is necessary to inform the police. If an unknown/uninvited visitor becomes abusive or aggressive, they will be asked to leave the site immediately and warned that if they fail to leave the College grounds, police assistance will be called for.

**Staff Development**

As part of their induction, new staff will be made conversant with this policy for External Visitors and asked to ensure compliance with its procedures at all times.

**Linked policies**

In order to safeguard and promote the welfare of children, this policy should also be read in conjunction with all College Safeguarding policies to ensure the safety and wellbeing of children.

Attendance Behaviour

Child Protection Complaints

Countering Bullying Curriculum

First aid

Health and Safety

Online Safety

Out of College Trips and Activities

Safer Recruitment

Special Educational Needs and Disability Staff Code of Conduct

Substance Use and Misuse

Supporting Students with Medical Conditions Whistleblowing

Copies of all College Policies are available on the College website.

**Review**

These guidelines will be reviewed by the Pastoral and Boarding Committee of the Governing Body

safeguarding



**Hockerill**  
Anglo-European College  
SAFEGUARDING

# SAFEGUARDING

Guidance for adults  
visiting or working at  
Hockerill Anglo-European College

## OUR COMMITMENT TO SAFEGUARDING

At Hockerill Anglo-European College the safety and wellbeing of our students is paramount. All adults visiting Hockerill Anglo-European College have a part to play in keeping our students safe. It is also important that visitors keep themselves safe.

At Hockerill Anglo-European College we promote safe working practices for everyone in the College community, whatever their role or reason to be here.

### DO:

- Sign in at College Reception on arrival
- Wear your visitor badge at all times
- Be aware that verbal interaction with students could be interpreted by them as being offensive or inappropriate, even if this was not your intention
- Be aware that contact made with a Hockerill student outside College grounds may be considered inappropriate
- Report any occasion when a student instigates communication via social media with you
- Report ANY unacceptable behaviour to a member of staff as soon as possible

### DO NOT:

- Initiate any verbal or physical contact with students unless it is appropriate and part of an agreed reason for your visit
- Give any personal information or details to any student e.g. your name, address, telephone number, email or any social media account details
- Accept or respond to students attempting to share their personal details with you
- Put yourself in a situation of vulnerability i.e. unsupervised one-to-one with a student unless it is agreed as necessary to your visit
- Instigate or respond to communication with students using any form of social media
- Use any recording device (including mobile phones) to take images within the College without express prior permission from the Principal
- Respond to verbal or physical contact from students. If this occurs or you have any other concerns about student behaviour, report it immediately to the member of staff at Hockerill who is responsible for your visit

### Child Protection

At Hockerill we believe that all students have the right to be safeguarded from harm and exploitation.

Adults working with or around children and young people must be aware of the risk of abuse by adults and other young people.

If you have concerns about a young person's safety during the course of your visit to our College

- immediately inform the Designated Safeguarding Lead through your contact in College
- write factual notes about what you have heard, witnessed or been told. Sign and date all notes.

If you suspect abuse or if a young person confides in you or if a complaint is made about you or any adult, it is your duty to report the concern to a member of College staff.

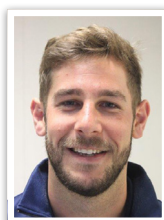
## REPORTING CONTACT DETAILS



**Designated  
Safeguarding Lead**  
Mr Alasdair Mackenzie  
Vice Principal  
(Pastoral)  
email: mackenziea@hockerill.com



**Deputy Designated  
Safeguarding Lead**  
Sister Lucy Tinnirello  
Head of Student Health  
& Wellbeing  
email: tinnirello@hockerill.com



**Deputy Designated  
Safeguarding Lead**  
Mr Will Conolly  
Assistant Principal  
Director of Boarding  
email: conollyw@hockerill.com



**Deputy Designated  
Safeguarding Lead**  
Ms Alison McCulloch  
Assistant Principal  
Executive SENco  
email: mccullochal@hockerill.com

If a disclosure is about a member of staff contact the

### Principal

**Mr David Woods**

email: woodsd@hockerill.com

If the disclosure is about the Principal contact the

### Joint Chairs of Governors

**Mrs Marie Roberts**

email: robertsm@hockerill.com

**Dr Judith Braeckman**

email: braeckmanj@hockerill.com

☎ Hockerill Anglo-European College: 01279 658451

## IN THE EVENT OF A FIRE ALARM SOUNDING

Please follow the College's evacuation procedures, do not re-enter the building until authorised by the person in charge.



### FIRE ACTION

IN CASE OF FIRE SOUND THE ALARM FROM  
THE NEAREST ALARM CALL POINT

#### ON HEARING THE FIRE ALARM

1. Leave the building by the nearest available exit
2. Do not stop to collect personal belongings.
3. Close all doors behind you.
4. Proceed, IN AN ORDERLY MANNER to the Fire Assembly point and report to the Person in Charge.

THE FIRE ASSEMBLY POINT IS SITUATED AT

**NETBALL COURTS AT ALL WEATHER PITCH**



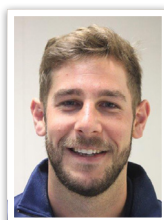
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email: mackenziea@hockerill.com



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Safeguarding Lead**  
Sister Lucy Tinnirello  
Head of Student Health  
& Wellbeing  
email: tinnirello@hockerill.com



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If the disclosure is about the Principal contact the

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**Mrs Marie Roberts**

email: robertsm@hockerill.com

**Dr Judith Braeckman**

email: braeckmanj@hockerill.com

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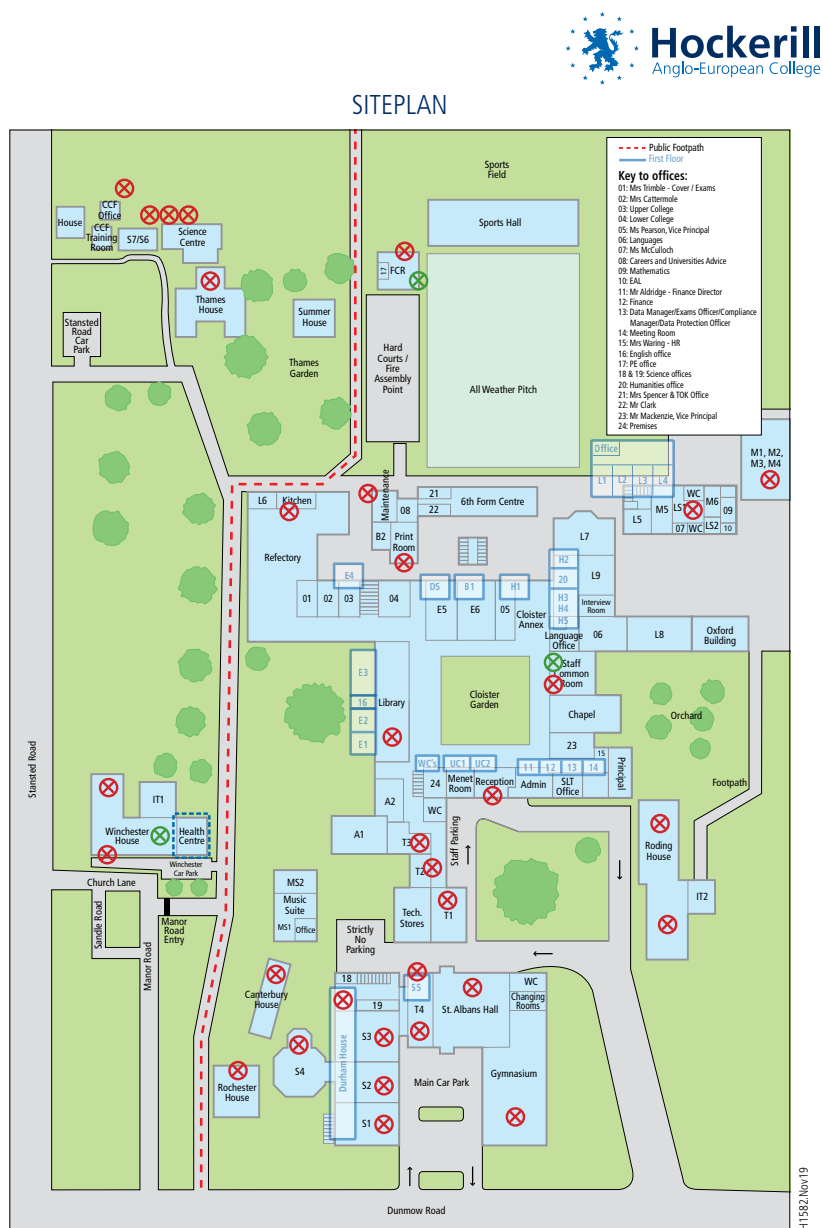
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**NETBALL COURTS AT ALL WEATHER PITCH**

First aid boxes 🚑 are located around the College campus. Automated External Defibrillators 🚑 are located in Winchester House and the Staff Common Room and outside the Field Changing Rooms. The College also has a Health Centre 🏥, staffed by Registered Nurses.





## Residential Visitors Form

Residential Accommodation (Boarding House/Property Name):	
Resident's Name:	
Visitor's Name:	
Relationship:	
Vehicle Registration No:	
Length of Stay:	
Dates:	From:
	To:
Other Comments:	

Please tick and sign below to agree to the following terms:

- ☐ I will ensure my visitor has read and understood the document 'Guidance for adults visiting or working at Hockerill Anglo-European College'
- ☐ The visitor will be supervised by yourself during the entirety of their visit to the College
- ☐ Contact with students will be limited as much as possible
- ☐ A Risk Assessment must be completed (if requested by the appropriate member of the Senior Leadership Team)
- ☐ A DBS will be sought via the Adult Vetting Officer if the visits become more frequent than bi-weekly

Signed by Resident:	
Date Completed:	
Agreed by the Principal:	
Date Signed:	

Completed Form to be handed to the Premises Department for filing

## APPENDIX 11

# SAFEGUARDING


**Hockerill**  
 Anglo-European College  
 SAFEGUARDING


Children have a right to be cared for and protected which is **everyone's responsibility**. As a member of the Hockerill community you have a duty to act when you have a concern about your own or someone else's welfare.



The Designated Safeguarding Leads are Mr Mackenzie, Sister Tinnirello, Mr Conolly and Ms McCulloch.

## SEE something

### Possible causes for concern

- Physical signs of harm
- Hearing worrying accounts of something that has happened
- Changes in a person's behaviour, presentation or appearance
- A person in emotional distress
- An awareness that someone's behaviour is putting themselves or others at risk
- Someone may disclose something to you

### Remember harm to a child or young person can be caused by

- Another young person
- A family member
- A friend
- A member of staff
- A stranger
- Themselves

## SAY something

Regardless of the source of harm you must report your concerns to a member of staff as soon as possible, even if you are not sure about the full extent of the situation.

**DO NOT WAIT** - delays in reporting could cause greater harm.

You can inform Mr Mackenzie, Sister Tinnirello, Mr Conolly or Ms McCulloch of any concern by talking to them or giving them a written record. Alternatively, you may speak to any other member of staff if you would feel more comfortable doing so.

If your concern is about a member of staff, you should report this directly to the Principal. If your concern is about the Principal, you should inform the Joint Chair of Governors, Dr J Braeckman and Mrs M Roberts via the College reception.

**If you think someone is in immediate danger and needs urgent help, you must call the police on 999**



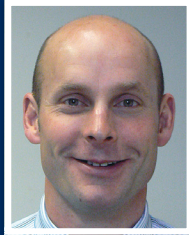
if you **SEE** something, **SAY** something

# SAFEGUARDING



**Hockerill**  
Anglo-European College  
SAFEGUARDING

## OUR DESIGNATED SAFEGUARDING LEADS (DSLs) ARE



**Alasdair Mackenzie**  
07800 719201



**Lucy Tinnirello**  
07941 688291



**Will Conolly**  
07515 378020



**Alison McCulloch**  
07702 457371

Children have a right to be cared for and protected. Protecting them is **everyone's responsibility**.  
As a member of Hockerill staff, if you know or suspect a child is being abused or neglected, you must;

## RECOGNISE, RESPOND AND REFER

### RECOGNISE

When you become aware of information that leads you to be concerned about the physical, emotional or sexual wellbeing of a child or young person you have a **duty** to report as a Child Protection concern.

You may be concerned about the behaviour of a member of staff or volunteer which you are also duty-bound to report.

Safeguarding concerns may stem from your own observations or from a disclosure made by the child or another person who shares information with you which indicates that a child may be at risk of harm (eg abuse or neglect).

College staff could be the first people to see a child after they have been abused and staff therefore must be vigilant to signs of abuse.

You might see physical sign, hear worrying accounts, pick up on emotional distress or notice a change in a child's behaviour or presentation. Be aware that not all abuse has physical signs.

#### In receiving a disclosure, your role is to;

- Accept what is being said
- Listen without interrupting, only asking questions when necessary to clarify (do not investigate).
- Reassure by being calm and non-judgemental but do not promise to keep what is said secret.
- Explain what has to be done next and who has to be told.
- Make a written record of exactly what was said using the child's own words.

### RESPOND

- In all cases complete a Record of Concern form giving as much information as possible, sign and date the form.
- Additionally, in an emergency situation call the Police on 999 and then contact the DSL to advise you have done this.

### REFER

Pass your written Record of Concern Form securely to the DSL without delay (do not leave in pigeon hole) and ensure that the DSL is aware of your referral before you leave the premises (ie do not rely on email).

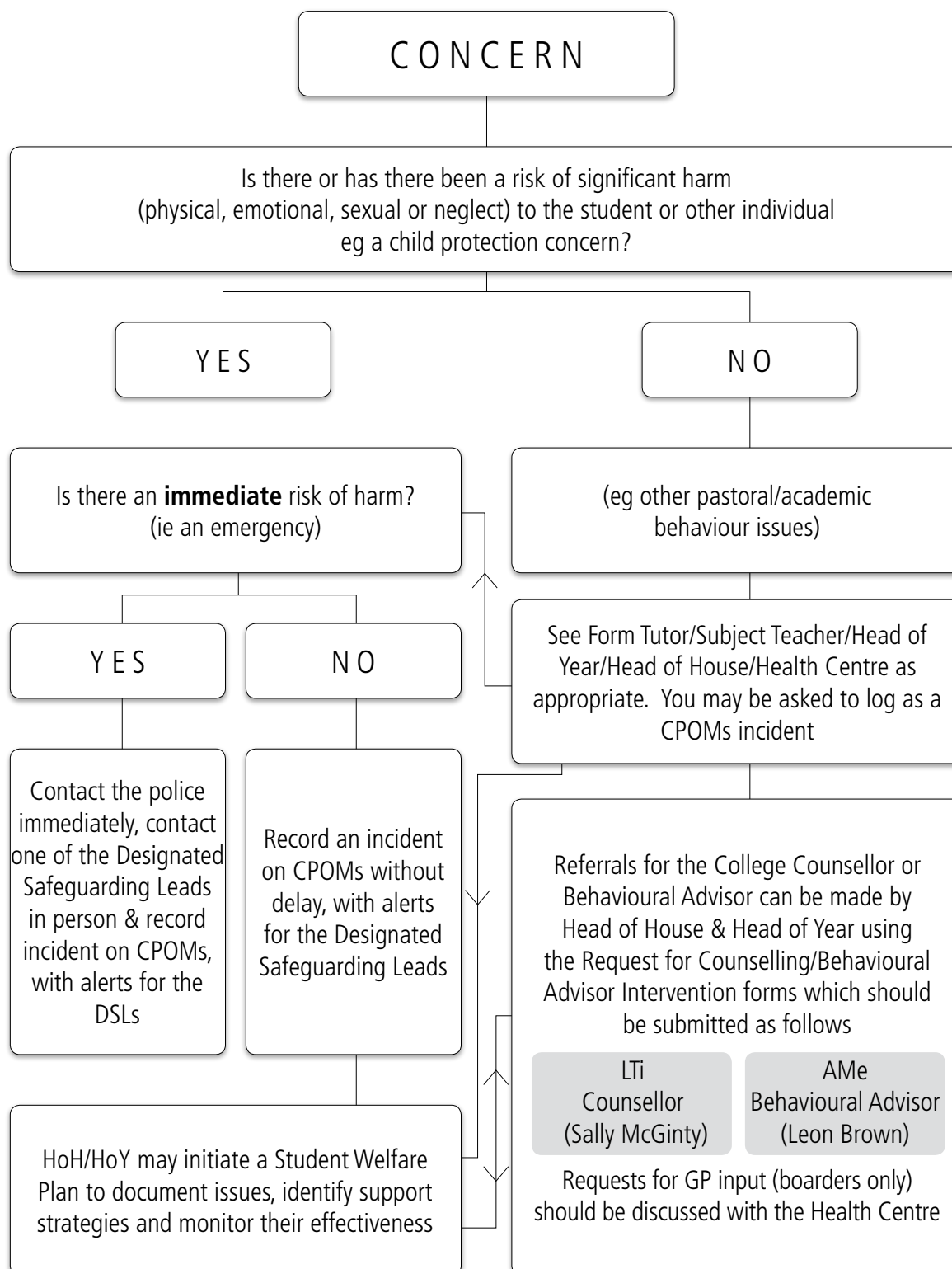
If your concern relates to a member of staff, your referral must go directly to the Principal.

If your concern is about the Principal you must inform the Joint Chair of Governors; **Dr Judith Braeckman 07754 967457**  
**Mrs Marie Roberts 07734 773397**



Ensure you are familiar with the College's **Child Protection Policy** and **Keeping Children Safe in Education** which are available for you to refer to on the College website and in the Shared Area. A hard copy is also available in the Staff Room.

## APPENDIX 12

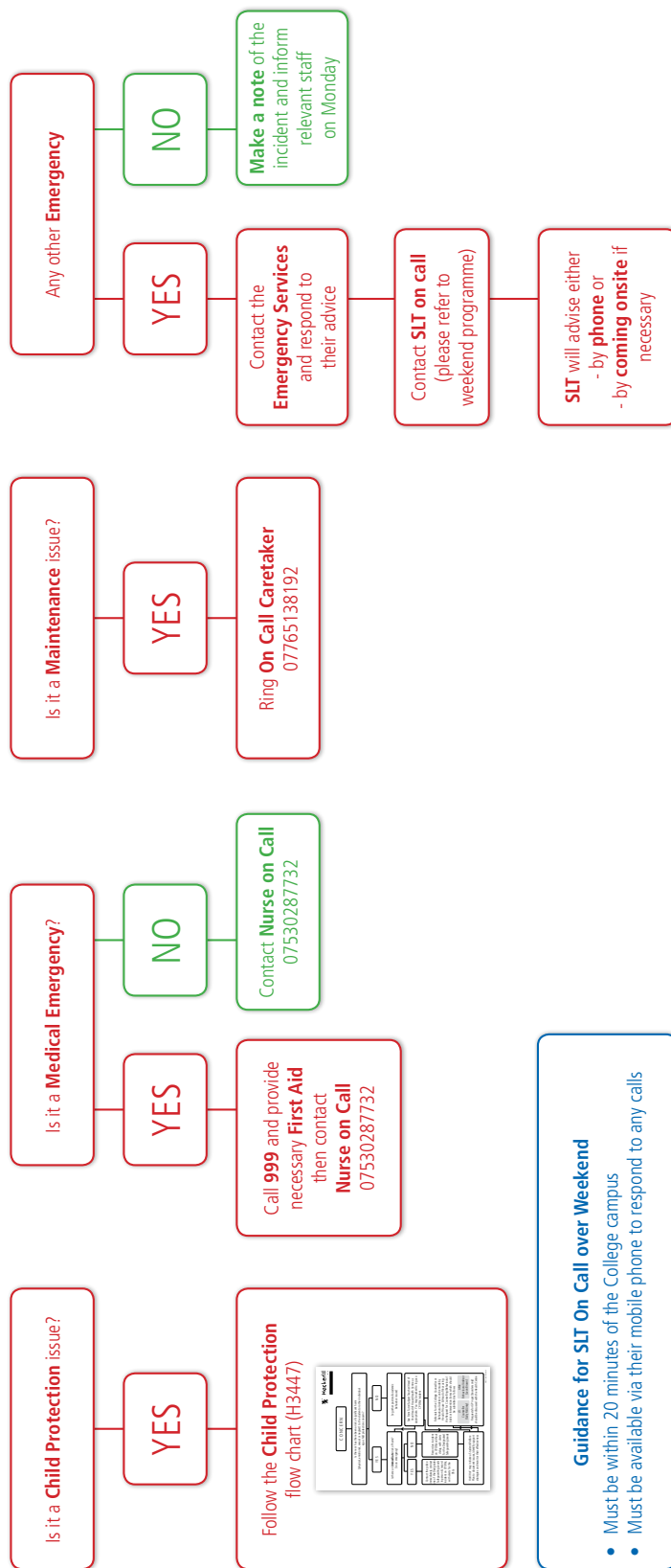


## APPENDIX 13



## WEEKEND EMERGENCIES

If an incident / accident has occurred that requires an immediate response, please follow the flowchart below.



## APPENDIX 14



# Commitment to Care Charter

## **BSA schools are committed to the highest duty of care and safeguarding**

Keeping boarders safe, secure and cared for are the main priorities for members.

## **Everyone working in a BSA school will raise any concerns immediately**

'Everyone' includes all full or part-time staff, volunteers, governors and contractors. It also means pupils, such as prefects in boarding houses. 'Immediately' is without hesitation or delay, and 'abuse' is any suspicion, belief or evidence of abuse by an adult against a pupil or by a pupil against another pupil.

## **BSA schools will follow all statutory safeguarding guidance and laws and report concerns to the relevant authority and the BSA**

Follow all 'safeguarding guidance and laws' means that all policies and procedures, including a school's guidelines for reporting, must comply with any applicable rules and expectations<sup>1</sup>, and in relation to any requirement to report to the police where necessary. 'Report concerns to the relevant authority' means to follow those guidelines and, if an unsatisfactory response is received, to escalate the concern. Report 'to the BSA' means to inform the BSA that a referral has been made, but without disclosing any details by which a case or an individual can be identified.

## **BSA schools will support any present pupils affected by abuse and those who report concerns, and offer support to past pupils**

'Support' means to provide open, honest communication, provide counselling or similar services or referral to them. 'Offer of support' means referral to other organisations (e.g. the police for past pupils), counselling or similar services. Support will be given if there is no conflict of interest or legal restriction.

## **BSA will support member schools which responsibly follow the Charter**

The BSA will support member schools to help them to follow the Charter. Member schools are expected to endorse the Charter clearly and strongly. The Safeguarding Governor is expected to have a clear oversight of safeguarding procedures and practice. BSA will review any instances where the Charter has not been responsibly followed (especially where cases and allegations have not been reported to the BSA as soon as it is permissible to do so) and consider any appropriate action.

<sup>1</sup>For member schools in England and Wales, this includes, but is not limited to, statutory guidance set out in Keeping Children Safe in Education (as updated from time to time). In other UK regions and overseas, this includes any relevant guidance or legislation.





## REPORTING SAFEGUARDING ISSUES TO BSA

The following guidance indicates the circumstances where, under the terms of the Charter, a school should inform BSA of a safeguarding issue:

### WHEN must BSA be notified?

BSA must be notified, as soon as it is permissible to do so, of any allegation against a member of staff, whether recent or non-recent, which the school has referred to the Local Authority Designated Officer (LADO) or equivalent, to the police or to Children's Services.

BSA must also be informed of any allegation of peer on peer abuse.

### WHAT information should be given?

BSA needs to know only that an incident has been alleged and which statutory agencies are involved. BSA does not need to know specific details (unless a school chooses to provide them), nor will it normally be appropriate for BSA to know as soon as the allegation is received. At a later stage, schools should update BSA with any information which is in the public domain (eg. copies of letters to parents etc).

### WHO sees the information?

BSA's Safeguarding Case Log is password protected and accessible only by the Chief Executive, Operations Director and Head of Safeguarding and Standards. Generic and statistical information, but not information which can identify a school, a case or any individual, may be shared with the Board and with the membership from time to time.

### WHY does BSA need the information?

BSA needs this information to ensure schools are meeting their obligations under the Commitment to Care Charter, to maintain an overview of safeguarding practice within the sector and to be in a position to offer help and support to individual schools and to the membership as a whole. It is vital that BSA is seen as proactively promoting good safeguarding practice within our schools.

### HOW do I inform BSA?

Please contact **Dale Wilkins**, Head of Safeguarding and Standards: [dale@boarding.org.uk](mailto:dale@boarding.org.uk) (+44 (0)7905 127 650) or email [safeguarding@boarding.org.uk](mailto:safeguarding@boarding.org.uk)

## PROCEDURE FOR DEALING WITH ALLEGED BREACHES OF THE BSA "COMMITMENT TO CARE" CHARTER

BSA can become aware of alleged breaches of the "Commitment to Care" Charter (the Charter) through inspection reports, media coverage, by other sources of information or by a school's own disclosure.

When BSA becomes aware of a suspected breach of the Charter, BSA will:

- Write to the Head/Principal and Chair of Governors asking for full clarification
- Make any other enquiries which are appropriate in the circumstances
- Offer, where practical and appropriate, BSA support and guidance

If it is clear that NO breach has taken place, continued support and guidance will be offered to help manage any remaining issues.

If it remains unclear as to whether a breach has occurred, the Head of Safeguarding and Standards will gather any further relevant information, and make a report to the Board. If the evidence indicates that, on the balance of probability, there has been a breach of the Charter, appropriate action will be considered, which may include a review by the Board of a school's membership of BSA. Such review may result in suspension of a school's BSA membership for a specified period.

If a school is suspended from membership, BSA will consider whether it is appropriate to offer support and guidance during the period of suspension. Member schools may choose to appeal against the decision, in writing, to the Chief Executive of BSA for review by the Board.

Once all relevant matters relating to the breach have been addressed satisfactorily, including any recommendations made by inspection bodies, the school may apply for the suspension to be lifted.

Any member school failing to engage with BSA concerning suspected breaches of the Charter will be considered to be in breach of the Charter.

The Board may terminate, without right of appeal, the membership of any BSA member establishment which fails to address breaches of the Charter during any period of suspension or at any other time. No re-application for membership will be considered within two years from the date of such termination.

## APPENDIX 15

Table of substantive changes from previous CP policy

SECTION OF POLICY	CHANGES
Policy review	Adding of 'Academy'/ 'principal' and 'board of trustee' to reflect settings that use these terms
1.Introduction	<p>Addition of Annex A for staff who do not have direct work with children</p> <p>Addition of Supply staff, voluntary and contract worker categories added</p> <p>Addition of Online Safety training requirement</p> <p>Page of KCSiE now referenced as Pg 31-33</p> <p>Addition of 'best' interest of the child to reflect language in KCSiE.</p>
2.Statutory Framework	<p>Update pf 2021 edition of KCSiE referenced</p> <p>Addition of recommended legislation used; Sexual violence and sexual harassment between children in schools and colleges (DfE 2017)</p>
3.DSL/ DDSL	<p>Updated section on recommended Training for DSL/ DDSL role as stated in KCSiE 2021</p> <p>Addition of Supply staff, voluntary and contract worker categorised added</p>

<p>4.The management of safeguarding (Governing Body, proprietors and management committees)</p>	<p>'Employee' added to code of conduct</p> <p>Addition of Annex A added from KCSiE as an condensed version of Part 1 as an alternative option for staff who do not have direct contact working with children (as decided by governors or proprietors).</p> <p>Annex B KCSiE referenced as area now detailing specific safeguarding issues.</p> <p>'Trustee' added</p> <p>Part 4 of KCSiE area now reflecting responding to allegations against staff</p> <p>Pg 57 referenced of KCSiE regarding information relating to staff DBS checks</p>
<p>5.When to be concerned</p>	<p>Removal of Family and Parent descriptions on types of abuse.</p> <p>'Child protection' added to contact referral due to being renamed by Hertfordshire.</p> <p>DSL's 'and their deputies' added to reflect joint responsibility of deputies in reporting concerns related to safeguarding.</p> <p>Part 5 of KCSiE referenced as area added in KCSiE 2021 relating to Child on Child sexual violence and sexual harassment.</p> <p>Annex B referenced now area of KCSiE relating to Child Sexual Exploitation and Child Criminal Exploitation.</p> <p>KCSiE Pg133 referenced in terms of schools PREVENT duty.</p>
<p>6.Dealing with a Disclosure</p>	<p>Area added around Third party disclosures</p>
<p>7.Record Keeping</p>	<p>No changes from CP policy 2020</p>

8. Confidentiality	No changes from CP policy 2020
9. School Procedures	<p>KCSiE Pg 23 now where Reporting pathway flow chart is listed</p> <p>KCSiE Pg 131-132 regarding staff mandatory reporting duty related to Female Genital Mutilation.</p>
10. Communication with parents	<p>KCSiE Pg 26 regarding student emergency contact details recommendations.</p> <p>Weblink now added for Further guidance around information sharing can be located within; Information sharing Advice for practitioners providing safeguarding services to children, young people, parents and carers (DfE, 2018) document.</p>
11. Allegations of abuse made against adults who work with children and young people.	<p>Hertfordshire Safeguarding Children Partnership (HSCP) Procedures Manual Section 5.1.5 Managing Allegations Against Adults who work with Children and Young People, referenced.</p> <p>Link to HSCP escalation and complaints procedures included.</p>
Annex 1. Link to KCSiE (DfE, 2021) Part One or Annex A: Information for all school and college staff Annex B: Further information Updates from KCSiE 2021	Addition of Annex A
Annex 2. Declaration for staff	Changes made aligned to KSCiE 2021
Annex 3. Actions where there are concerns about a child	Now appears on page 23 of KCSiE 2021
Annex 4. Operation Encompass – Information sharing from Police regarding Domestic Abuse notifications and Children Missing from Education (2nd December 2019)	Addition of Children Missing from Education guidance
Annex 5. Ofsted school Inspection Handbook (September 2021)	New appendix added 2021

Annex 6. Sexual violence and sexual harassment between children in schools and colleges guidance (2021)	New appendix added 2021
Annex 7. Online Safety guidance	New Appendix added 2021
Annex 8. Covid guidance into new academic year 2021-2022	New signposting for further guidance
Annex 9. GDPR, data protection and Freedom of Information	New Appendix added 2021

