ACHIEVING TOGETHER

FOUR STONES GATEWAY TRUST

SAFEGUARDING CHILDREN POLICY (including Child Protection)

For Shropshire Schools

DATE POLICY WAS APPROVED	01.09.2026
DATE POLICY WILL BE REVIEWED	Autumn 2027
MEMBER OF STAFF WITH RESPONSIBILTY FOR REVIEW	Executive Headteacher

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Four Stones Gateway Trust is a company limited by guarantee registration number 9115941

Key Definitions

This Trust Safeguarding policy relates to our schools based within the Shropshire Local Authority as outlined below:

- Clee Hill Community Academy
- Cleobury Mortimer Primary School
- Lacon Childe School
- SHaW (Shropshire, Herefordshire, and Wolverhampton) Maths Hub
- Stottesdon CofE Primary School
- Any other Shropshire schools or organisations that may join the Trust from time to time and not listed above.

The terms academy, school, organisation and Trust may be used interchangeably where the context makes the meaning clear.

The following definitions apply where relevant:

"CEO" means the Chief Executive Officer.

"CFOO" means the Chief Financial and Operating Officer.

"Trust Senior Leadership Team" means the Executive Headteachers, Headteachers, strategic operational leads and Teaching School or SCITT Directors.

"Headteacher" means the Headteacher responsible for the relevant school.

"Trustees" or "Trust Board" means the appointed Trustees who set the Trust's strategic direction and oversee its governance.

"Local Academy Board" or "LAB" means the local governing body. LAB governors act as advocates for safeguarding, SEND, standards and stakeholder engagement at their school.

"Chair" means the person responsible for leading the relevant board and supporting its effectiveness.

"Stakeholders" means people or organisations with an interest in the success and wellbeing of the Trust or a school, including pupils, parents and carers, staff, governors, trustees, trade unions, community representatives and local organisations.

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What to do if you have a serious safeguarding concern at a Shropshire LA school in Four Stones Gateway Trust (the Trust)

Why are you concerned?
For example:
- Disclosure
- Child's appearance
- Behaviour change
- Witnessed concerning behaviour
- Student Help Advise Reporting Page referral or student/parent/community My Concern

Immediately record your concern on 'My Concern' online recording tool or on a 'Cause for Concern' form/ referral or student/parent/community My Concern **(external/visitors) only**

Forward to DSL/DDSL
- Clarify concerns if necessary
- Use child's own words
- Sign and date your records
- Reassure the child
- Seek support for yourself if required from the DSL

Designated Safeguarding Lead reviews referral and makes a decision about next steps. Feedback (on a need-to-know basis) is given to staff/referrer on next steps.

Referral/further discussion
- Consider whether the child is at immediate risk of harm e.g. unsafe to go home
- Discussion/refer to other agencies as appropriate e.g. Inter-agency referral
- If allegation against a professional inform the school's Headteacher - LADO notification
- If allegation against a Headteacher inform the CEO of Four Stones Gateway Trust
- If allegation against the CEO of Four Stones Gateway Trust inform the Chair of Trustees

In School Monitoring Process
- What you are monitoring – Behaviour, trends, appearance etc.
- How long will you monitor? Timeline
- Where, how and to whom will you feedback? Staff/Referrer/Headteacher
- Where will you record? My Concerns
- Inform parent/carer of support provided?

Record decision
Child deemed at risk of significant harm or the likelihood of danger of harm and or risk. Decision made to refer to social care referral agency/Family Help or universal services and community-based early help/CAMHS

At all stages, the child's circumstances will be kept under review.
The DSL/staff will re-refer if required to ensure the child's safety is paramount.

2. Introduction and Commitment

Four Stones Gateway Trust (Trust) is a community and all those directly connected (staff, trustees, governors, parents/carers, families, and children/learners) have an essential role to play in making it safe and secure. The Trust fully recognises its moral and statutory responsibilities for safeguarding and promoting the welfare of children, which is defined as: protecting children from maltreatment; preventing impairment of children's mental and physical health or development; ensuring that children grow up in circumstances with the provisions of safe and effective care; and taking action to enable all children to have the best outcomes.

The Trust also recognises the importance of providing an ethos and environment within school/educational setting that will help students to feel safe, secure, and respected; encourage them to talk openly; and enable them to feel confident that they will be listened to. We are alert to the signs of abuse, neglect, exploitation and discrimination and follow our procedures to ensure that students/learners receive effective support, protection, and justice.

2.1 This Policy has been developed in accordance with the principles established by:

- The Children's Acts 1989 and 2004 and the Education Act 2002.
- Section 175 of the Education Act 2002, which places a duty on schools and local authorities to safeguard and promote the welfare of pupils.
- Keeping Children Safe in Education
- Home Office PREVENT Duty Guidance (2023)
- the Prevent Duty and Terrorism (Protection of Premises) Act 2025: aka "Martyn's Law"
- Working Together to Safeguard Children (2026).
- DfE (2018) 'Disqualification under the Childcare Act 2006'
- The School Staffing (England) Regulations 2009, which set out what must be recorded on the single central record and the requirement for at least one person on a school interview/appointment panel to be trained in safer recruitment techniques.
- Part 3 of the schedule to the Education (Independent School Standards) Regulations 2014, which places a duty on academies and independent schools to safeguard and promote the welfare of pupils at the school.
- The Children Act 1989 (and 2004 amendment), which provides a framework for the care and protection of children.
- Section 5B (11) of the Female Genital Mutilation Act 2003, as inserted by section 74 of the Serious Crime Act 2015, which places a statutory duty on teachers to report to the Police where they discover that female genital mutilation (FGM) appears to have been carried out on a girl under 18.
- The Rehabilitation of Offenders Act 1974, which outlines when people with criminal convictions can work with children.
- Schedule 4 of the Safeguarding Vulnerable Groups Act 2006, which defines what 'regulated activity' is in relation to children.
- The Domestic Abuse Act 2021.
- HM Government (2020) 'Multi-agency statutory guidance on female genital mutilation'
- The DfE statutory guidance 'Relationships education, relationships and sex education (RSE) and health education' September 2026.
- The Human Rights Act 1998 (HRA). The specific convention rights applying to schools and colleges are: Article 3: the right to freedom from inhuman and degrading treatment (an absolute right), Article 8: the right to respect for private and family life (a qualified right) includes a duty to protect individuals' physical and psychological integrity, Article 14: requires that all of the rights and freedoms set out in the Act must be protected and applied without discrimination, 25 and Protocol 1, Article 2: protects the right to education;
- The Equality Act 2010, (including the Public Sector Equality Duty), and the local multi-agency safeguarding arrangements.
- The DfE 'Working together to improve school attendance' (2026)
- The DfE 'Plan technology for your school service' (2024)
- The DfE 'Alternative Provision' (2025)
- The DfE 'Education for children with health needs who cannot attend school' (2023)
- The Children's Wellbeing and Schools Bill (2026)
- Early Years foundation stage (EYFS) statutory framework (2026)

- The Shropshire Safeguarding Community Partnership Family Help Together - A Framework for Action Shropshire Safeguarding Community Partnership West Midlands Safeguarding Children Procedures and
- Shropshire Safeguarding Community Partnership. Allegations about staff/volunteers

Rather than duplicating content from Keeping Children Safe in Education in this Policy, it should be understood that the Trust will always refer to KCSIE as the benchmark for all safeguarding practice and decision-making.

2.2 The Trust fully recognises its moral and statutory responsibilities for safeguarding and promoting the welfare of children. Our Trust recognises that some children are living in circumstances that may make them more vulnerable to abuse, neglect, or poor outcomes.

2.3 Our Policy applies to all staff (teaching and non-teaching) including those from the executive and central team, peripatetic, supply staff, contract staff and third-party contractors, members, trustees, governors, volunteers, and visitors in the Trust.

2.4 There are six main elements to our Policy:
- ensuring we practise safer recruitment in checking the suitability of staff and volunteers to work with children;
- raising awareness of child protection issues and equipping children with the skills needed to keep them safe.
- developing and then implementing procedures for identifying and reporting cases, or suspected cases, of abuse.
- equipping staff, trustees, governors, supply staff and volunteers with the necessary information and training to enable them to meet their Child Protection responsibilities.
- supporting students who have been identified as in need of early help or at risk of harm in accordance with the agreed Child Protection, Child in Need or Family Help/Supporting Families plan; and
- establishing a safe environment in which children can learn and develop.

2.5 The Trust recognises that because of day-to-day contact with children, staff are well placed to identify concerns early and to observe the outward signs of abuse. The Trust will therefore:
- establish and maintain an environment where children feel safe, secure, valued, and respected and are encouraged to talk, believing they will be listened to.
- ensure all staff are aware that children may not feel ready, know how to or be able to tell someone that they are being abused, exploited, or neglected, and/or they may not recognise their experiences as harmful. For example, children may feel embarrassed, humiliated, or being threatened. This could be due to their vulnerability, disability and/or sexual orientation or language barriers. This should not prevent staff from having professional curiosity and speaking to the DSL if they have concerns about a child.
- ensure children know that there are adults in all their schools whom they can approach if they are worried; and
- include opportunities in the curriculum, specifically through personal, social, health education (PSHE/Ethics), for children to develop the skills they need to recognise and stay safe from abuse and to know who they should turn to for help; and
- where relevant assess the risks and issues in the wider community when considering the well-being and safety of our students

2.6 We seek to ensure that the child's wishes and feelings are taken into account when determining what action to take and what services to provide to protect children from harm. To this end we will:
- ensure there are systems in place for children to express their views and give feedback e.g. through school/class councils, safety questionnaires, participation in anti-bullying and online safety events and
- ensure that the child's thoughts/wishes and feelings are heard and considered in all assessments, planning, decision making and referral (Where a child is unable to communicate due to age, development stage, communication needs, distress, or other factors, staff will make reasonable efforts to ascertain the child's views use age/stage appropriate accessible methods).

2.7 Safeguarding is threaded through the curriculum. The following areas are addressed and taught to children and young people (age and stage appropriate) in our PSHE/Ethics Curriculum and in the wider curriculum:

- Bullying/Cyber Bullying;
- Drugs, Alcohol and Substance Abuse;
- Online Safety / Mobile technologies;
- Mental Health;
- Stranger Danger;
- Fire and water safety;
- Road safety;
- Child on Child Abuse;
- Sexual Violence and Sexual Harassment;
- Domestic Abuse;
- Healthy Relationships / Consent;
- Honour Based Violence issues (HBV) e.g. Forced Marriage, Female Genital Mutilation (FGM);
- Exploitation of Children; and
- Extremism and Radicalisation (in line with the DfE advice Promoting Fundamental British Values as part of SMSC (spiritual, moral, social, and cultural education) in Schools (2014).

3. Procedures

3.1 We will follow the West Midlands Safeguarding Procedures (WMSP) as required by the Shropshire Safeguarding Community Partnership (SSCP) and take account of guidance issued by the Department for Education (DfE).

3.2 The Trust will:

- ensure the schools have safeguarding policies and procedures in place (as outlined in Part 2 Keeping children safe in education and Early years foundation stage (EYFS) statutory framework) that are implemented effectively and comply with our duties under Legislation, Standards and Guidance at all times.
- ensure it has a senior leader nominated as Designated Safeguarding Lead (DSL) in each school who has received appropriate training and support for this role;
- ensure it has at least one member of staff in each school who will act in the absence of the DSLs (deputy DSL);
- ensure it has a nominated governor in each school who will take leadership responsibility for the school's safeguarding arrangements;
- ensure it has a nominated trustee in the Trust who will take leadership responsibility for the Trust's safeguarding arrangements;
- ensure every member of staff (including temporary and supply staff and volunteers), trustee and governor knows the name of the DSL and any deputies in each school and understands their role;
- ensure that the DSLs and/or deputy DSLs are always available to speak to during school hours and has made adequate and appropriate cover arrangements for any out of hours/out of term time activities;
- ensure all staff and volunteers are alert to the potential need for early help and aware of those children whose vulnerabilities may indicate a greater need and are aware of the role they may play in supporting other agencies and professionals in an early help assessment;
- ensure all staff and volunteers understand their responsibilities in being alert to the signs of abuse, neglect and exploitation including the specific issues of Female Genital Mutilation (FGM), Child Sexual Exploitation (CSE), Children Missing Education (CME), Radicalisation and Extremism (Prevent) and Sexual Violence & Sexual Harassment, and maintain an attitude of 'it could happen here';
- ensure all staff and volunteers understand their responsibility for referring any concerns to the DSL, deputy DSLs or other members of the senior leadership team in a timely manner and are aware that they may raise concerns directly with the local authority Children's Social Care services if they believe their concerns have not been listened to or acted upon;
- ensure that reports made to social care are informative and include as much information as possible, including where there are concerns about a child or young person being harmed outside of the home;
- ensure that parents/carers have an understanding of the responsibility placed on the schools and staff for child protection by setting out its obligations through the published Policy on the Trust website;
- operate a Lettings Policy which ensures the suitability of adults working with children in all its schools at any time;

- ensure that community users organising activities for children are aware of, and understand the need for compliance with the relevant school's child protection guidelines and procedures;
- ensure that the duty of care towards its students and staff is promoted by raising awareness of illegal, unsafe, and unwise behaviour and assist staff to monitor their own standards and practice;
- ensure that all staff and volunteers feel able to raise concerns about poor or unsafe practice and are aware of whistleblowing procedures and helplines;
- be aware of and follow procedures set out by the DfE and the SSCP where an allegation of abuse is made against a member of staff or volunteer, including making a referral to the local authority Designated Officer (LADO). Where a school has EYFS provision we will notify OFSTED of any allegations of harm or abuse by anyone working or looking after children at the premises. Will do this irrespective of whether the allegations of harm or abuse are alleged to have been committed on the premises or elsewhere, for example, on a visit. We will notify OFSTED as soon as reasonably practical and within 14 days of the allegation first being made, informing them of action taken by completing the online form - Report-a-serious-childcare-incident
- ensure that a referral is made to the DBS and/or the Teaching Regulation Agency if a person in regulated activity has been dismissed or suspended or removed from regulated activity where the harm criteria is met, or would have been had they not resigned; and operate safer recruitment practice, ensuring that at
- one member of every recruitment panel has completed safer recruitment training.

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

4. Training

4.1 Staff with specific responsibility for safeguarding children (eg DSL/DDSL), and all staff who work in Shropshire primary schools with early years provision (EYFS) will undertake both single and inter-agency training at a level suitable for their role and responsibilities, updated every two years. In addition to formal training the DSL and deputy DSLs will update their knowledge and skills via SSCP newsletters, briefings, network meetings and seminars, at regular intervals, at least annually.

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

4.3 The following will undertake safer recruitment training updated every three years: all members of the Trust's Executive and Central Team, all members of the senior leadership team in each school and at least one trustee.

4.4 New staff and governors: When staff are offered a post in the Trust, their offer letter will include information about the safeguarding children's arrangements in place. This will include:

- The Safeguarding Policy which includes the procedures for reporting concerns, the safeguarding response to children who go missing from education and the role of the DSL (including their identity and any deputies);
- Part 1 and Part 2 and Annex A (Trustees and Governors) of Keeping Children Safe in Education; and
- The Trust's Code of Conduct and Behaviour Policy.

Staff will be expected to have read the information in advance of starting work at the designated school or as part of the Trust Senior Leadership Team. Before they have any direct contact with students, all new staff and governors will receive induction training in safeguarding children. The induction training will include the documents above, basic child protection information relating to signs and symptoms of abuse, how to manage a disclosure from a child, when and how to record a concern about the welfare of a child and advice on safe working practice. They will be given an opportunity to clarify any issues from the documents above before they have any direct contact with students and asked to confirm that they have read and understood the information and undertake to comply with it. Staff employed to be part of the executive and/or central team will follow the induction training in safeguarding children held in one of the schools at which they are based.

All staff, trustees and governors will receive annual update training in safeguarding children (including online safety which includes an understanding of the expectations, applicable roles, and responsibilities in relation to filtering and monitoring).

4.5 The process above also applies to ITTs.

4.6 All volunteers, supply staff and regular visitors to our schools will be given information about safeguarding children arrangements in place prior to coming into the school or before any direct contact with students. This will include:

- The Safeguarding Policy and leaflet, which include the procedures for reporting concerns, the safeguarding response to children who go missing from education and the role of the DSL (including their identity and any deputies);
- Part 1 of Keeping Children Safe in Education; and
- The Code of Conduct and Behaviour Policy.

4.7 All staff, trustees and governors in our schools will receive regular training in child protection including online safety, and safe working practice, updated at least annually, in line with the SSCP Training Guidance to provide them with the requisite skills and knowledge to safeguard children effectively. Training will include signs and symptoms of abuse, neglect, and exploitation, as well as specific safeguarding issues, such as County Lines, CSE, FGM, Prevent, serious crime, on-line safety, child on child abuse (including consensual and non-consensual sharing of nudes and semi-nudes images and/or videos and sexual violence and sexual harassment) and how to record and report abuse both within school and to the local authority Children's Social Care. In addition, staff will receive safeguarding and child protection updates from the DSL as required, but at least annually. The Trust safeguarding lead will deliver any updates to the executive and central teams.

4.8 All staff in the Trust will be issued with the following documents in September of each year:

- The Safeguarding Policy which includes the procedures for reporting concerns, the safeguarding response to children who go missing from education and the role of the DSL (including their identity and any deputies);
- Part 1 of Keeping Children Safe in Education;
- The Code of Conduct and Behaviour Policy; and
- EYFS Staff & Senior Leadership Team: Section 3 Early years foundation stage (EYFS) statutory framework (group and school-based providers)

They will be given an opportunity to clarify any issues from the documents and asked to confirm that they have read and understood the information and undertake to comply with it.

5. Responsibilities

5.1 The Trust Board retains statutory responsibility for ensuring that all legal responsibilities in connection with safeguarding are discharged. The Trust Board appoints a Safeguarding Link Trustee to act as the link between the Trustees and the Trust Safeguarding lead. The Trust board will ensure that:

- arrangements are in place to carry out functions in respect of safeguarding and promoting the welfare of children and have regard to statutory guidance by the Secretary of State;
- all schools in the Trust meet their duties with regard to Safeguarding and Child Protection;
- ensure that there is a single central record of all staff and others who work in the schools;
- ensure that policies and procedures are in place for appropriate action to be taken in a timely manner to safeguard and promote children's welfare, e.g. safeguarding children Policy (including child protection), staff code of conduct etc;
- ensure all schools have a Designated Safeguarding Lead (DSL) and deputy(ies) and that they have undergone training within the last two years;
- they monitor the work of the Trust Safeguarding and SEND Lead;
- a Designated Teacher is appointed to promote the educational achievement of children who are looked after, that they have the skills, knowledge and understanding necessary to keep Children Looked After safe, and that the information they need in relation to the child's looked after status, his/her care arrangements and the levels of authority delegated to the carer by the authority looking after him/her is made available to them;

- any weakness brought to its attention relating to safeguarding are remedied without delay and it complies with all legislative duties, including the duty to report suspected or known cases of FGM and the duty to prevent young people from being drawn into terrorism;
- ensure that children are safeguarded from harmful and inappropriate online material by ensuring that appropriate filters and monitoring systems are in place;
- ensure that all governors and trustees receive appropriate safeguarding and child protection (including online) training at induction. This training should equip them with the knowledge to provide strategic challenge to test and assure themselves that the safeguarding policies and procedures in place in schools and colleges are effective and support the delivery of a robust whole school approach to safeguarding. The training should be regularly updated;
- follow guidance from the government regarding recruitment and appointment of new members, trustees, and governors; and
- all allegations of abuse against the Chief Executive Officer (CEO) are reported to the LADO in a timely manner.

5.2 The Chief Executive Officer (CEO) will:

- ensure all trustees understand their safeguarding duties;
- ensure there is a clear and robust Safeguarding Policy in place that aligns to statutory guidance;
- remind trustees that they must report serious incidents;
- ensure all staff within the schools comply with the prevent duty;
- follow guidance from the government regarding recruitment and appointment of new members, trustees, and governors and that the schools undertake robust checks for all their employees and volunteers before they are appointed;
- ensure all staff feel able to raise concerns about poor or unsafe practice and ensure that these are handled sensitively and in accordance with the whistleblowing procedures; and
- ensure all allegations of abuse against the Headteachers and members of the Trust's executive or central teams are reported to the LADO in a timely manner.

5.3 The Trust Safeguarding Lead will:

- monitor the delegated responsibilities for safeguarding in the scheme of delegation;
- ensure that the school has a child protection policy is in place as required by Keeping children safe in education and Early years foundation stage (EYFS) statutory framework, that is implemented and followed by all staff.
- raise awareness of safeguarding issues with the Headteacher(s), and Governors or Trustees;
- monitor the quality and effectiveness of safeguarding provision within all schools and update the Headteacher(s), and Governors or Trustees;
- regularly review and update the Safeguarding Policy and related procedures and that these are available on the Trust website;
- undertake annual quality assurance checks relating to safeguarding at each school to ensure effective safeguarding practices are in place;
- provide information for the Chief Executive Officer's regular reports to the Trustees;
- report annually to the Trust Board;
- ensure the DSLs and Deputy DSLs are explicit in the role holders' job descriptions and that the DSL takes lead responsibility for safeguarding and child protection and does not delegate this responsibility;
- ensure the individual school DSLs are supported in fulfilling their responsibilities;
- ensure that mechanisms are in place to assist staff to understand and discharge their role and responsibilities as set out in part one of Keeping Children Safe in Education;
- ensure that the Trust's safeguarding arrangements take into account the procedures and practice of the local safeguarding partners;
- ensure that safeguarding responses are put in place in cases where children go missing from education;
- ensure that a Designated Teacher is appointed to promote the educational achievement of children who are looked after, that they have the skills, knowledge and understanding necessary to keep Looked After Children safe, and that the information they need in relation to the child's looked after status, his/her care arrangements and the level of authority delegated to the carer by the authority looking after him/her is made available to them; and
- ensure that senior leaders at each school are involved in quality assurance processes, including the analysis of referrals and concerns, enabling the individual school to be responsive to identified patterns and the bespoke needs of the local community.

5.4 The Local Academy Board (LAB) for each of our schools will nominate a member to take leadership responsibility for safeguarding children who will liaise with the DSL and/or the Headteacher in matters relating to safeguarding. It will ensure that:

- the DSL takes lead responsibility for safeguarding and child protection and does not delegate this responsibility.
- the DSL's and deputy DSLs' role are explicit in the role holders' job descriptions.
- safeguarding responses are put in place in cases where children go missing from education.
- mechanisms are in place to assist staff to understand and discharge their role and responsibilities as set out in Part 1 and Part 2 of Keeping Children Safe in Education.
- termly reports on the effectiveness of the school's safeguarding procedures are presented to the Local Academy Board.
- any returns requested by the LA/WMSP (e.g. Section 11) are completed in a timely manner to enable the SSCP to meet its statutory duties.
- any weaknesses brought to its attention relating to safeguarding are remedied without delay; and
- it complies with all legislative duties, including the duty to report suspected or known cases of FGM and the duty to prevent young people from being drawn into terrorism.

5.5 The Headteacher in each school will ensure that:

- the safeguarding policies and procedures are fully implemented and followed by all staff.
- they establish and maintain an environment where children feel safe, secure, valued, and respected and are encouraged to talk, believing they will be listened to.
- children and young people know that there are adults in the school whom they can approach if they are worried.
- they include opportunities in the curriculum, specifically through Relationships Education/Relationships and Sex Education and IT, for children and young people to develop the skills they need to recognise and stay safe from abuse and to know who they should turn to for help.
- there are systems in place for children and young people to express their views and give feedback e.g. through the student council and student voice activities.
- the child's thoughts, wishes and feelings are sought and recorded on all referrals and taken into account when determining what action to take and what services to provide to protect children from harm.
- the DSL and/or a deputy DSL is always available to speak to during school hours and has made adequate and appropriate cover arrangements for any out-of-hours/out-of-term time activities.
- sufficient funding, support, time, and resources are allocated to enable the DSL and other staff to discharge their responsibilities with regard to child protection.
- it has at least one member of staff who will act in the absence of the DSL (Deputy DSL).
- every member of staff (including temporary and supply staff and volunteers), regular visitors to our school and the Local Academy Board is told where to find this Policy, knows the name of the DSL and any deputies and is informed of the school's procedures in reporting concerns and understands their role.
- it receives written confirmation that the appropriate Child Protection checks and procedures have been carried out on staff from another organisation.
- all staff feel able to raise concerns about poor or unsafe practice and that these are handled sensitively and in accordance with the whistleblowing procedures.
- parents/carers have an understanding of the responsibility placed on the school and staff for Child Protection by setting out its obligations by publishing its Policy on the school website.
- ensure a process for reviewing the filtering and monitoring process at least annually;
- all allegations of abuse against the relevant staff are reported to the LADO in a timely manner; and
- ensure they notify Ofsted of any changes as outlined in Early Years Foundation Stage Statutory Framework
- Ensure appropriate health arrangements are in place and adhere to requirements outlined in Safeguarding children with medical conditions and the Health section in Early Years Foundation Stage Statutory Framework.

5.6 The DSL in each school will co-ordinate action on safeguarding and promoting the welfare of children within the school setting. The DSL will act as the central contact point for all staff to discuss any safeguarding concerns. The DSL is responsible for:

- organising child protection induction training for all newly appointed staff, whole staff training, refreshed at least every 3 years or every two years for settings with EYFS with annual updates as required.
- providing a mechanism to ensure that all staff understand and are able to discharge their role and responsibilities as set out in Part 1 of Keeping Children Safe in Education.
- undertaking, in conjunction with the Headteacher and Safeguarding Governor, an annual audit of safeguarding procedures, using the County S11 audit or similar.
- making use of the Levels of Need guidance when making a decision about whether or not the threshold for Early Help or the local authority Children's Social Care intervention is met.
- referring a child to the First Point of Contact (when there are concerns about possible abuse, neglect, and exploitation.
- referring a child to the Channel Panel when there are concerns about possible radicalisation or involvement in extremist groups.
- working in a multi-agency approach with other key safeguarding partners (the local authority, the clinical commissioning group, and Police) to safeguard and promote the welfare of children.
- liaising with the Headteacher to ensure they are informed of all child protection issues, especially ongoing enquiries under section 47 of the Children Act 1989 and Police investigations.
- liaising with other staff (for example Heads of Year/pastoral teams, school nurses or counsellors, IT technicians and the SENCO) on matters of safety and safeguarding and when deciding whether to make a referral by liaising with relevant agencies.
- coordinate safeguarding action for children and in the case of children in care, the DSL will ensure that the designated teacher for CLA maintains the details of the child's social worker and the name of the virtual school head in the authority that looks after the child (DSL liaising closely with the designated teacher).
- keeping electronic records (My Concerns) of concerns about children, including the use of body maps, even where there is no need to refer the matter immediately.
- ensuring all child protection records are kept securely, separate from the main student file, and in locked/password protected locations.
- ensuring that all child protection files are transferred in a safe and timely manner when a child moves settings, both between and across phases, within and out of county and that a receipt of transfer is obtained. The files must meet the standards set out in Shropshire Transition in Education Guidance (safeguarding children at educational transition points)
- Promptly notifying the child's social worker of any unexplained absence of a child who is subject to a Child Protection Plan, in line with local safeguarding partnership and school attendance procedures monitoring unauthorised absence, particularly where children go missing on repeated occasions, reporting concerns in line with 'missing children' procedures.
- developing effective links with relevant agencies and other professionals and co-operating as required with their enquiries regarding safeguarding matters including co-operation with serious case reviews, attendance at strategy meetings, initial and review child protection conferences, core group and child in need review meetings.
- ensuring that children's wishes and feelings are considered where there is a safeguarding concern.
- contributing to assessments and providing a report to initial and review conferences which has been shared with parents/carers first, whenever possible.
- co-ordinating a programme of safety, health, and well-being through the curriculum, including issues of protective behaviours, healthy relationships, staying safe on-line, and the promotion of fundamental British values.
- take the lead in ensuring that the standards for filtering and monitoring are met; and
- acting as a source of support, advice, and expertise for all staff.

5.7 Every employee of the Trust and all trustees, governors, volunteers, supply staff and regular visitors are under a general legal duty to:

- protect children from abuse;
- be alert to signs of harm and abuse, including issues that can manifest themselves due to child-on-child abuse. This is most likely to include but not limited to: bullying including cyberbullying), child on child abuse and gender-based violence/sexual assault and sexting.
- be aware of the school's safeguarding/child protection procedures and to follow them;
- know how to access and implement the school's child protection procedures, independently if necessary;
- keep a sufficient record of any significant complaint, conversation, or event in accordance with this Policy; and

- report any matters of concern to the relevant DSL.

6. Procedures for Managing Concerns

6.1 Our schools adhere to child protection procedures that have been agreed locally through the Shropshire Safeguarding Community Partnership (SSCP). Where we identify children and families in need of support, we will carry out our responsibilities in accordance with the West Midlands Safeguarding Children Procedures.

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

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

6.4 It is *not* the responsibility of staff to investigate welfare concerns or determine the truth of any disclosure or allegation. All staff, however, have a duty to recognise concerns and pass the information on in accordance with the procedures outlined in this Policy.

6.5 The DSLs should be used as a first point of contact for concerns and queries regarding any safeguarding concern in our schools. Any member of staff or visitor to the school who receives a disclosure of abuse or suspects that a child is at risk of harm must report it immediately to the DSL or, if unavailable, to the deputy designated lead. In the absence of either of the above, the matter should be brought to the attention of the most senior member of staff or the local authority Children's Social Care services.

6.6 All concerns about a child or young person should be reported without delay and recorded in writing using the incident electronic form in My Concerns.

6.7 Following receipt of any information raising concern, the DSL will consider what action to take and seek advice from the local authority Children's Social Care services as required. All information and actions taken, including the reasons for any decisions made, will be fully documented.

6.8 All referrals will be made in line with local procedures as detailed on the Shropshire safeguarding website.

6.9 If, at any point, there is a risk of immediate serious harm to a child a referral should be made to the local authority Children's Social Care services immediately. Anybody can make a referral. If the child's situation does not appear to be improving the staff member with concerns should press for re-consideration by raising concerns again with the DSL and/or the Headteacher. Concerns should always lead to help for the child at some point.

6.10 Staff should always follow the reporting procedures outlined in this Policy in the first instance. However, they may also share information directly with the local authority Children's Social Care services, or the Police if:

- the situation is an emergency and the designated senior person, their deputy and the Headteacher are all unavailable and
- they are convinced that a direct report is the only way to ensure the student's safety.

6.11 Any member of staff who does not feel that concerns about a child have been responded to

appropriately and in accordance with the procedures outlined in this Policy should raise their concerns with the Headteacher, the Chair of the Local Academy Board or the Chief Executive Officer. If any member of staff does not feel the situation has been addressed appropriately at this point, they should contact the Children's Referral Portal 03456 789 021. You can also contact the NSPCC whistleblowing helpline at 0800 028 0285 or email at help@nspcc.org.uk. If you believe a child or young person is at immediate risk of harm, then you should contact the police.

6.12 Any child may benefit from Family Help. Staff in the Trust are experienced and appropriately trained to identify the potential need for early help for a child who:

- is disabled, has certain health conditions, or has specific additional needs;
- 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 pregnant and/or are parents themselves;
- 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;
- exhibits early signs of abusive, violent and/or harmful behaviour;
- is frequently missing/goes missing from care or from home;
- is repeatably removed from the classroom or on a part-time timetable;
- has experienced multiple suspensions, is at risk of being permanently excluded from schools, colleges and in Alternative Provision or a Pupil Referral Unit;
- is at risk of modern slavery, trafficking, sexual or criminal exploitation;
- is at risk of being radicalised or exploited;
- has a parent or carer in custody, 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;
- is at risk of 'honour'-based abuse such as Female Genital Mutilation or Forced Marriage;
- is a privately fostered child; and

The schools' Family Help/Supporting Families Offer is accessible on their website. As part of our family help offer, we support children and young people by completing a family help assessment, where deemed necessary. All our family help cases are reviewed regularly and if the situation does not improve then consideration is given as to whether a referral to children's social care for assessment for statutory services should be made.

7. Specific Safeguarding Issues – Contextualised Safeguarding

We are aware that safeguarding incidents and/or behaviours can be associated with factors outside of our schools and/or can occur between children outside of these environments. All staff, but especially the DSL (and deputies) should consider whether children are at risk of abuse or exploitation in situations outside their families. Extra-familial harms take a variety of different forms and children can be vulnerable to multiple harms including (but not limited to) sexual exploitation, criminal exploitation, and serious youth violence.

7.1 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. It can be committed by parents, other family members, neighbours, friends, acquaintances, or strangers.

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

As children get older and are granted more independence, it is important that they are given practical advice on how to keep themselves safe. Lessons should focus on building children's confidence and abilities, rather than simply warning them about strangers. Further information is available at www.actionagainstabduction.org and www.clevernevergoes.org.

7.2 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. Making child arrangements via the family court following separation can be stressful and entrench conflict in families. This can be stressful for children. We will support children and young people and parents/carers by sharing the documentation made available by The Ministry of Justice.

7.3 Children Missing Education (CME)

We recognise that a child who is absent from education for prolonged periods and/or on repeat occasions, including those missing from education, is a potential indicator of abuse or neglect.

The procedures within our schools for dealing with children that go missing from education are based on the SSCP and West Midlands Safeguarding Children procedures. Staff are made aware of these procedures at induction and through our Attendance Policy. We will make every attempt to obtain more than one emergency contact number for each child registered at a school within Four Stones Gateway Trust to ensure we are able to make contact with a responsible adult when a child missing education is also identified as a welfare and/or safeguarding concern.

We will ensure that we inform the local authority when removing a child from the school role at standard and non-standard transition points in line with the DfE guidance on Children Missing Education.

We will ensure that we follow these procedures for dealing with children that go missing from education, particularly on repeat occasions, to help identify the risk of abuse, neglect, and exploitation, including sexual exploitation, and to help prevent the risks of their going missing in future.

We will ensure that we report children missing education to the Local Authority's CME officer, in line with statutory requirements.

We will hold more than one emergency contact number for each student. This goes beyond the legal minimum and gives us additional options to make contact with a responsible adult when a child missing education is also identified as a welfare and/or safeguarding concern.

The attendance officer in each school is aware of all students who are Children Looked After (CLA), Previously Children Looked After (PCLA), young carers, subject to Child in Need or Child Protection plans and who receive targeted family support. The attendance officers prioritise phone calls and home visits for these students.

We follow appropriate procedures when carrying out reasonable enquiries-e.g. the DSL conducts discussions with neighbours, relatives, landlords etc. to determine whether a child may be at risk of harm.

Home visits will be carried out by a trained member of school staff on the third day of absence at the latest, if the following applies: we have not seen the student in school for three consecutive days, we are unable to contact parents/carers and have no information as to the whereabouts of the student.

If there is no answer at the home address and neighbours do not know their whereabouts, the attendance officer may request the police do a safe and well check.

On the third day of absence and if a home visit is unsuccessful in securing information about the student's whereabouts, we inform the local authority Children's Social Care, through the Children's Referral Portal to let them know we have requested a Police safe and well check.

We inform the local authority of any student who has missed 10 school days or more without permission.

All students who attend an off-site provision are members of the student community (and often vulnerable) and schools must ensure they are safeguarded at all times. Therefore, schools will:

- always make a daily phone call to the off-site provider to check if a student is present or absent;

- follow the same protocols as with other student absences by also contacting the parents/carers, in addition to any contact that the off-site provider may also make to pursue the reason for absence; and
- prioritise a home visit (where contact cannot be established with the parent/carer) to ensure the student is safe and well.

The DSLs will record that they have completed these procedures and, if necessary, make a referral to the local authority Children's Social Care services or Police.

7.4 Elective Home Education (EHE)

Elective Home Education (EHE) is where a decision is made by the parents/carers of a young person to remove them from a school roll and educate them at home. EHE can be a positive experience for many children and young people but for some it can mean they are less visible to the services that are there to keep them safe and supported in line with their needs. The Trust has a clear set of procedures and protocols that all schools follow when a request to educate a child or young person electively at home has been made.

7.5 Children with family members in prison

These children are at risk of poor outcomes including poverty, stigma, isolation, and poor mental health. NICCO (National Information Centre on Children of Offenders) provides information designed to support professionals working with offenders and their children, to help mitigate negative consequences for those children.

7.6 Serious Violence and Harmful Behaviours

Staff will be made aware of indicators which may signal that children are at risk from, or are involved with, serious violent crime. These may include being male, increased absence from school or permanently excluded from school, having been involved in offending, such as theft or robbery, 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. Concerns relating to serious violence should be reported immediately to the DSL.

Any concerns that a child or young person is carrying a weapon, has used a weapon, or has expressed an intention to do so must be reported immediately to the Designated Safeguarding Lead (DSL) or a deputy. The DSL will assess the level of risk to the child and others, gather relevant information, and take appropriate action in line with local safeguarding procedures. This may include the development of a safety and support plan, engagement with parents/carers, referrals to external agencies, and where necessary, contacting the police.

7.7 Child Sexual Exploitation (CSE) (see Appendix 3)

We recognise that CSE is a form of child sexual abuse involving criminal behaviours against children and young people which can have a long-lasting adverse impact on a child's physical and emotional health. Sexual abuse may involve physical contact, including assault by penetration (for example, rape or oral sex) or no penetrative acts such as masturbation, kissing, rubbing, and touching outside clothing. It may include non-contact activities, such as involving children in the production of sexual images, forcing children to look at sexual images or watch sexual activities, encouraging children to behave in sexually inappropriate ways or grooming a child in preparation for abuse including via the internet.

Sexual exploitation involves an individual or group of adults taking advantage of the vulnerability of an individual or groups of children or young people. It can occur over time or be a one-off occurrence. Victims can be boys or girls. Children and young people are often unwittingly drawn into sexual exploitation through the offer of friendship and care, gifts, drugs, and alcohol, and sometimes accommodation. It may also be linked to child trafficking.

The schools address the risks of sexual exploitation in the PSHE (Ethics) curriculum (which includes personal, social and health education). A common feature of sexual exploitation is that the child often doesn't recognise the coercive nature of the relationship and doesn't see themselves as a victim eg they believe they are in a genuine romantic relationship. The child may initially resent what they

perceive as interference by staff, but staff must act on their concerns, as they would for any other type of abuse.

All staff, volunteers and governors are made aware of the indicators of sexual exploitation, the fact that the victim may have been sexually exploited even if the sexual activity appears consensual and that it does not always involve physical contact but can occur through the use of technology. All concerns of child sexual exploitation are reported immediately to the DSL.

7.8 Child Criminal Exploitation (CCE) – including County Lines (see Appendix 9)

CCE is where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child into any criminal activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial or other advantage of the perpetrator or facilitator and/or (c) through violence or the threat of violence. The victim may have been criminally exploited even if the activity appears consensual. CCE does not always involve physical contact; it can also occur through the use of technology. It is also important to note that children and young people being criminally exploited may be at higher risk of sexual exploitation and the experience of girls being criminally exploited can be very different to boys. Indicators of CCE may also be different for girls.

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

7.9 Domestic Abuse (see Appendix 4)

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

We recognise that exposure to domestic abuse 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.

We will ensure that our students are educated to ensure they understand what a healthy relationship looks like, for example by using the resources from the Shropshire Domestic Abuse Website.

We receive notifications through Operation Encompass to inform us that domestic abuse has taken place, and the Police have been called. Staff liaise with the student and an appropriate family member to determine what support may be necessary. (Shropshire schools please see here: Operation Encompass (Domestic Abuse) | Shropshire Learning Gateway)

Young people can also experience domestic abuse within their own intimate relationships. This form of child-on-child 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 will be followed and both young victims and young perpetrators will be offered support.

All concerns regarding domestic abuse will be reported to the DSL, who will ensure that appropriate support is available to the young people and make referrals to the Children's Referral Portal where the threshold for social care intervention is met.

7.10 Homelessness

Being homeless or being at risk of becoming homeless presents a real risk to a child's welfare. The DSL (and any deputies) are 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 the local authority 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 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/carers, for example through their exclusion from the family home, and will require a different level of intervention and support. The local authority Children's Social Care will be the lead agency for these young people 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: https://www.gov.uk/government/publications/provision-of-accommodation-for-16-and-17-year-olds-who-may-be-homeless-and-or-require-accommodation

Temporary accommodation notification duty

The Children's Wellbeing and Schools Act places a new duty on local housing authorities in England to notify educational institutions when a child is placed in temporary accommodation. This notification should be made when consent has been given from the parent, those with parental responsibility or care of the child, or the child themselves in cases of 16–17-year-olds living independently from their parents. The notification will enable our schools to safeguard and promote the welfare of these children at the earliest opportunity and support them to improve their outcomes. The notification does not, however, replace existing safeguarding and welfare duties nor a referral into local authority children's social care where a child has been harmed or is at risk of harm. Our schools will continue to follow our safeguarding procedures where concerns are raised.

7.11 Extremism and Radicalisation (see Appendix 8)

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

- Through training, staff, volunteer, governors, and trustees have an understanding of what radicalisation and extremism is, why we need to be vigilant in school and how to respond when concerns arise.
- There are systems in place for keeping students safe from extremist material when accessing the internet in our school by using effective filtering and usage policies.
- A member of the safeguarding team in each school has received Prevent training and will act as the point of contact within our school for any concerns relating to radicalisation and extremism.
- The DSLs will make referrals in accordance with West Midlands child protection procedures and will represent our schools at Channel meetings as required;
- Through our curriculum, we will promote the spiritual, moral, social, and cultural development of students. We encourage students to respect the fundamental British values of democracy, the rule of law, individual liberty and mutual respect, and tolerance of those with different faiths and beliefs; and
- We will use relevant information, tools and resources to help our staff and parents/carers recognise and address extremism and radicalisation in young people, for example the Educate Against Hate website.

7.12 'Honour Based' Violence and Female Genital Mutilation (FGM) (see Appendices 5 & 6)

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

Where FGM has taken place there has been a mandatory reporting duty placed on teachers (persons employed or engaged to carry out teaching work). Section 5B of the Female Genital Mutilation Act 2003 (as inserted by section 74 of the Serious Crime Act 2015) places a statutory duty upon teachers in England and Wales, to personally report to the Police where they discover (either through disclosure by the victim or visual evidence) that FGM appears to have been carried out on a girl under 18. Those failing to report such cases will face disciplinary sanctions. We will provide guidance and support to our teachers on this requirement and further information on when and how to make a report can be found in the following Home Office guidance: Mandatory reporting of female genital mutilation: procedural information - GOV.UK (www.gov.uk) (October 2020).

7.13 Modern Slavery

The Modern Slavery Act 2015 places a new statutory duty on public authorities, including schools, to notify the National Crime Agency (NCA) (section 52 of the Act) on observing signs or receiving intelligence relating to modern slavery. The public authority (including schools) bears this obligation where it has 'reasonable grounds to believe that a person may be a victim of modern slavery or human trafficking.' Staff need to be aware of this duty and inform the DSL should they suspect or receive information that either parents/carers or their children may be victims of modern slavery. The DSL will then contact the NCA.

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.
Modern slavery: how to identify and support victims - GOV.UK

7.14 Child on Child Abuse (including upskirting)

We recognise that children are also vulnerable to physical, sexual, and emotional abuse by their peers or siblings. It can happen both inside and outside of school and online. This is most likely to include, but not limited to: bullying (including cyber bullying, prejudice-based and discriminatory bullying), abuse in intimate relationships between peers; physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm; sexual violence (such as rape and assault by penetration) and sexual harassment (such as sexual comments, remarks, jokes and online sexual harassment); 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 nudes and semi nudes images and or videos (also known as sexting or youth produced sexual imagery - see Appendix 7); and initiation/hazing type violence and rituals. It also includes upskirting, which typically involves staking a picture under a person's clothing without them knowing, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress, or alarm. This is a criminal offence. Abuse perpetrated by children can be just as harmful as that perpetrated by an adult, so it is important to remember the impact on the victim of the abuse as well as to focus on the support for the child or young person exhibiting harmful behaviour. Such abuse will always be taken as seriously as abuse perpetrated by an adult and the same safeguarding children procedures will apply in respect of any child who is suffering or likely to suffer significant harm.

Child on Child abuse: harmful sexual behaviour (HSB), sexual violence and sexual harassment between children and young people (See appendix 10 and refer to Part 5 of KCSiE)

HSB can occur between two or more 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. HSB exists on a continuum and may escalate

into sexual harassment or sexual violence, it can occur online or face-to-face (both physically and verbally) and is never acceptable.

Staff will be made aware that some groups are potentially at more risk. Evidence shows girls, children with special educational needs and disabilities (SEND) and LGBTQ+ children are at greater risk. Staff must never tolerate or dismiss concerns relating to child-on-child abuse, must not pass it off as 'banter,' just having a laugh' or 'part of growing up' or 'boys being boys.' Staff will be made 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 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;
- recognising the escalatory nature of misogyny and the benefits of early identification to support their approach to minimising the risk of HSB, sexual harassment and sexual violence; and
- taking a safeguarding approach in response to all incidents involving the sharing of nude or semi-nude images, regardless of whether they are consensual or non-consensual. All such incidents require a safeguarding response, with a proportionate approach that considers the age, development, and circumstances of the children involved, as well as any elements of coercion, exploitation or vulnerability.

We recognise that whilst **any** report of sexual violence or sexual harassment should be taken seriously, our staff will be made aware it is more likely that girls will be the victims of sexual violence and sexual harassment and more likely it will be perpetrated by boys. Children with disabilities are also three times more likely to be abused than their peers. Our staff will also understand that we accept that child-on-child abuse may be happening in our schools even if it is not being regularly reported by children and young people. We encourage all staff and students to report any concerns they may have regarding child-on-child abuse. We will also utilise the search and confiscation guidance produced by the DfE. Searching, screening and confiscation in schools - GOV.UK

The Trust has clear procedures that are followed by each school when investigating child-on-child abuse, see Appendix 10. We recognise the need for a robust approach to investigating and supporting victims of child-on-child abuse.

7.15 Mental Health

We recognise 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. We will liaise with appropriately trained staff to make a diagnosis of a mental health difficulties, using clear processes for identifying potential difficulties. We will make use of advice and guidance published by the Government to help us determine needs and actions, in line with local authority guidelines.

If staff have a mental health concern about a child that is also a safeguarding concern, immediate action should be taken, following our child protection and Safeguarding Policy.

We will ensure, through training that staff, volunteers, and governors will have an understanding of the range of child-on-child abuse, including sexual violence and sexual harassment, and will be made aware of how to recognise and manage such issues. Staff will be given the skills to identify and manage harmful sexual behaviour using resources such as the Brook Traffic Light Tool. Staff should be aware that some groups are potentially more at risk, for example girls, children with SEND and LGBTQ+ children.

Staff should be aware that such incidents and/or behaviours can be associated with factors outside the school and can occur between children outside the school. Staff, and particularly the DSLs, should always consider the context in which such incidents and/or behaviours occur.

Where the abuse is physical, verbal, bullying or cyber-bullying, recording of such incidents and sanctions will be applied in line with our Behaviour and Anti-Bullying policies. Where a child discloses safeguarding allegations of a sexual nature against another student in the same setting, the DSL

should refer to the West Midlands Safeguarding Children procedures website (section 2.1) and seek advice from the Children's Referral Portal or Community Social Worker before commencing its own investigation or contacting parents/carers. This may mean, on occasions, that the individual school is unable to conduct its own investigation into such incidents. All such incidents will be recorded using our child protection recording forms. The schools within Four Stones Gateway Trust use the protocols outlined in appendix 10 to investigate incidents.

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

Depending on the nature of abuse, the schools may need to consider providing measures to protect and support the victim, the alleged perpetrator, and other students and/or staff in the school by means of a risk assessment. The risk assessment should be recorded and kept under review.

A range of advice will be accessed to support children and young people with mental health concerns, including the use of outside agencies. We will also include opportunities in the curriculum, specifically through personal, social, and health education (PSHE/Ethics).

Each school within the Trust has a designated mental health lead and staff are trained in basic mental health. The Trust has a clear set of protocols and procedures, which all schools follow, as to how to refer and support children and young people with mental health concerns. Mental Health First Aiders are identified in school through wearing a green lanyard.

7.16 Children potentially at greater risk of harm - Children who need a social worker (Child in Need and Child Protection Plans)

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

Local authorities should share the fact a child has a social worker, and the DSLs should hold and use this information so that decisions can be made in the best interests of the child's safety, welfare, and educational outcomes. This should be considered as a matter of routine. There are clear powers to share this information under existing duties on both local authorities and schools to safeguard and promote the welfare of children.

Where children need a social worker, this should inform decisions about safeguarding (for example, responding to unauthorised absence or missing education where there are known safeguarding risks) and about promoting welfare (for example, considering the provision of pastoral and/or academic support, alongside action by statutory services).

Findings from the Children in Need review 'Improving the educational outcomes of Children in Need of help and protection' contains further information; the conclusion of the review, 'Help, protection, education' sets out action Government is taking to support this.

7.17 Children Questioning Their Gender

Our Trust schools recognise that some children and young people may question their gender identity, gender expression, or how they relate to societal expectations associated with sex and gender.
We will not initiate any action to make changes or put support in place to facilitate a child presenting as the opposite biological sex (known as "social transition") unless a child's parent or carers have been involved in the decision (except when involving them would increase risk to the child).

Keeping Children Safe in Education (part 2), including if a Designated Safeguarding Lead Response is required will be followed relating to:

- Sport

- Regulations and safeguarding requirements relating to school premises
- Boarding and residential accommodation (including educational visits)
- Children who are questioning their gender.

Staff are expected to report the following to the Designated Safeguarding Lead:

- a child requests changes or support for social transition and their parent or carer is not aware or already involved in the decision.
- a child has confided in a staff member, or it is known that they are questioning their gender but have not made a request for changes and the staff member has concerns for the child's safety or wellbeing (if there are no safeguarding concerns, there is no reason to report to the DSL)
- a parent or carer requests changes or support for social transition and there are concerns for the child's safety or wellbeing.

Children who are questioning their gender can sometimes be targeted by other children. In some cases, a child who is perceived by other children or adults to be engaging or behaving in ways that are less typically associated with their sex can be just as vulnerable.

Our Trust schools are committed to providing a safe, inclusive, and respectful environment for all students. Policies and practices will seek to avoid unnecessary gender stereotyping while ensuring that safeguarding, welfare, and educational needs remain the primary consideration in all decision-making.

8. Racist Incidents

8.1 Our Policy on racist incidents is set out in the Equality Policy and acknowledges that repeated racist incidents or a single serious incident may lead to consideration under child protection procedures. We maintain a log of racist incidents in school and follow hate relating incident reporting processes. All staff recognise racism, faith-based prejudice, and other discrimination as harm in its own right and understand that racism and faith-targeted abuse can significantly affect a child's welfare.

9. Anti-Bullying

9.1 The anti-bullying Policy forms part of our Behaviour Policy and acknowledges that to allow or condone bullying may lead to consideration under child protection procedures. All incidences of bullying, including cyber-bullying, consensual and non-consensual sharing of nudes and semi-nudes images and/or videos, racist, homophobic, and gender-related bullying, will be dealt with in accordance with our anti-bullying Policy. We recognise that children with special needs and/or disabilities are more susceptible to being bullied. We maintain a log of bullying incidents in each school.

9.2 We recognise that there will be occasions when bullying incidents will fall within child protection procedures or may be deemed criminal activity and that it may be necessary to report the concerns to the Children's Referral Portal or to the Police.

10. Safeguarding children with medical conditions

We recognise the importance of ensuring early support for children with medical conditions to ensure that their welfare is promoted and they are effectively safeguarded.

We support children with medical conditions, including allergies and mental health needs through clear school arrangements that promote their health, safety and inclusion. Relevant information is obtained from parents and carers, recorded accurately, shared with appropriate staff on a need-to-know basis, and reviewed when needs change. Staff follow agreed procedures and relevant staff complete appropriate training for:

- managing allergies and dietary requirements, including ensuring safer eating,
- maintaining first aid arrangements and responding to medical incidents
- administering medicines (where necessary),

Where appropriate and proportionate individual health care plans and children's education is adapted to ensure we effectively support children with medical conditions. This may also be in place alongside support provided as part of a child's special education need or disability.

Further details as to our procedures for children with medical conditions are outlined in our:

- Supporting pupils with medical conditions policy that is in line with Supporting pupils with medical conditions at school - GOV.UK and Early years foundation stage (EYFS) statutory framework - GOV.UK
- Allergy Safety Policy that is in line with Allergy safety in schools - GOV.UK

Where there are concerns that a child's medical needs are not being effectively managed or responded to or indicate risk of suffering abuse, neglect, exploitation and/or harm (whether from parents/carers or other people outside of their family including staff); staff are expected to adhere to our procedures for reporting a concern.

11. Children under 5, particularly babies and those not yet born

Children under 5 years of age are particularly vulnerable to abuse and neglect. Babies (under the age of 1 including those not yet born) are more vulnerable to experiencing serious harm in certain circumstances.

Where our schools have nursey provision, we care for children under 5, including babies under the age of 1, we follow the Early Years Foundations Stage Statutory Framework.

We consider the safety and welfare of every child within a family; even if they do not attend our school/setting (see Safeguarding all children and Working in Partnership). As such, we ensure that we are alert to families who are pregnant and/or have children under the age of 5, including paying attention to any indications that children in this group may be at risk.

Where concerns about children in this group arise; staff are expected to adhere to this policy. Designated Safeguarding Leads will ensure they refer to specific regional procedures as applicable including:

- Pre-Birth
- Bruising in Babies and Children

12. Online Safety (including filtering and monitoring)

12.1 Online safety is a safeguarding issue and forms an integral part of our whole-school safeguarding approach. Online safety considerations run through all aspects of school life and may be relevant whenever a safeguarding concern is identified. All staff and DSLs understand the unique risks (content, contact, conduct and commerce as outlined in KCSiE) associated with online safety and have the relevant knowledge and up to date capability required to keep children safe whilst they are online at school. DSLs are also aware of the safety expectations Generative AI: product safety expectations guidance and how to ensure our filtering and monitoring requirements apply to using generative AI within education. DSLs recognise that AI has the potential to facilitate abuse and/or expose students to harmful content. They also support us in reviewing our filtering and monitoring provision annually.

12.2 The DSLs are able to recognise the additional risks that children with SEN and disabilities (SEND) face online, for example from online bullying, grooming and radicalisation and have the capability to support SEND children to stay safe online.

12.3 All members of staff are trained in and receive regular updates in online safety (including filtering and monitoring) and recognising and reporting concerns. Staff will be alert to online safety risks and indicators of harm, including:

- exposure to misinformation, disinformation (including fake news) and conspiracy theories that may cause harm or contribute to radicalisation, prejudice or unsafe decision-making;
- risks of financial exploitation including phishing, scams, coercive online financial activity and the targeting of children through gaming and social media platforms;
- online safety concerns occurring outside school, including through the use of personal devices, gaming platforms, messaging services and social media. Concerns identified in school will be responded to in line with safeguarding procedures regardless of where the activity took place;
- online behaviour that may indicate abuse, neglect, exploitation, child-on-child abuse, coercive control, radicalisation, criminal exploitation, sexual exploitation or mental health concerns; and
- risks associated with AI-generated content, including deepfakes, manipulated imagery, misinformation, impersonation and AI-generated nude or semi-nude images.

- the guidance relating to use of screens with early years children. We follow Help for early years providers: Screen use

12.4 The IT Acceptable Use Policy recognises that internet safety is a whole school responsibility (staff, students, governors, trustees, and parents/carers).

12.5 Children and young people may expose themselves to danger, whether knowingly or unknowingly, when using the internet and other technologies. Additionally, some young people may find themselves involved in activities which are inappropriate or possibly illegal.

12.6 We therefore recognise our responsibility to educate our students, teaching them the appropriate behaviours and critical thinking skills to enable them to remain both safe and legal when using the internet and related technologies.

12.7 We will ensure that filters are in place to prevent access to unsuitable sites, and we will monitor the use of the school network and internet to ensure that any student or staff member attempting to access inappropriate, abusive, or harmful material is appropriately advised and/or supported.

12.8 Whilst it is essential that appropriate filters and monitoring systems are in place, the central team will be careful that "over blocking" does not lead to unreasonable restrictions as to what children and young people can be taught with regard to online teaching and safeguarding.

12.9 We will treat any use of AI to access harmful content or to bully other students in line with this policy, the behaviour policy and the anti-bullying policy.

12.10 We also recognise that children and young people can also abuse other children and young people online, this can take the form of abusive, harassing, and misogynistic/misandrist messages, the non-consensual making or sharing of nudes or semi-nudes, especially around chat groups, and the sharing of abusive images and pornography to those who do not want to receive such content. Any concerns as outlined above will be shared with DSL.

12.11 **Mobile phones**

Our Trust schools are mobile phone-free environment by default; anything other than this should be an exception, eg for medical reasons. Mobile phones in schools - GOV.UK

We ensure our acceptable use and behaviour policy includes that students do not have access to their mobile phone throughout the school day including during lessons, the time between lessons, breaktimes and lunchtime.

Each school has a set of procedures outlining the processes for ensuring mobile phones are not accessible during the school day.

13. Supporting Children

13.1 We recognise that children who are abused or witness violence may find it difficult to develop a sense of self-worth. They may feel helplessness, humiliation, and some sense of blame.

13.2 We acknowledge that our schools may be the only stable, secure, and predictable element in the lives of children who have been abused or who are at risk of harm.

13.3 We are aware that research shows that at school their behaviour may be challenging and defiant or they may be withdrawn.

13.4 The schools will endeavour to support all children by:

- encouraging self-esteem and self-assertiveness through the curriculum, as well as promoting respectful relationships, challenging bullying, and humiliating behaviour.
- promoting a positive, supportive, and secure environment giving students a sense of being valued.
- consistently applying school behaviour Policy which is aimed at supporting vulnerable students. The school will ensure that the student knows that some behaviour is unacceptable but that they are valued and not to be blamed for any abuse which has occurred.

- liaising with other agencies that support the student such as the local authority Children's Social Care, Child, and Adult Mental Health Service (CAMHS), Educational Psychology Service and those agencies involved in the safeguarding of children.
- using Family Help Services, through Compass, when appropriate.
- notifying the local authority Children's Social Care immediately there is a significant concern; and
- providing continuing support to a child about whom there have been concerns about who leaves the school by ensuring that appropriate information is forwarded under confidential cover to the child's new setting.

14. Children Looked After (CLA) and Previously Children Looked After (PCLA)

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

14.2 We recognise that a previously child looked after potentially remains vulnerable and therefore ensure that all staff have the skills, knowledge and understanding to keep previously looked after children safe.

14.3 Our designated teachers for children looked after and previously children looked after have the appropriate training and the relevant qualifications and experience of working with this group of children.

14.4 The DSLs will obtain details of the local authority Personal Adviser appointed to guide and support each care leaver and will liaise with them as necessary regarding any issues of concern affecting the care leaver.

15. Special Educational Needs and Disability (SEND)

15.1 We recognise that children with special educational needs and disabilities can face additional safeguarding challenges, and these are discussed in staff training. These additional barriers can include:

- assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's disability without further exploration.
- being more prone to peer group isolation than other children.
- children with SEND being disproportionally impacted by behaviours such as bullying without outwardly showing any signs.
- communication barriers and difficulties in overcoming these barriers; and
- cognitive understanding – being unable to understand the difference between fact and fiction in online content and the repeating the content/behaviours in school or the consequences of doing so.

15.2 We will always consider extra pastoral support for children with SEND to address these additional challenges.

16. Restrictive Interventions including the Use of Reasonable Force

16.1 The Trust procedures regarding positive handling are set out in our Restrictive Interventions including the Use of Reasonable Force Policy and acknowledges that staff must only ever use physical intervention as a last resort, and that at all times it must be the minimal force necessary to prevent injury or damage to property.

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

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

16.4 Staff who are likely to need to use physical intervention will be appropriately trained in the Team Teach technique, or equivalent.

16.5 All incidences of physical intervention will be recorded in accordance with the recommended Team Teach or equivalent procedures.

16.6 We recognise that touch is appropriate in the context of working with children and all staff have been given 'safe working practice' guidance to ensure they are clear about their professional boundaries.

16.7 We recognise that the adoption of a 'no contact' Policy could leave staff unable to fully support and protect our students.

17. School Exclusion

17.1 Each school within the Trust takes steps to safeguard students where they have had to be excluded. from school. For example, we may ask a student to remain on the school site to serve their exclusion rather than be sent home if we have concerns relating to the home environment or their safety. We actively encourage parents/carers to remove any digital device whilst their child is serving an exclusion to reduce the potential risks online.

Where appropriate we would work with other agencies such as children's social care and the police as appropriate, to make sure children who are not in school are safe.

18. Alternative Provision

18.1 Occasionally, schools may have to engage with alternative providers to support children and young people. We recognise that those who attend an alternative provision often have complex needs and this may lead to additional risks of harm, which our children and young people may be vulnerable to. We use alternative provision as a last resort and ensure all safeguarding checks are carried out before a provision is used.

Whilst a child or young person attends an alternative provision their attendance is checked on a daily basis and half termly visits are carried out by the home school and half termly monitoring reports are provided by the provision. Parents/carers are invited to regular meetings, usually held at the alternative provision venue. Whilst a child attends the alternative provision it continues to be the school's responsibility for the safeguarding of their student, and our schools should ensure they are satisfied that the placement meets the student's needs.

Please refer to our Alternative Provision Policy for further information and guidance.

19. Record Keeping

19.1 Any member of staff receiving a disclosure of abuse from a child or young person, or noticing signs or symptoms of possible abuse, will make notes as soon as possible without delay, writing down exactly what was said, using the child's own words as far as possible. All notes should be timed, dated, and signed, with name printed alongside the signature. Concerns will be recorded using My Concerns. For staff or visitors who do not have access to My Concerns will complete the form found in Appendix 1 and pass to the DSL without delay.

19.2 All records of a child protection nature will be passed to the DSL in the host school including case conference or core group minutes, child protection plans and written records of any concerns. Child protection records are kept securely under lock and key, or password protected, with only appropriate people having access to them.

19.3 Any referrals made to other agencies, including referrals to the local authority Children's Social Care services, will be copied prior to sending and stored in the child's child protection file.

19.4 The DSLs will ensure that all records will include a clear and comprehensive summary of the concern, details of how the concern was followed up and resolved and a note of any action taken, decisions reached and the outcome.

19.5 The DSLs will maintain and regularly audit the school's child protection records, ensuring that each stand-alone file includes a chronology of significant events, and that information and contact details are accurate and up-to-date.

19.6 The DSLs will transfer the child protection record in a safe and timely manner (usually within 5 working days) when a child moves school, ensuring receipt of transfer is obtained.

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

19.8 The headteacher will be kept informed of any significant issues by the DSL. The CEO will also be kept informed where there are concerns related to the Trust Executive and Central Teams.

20. Information Sharing, Confidentiality and GDPR

20.1 Information sharing is vital in identifying and tackling all forms of abuse, neglect, and exploitation, and in promoting children's welfare, including their educational outcomes. We will share, hold, and use information for these purposes where appropriate to do so.

20.2 All personal information will be processed fairly and lawfully in line with our duties and will be held safely and securely. However, The Data Protection Act 2018 and UK GDPR do not prevent or limit the sharing of information for the purposes of keep children safe and we therefore recognise that this is not a barrier to sharing information where the failure to do so would result in a child being placed at risk of harm.

20.3 We recognise that all matters relating to child protection are confidential.

20.4 The Headteachers or DSLs will disclose any information about a student to other members of staff on a need-to-know basis only.

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

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

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

20.8 Data protection law is not a barrier, but it is a system of checks and balances to be borne in mind when recording, sharing, and retaining vital but sensitive data.

- All schools have an appointed Data Protection Lead who is responsible for guiding the CEO/headteacher on data protection matters.
- DSL/DDSL who manage My Concerns should be aware of the content of UK GDPR in order to oversee how the school is complying with data protection legislation.
- Staff who influence how data is used, processed, and secured should be aware of lawful reasons for processing data and minimising risks.
- All staff should be aware of what personal data is, how it can be used, and any risks involved.

21. Communication with Parents/Carers

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

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

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

22. Supporting and Supervision of Staff

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

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

22.3 We will enable supervision for the DSLs through network meetings, direct consultation with the Safeguarding in Education Adviser or Consultant Social Workers and half termly supervision meetings with a clinical psychologist in order to promote best practice and challenge unsatisfactory or poor practice.

22.4 In order to reduce the risk of allegations being made against staff, and ensure that staff are competent, confident, and safe to work with children, they will be made aware of safer working practice guidance and will be given opportunities in training to develop their understanding of what constitutes safe and unsafe behaviour.

23. Safer Recruitment and Selection of Staff

23.1 The Trust has a written recruitment and selection Policy and procedures linking explicitly to this Policy, KCSiE and the EYFS Part 3. The statement is included in all job advertisements, publicity material, recruitment websites, and candidate information packs.

23.2 The Trust's recruitment process is robust in seeking to establish the commitment of candidates to support the school's measures to safeguard children and to identify, deter or reject people who might pose a risk of harm to children or are otherwise unsuited to work with them.

23.3 References are requested and scrutinised for all candidates prior to interview, and any discrepancies or concerns are raised and discussed during interview, including for any volunteers. References are always requested directly from the referee and verified as being from a senior person with appropriate authority; electronic references are checked to ensure they originate from a legitimate source. Where specific questions have not been answered satisfactorily or insufficient information is provided, the referee will be contacted directly for further clarification. Where references are not forthcoming, despite reminders, the candidate will be asked to provide an alternative referee. References are not usually required for internal candidates as they often lead to a conflict of interests, and the line managers are involved in the interviews.

23.4 All staff working within our schools who have substantial access to children have been checked as to their suitability, including verification of their identity, two satisfactory references, medical clearance, qualifications and a satisfactory barred list check, enhanced DBS check and a right to work in the UK. Shortlisted candidates are also informed that online searches may also be carried out as part of our due diligence checks.

23.5 All teachers working within our schools have been checked using the Teacher Services website to ensure they have been awarded QTS (or EYFS equivalent), they have completed their teacher induction and that there are no prohibitions, sanctions or restrictions in place that might prevent them from taking part in certain activities or working in specific positions, e.g. management posts.

23.6 The schools seek written assurance from supply and third-party agencies, alternative providers, initial teacher training providers and contractors that they have undertaken all appropriate checks on any of their staff that work with or have regular contact with our students.

23.7 Our members and trustees are not working in regulated activity and so are subject to an enhanced DBS check without barred list check. They have also been checked to ensure they are not disqualified from holding office under a section 128 direction. Our governors are considered to be working in regulated activity as they take part in regular reviews of the relevant school, and these reviews include unsupervised sessions with students. Therefore, they are subject to an enhanced DBS check with barred list check and have also been checked to ensure they are not disqualified from holding office under a section 128 direction.

23.8 The schools maintain a single central record of recruitment checks for audit purposes.

23.9 Any member of staff working in regulated activity prior to receiving a satisfactory DBS check will not be left unsupervised and will be subject to a risk assessment.

23.10 In accordance with KCSIE guidelines, the Trust will ensure that all regular volunteers (defined as those volunteering 3+ days in a 30-day period) and those joining overnight residential trips undergo a mandatory Enhanced DBS check with children's barred list information prior to commencing their role.

For occasional or one-off volunteers who are not in regulated activity and remain fully supervised at all times, the school will undertake a formal, written risk assessment to determine whether an Enhanced DBS check (without a barred list check) is required. Under no circumstances will a volunteer who has not undergone any background checks be left unsupervised with children.

23.11 Staff, Trustees and governors involved in the recruitment of staff (including administration) need to read Part 3 of KCSiE.

24. Allegations Against Staff

24.1 We acknowledge that a student may make an allegation against a member of staff or volunteer.

If such an allegation is made, which meets the criteria as identified in Keeping Children Safe in Education, the member of staff receiving the allegation will immediately inform the Headteacher, unless the allegation concerns the Headteacher, in which case the CEO will be informed immediately. The CEO will inform the Chair of the Local Academy Board. If the allegation concerns a member of the Trust's executive or central team, the CEO will be informed immediately. If the allegation concerns the CEO, the Chair of the Trust Board will be informed immediately.

24.2 For allegations concerning the Headteachers or any member of the MAT's executive or central teams, the CEO will discuss the content of the allegation with the LADO, prior to undertaking any investigation using the HR Guidance 'Allegations of Abuse against Teachers and other Staff'. For allegations concerning the CEO, the Chair of the Trust Board will discuss the content of the allegation with the LADO, prior to undertaking any investigation using the HR Guidance 'Allegations of Abuse against Teachers and other Staff.' For all other allegations, the Headteachers will discuss the content of the allegation with the LADO, prior to undertaking any investigation using the HR Guidance 'Allegations of Abuse against Teachers and other Staff.'

24.3 The schools will follow the DfE, West Midlands Safeguarding Children and SSCP procedures for managing allegations against staff Shropshire Safeguarding Community Partnership. Allegations about staff/volunteers

24.4 The case manager will be guided by the LADO in all matters relating to the case, including suspension, sharing of information and any follow-up investigation.

24.5 Concerns that do not meet the harm threshold, 'low level' concerns will still be reported as outlined above and investigated promptly and appropriately. It is crucial that these concerns are dealt with effectively as it may build part of a 'wider picture' of concern but will also protect those working on our schools from potentially false allegations and misunderstandings. A 'low level' concern does not mean it is insignificant; it means that the behaviour towards a child does not meet the threshold set out in KCSiE.

24.6 Supply teachers: In some circumstances our schools will have to consider an allegation against an individual not directly employed by them, where its disciplinary procedures do not fully apply, for example, supply teachers provided by an employment agency or business (referred to in this section as 'the agency').

Whilst our schools are not the employers of supply teachers, they will ensure allegations are dealt with properly. In no circumstances will our schools decide to cease to use a supply teacher due to safeguarding concerns, without finding out the facts and liaising with the LADO to determine a suitable outcome. The Headteachers will discuss with the supply agency whether it is appropriate to suspend the supply teacher, or redeploy them to another part of the school, whilst they carry out their investigation.

Supply agencies should be fully involved and co-operate in any enquiries from the LADO, Police and/or the local authority Children's Social Care. Our schools will usually take the lead because agencies do not have direct access to children or other school staff, so they will not be able to collect the facts when an allegation is made, nor do they have all the relevant information required by the LADO as part of the referral process. Supply teachers, whilst not employed by the schools, are under the supervision, direction, and control of the Headteachers when working in their school. They should be advised to contact their trade union representative if they have one, or a colleague for support. The allegations management meeting which is often arranged by the LADO should address issues such as information sharing, to ensure that any previous concerns or allegations known to the agency are taken into account by the school during the investigation.

When using an agency, our schools will inform the agency of its process for managing allegations. This should include inviting the agency's human resource manager or equivalent to meetings and keeping them up to date with information about its policies.

25. Abuse of Position of Trust

25.1 We recognise that as adults working in the Trust, we are in a relationship of trust with students in our care and acknowledge that it could be considered a criminal offence to abuse that trust. Any form of sexual contact between a member of staff, including volunteers, and any student over the age of 18, will be dealt with under disciplinary procedures as set out in our Staff Code of Conduct.

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

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

25.4 Where we receive an allegation relating to an incident that happened when an individual or organisation has used any of the facilities within our schools, eg community groups or extra-curricular activities, we will follow our Safeguarding Policy and procedures, including informing the LADO.

26. Complaints or Concerns Expressed by Students, Parents/Carers, Staff or Volunteers

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

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

27. Whistleblowing (Confidential Reporting)

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

27.2 All staff should be aware of their duty to raise concerns, where they exist, about the attitude or actions of colleagues using the Trust's confidential reporting (Whistleblowing) Policy.

27.3 Whistleblowing concerns should be dealt with according to the Whistleblowing Policy and Procedure.

27.4 Staff will be made aware that if they feel unable to raise a child protection failure internally, they can contact the NSPCC whistleblowing helpline.

28. Low Level Concerns and how to report them

28.1 Low level concerns about a member of staff will always be recorded. If there are concerns about Supply Staff or Contractors, these should be reported to their employer to ensure that any pattern of inappropriate behaviour can be identified. Staff are also encouraged to feel confident to self-refer if they feel that they have been in a situation which could be misinterpreted as being compromising or if they feel that they may have behaved in a way that falls below the expected standards of professionalism.

All low-level concerns should be recorded in writing. The record should include details of the concern, the context in which the concern arose, and action taken. The name of the individual sharing their concerns should also be noted, if the individual wishes to remain anonymous then that should be respected as far as reasonably possible. Records will be retained by the Headteacher and will review regularly so that potential patterns of concerning behaviour can be identified. Should the level of concern reach the harms threshold the case will be referred to the LADO. Records will be retained until the individual ceases to be employed in the school.

29. Photography and Use of Images (including handheld devices)

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

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

29.3 Many students own or have access to handheld devices and parents/carers are encouraged to consider measures to keep their children safe when using the internet and social media at home and in the community.

30. Staff/Student Relationships

30.1 The school provides advice to staff regarding their personal online activity and has strict rules regarding online contact and electronic communication with students (Acceptable Use Policy). Staff found to be in breach of these rules may be subject to disciplinary action or child protection investigation.

31. Health & Safety

31.1 Our Trust Health & Safety Policy reflects the consideration we give to the safeguarding of our children both within the school environment and when away from the school, for example when undertaking school trips and visits.

31.2 Risk Assessments are undertaken and reviewed regularly, in respect of site security, risk of children being drawn into terrorism or exposed to extremist behaviour, risk to and from children displaying harmful behaviour.

32. Safe Environment

32.1 The schools undertake appropriate risk assessments and checks in respect of all equipment and of the building and grounds in line with local and national guidance and regulations concerning health and safety.

32.2 The schools have adequate security arrangements in place in respect of the use of its grounds and buildings by visitors both in and out of school hours.

Where a school rents out its facilities, any services or activities that are provided by the school, under the direct supervision or management of the school staff, the school's arrangements for child protection will apply. However, where services or activities are provided separately by another body this will not necessarily be the case and the school, through the external provider, will seek assurance that the body concerned has appropriate safeguarding and child protection policies and procedures in place (including inspecting these as required).

32.3 Visitors to the schools, for example visiting speakers, theatre groups or curriculum specialists, will be appropriately checked and vetted, to ensure they are not linked to extremist groups or promoting extremist or other harmful material.

33. Private Fostering Arrangements

33.1 A private fostering arrangement occurs when someone other than a parent or a close relative cares for a child for a period of 28 days or more, with the agreement of the child's parents. It applies to children under the age of 16 or aged under 18 if the child is disabled. Children looked after by the local authority or who are placed in a residential school, children's home or hospital are not considered to be privately fostered.

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

33.3 Most privately fostered children remain safe and well, but safeguarding concerns have been raised in some cases, so it is important that schools are alert to possible safeguarding issues, including the possibility that a child has been trafficked into the country.

33.4 By law, a parent, private foster carer, or other persons involved in making a private fostering arrangement must notify the local authority Children's Social Care as soon as possible.

33.5 If we become aware of a privately fostering arrangement, we will check that the local authority Children's Social Care have been informed.

34. Challenge and Escalation

34.1 We recognise that professional disagreements may arise between any agencies and resolving problems is an integral part of co-operation and joint working to safeguard children.

34.2 As part of our responsibility for safeguarding children, we acknowledge that we must be prepared to challenge each other if we feel that responses to concerns, assessments or the way in which plans are implemented are not safeguarding the child and promoting their welfare.

34.3 We are aware of the SSCP for raising concerns in respect of poor practice and recognise our responsibility to utilise these as and when necessary, in the interests of safeguarding and promoting the welfare of children.

35. Monitoring and Evaluation

35.1 Our Safeguarding Children Policy and procedures will be monitored and evaluated by each school through:

- completion of the internal annual safeguarding audit and biannual external audit.
- completion and return to the LA of the annual safeguarding report to the Trust Board and Local Academy Board.
- student surveys and questionnaires.
- discussions with children and staff.
- scrutiny of data and risk assessments.
- scrutiny of the school's single central record of recruitment checks.
- scrutiny of Trust Board and Local Academy Board minutes.
- monitoring of logs of bullying/racist/behaviour incidents and PPI records.

- supervision of staff involved in child protection; and
- case file audits undertaken by the DSL.

36. Other Relevant Policies

36.1 The Trust Board's statutory responsibility for safeguarding the welfare of children goes beyond basic child protection procedures.

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

- Working at Four Stones Gateway Trust
- Staff Code of Conduct
- Safer recruitment policy
- Allegations of Abuse against Teachers and other Staff
- Complaints Procedure
- Behaviour Policy (including use of mobile phones)
- Restrictive Interventions including the Use of Reasonable Force Policy
- Special Educational Needs Policy
- Trips and Visits Policy
- Health and Safety Policy
- Intimate Care Policy
- Relationships and Sex Education Policy
- Photographic Images of Students Policy
- Attendance policy
- Online safety/acceptable use policy
- Equality Policy
- Whistleblowing Policy
- Data protection guidance
- Administration of first aid/medicines
- Allergy Policy

Each individual school in the Trust will have school specific policies that should also be referred to.

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

37.0 Contacts

External	Shropshire First Point of Contact Non-urgent concerns	Tel : 03456789021 Children's Referral Portal
	Shropshire Emergency Social Work Team	Tel: 03456789040
	Shropshire LADO	Tel : Through FPOC 03456789021 Email : Lado@shropshire.gov.uk
	Shropshire Safeguarding and Child Protection Leads:	Sarah Kynaston: **Senior Education Quality Advisor for Early Years and Safeguarding** Email: Sarah.Kynaston@shropshire.gov.uk Charlotte Percival: **Safeguarding Officer (Early Years)** Email: Charlotte.Percival@shropshire.gov.uk Tel: 01743254147 Emma Harding: **Safeguarding Officer (Schools)** Email: Emma.Harding-Safeguarding@shropshire.gov.uk Tel: 01743 257929
	Police-Prevent team: DS Matt Gibbons DS Matthew Dyson Paul Kinsella (WCC)	Email: matthew.gibbons@westmercia.police.uk or matthew.gibbons@westmidlands.police.uk Email: matthew.dyson@westmidlands.police.uk Prevent advice line: 0800 011 3764 See also slide 7 in link
	Ofsted	Tel: 0300 123 1231
	Childline	Tel: 0800 1111
	Women's Aid (24hr. Helpline)	Tel: 0800 980 3331
	West Mercia Rape and Sexual Abuse Support Centre (WMRSASC)	Tel: 01905 724514

APPENDIX 1

My Concern has a variety of videos to support users at different levels. This Trusted User 13 min video provides the basic overview, including logging a concern. Please as the DSL for further information: MyConcern - Trusted User MyConcern Briefing (2024) | Videos & Movies on Vimeo

APPENDIX 2
Recognition & Identification of Abuse

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

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

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

Emotional abuse is difficult to:
- Define.
- identify/recognise; and
- prove.

Emotional abuse is chronic and cumulative and has a long-term impact. Indicators may include:
- physical, mental, and emotional development lags.
- sudden speech disorders.
- continual self-depreciation ('I'm stupid, ugly, worthless, etc.').
- overreaction to mistakes.
- extreme fear of any new situation.
- inappropriate response to pain ('I deserve this').
- unusual physical behaviour (rocking, hair twisting, self-mutilation) - consider within the context of any form of disability such as autism.
- extremes of passivity or aggression.
- children suffering from emotional abuse may be withdrawn and emotionally flat. One reaction is for the child to seek attention constantly or to be over-familiar. Lack of self-esteem and developmental delay are again likely to be present.
- babies – feeding difficulties, crying, poor sleep patterns, delayed development, irritable, non-cuddly, apathetic, non-demanding.
- toddler/Pre-School – head banging, rocking, bad temper, 'violent,' clingy. From overactive to apathetic, noisy to quiet. Developmental delay – especially language and social skills.
- school age – Wetting and soiling, relationship difficulties, poor performance at school, non-attendance, antisocial behaviour. Feels worthless, unloved, inadequate, frightened, isolated, corrupted, and terrorised.
- adolescent – depression, self-harm, substance abuse, eating disorder, poor self-esteem, oppositional, aggressive, and delinquent behaviour.
- child may be underweight and/or stunted;

- child may fail to achieve milestones, fail to thrive, experience academic failure or under achievement; and
- also consider a child's difficulties in expressing their emotions and what they are experiencing and whether this has been impacted on by factors such as age, language barriers or disability.

NEGLECT

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

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

Neglect can often fit into six forms which are:

- medical – the withholding of medical care including health and dental.
- emotional – lack of emotional warmth, touch, and nurture.
- nutritional – through lack of access to a proper diet which can affect in their development.
- educational – failing to ensure regular school attendance that prevents the child reaching their full potential academically.
- physical – failure to meet the child's physical needs; and
- lack of supervision and guidance – meaning the child is in dangerous situations without the ability to risk assess the danger.[1]

Common Concerns:

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

- the child's development in all areas including educational attainment.
- cleanliness.
- health.
- children left at home alone and accidents related to this.
- taking on unreasonable care for others; and
- young carers.

[1] Source: Horwath, J (2007): Child neglect: identification and assessment: Palgrave Macmillan

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

- poor health, including mental health or mental illness.
- disability, including learning difficulties.
- substance misuse and addiction; and
- domestic violence.

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

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

Here are some signs of possible neglect:

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

Behavioural signs:
- no social relationships.
- compulsive scavenging.
- destructive tendencies.
- if they are often absent from school for no apparent reason.
- if they are regularly left alone, or in charge of younger brothers or sisters.
- lack of stimulation can result in developmental delay, for example, speech delay, and this may be picked up opportunistically or at formal development checks.
- craving attention or ambivalent towards adults or may be very withdrawn.
- delayed development and failing at school (poor stimulation and opportunity to learn); and
- difficult or challenging behaviour.

PHYSICAL ABUSE

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

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

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

Physical signs:
- bald patches.
- bruises, black eyes and broken.
- untreated or inadequately treated injuries.

- injuries to parts of the body where accidents are unlikely, such as thighs, back, abdomen; and
- scalds and burns.

General appearance and behaviour of the child may include:
- concurrent failure to thrive: measure height, weight and, in the younger child, head circumference and
- frozen watchfulness: impassive facial appearance of the abused child who carefully tracks the examiner with his eyes.

Bruising:
- bruising patterns can suggest gripping (finger marks), slapping or beating with an object and
- bruising on the cheeks, head or around the ear and black eyes can be the result of non-accidental injury.

Other injuries:
- bite marks may be evident from an impression of teeth.
- small circular burns on the skin suggest cigarette burns.
- scalding inflicted by immersion in hot water often affects buttocks or feet and legs symmetrically.
- red lines occur with ligature injuries.
- retinal haemorrhages can occur with head injury and vigorous shaking of the baby.
- tearing of the frenulum of the upper lip can occur with force-feeding. However, any injury of this type must be assessed in the context of the explanation given, the child's developmental stage, a full examination, and other relevant investigations as appropriate.
- fractured ribs: rib fractures in a young child are suggestive of non-accidental injury; and
- other fractures: spiral fractures of the long bones are suggestive of non-accidental injury.

Behavioural signs:
- wearing clothes to cover injuries, even in hot weather.
- refusal to undress for gym.
- chronic running away.
- fear of medical help or examination.
- self-destructive tendencies.
- fear of physical contact - shrinking back if touched.
- admitting that they are punished, but the punishment is excessive (such as a child being beaten every night to 'make him study').
- fear of suspected abuser being contacted.
- injuries that the child cannot explain or explains unconvincingly.
- become sad, withdrawn, or depressed.
- having trouble sleeping.
- behaving aggressively or be disruptive.
- showing fear of certain adults.
- having a lack of confidence and low self-esteem.
- using drugs or alcohol.
- repetitive pattern of attendance: recurrent visits, repeated injuries.
- excessive compliance; and
- hyper-vigilance.

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

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

Characteristics of child sexual abuse:

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

In young children behavioural changes may include:

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

In older children behavioural changes may include:

- extreme reactions, such as depression, self-mutilation, suicide attempts, running away, overdoses, anorexia.
- personality changes such as becoming insecure or clinging.
- sudden loss of appetite or compulsive eating.
- being isolated or withdrawn.
- inability to concentrate.
- become worried about clothing being removed.
- suddenly drawing sexually explicit pictures.
- trying to be 'ultra-good' or perfect; overreacting to criticism.
- genital discharge or urinary tract infections.
- marked changes in the child's general behaviour. For example, they may become unusually quiet and withdrawn, or unusually aggressive. Or they may start suffering from what may seem to be physical ailments, but which can't be explained medically.
- the child may refuse to attend school or start to have difficulty concentrating so that their schoolwork is affected.
- they may show unexpected fear or distrust of a particular adult or refuse to continue with their usual social activities.
- the child may describe receiving special attention from a particular adult, or refer to a new, "secret" friendship with an adult or young person.
- children who have been sexually abused may demonstrate inappropriate sexualised knowledge and behaviour; and
- low self-esteem, depression and self-harm are all associated with sexual abuse.

Physical signs and symptoms for any age child could be:

- medical problems such as chronic itching, pain in the genitals, venereal diseases.
- stomach pains or discomfort walking or sitting.
- sexually transmitted infections.
- any features that suggest interference with the genitalia. These may include bruising, swelling, abrasions or tears.
- soreness, itching or unexplained bleeding from penis, vagina, or anus.
- sexual abuse may lead to secondary enuresis or faecal soiling and retention; and

- symptoms of a sexually transmitted disease such as vaginal discharge or genital warts, or pregnancy in adolescent girls.

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

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

Inappropriate Sexual Behaviour can be inappropriate socially, inappropriate to development, or both. In considering whether behaviour fits into this category, it is important to consider what negative effects it has on any of the parties involved and what concerns it raises about a child or young person. It should be recognised that some actions may be motivated by information seeking, but still cause significant upset, confusion, worry, physical damage, etc. it may also be that the behaviour is “acting out” which may derive from other sexual situations to which the child or young person has been exposed.

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

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

Assessment
In order to determine the nature of the incident the following factors more fully should be given consideration.

The presence of exploitation in terms of:
- **Equality** – consider differentials of physical, cognitive, and emotional development, power and control and authority, passive and assertive tendencies.
- **Consent** – agreement including all the following:
    - understanding that is proposed based on age, maturity, development level, functioning and experience.
    - knowledge of society’s standards for what is being proposed.
    - awareness of potential consequences and alternatives.
    - assumption that agreements or disagreements will be respected equally.
    - voluntary decision; and
    - mental competence.

- **Coercion** – the young perpetrator who abuses may use techniques like bribing, manipulation and emotional threats of secondary gains and losses that is loss of love, friendship, etc. Some may use physical force, brutality, or the threat of these regardless of victim resistance.

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

APPENDIX 3
Child Sexual Exploitation (CSE)

Child sexual exploitation is a form of abuse which involves children (male and female, of different ethnic origins and of different ages) receiving something in exchange for sexual activity.

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

The definition and further guidelines can be found in the DfE document Child sexual exploitation - Definition and a guide for practitioners

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

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

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

WARNING SIGNS AND VULNERABILITIES CHECKLIST[2]
The evidence available points to several factors that can increase a child's vulnerability to being sexually exploited. The following are typical **vulnerabilities in children prior to abuse**:

- living in a chaotic or dysfunctional household (including parental substance use, domestic violence, parental mental health issues, parental criminality).
- history of abuse (including familial child sexual abuse, risk of forced marriage, risk of 'honour'-based violence, physical and emotional abuse, neglect, and exploitation).
- recent bereavement or loss.
- gang association either through relatives, peers, or intimate relationships (in cases of gang-associated CSE only).
- attending school with young people who are sexually exploited.
- learning disabilities.
- unsure about their sexual orientation or unable to disclose sexual orientation to their families.
- friends with young people who are sexually exploited.
- homeless.
- lacking friends from the same age group.
- living in a gang neighbourhood.
- living in residential care.
- living in hostel, bed and breakfast accommodation or a foyer.
- low self-esteem or self-confidence; and
- young carer.

[2] The Office of the Children's Commissioner (2012) Interim Report - Inquiry into Child Sexual Exploitation in Group and Gangs.

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

- missing from home or care.
- physical injuries.

- drug or alcohol misuse.
- involvement in offending.
- repeat sexually-transmitted infections, pregnancy, and terminations.
- absent from school.
- evidence of sexual bullying and/or vulnerability through the internet and/or social networking sites.
- estranged from their family.
- receipt of gifts from unknown sources.
- recruiting others into exploitative situations.
- poor mental health.
- self-harm; and
- thoughts of or attempts at suicide.

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

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

The DSL must ensure they are aware of the guidance on Child Sexual Exploitation on the WSCP/Shropshire website: http://www.worcestershire.gov.uk/cms/safeguarding-our-children/child-sexual-exploitation.aspx; Child exploitation | Shropshire Council; Response pathway home | CSA Centre

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

APPENDIX 4

Effects of domestic abuse on children and young people

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

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

- **Physical:** Children and young people can be hurt either by trying to intervene and stopping the violence or by being injured themselves by the abuser. They may develop self-harming behaviour or eating disorders. Their health could be affected, as they may not be being cared for appropriately. They may have suicidal thoughts or try to escape or blank out the abuse by using drugs, alcohol or by running away.
- **Sexual:** There is a high risk that children and young people will be abused themselves where there is domestic abuse. In homes where living in fear is the norm, and situations are not discussed, an atmosphere of secrecy develops, and this creates a climate in which sexual abuse could occur. In addition to this, children and young people may sometimes be forced to watch the sexual abuse of their mother/carer. This can have long-lasting effects on the sexual and emotional development of the child/young person.
- **Economic:** The parent or carer of the child or young person may have limited control over the family finances. Therefore, there might be little or no money available for extra-curricular activities, clothing or even food, impacting on their health and development.
- **Emotional:** Children and young people will often be very confused about their feelings – for example, loving both parents/carers but not wanting the abuse to continue. They may be given negative messages about their own worth, which may lead to them developing low self-esteem. Many children and young people feel guilty, believing that the abuse is their fault. They are often pessimistic about their basic needs being met and can develop suicidal thoughts. Some children and young people may internalise feelings and appear passive and withdrawn or externalise their feelings in a disruptive manner.
- **Isolation:** Children and young people may become withdrawn and isolated; they may not be allowed out to play; and if there is abuse in the home, they are less likely to invite their friends round. Schooling may be disrupted in many ways, and this may contribute to their growing isolation. They may frequently be absent from school as they may be too scared to leave their mother alone. They may have to move away from existing friends and family – e.g. into a refuge or other safe or temporary accommodation.
- **Threats:** Children and young people are likely to have heard threats to harm their mother/father. They may have been directly threatened with harm or heard threats to harm their pet. They also live under the constant and unpredictable threat of violence, resulting in feelings of intimidation, fear, and vulnerability, which can lead to high anxiety, tension, confusion, and stress.

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

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

What you might see in school

- unexplained absences or lateness – either from staying at home to protect their parent or hide their injuries, or because they are prevented from attending school.
- children and young people attending school when ill rather than staying at home.
- children and young people not completing their homework, or making constant excuses, because of what is happening at home.
- children and young people who are constantly tired, on edge and unable to concentrate through disturbed sleep or worrying about what is happening at home.

- children and young people displaying difficulties in their cognitive and school performance.
- children and young people whose behaviour and personality changes dramatically.
- children and young people who become quiet and withdrawn and have difficulty in developing positive peer relations.
- children and young people displaying disruptive behaviour or acting out violent thoughts with little empathy for victims; and
- children and young people who are no trouble at all.

This list is not exhaustive. It is intended to give you an idea of some of the types of behaviour that could be presented.

What schools can do?

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

For many victims, the school might be the one place that they visit without their abusive partner. It would help if schools displayed posters or had cards/pens available with information about domestic abuse and contact details for useful agencies. For example:
- NSPCC **0808 800 5000** and ChildLine **0800 11 11**
- Parent line **0808 800 2222**
- West Mercia Women's Aid 24 hr. helpline: **0800 980 3331**.
- West Mercia Constabulary - Police Domestic Abuse Units 101.

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

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

Improving the self-esteem and confidence of children and young people by:
- offering them opportunities to take on new roles and responsibilities.
- offering tasks which are achievable and giving praise and encouragement.
- monitoring their behaviour and setting clear limits.
- criticising the action, not the person.
- helping them to feel a sense of control in their school lives.
- involving them in decision making.
- helping them to be more assertive.
- respecting them as individuals; and
- encouraging involvement in extra-curricular activities.

From The Expect Respect Education Toolkit – Women's Aid

Advice for schools on receiving notification of a Domestic Abuse incident Background.
Following a call to a domestic abuse incident where children are involved, Police notify the local authority Children's Social Care and Health. A domestic abuse triage meeting takes place each day within the Multi-

Agency Safeguarding Hub (MASH) where the notifications are sorted into low, medium, and high risk, depending on the perceived level of risk to the children. For those cases that are classified medium or high, the school DSL will receive an e-mail via their secure communications system on the Children's Services Portal, from the Children's Referral Portal informing them that an incident has taken place and giving them a copy of the Police log. For high-risk cases, they will also be contacted by telephone and asked whether they have any concerns about the children at school. The local authority Children's Social Care will also inform parents that the notification has been received and shared with other agencies and that the information will be treated confidentially.

School action

On receiving this information, the DSL should:

- Log the information and keep the record alongside other information/concerns that the school has on this child/family, with all other confidential CP records in a secure place. This will allow the school to recognise any pattern and/or frequency of notifications and take appropriate action. Please note that school may receive further communication about this same incident once further assessment of the situation has been undertaken by Police – be careful not to log this as a separate incident.
- Inform any staff of notification on a 'need to know' only basis – e.g. class teacher/form tutor.
- Alert all staff who teach student/student with minimum of information – e.g. 'This student/student may need extra support / may need extra time to complete homework.'
- Monitor student/student behaviour in school (including attendance) and should concerns arise which may be attributed to the impact of the incident, consult with the local authority Children's Social Care through the Children's Referral Portal as the concerns may be significant and lead to new safeguarding action, or to seek advice on how to proceed.
- Provide appropriate support for child, if required – do not question student/student about the incident. Respect the child's decision on whether or not they wish to discuss the situation.
- Provide appropriate support for adult, if asked – e.g. helpline number (0800 980 3331) or website address.

Bear in mind

- Victim of incident may be anxious that the information will be shared inappropriately.
- Notification may not give details as to which parent is the perpetrator/victim – any disclosure to the 'wrong' parent could heighten risk.
- Need to be aware who is 'connected' to the child – e.g. TA/lunchtime supervisor may be child's relative / friend of the family.
- Inappropriate sharing of information could heighten the risk for the victim and/or the child. If in doubt, consult with the Children's Referral Portal

APPENDIX 5

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

Forced Marriage should be recognised as a human rights abuse – and should always invoke child protection procedures within the school. A forced marriage is one entered into without the full and free consent of one or both parties, and where violence, threats or any other form of coercion is used to cause a person to enter into a marriage. Threats can be physical or emotional and psychological. A lack of full and free consent can be where a person does not consent or where they cannot consent (if they have learning disabilities, for example). Nevertheless, some communities use religion and culture as a way to coerce a person into marriage. A forced marriage is different from an arranged marriage – in an arranged marriage the families take a leading role in choosing the marriage partner. The marriage is entered into freely by both people.

Warning signs
Warning signs can include a sudden drop in performance, truancy from lessons and conflicts with parents over continuation of the student's education. There may be excessive parental restrictions and control, a history of domestic abuse within the family, or extended absence through sickness or overseas commitments. Students may also show signs of depression or self-harming, and there may be a history of older siblings leaving education early to get married.

The justifications
Most cases of forced marriage in the UK involve South Asian families. This is partially a reflection of the fact that there is a large established South Asian population in the UK. It is clear, however, that forced marriage is not a solely South Asian phenomenon — there have been cases involving families from East Asia, the Middle East, Europe, and Africa. Some forced marriages take place in the UK with no overseas element, while others involve a partner coming from overseas, or a British citizen being sent abroad. Parents who force their children to marry often justify it as protecting them, building stronger families, and preserving cultural or religious traditions. They may not see it as wrong. Forced marriage can never be justified on religious grounds: every major faith condemns it and freely given consent is a pre-requisite of Christian, Jewish, Hindu, Muslim, and Sikh marriage.

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

The law
Sexual intercourse without consent is rape, regardless of whether this occurs within the confines of a marriage. A girl who is forced into marriage is likely to be raped and may be raped until she becomes pregnant. In addition, the Forced Marriage (Civil Protection) Act (2007) makes provision for protecting children, young people, and adults from being forced into marriage without their full and free consent through Forced Marriage Protection Orders. Breaching a Forced Marriage Protection Order is a criminal offence. The Anti-Social Behaviour, Crime and Policing Act 2014 makes it a criminal offence, with effect from 16th June 2014, to force someone to marry. This includes:

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

Since February 2023 it has also been a crime to carry out any conduct whose purpose is to cause a child to marry before their eighteenth birthday, even if violence, threats, or another form of coercion are not used. As with the existing forced marriage law, this applies to non-binding, unofficial ‘marriages’ as well as legal marriages.

What to do if a student seeks help

- The student should be seen immediately in a private place, where the conversation cannot be overheard.
- The student should be seen on her own, even if she attends with others.

- Develop a safety plan in case the student is seen i.e. prepare another reason why you are meeting.
- Explain all options to the student and recognise and respect her wishes. If the student does not want to be referred to the local authority Children's Social Care, you will need to consider whether to respect the student's wishes — or whether the student's safety requires further action to be taken. If you take action against the student's wishes you must inform the student.
- Establish whether there is a family history of forced marriage — i.e. siblings forced to marry.
- Advise the student not to travel overseas and discuss the difficulties she may face.
- Seek advice from the Forced Marriage Unit.
- Liaise with Police and the local authority Children's Social Care to establish if any incidents concerning the family have been reported.
- Refer to Police if there is any suspicion that there has been a crime or that one may be committed.
- Refer the student with her consent to the appropriate local and national support groups, and counselling services.

What to do if the student is going abroad imminently
The Forced Marriage Unit advises education professionals to gather the following information if at all possible — it will help the unit to locate the student and to repatriate her:
- a photocopy of the student's passport for retention — encourage her to keep details of her passport number and the place and date of issue;
- as much information as possible about the family (this may need to be gathered discretely);
- full name and date of birth of student under threat;
- student's father's name;
- any addresses where the student may be staying overseas;
- potential spouse's name;
- date of the proposed wedding;
- the name of the potential spouse's father if known; and
- addresses of the extended family in the UK and overseas.

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

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

Forced marriage: what educators should NOT do.
- treat such allegations merely as domestic issues and send the student back to the family home.
- ignore what the student has told you or dismiss the need for immediate protection.
- approach the student's family or those with influence within the community, without the express consent of the student, as this will alert them to your concern and may place the student in danger.
- contact the family in advance of any enquires by the Police, the local authority Children's Social Care or the Forced Marriage Unit, either by telephone or letter.
- share information outside child protection information sharing protocols without the express consent of the student.
- breach confidentiality except where necessary in order to ensure the student's safety; and
- attempt to be a mediator.

Further guidance is available from The Forced Marriage Unit:

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

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

E-mail: fmu@fcdo.gov.uk **Website:** www.fco.gov.uk/forcedmarriage

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

See also: *'The Right to Choose – Multi-Agency Guidance in relation to Forced Marriage' Government Office - November 2008,* West Mercia regional procedures and Forced Marriage Guidance on the *2.22 Forced marriage | West Midlands Safeguarding Children Group (procedures.org.uk)* website.

2023 Forced Marriage Guidance

APPENDIX 6

Female Genital Mutilation (FGM) and Breast Ironing – a form of Human Rights Abuse

What is FGM?
FGM includes procedures that intentionally alter or injure the female genital organs for non-medical reasons. There are four known types of FGM, all of which have been found in the UK:

- **Type 1** – clitoridectomy: partial or total removal of the clitoris and, in very rare cases, only the prepuce (the fold of skin surrounding the clitoris)
- **Type 2** – excision: partial or total removal of the clitoris and the labia minora, with or without excision of the labia majora (the labia are the 'lips' that surround the vagina)
- **Type 3** – infibulation: narrowing of the vaginal opening through the creation of a covering seal. The seal is formed by cutting and repositioning the inner, or outer, labia, with or without removal of the clitoris.
- **Type 4** – other: all other harmful procedures to the female genitalia for non-medical purposes, e.g., pricking, piercing, incising, scraping, and cauterising the genital area.

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

Why is FGM carried out?
It is believed that:

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

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

Within which communities is FGM known to be practised?
According to the Home Office it is estimated that up to 24,000 girls under the age of 15 are at risk of FGM.

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

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

Is FGM harmful?
FGM is extremely harmful and is often described as brutal because of the way it is carried out, and its short and long-term effects on physical and psychological health. FGM is carried out on children between the ages of 0 and 15, depending on the community in which they live. It is often carried out without any

form of sedation and without sterile conditions. The girl or young woman is held down while the procedure of cutting takes place and survivors describe extreme pain, fear, and feelings of abandonment. Where the vagina is cut and then sewn up, only a very small opening may be left. This is often seen as a way to ensure that when the girl enters marriage, she is a virgin. In some communities the mother of the future husband and the girl's own mother will take the girl to be cut open before the wedding night. Repeat urinal tract infections are a common problem for women who have undergone FGM, and for some, infections come from menstruation being restricted. Many women have problems during pregnancy and childbirth. The removal of the clitoris denies women physical pleasure during sexual activity and some groups will practise complete removal to ensure chastity.

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

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

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

Signs, symptoms, and indicators
The following list of possible signs and indicators are not diagnostic but are offered as a guide as to what kind of things should alert professionals to the possibility of FGM. Things that may point to FGM happening:

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

Things that may indicate a child has undergone FGM:

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

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

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

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

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

Breast Ironing in the UK
Concerns have been raised that breast ironing is also to be found amongst African communities in the UK, with as many as1000 girls at risk. The latest version of Keeping Children Safe in Education mentions breast ironing, as part of the section on so-called 'honour-based' violence. Staff worried about the risk of breast ironing in their school should speak to the Designated Safeguarding Lead as soon as possible. Schools need to know the risk level within their communities and tackle the risk as appropriate.

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

- contact the parents before seeking advice from the local authority Children's Social Care.
- make any attempt to mediate between the child/young person and parents.

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

The 'one chance' rule
In the same way that we talk about the 'one chance rule' in respect of young people coming forward with fears that they may be forced into marriage, young people disclosing fears that they are going to be sent abroad for FGM are taking the 'one chance', of seeking help. It is essential that we take such concerns seriously and act without delay. Never underestimate the determination of parents who have decided that it is right for their daughter to undergo FGM. Attempts to mediate may place the child/young person at greater risk, and the family may feel so threatened at the news of their child's disclosure that they bring forward their plans or take action to silence her.

Mandatory Reporting Duty
Where FGM has taken place, since 31 October 2015 there has been a mandatory reporting duty placed on teachers. Section 5B of the Female Genital Mutilation Act 2003 (as inserted by section 74 of the Serious Crime Act 2015) places a statutory duty upon teachers in England and Wales, to personally report to the Police where they discover (either through disclosure by the victim or visual evidence) that FGM appears to have been carried out on a girl under 18. Those failing to report such cases will face disciplinary sanctions. Further information on when and how to make a report can be found in the following Home Office guidance: FGM_Mandatory_Reporting_-_procedural_information_nov16_FINAL.pdf (publishing.service.gov.uk)

APPENDIX 7

Consensual and non-consensual sharing of nudes and semi-nudes images and/or videos (sexting – also known as youth produced sexual imagery)

What is consensual and non-consensual sharing of nudes and semi-nudes images and/or videos (sexting)?

Consensual and non-consensual sharing of nudes and semi-nudes images and/or videos, is the exchange of self-generated sexually explicit images, through mobile picture messages or webcams over the internet. Consensual and non-consensual sharing of nudes and semi-nudes images and/or videos, is often seen as flirting by children and young people who think that it's part of normal life. Often, incidents of consensual and non-consensual sharing of nudes and semi-nudes images and/or videos, are not clear-cut or isolated; schools may encounter a variety of scenarios. Consensual and non-consensual sharing of nudes and semi-nudes images and/or videos, incidents can be divided into two categories – aggravated and experimental[3]:

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

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

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

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

The Law

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

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

The National Police Chiefs Council (NPCC) has made clear that incidents involving youth produced sexual imagery should primarily be treated as safeguarding issues. Schools may respond to incidents without involving the Police. Where the Police are notified of incidents of youth produced sexual imagery they are obliged, under the Home Office Counting rules and National Crime Recording Standards, to record the incident on their crime systems. The incident will be listed as a 'crime' and the young person involved will be listed as a 'suspect.'

This is not the same as having a criminal record.

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

3Reprinted from Wolak and Finkelhor 'Consensual and non-consensual sharing of nudes and semi-nudes images and/or videos, : a Typology' March 2011

Actions to take in the case of an incident of consensual and non-consensual sharing of nudes and semi-nudes images and/or videos

Step 1 – Disclosure by a student.
Consensual and non-consensual sharing of nudes and semi-nudes images and/or videos disclosures should follow the normal safeguarding practices and protocols. A student is likely to be very distressed especially if the image has been circulated widely and if they don't know who has shared it, seen it or where it has ended up. They will need pastoral support during the disclosure and after the event. They may even need immediate protection or a referral to the local authority Children's Social Care. The following questions will help decide upon the best course of action:

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

Do they know where the image has ended up?

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

Step 2 – Searching a device.
It is highly likely that the image will have been created and potentially shared through mobile devices. The image may not be on one single device but may be on a website or on a multitude of devices; it may be on either a school-owned or personal device. It is important to establish the location of the image but be aware that this may be distressing for the young person involved, so be conscious of the support they may need. When searching a mobile device the following conditions should apply:

- the action is in accordance with the school's child protection and safeguarding policies.
- the search is conducted by the headteacher, or a person authorised by them.
- a member of the safeguarding team is present; and
- the search is conducted by a member of the same sex.

If any illegal images of a child are found, you should consider whether to inform the Police. As a general rule it will almost always be proportionate to refer any incident involving "aggravated" sharing of images to

the Police, whereas purely “experimental” conduct may proportionately be dealt with without such referral, most particularly if it involves the child sharing images of themselves.

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

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

Always put the child first. Do not search the device if this will cause additional stress to the student/person whose image has been distributed. If there is an indecent image of a child on a website or a social networking site, then you should report the image to the site hosting it. In the case of a consensual and non-consensual sharing of nudes and semi-nudes images and/or videos incident involving a child or young person where you feel that they may be at risk of abuse then you should report the incident directly to CEOP www.ceop.Police.uk/ceop-report, so that law enforcement can make an assessment, expedite the case with the relevant provider and ensure that appropriate action is taken to safeguard the child.

Step 3 – What to do and not do with the image.
If the image has been shared across a personal mobile device:
- confiscate and secure the device.
- don’t view the image unless there is a clear reason to do so.
- don’t send, share, or save the image anywhere; and
- don’t allow students to view images or send, share, or save them anywhere.

If the image has been shared across a school network, a website or social network:
- block the network to all users and isolate the image.
- don’t send or print the image.
- don’t move the material from one place to another; and
- don't view the image outside of the protocols of your safeguarding policies and procedures.

Step 4 – Who should deal with the incident?
Whoever the initial disclosure is made to must act in accordance with the school Safeguarding Policy, ensuring that the DSL or a senior member of staff is involved in dealing with the incident. The DSL should always record the incident. Senior management should also always be informed. There may be instances where the image needs to be viewed and this should be done in accordance with protocols. The best interests of the child should always come first; if viewing the image is likely to cause additional stress, staff should make a judgement about whether or not it is appropriate to do so.

Step 5 – Deciding on a response
There may be a multitude of reasons why a student has engaged in consensual and non-consensual sharing of nudes and semi-nudes images and/or videos – it may be a romantic/sexual exploration scenario, or it may be due to coercion. It is important to remember that it won’t always be appropriate to inform the Police; this will depend on the nature of the incident. However, as a school it is important that incidents are consistently recorded. It may also be necessary to assist the young person in removing the image from a website or elsewhere. If indecent images of a child are found:
- act in accordance with your child protection and Safeguarding Policy, e.g. notify DSL;
- store the device securely;
- carry out a risk assessment in relation to the young person;
- make a referral if needed;
- contact the Police (if appropriate);
- put the necessary safeguards in place for the student, e.g. they may need counselling support, immediate protection and parents must also be informed; and
- inform parents and/or carers about the incident and how it is being managed

The Trust schools will follow the guidance of UKCIS on sharing nudes and semi nudes where indecent images have been shared that are AL generated.

Step 6 – Contacting other agencies (making a referral)

If the nature of the incident is high-risk, consider contacting the local authority Children's Social Care. Depending on the nature of the incident and the response you may also consider contacting local Police or referring the incident to CEOP. Understanding the nature of the incident, whether experimental or aggravated, will help to determine the appropriate course of action.

Step 7 – Containing the incident and managing student reaction.
Sadly, there are cases in which victims of consensual and non-consensual sharing of nudes and semi-nudes images and/or videos have had to leave or change schools because of the impact the incident has had on them. The student will be anxious about who has seen the image and where it has ended up. They will seek reassurance regarding its removal from the platform on which it was shared. They are likely to need support from the school, their parents, and their friends. Education programmes can reinforce to all students the impact and severe consequences that this behaviour can have. Consider engaging with your local Police and asking them to talk to the students. Other staff may need to be informed of incidents and should be prepared to act if the issue is continued or referred to by other students. The school, its students and parents should be on high alert, challenging behaviour and ensuring that the victim is well cared for and protected. The students' parents should usually be told what has happened so that they can keep a watchful eye over their child, especially when they are online at home. Creating a supportive environment for students in relation to the incident is very important.

Step 8 – Reviewing outcomes and procedures to prevent further incidences.
As with all incidents, a review process ensures that the matter has been managed effectively and that the school has the capacity to learn and improve its handling procedures. Incidents of consensual and non-consensual sharing of nudes and semi-nudes images and/or videos can be daunting for a school to manage, especially if the image has been widely shared between students in school.

Further information is available from the NSPCC and UKCIS.

APPENDIX 8

RADICALISATION AND EXTREMISM

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

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

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

What is Prevent?
Prevent is the Government's strategy to stop people becoming terrorists or supporting terrorism, **in all its forms**. Prevent works at the pre-criminal stage by using early intervention to encourage individuals and communities to challenge extremist and terrorist ideology and behaviour. The Counter-Terrorism and Security Act (2015), places a duty on specified authorities, including schools and colleges, to have due regard to the need to prevent people from being drawn into terrorism ("the Prevent duty"). The Prevent duty reinforces existing duties placed upon educational establishments for keeping children safe by:

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

Warning Signs/Indicators of Concern
There is no such thing as a "typical extremist": those who become involved in extremist actions come from a range of backgrounds and experiences, and most individuals, even those who hold radical views, do not become involved in violent extremist activity. Students may become susceptible to radicalisation through a range of social, personal, and environmental factors. It is vital that school staff are able to recognise those vulnerabilities. However, this list is not exhaustive, nor does it mean that all young people experiencing the above are at risk of radicalisation for the purposes of violent extremism.

Factors which may make students more vulnerable may include:

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

Students who are vulnerable to radicalisation may also be experiencing:

- substance and alcohol misuse.
- pressure.
- influence from older people or via the Internet.
- bullying.
- domestic violence; and
- race/hate crime.

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

- being in contact with extremist recruiters and/or spending increasing time in the company of other suspected extremists.
- loss of interest in other friends and activities not associated with the extremist ideology, group, or cause.
- students accessing extremist material online, including through social networking sites.
- possessing or accessing materials or symbols associated with an extremist cause.
- using extremist narratives and a global ideology to explain personal disadvantage.
- students voicing opinions drawn from extremist ideologies and narratives, this may include justifying the use of violence to solve societal issues.
- graffiti symbols, writing or artwork promoting extremist messages or images.
- significant changes to appearance and/or behaviour increasingly centred on an extremist ideology, group, or cause.
- changing their style of dress or personal appearance to accord with the group.
- attempts to recruit others to the group/cause.
- using insulting to derogatory names for another group.
- increase in prejudice-related incidents committed by that person – these may include:
- physical or verbal assault.
- provocative behaviour.
- damage to property.
- derogatory name calling.
- possession of prejudice-related materials.
- prejudice related ridicule or name calling.
- inappropriate forms of address.
- refusal to co-operate.
- attempts to recruit to prejudice-related organisations.
- condoning or supporting violence towards others; and
- Parental reports of changes in behaviour, friendship or actions and requests for assistance.

Partner schools, local authority services, and Police reports of issues affecting students in other schools.

Referral Process

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

- talking to the young person about their behaviour/views/on-line activity/friends etc.
- discussion with parents/carers about the concerns.
- checking out on-line activity, including social media if possible.
- providing in-house support, if available; and
- providing Early Help targeted support if necessary.

If concerns persist, then the DSL should complete the Channel Referral Form (available from the WSCP website or the Shropshire Learning Gateway), normally with the knowledge and consent of the young person. The referral will then be subject to a triage process to decide whether or not it meets the threshold for a referral to Channel. If it does, the DSL should be prepared to attend the Channel Panel meeting to share the concerns and help identify any intervention required. Further feedback to the Channel Panel will be expected following intervention to decide whether there are still concerns. Further information can be found in the WSCP regional procedures. or on the Shropshire Learning Gateway

APPENDIX 9

CHILD CRIMINAL EXPLOITATION – COUNTY LINES

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

The UK Government defines county lines as:

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

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

Child Criminal Exploitation is common in county lines and occurs where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child or young person under the age of 18. The victim may have been criminally exploited even if the activity appears consensual. Child Criminal Exploitation does not always involve physical contact; it can also occur through the use of technology.

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

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

Violence
Gangs sometimes use violence to threaten children and young people when recruiting them. Gangs also violently assault children and young people working for them if they find their drugs or money to be missing. Weapons such as firearms, knives, bats, acid are sometimes used to make violent threats.

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

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

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

- Are they always going missing from school or their home?
- Are they travelling alone to places far away from home?
- Do they suddenly have lots of money/lots of new clothes/new mobile phones?
- Are they receiving much more calls or texts than usual?
- Are they carrying or selling drugs?

- Are they carrying weapons or know people that have access to weapons?
- Are they in a relationship with or hanging out with someone/people that are older and controlling?
- Do they have unexplained injuries?
- Do they seem very reserved or seem like they have something to hide?
- Do they seem scared?
- Are they self-harming?

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

Cuckooing
Cuckooing is when drug gangs take over the home of a vulnerable person through violence and intimidation, using it as their base for selling/manufacturing drugs. Signs of cuckooing:
- an increase in people coming and going.
- an increase in cars or bikes outside.
- litter outside.
- signs of drugs use; and
- you haven't seen the person who lives there recently or when you have, they have been anxious or distracted.

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

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

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

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

What to do if you have concerns a young person is involved in County Lines
Follow your normal safeguarding procedures and refer to your school's DSL. The DSL will refer on to the local authority Children's Social Care and/or the Police, if the young person is at immediate risk of harm.

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

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

APPENDIX 10

What are Harmful Sexual Behaviours (HSB), Sexual Violence and Sexual Harassment?

Harmful Sexual Behaviours (HSB)
The umbrella term 'harmful sexual behaviour' (HSB) is widely used in child protection and applies to behaviour occurring online, face-to-face, or both. HSB should always be considered within a child protection context. HSB can, in some cases, progress on a continuum. Early intervention in inappropriate behaviour such as misogyny can help to prevent escalation to more serious abuse such as sexual harassment and sexual violence. Children who display HSB have often experienced their own abuse and trauma. It is important that they are offered appropriate support.

Sexual violence
It is important that school and college staff are aware of sexual violence and the fact children and young people 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 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? 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.

- a child under the age of 13 can never consent to any sexual activity;
- the age of consent is 16;
- 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. It may include:
- consensual and non-consensual sharing of nudes and semi-nudes' images and/or videos;
- sharing of unwanted explicit content;
- upskirting (is a criminal offence);
- sexualised online bullying;
- unwanted sexual comments and messages, including, on social media;
- sexual exploitation; coercion and threats.

Appendix 11

Sexual violence, sexual abuse, or harassment between children
Protocols for SLT, DSLs, the safeguarding and pastoral teams

School initial action flow chart

Disclosure is made.

The victim should be reassured that they are being taken seriously and that they will be supported and kept safe. Confidentiality must not be promised. The allegation must be **immediately** reported to the DSL or deputy and a disclosure form started (Appendix 1 of the sexual violence documentation). Before any investigation begins the DSL and Headteacher should decide if the matter should be referred to the police rather than an in-school investigation take place (refer to Part 5 in Keeping Children Safe in Education)

Victim(s)

Immediate provision must be made for the students physical and emotional safety. This may include being removed from lessons and offered a safe space in school. They should then be given the opportunity to write a statement (or to explain their allegation to a member of the safeguarding team who will keep a record) using a Student Statement Form. Appropriate medical care should be given or summoned if a student has been physically injured or is unwell.

Alleged perpetrator(s)

The DSL or deputy DSL (in conjunction with the behaviour lead in the school) will make an immediate Risk Assessment and take action to ensure the safety of the victim, perpetrator, other students, and staff. The Brook Traffic Light Tool appropriate to the age or stage of the alleged perpetrator should be referred to when assessing risk and need (refer to Appendix 2). This may include the immediate isolation of the alleged perpetrator(s).

Staff receiving disclosure.

Staff must be given the time and space to write their account of the disclosure as soon as is practicable. They must be advised to write in detail and to indicate where they have used the student's words verbatim. This should be recorded on My Concerns and only discussed further, if necessary, with a member of the safeguarding team.

Decision to involve other agencies.

The DSL or deputy DSL will collate all documents and create a Serious Incident Chronology (Appendix 4) to record all interactions and investigations. The DSL or deputy DSL will discuss the allegations with the Headteacher. A decision will be made as to whether the allegation can properly be managed internally or whether other agencies should be involved. If a child has been seriously harmed, is in immediate danger, or is at risk of harm a referral must be made to children's social care. Where there is a report of activity which is an offence, a report must be made immediately to the police. Further guidance on decision making is given below and further details can be found in Part *5 Keeping Children Safe in Education.*

Victim(s)

The DSL or deputy DSL will notify families of the allegation. Safety and support advice will be given to families and a member of the safeguarding team will be assigned as their main contact. A record will be kept on My Concerns.

Alleged perpetrator(s)

The DSL or deputy DSL will notify families of the allegation. Safety and support advice will be given to families and a member of the safeguarding team will be assigned as their main contact. A record will be kept on My Concerns.

Staff receiving disclosure.

The DSL or deputy DSL will discuss the written statement given by the member of staff to ensure clarity. Support and guidance will be offered to the member of staff, including a named member of the safeguarding team for ongoing support if necessary.

Next steps

The DSL will lead on planning, to include:

- Appropriate support for the victim(s) and staff and appropriate support and sanctions for the perpetrator(s).
- Compile risk assessment and control measures. (Appendix 3)
- Investigation of the allegation and decisions on next steps.
- Ongoing support record to be reviewed regularly. (Appendix 5 & Appendix 6)

Decisions to involve other agencies.
Ongoing school actions
Initial accounts
The member of staff taking the initial disclosure must record it in as much detail as possible as soon as is practicable, indicating where the students' own words are recorded.

Risk Assessment
A risk assessment will be carried out by the DSL or deputy DSL with a view to taking immediate action to safeguard the victim(s), perpetrator(s), other students, and staff. The risk assessment will be regularly reviewed and amended, if necessary, as more information is received. The risk assessment should be reviewed weekly. The Brook Traffic Light tool should be used to determine the level of risk. Short term plans will be put in place to manage risk and to support all students involved, which may necessitate alternative arrangements being made for the education of students involved.

Determining the nature of the incident
All allegations of sexual assault or sexual abuse will be fully investigated following our normal school procedures. This includes the taking of witness statements, checking for potential CCTV and the chance for those involved to give a full account before a judgement is made about what the evidence indicates has taken place.

Interviewing victims
It is essential that all victims are reassured that they are being taken seriously and that they will be supported and kept safe. There is likely to be a need for further interviews of the victim(s). Wherever possible, two members of staff from the safeguarding team should be involved in any interview. An accurate record must be kept of any interviews.

Interviewing alleged perpetrators
We must remain mindful of the duty of care to alleged perpetrators. As a matter of effective safeguarding practice, we will do all we reasonably can to protect the anonymity of any students involved in any report of sexual violence or sexual harassment. Amongst other things, this will mean carefully considering, based on the nature of the report, which staff should know about the report and any support that will be put in place for the student involved. Alleged perpetrators will also be interviewed with two members of staff from the safeguarding team and an accurate record kept. Consideration will be given to the fact that abusing another student can be an indication that the perpetrator has themselves been abused.

Parents and carers
The parents/carers of students involved will be informed as soon as is practicable as long as this does not put the student at additional risk. The parents/carers will be involved as appropriate throughout the investigation process.

Actions
A decision on actions will be taken in line with the published Behaviour Policy and the Safeguarding Policy as well as other policies as necessary. The reasons for decisions made will be recorded. Where a report has been made to the police and/or to social care, we will work with these agencies to determine necessary actions to safeguard students and in response to the incident.

Ongoing support
We will plan for ongoing support for the victim(s) and alleged perpetrator(s) as necessary and a member of the safeguarding team or Head of Year (where appropriate) will oversee this and to be the main contact with the student and their family. It is important that the student and their family are given the opportunity to shape the nature of any ongoing support.
Consideration will be given to:

- Ongoing interactions in school including in classes and in other areas
- Potential interactions outside of school
- Confidentiality and students sharing information with other students
- Repercussions following any sanctions
- The particular needs of the students involved
- Early Help

- Counselling or other support
- Health and wellbeing
- Support from relevant statutory services

Appendix 1 of the sexual violence, sexual abuse, or sexual harassment protocols
Sexual violence, sexual abuse, or harassment between children
Disclosure form

Details of the disclosure			
Name of student(s) making the disclosure			
Disclosure made to		**Date of the disclosure**	
Time		**Location**	
Other adults present		**Other students present**	
Summary of disclosure			
Full statements must be written by all staff and students involved at the earliest appropriate opportunity			

Initial action taken (To include the student(s) making the disclosure and the subject(s) of the disclosure)		
Student	**Action taken**	**By whom**

Professionals involved						
Professional / agency	**Notified?**	**Reason**	**Method**	**Date**	**Time**	**Notified by**
DSL						
Headteacher						
Police						
Social Care						
Health						
other						

Notification to families				
Student name	**Notified via**	**Date of notification**	**Time of notification**	**Notified by**

Record completed by	
Signature	
Date	

Appendix 2 of the sexual violence, sexual abuse, or sexual harassment protocols

Student name: _____

Reason for selection: Chronological age / Developmental stage

Completed by: _____ **Date:** _____

brook

SEXUAL BEHAVIOURS TRAFFIC LIGHT TOOL

Behaviours: age 0 to 5 years

All green, amber and red behaviours require some form of attention and response. It is the level of intervention that will vary.

Green behaviours

- holding or playing with own genitals
- attempting to touch or curiosity about other children's genitals
- attempting to touch or curiosity about breasts, bottoms or genitals of adults
- games e.g. mummies and daddies, doctors and nurses
- enjoying nakedness
- interest in body parts and what they do
- curiosity about the differences between boys and girls

Amber behaviours

- preoccupation with adult sexual behaviour
- pulling other children's pants down/ skirts up/trousers down against their will
- talking about sex using adult slang
- preoccupation with touching the genitals of other people
- following others into toilets or changing rooms to look at them or touch them
- talking about sexual activities seen on TV/online

Red behaviours

- persistently touching the genitals of other children
- persistent attempts to touch the genitals of adults
- simulation of sexual activity in play
- sexual behaviour between young children involving penetration with objects
- forcing other children to engage in sexual play

What is green behaviour?

Green behaviours reflect safe and healthy sexual development. They are:

- displayed between children or young people of similar age or developmental ability
- reflective of natural curiosity, experimentation, consensual activities and positive choices

What is amber behaviour?

Amber behaviours have the potential to be outside of safe and healthy behaviour. They may be:

- unusual for that particular child or young person
- of potential concern due to age, or developmental differences
- of potential concern due to activity type, frequency, duration or context in which they occur

What is red behaviour?

Red behaviours are outside of safe and healthy behaviour. They may be:

- excessive, secretive, compulsive, coercive, degrading or threatening
- involving significant age, developmental, or power differences
- of concern due to the activity type, frequency, duration or the context in which they occur

What can you do?

Green behaviours provide opportunities to give positive feedback and additional information.

What can you do?

Amber behaviours signal the need to take notice and gather information to assess the appropriate action.

What can you do?

Red behaviours indicate a need for immediate intervention and action.

Student name: _____

Reason for selection: Chronological age / Developmental stage

Completed by: _____ **Date:** _____

brook

SEXUAL BEHAVIOURS
TRAFFIC LIGHT TOOL

Behaviours: age 5 to 9 years

All green, amber and red behaviours require some form of attention and response. It is the level of intervention that will vary.

Green behaviours

- feeling and touching own genitals
- curiosity about other children's genitals
- curiosity about sex and relationships, e.g. differences between boys and girls, how sex happens, where babies come from, same-sex relationships
- sense of privacy about bodies
- telling stories or asking questions using swear and slang words for parts of the body

Amber behaviours

- questions about sexual activity which persist or are repeated frequently, despite an answer having been given
- sexual bullying face to face or through texts or online messaging
- engaging in mutual masturbation
- persistent sexual images and ideas in talk, play and art
- use of adult slang language to discuss sex

Red behaviours

- frequent masturbation in front of others
- sexual behaviour engaging significantly younger or less able children
- forcing other children to take part in sexual activities
- simulation of oral or penetrative sex
- sourcing pornographic material online

What is green behaviour?

Green behaviours reflect safe and healthy sexual development. They are:

- displayed between children or young people of similar age or developmental ability
- reflective of natural curiosity, experimentation, consensual activities and positive choices

What is amber behaviour?

Amber behaviours have the potential to be outside of safe and healthy behaviour. They may be:

- unusual for that particular child or young person
- of potential concern due to age, or developmental differences
- of potential concern due to activity type, frequency, duration or context in which they occur

What is red behaviour?

Red behaviours are outside of safe and healthy behaviour. They may be:

- excessive, secretive, compulsive, coercive, degrading or threatening
- involving significant age, developmental, or power differences
- of concern due to the activity type, frequency, duration or the context in which they occur

What can you do?

Green behaviours provide opportunities to give positive feedback and additional information.

What can you do?

Amber behaviours signal the need to take notice and gather information to assess the appropriate action.

What can you do?

Red behaviours indicate a need for immediate intervention and action.

Student name: _____

Reason for selection: Chronological age / Developmental stage

Completed by: _____ **Date:** _____

brook

SEXUAL BEHAVIOURS
TRAFFIC LIGHT TOOL

Behaviours: age 9 to 13 years

All green, amber and red behaviours require some form of attention and response. It is the level of intervention that will vary.

Green behaviours

- solitary masturbation
- use of sexual language including swear and slang words
- having girl/boyfriends who are of the same, opposite or any gender
- interest in popular culture, e.g. fashion, music, media, online games, chatting online
- need for privacy
- consensual kissing, hugging, holding hands with peer

Amber behaviours

- uncharacteristic and risk-related behaviour, e.g. sudden and/ or provocative changes in dress, withdrawal from friends, mixing with new or older people, having more or less money than usual, going missing
- verbal, physical or cyber/virtual sexual bullying involving sexual aggression
- LGBT (lesbian, gay, bisexual, transgender) targeted bullying
- exhibitionism, e.g. flashing or mooning
- giving out contact details online
- viewing pornographic material
- worrying about being pregnant or having STIs

Red behaviours

- exposing genitals or masturbating in public
- distributing naked or sexually provocative images of self or others
- sexually explicit talk with younger children
- sexual harassment
- arranging to meet with an online acquaintance in secret
- genital injury to self or others
- forcing other children of same age, younger or less able to take part in sexual activities
- sexual activity e.g. oral sex or intercourse
- presence of sexually transmitted infection (STI)
- evidence of pregnancy

What is green behaviour?

Green behaviours reflect safe and healthy sexual development. They are:

- displayed between children or young people of similar age or developmental ability
- reflective of natural curiosity, experimentation, consensual activities and positive choices

What is amber behaviour?

Amber behaviours have the potential to be outside of safe and healthy behaviour. They may be:

- unusual for that particular child or young person
- of potential concern due to age, or developmental differences
- of potential concern due to activity type, frequency, duration or context in which they occur

What is red behaviour?

Red behaviours are outside of safe and healthy behaviour. They may be:

- excessive, secretive, compulsive, coercive, degrading or threatening
- involving significant age, developmental, or power differences
- of concern due to the activity type, frequency, duration or the context in which they occur

What can you do?

Green behaviours provide opportunities to give positive feedback and additional information.

What can you do?

Amber behaviours signal the need to take notice and gather information to assess the appropriate action.

What can you do?

Red behaviours indicate a need for immediate intervention and action.

Student name: _____

Reason for selection: Chronological age / Developmental stage

Completed by: _____ **Date:** _____

brook

SEXUAL BEHAVIOURS
TRAFFIC LIGHT TOOL

Behaviours: age 13 to 17 years

All green, amber and red behaviours require some form of attention and response. It is the level of intervention that will vary.

Green behaviours

- solitary masturbation
- sexually explicit conversations with peers
- obscenities and jokes within the current cultural norm
- interest in erotica/pornography
- use of internet/e-media to chat online
- having sexual or non-sexual relationships
- sexual activity including hugging, kissing, holding hands
- consenting oral and/or penetrative sex with others of the same or opposite gender who are of similar age and developmental ability
- choosing not to be sexually active

Amber behaviours

- accessing exploitative or violent pornography
- uncharacteristic and risk-related behaviour, e.g. sudden and/ or provocative changes in dress, withdrawal from friends, mixing with new or older people, having more or less money than usual, going missing
- concern about body image
- aking and sending naked or sexually provocative images of self or others
- single occurrence of peeping, exposing, mooning or obscene gestures
- giving out contact details online
- joining adult- only social networking sites and giving false personal information
- arranging a face to face meeting with an online contact alone

Red behaviours

- exposing genitals or masturbating in public
- preoccupation with sex, which interferes with daily function
- sexual degradation/humiliation of self or others
- attempting/forcing others to expose genitals
- sexually aggressive/exploitative behaviour
- sexually explicit talk with younger children
- sexual harassment
- non-consensual sexual activity
- use of/acceptance of power and control in sexual relationships
- genital injury to self or others
- sexual contact with others where there is a big difference in age or ability
- sexual activity with someone in authority and in a position of trust
- sexual activity with family members
- involvement in sexual exploitation and/or trafficking
- sexual contact with animals
- receipt of gifts or money in exchange for sex

What is green behaviour?

Green behaviours reflect safe and healthy sexual development. They are:

- displayed between children or young people of similar age or developmental ability
- reflective of natural curiosity, experimentation, consensual activities and positive choices

What is amber behaviour?

Amber behaviours have the potential to be outside of safe and healthy behaviour. They may be:

- unusual for that particular child or young person
- of potential concern due to age, or developmental differences
- of potential concern due to activity type, frequency, duration or context in which they occur

What is red behaviour?

Red behaviours are outside of safe and healthy behaviour. They may be:

- excessive, secretive, compulsive, coercive, degrading or threatening
- involving significant age, developmental, or power differences
- of concern due to the activity type, frequency, duration or the context in which they occur

What can you do?

Green behaviours provide opportunities to give positive feedback and additional information.

What can you do?

Amber behaviours signal the need to take notice and gather information to assess the appropriate action.

What can you do?

Red behaviours indicate a need for immediate intervention and action.

Appendix 3 of the sexual violence, sexual abuse, or sexual harassment protocols
Individual student risk assessment – child on child abuse/harmful sexual behaviour

The terms victim and alleged perpetrator are used to identify the children involved. NB: there should be no assumption of guilt on the part of the alleged perpetrator, pending investigation.
Each section/question will be considered from the perspective of both pupils. Consideration will be given for the impact on, and needs of, the wider school community. All concerns and proposed actions will be recorded.
The school will work with the local multi-agency safeguarding hub (MASH) and other agencies as necessary when completing this risk assessment. This document should be reviewed frequently to ensure it is fit for purpose.
***A risk assessment should be completed for all cases relating to sexual violence or alleged sexual violence. Sexual violence is defined by the sexual offences act 2002 as "criminal acts: rape, assault by penetration and sexual assault".**
***This risk assessment should be completed with reference to Keeping Children Safe in Education, and the local West Midlands Policy (2.26)**
https://westmidlands.procedures.org.uk/pkoso/regional-safeguarding-guidance/children-who-abuse-others

Name(s)	Names of all students involved should be added here unless it is deemed appropriate to do a separate risk assessment for each student involved.	**D.O.B.**	
Reason for risk assessment	Brief summary of allegation		
Has violence been used or threatened?	Yes or no and with brief details		
What kind of harm has been threatened or sustained previously?	Details of alleged incident triggering risk assessment		
Is there a pattern of behaviour / risk?	Records (SIMs, confidential file) should be checked or any previous incidents which could indicate a pattern		
Is there evidence to suggest it will be repeated or that there has been increase of risk?	Consideration should be given to the nature of the alleged incident and all students' reactions to it. Increased risk could refer to risk of repeated or worsening incidents or to emotional risk through students involved being in contact with each other		

Is there evidence to suggest premeditation?	Yes or no with brief details
Do they share classes?	
Do they share break times?	
Do they share transport to/from school?	
Professionals / other adults involved and roles	Name, role, and agency involved in the risk assessment – either directly or through their advice or opinions being taken into account - should be recorded here.
Intended outcome of risk assessment	This will include safe management of risk and should say whether the intention is for all parties to remain in school / classes or will be educated elsewhere.

Individual or group at risk	Nature of risk	Protective factors / controls normally in place	Risk rating (severity x likelihood = risk)	Controls / actions needed	Modified risk rating (severity x likelihood = risk)
Victim	Physical – risk of repeated assault or harassment Physical – risk of retaliation by friends / family of perpetrator	Staff and students adhering to Behaviour for Learning Policy Staff and students adhering to Behaviour for Learning Policy		Consideration of isolation or exclusion of perpetrator Action taken to ensure wider knowledge of incident is understood and students are clear about expectations. Ongoing need to	

				consider isolation or exclusion for others	
	Emotional – impact of assault or harassment	Support available from pastoral team		Named person for support, support plan agreed with victim and family. Consideration of support being sought from other agencies. Advice and guidance given to family	
	Emotional aggravation of pre-existing physical or mental health concerns	Support available from pastoral team and medical support		Named person for support, support plan agreed with victim and family. Consideration of support being sought from other agencies. Advice and guidance given to family	
	Emotional – impact of ongoing investigation especially by outside agencies	Support available from pastoral team		Named person for support, support plan agreed with victim and family. Consideration of support being sought from other agencies. Advice and guidance given to family Named person for support, support plan agreed with victim and family. Consideration of support being sought from other agencies. Advice and guidance given to family	
	Online – risk of harassment via social media	Support available from pastoral team		Action taken to ensure wider knowledge of incident is understood and students are clear about expectations. Ongoing need to consider isolation or exclusion for others	

Alleged perpetrator	Physical – risk of retaliation by friends / family of victim	Staff and students adhering to Behaviour for Learning Policy		Action taken to ensure wider knowledge of incident is understood and students are clear about expectations. Ongoing need to consider isolation or exclusion for others	
	Emotional – impact of alleged incident	Support available from pastoral team		Named person for support, support plan agreed with perpetrator and family. Consideration of support being sought from other agencies. Advice and guidance given to family	
	Emotional aggravation of pre-existing physical or mental health concerns	Support available from pastoral team and medical support		Named person for support, support plan agreed with perpetrator and family. Consideration of support being sought from other agencies. Advice and guidance given to family	
	Emotional – impact of ongoing investigation especially by outside agencies	Support available from pastoral team		Named person for support, support plan agreed with victim and family. Consideration of support being sought from other agencies. Advice and guidance given to family	
	Online – risk of harassment via social media	Support available from pastoral team		Action taken to ensure wider knowledge of incident is understood and students are clear about expectations. Ongoing need to consider isolation or exclusion	
	Media –risk of incident being reported in the media			Action taken to ensure wider knowledge of incident is understood	

				and students are clear about expectations. No comment made to press	
Other students	Physical – risk of assault or harassment Emotional – impact of assault or harassment on friend / wider community Emotional – impact of ongoing investigation especially by outside agencies Online – risk of being a victim or perpetrator of harassment via social media	Staff and students adhering to Behaviour Policy Support available from pastoral team Support available from pastoral team Support available from pastoral team and year teams		Consideration of isolation or exclusion of perpetrator Action taken to ensure wider knowledge of incident is understood and students are clear about expectations. Ongoing need to consider isolation or exclusion for others Action taken to ensure wider knowledge of incident is understood and students are clear about expectations. Watching brief of anyone affected Action taken to ensure wider knowledge of incident is understood and students are clear about expectations. Watching brief of anyone affected. Ongoing need to consider isolation or exclusion for others	
Staff	Physical – risk of assault or harassment Emotional – impact of receiving disclosure for staff involved including	Staff and students adhering to Behaviour for Learning Policy Support available from DSL and SLT line manager		Consideration of isolation or exclusion of perpetrator Regular support offered as required. Consideration of involvement of	

	consideration of possible impact on pre-existing physical or mental health concerns			support from other agencies as necessary.	
	Emotional – impact of assault or harassment on wider community	Support available from DSL and SLT line manager		Regular support offered as required. Consideration of involvement of support from other agencies as necessary.	
	Emotional – impact of ongoing investigation especially by outside agencies	Support available from DSL and SLT line manager		Regular support offered as required. Consideration of involvement of support from other agencies as necessary.	

	Likelihood				
Severity	Not likely (1)	Unlikely (2)	Possible (3)	Likely (4)	Highly likely (5)
Fatality (5)					
Major injury / harm (4)					
Moderate injury / harm (3)					
Minor injury / harm (2)					
No injury / harm (1)					

Overall risk rating				
1 - 2	3 - 7	8 - 11	12 - 14	15 - 25
No risk	Minimal risk	Moderate risk	Serious risk	Major risk

Risk assessment completed by:
Signed: **Name:**

Role: **Date:**

Staff / other professionals consulted:

Action	YES/NO	Date
Police informed		
Referral to MASH		
Referral to external support services		
Referral to internal support services		
Referral to CAMHS		
Referral to family help		
Uploaded to My Concerns?		
Other		

Proposed action, with controls as detailed above, can / cannot proceed.

Signed: **Name:**
Role: **Date:**

Appendix 4 of the sexual violence, sexual abuse, or sexual harassment protocols
Serious Incident Chronology – peer on peer abuse

Date of incident	
Location of incident	
Brief summary of incident	
Victim(s)	
Alleged perpetrator(s)	
Student witnesses	
Staff witnesses	
Lead member of staff investigating	
Lead staff contact – victim(s)	
Lead staff contact – perpetrator(s)	
Other staff involved	
Other professionals – victim(s)	
Other professionals – alleged perpetrator(s)	

Date & time	Detail	Action	Resp.	Doc. ref.	Recorded by

Appendix 5 of the sexual violence, sexual abuse, or sexual harassment protocols
Sexual violence, sexual abuse, or harassment between children
Ongoing support record – victim

Details of disclosure			
Name of student			
Assigned staff contact		**Date of disclosure**	
Summary of disclosure			

Student details		
Vulnerability	**Y / N?**	**Detail**
S.E.N.D.		
Medical		
Emotional		
Family		
Peer group		

Professionals involved			
Professional / agency	**Inv'd ?**	**Contact name**	**Telephone / Email**
DSL			
Headteacher			
Police			
Social Care			
Health			
CAMHS			

Support plan					
Area of need	**Support plan**	**Lead professional**	**School contact (if applicable)**	**Date**	**Initials**

Appendix 6 of the sexual violence, sexual abuse, or sexual harassment protocols
Sexual violence or harassment between children
Ongoing support record – alleged perpetrator

Details of disclosure			
Name of student			
Assigned staff contact		**Date of disclosure**	
Summary of disclosure			

Student details		
Vulnerability	**Y / N?**	**Detail**
S.E.N.D.		
Medical		
Emotional		
Family		
Peer group		

Professionals involved			
Professional / agency	**Inv' d?**	**Contact name**	**Telephone / Email**
D.S.L.			
Headteacher			
Police			
Social Care			
Health			
CAMHS			

Support plan					
Area of need	**Support plan**	**Lead professional**	**School contact (if applicable)**	**Date**	**Initials**

APPENDIX 12
Job Descriptions for the DSL and Deputy DSLs in each school

Designated Safeguarding Lead Job description
Post title: Designated Safeguarding Lead (DSL)
Responsible to: Headteacher

Purpose (also refer to KCSiE Appendix B):
- The Local Academy Board has appointed an appropriate senior member of staff, from the school leadership team to the role of designated safeguarding lead.
- The DSL takes the lead responsibility for safeguarding and child protection (including online safety and understanding the filtering and monitoring systems and processes in place).
- The DSL has the appropriate status, authority, skills and experience within the school to carry out the duties of the post.
- The DSL has time, funding, training, resources, and support to provide advice and support to other staff on child welfare and child protection matters, to take part in strategy discussions and interagency meetings – and/or to support other staff to do so – and to contribute to the assessment of children.
- There are deputy designated safeguarding leads (DDSLs) who are trained to the same standard as the DSL.
- Whilst the activities of the DSL can be delegated to a DDSL, the ultimate lead responsibility for child protection, as set out above, remains with the DSL; this lead responsibility will not be delegated.

Responsibilities/duties:
Managing referrals

The DSL is expected to:
- refer cases of suspected abuse to the local authority Children's Social Care as required;
- support staff who make referrals to the local authority Children's Social Care;
- refer cases to the Channel programme where there is an extremism and/ radicalisation concern as required;
- refer cases where a person is dismissed or left due to risk/harm to a child to the Disclosure and Barring Service as required; and
- refer cases where a crime may have been committed to the Police as required.

Working with others

The DSL is expected to liaise with the Headteacher to inform them of referrals, especially ongoing enquiries under section 47 of the Children Act 1989 and Police investigations. This should include being aware of the requirement for children to have an Appropriate Adult. Further information can be found in the Statutory guidance - PACE Code C 2019.
- as required, liaise with the “case manager” and the designated officer(s) at the local authority for child protection concerns (all cases which concern a staff member); and liaise with staff eg mental health lead, SENCO on matters of safety and safeguarding and when deciding whether to make a referral by liaising with relevant agencies.
- act as a source of support, advice, and expertise for staff.
- act as a point of contact for safeguarding partners.
- Work with the Headteacher and senior leadership team to ensure that all staff are aware of the cohort of students who may have a safeguarding vulnerability and support teaching staff to provide additional academic support or reasonable adjustments to support vulnerable children and young people reach their full potential.

Training

The DSL and DDSLs must undergo training to provide them with the knowledge and skills required to carry out the role.
- This training should be updated at least every two years.
- The DSL should undertake Prevent awareness training.

In addition to the formal training set out above, the DSL will regularly refresh their knowledge and skills. This is via e-bulletins, meeting other designated safeguarding leads, or taking time to read and digest safeguarding developments at regular intervals, as required, but at least annually, attend Trust termly Network meetings:

- understand the assessment process for providing early help and intervention, for example through locally agreed common and shared assessment processes such as family help assessments.
- The DSL will keep up to date with any developments relevant to their role, so they have a working knowledge of how local authorities conduct a child protection case conference and a child protection review conference and be able to attend and contribute to these effectively when required to do so.
- ensure each member of staff has access to and understands the school's Child Protection Policy and procedures, especially new and part-time staff.
- are alert to the specific needs of children in need, those with special educational needs and other vulnerable groups.
- are able to keep detailed, accurate and secure written records of concerns and referrals; understand and support the school 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 extremism and/ radicalisation.
- 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 school may put in place to protect them.

Raising Awareness

The DSL will:

- ensure the Trust's child protection policies are known, understood, and used appropriately.
- ensure the Trust's child protection Policy is reviewed annually (as a minimum) and the procedures and implementation are updated and reviewed regularly, and work with Local Academy Boards regarding this.
- ensure the Child Protection Policy is available publicly and parents/carers are aware of the fact that referrals about suspected abuse or neglect may be made and the role of the school in this; and
- link with the Local Safeguarding Children Board to make sure staff are aware of training opportunities and the latest local policies on safeguarding.
- carry out termly audit checks of the school's Single Central record to ensure the correct checks and information is being recorded in accordance with Ofsted guidelines.

The relevant Chair of the school's Local Academy Board will countersign these audit checks.

Child protection file (My Concerns)

Where young people leave the school, the DSL will ensure their child protection file is transferred to the new school as soon as possible. This will be transferred separately from the main student file if paper copies exist and My Concerns electronically, ensuring secure transit and confirmation of receipt will be obtained.

Availability

During term time the DSL or DDSLs will always be available (during school hours) for staff in the school to discuss any safeguarding concerns. The school and the DSL will arrange adequate and appropriate cover arrangements for any out-of-hours/out-of-term activities.

Whilst every effort has been made to explain the main duties and responsibilities for the post, each individual task required may not be identified, especially in the context of our forward-thinking Academy which requires flexibility in all of its employees.

Deputy Designated Safeguarding Lead Job description
Post title: Deputy Designated Safeguarding Lead (DDSL)
Responsible to: Designated Safeguarding Lead (DSL) and Headteacher

Purpose:
- The DSL can delegate duties of protecting and safeguarding children in their absence to the DDSL.
- The DSL will always take the lead responsibility for safeguarding and child protection.
- The DDSL will have the appropriate authority within the school to carry out the duties of the post.
- They will be delegated the authority to take part in strategy discussions and interagency meetings – and/or to support other staff to do so – and to contribute to the assessment of children.
- The DDSL is trained to the same standard as the DSL.
- Whilst the activities of the DSL can be delegated to a DDSL, the ultimate lead responsibility for child protection, as set out above, remains with the DSL; this lead responsibility will not be delegated.

Responsibilities/duties:
Managing referrals

When directed by, or in the absence of, the DSL, the DDSL is expected to:
- refer cases of suspected abuse to the local authority Children's Social Care as required;
- support staff who make referrals to the local authority Children's Social Care;
- refer cases to the Channel programme where there is an extremism and/ radicalisation concern as required;
- refer cases where a person is dismissed or left due to risk/harm to a child to the Disclosure and Barring Service as required; and
- refer cases where a crime may have been committed to the Police as required.

Working with others

The DDSL will support the DSL with appropriate documentation and information, when the DSL has to liaise with the Headteacher to inform her of referrals, especially ongoing enquiries under section 47 of the Children Act 1989 and Police investigations.
- as required, liaise with the “case manager” and the designated officer(s) at the local authority for child protection concerns (all cases which concern a staff member); and liaise with staff eg mental health lead, SENCO on matters of safety and safeguarding and when deciding whether to make a referral by liaising with relevant agencies.
- act as a source of support, advice, and expertise for staff.
- act as a point of contact for safeguarding partners.
- Work with the Headteacher and senior leadership team to ensure that all staff are aware of the cohort of students who may have a safeguarding vulnerability and support teaching staff to provide additional academic support or reasonable adjustments to support vulnerable children and young people reach their full potential.

Training

The DDSLs must undergo training to provide them with the knowledge and skills required to carry out the role.
- This training should be updated at least every two years.
- The DDSL can undertake Prevent awareness training.

In addition to the formal training set out above, their knowledge and skills will be refreshed. This might be via e-bulletins, meeting other designated safeguarding leads or deputy designated safeguarding leads, or simply taking time to read and digest safeguarding developments at regular intervals, as required, but at least annually, to allow them to understand and keep up with any developments relevant to their role so they:
- understand the assessment process for providing family help and intervention, for example through locally agreed common and shared assessment processes such as early help assessments.

- The DDSL will keep up to date with any developments relevant to their role, so they have a working knowledge of how local authorities conduct a child protection case conference and a child protection review conference and be able to attend and contribute to these effectively when required to do so.
- ensure each member of staff has access to and understands the school's child protection Policy and procedures, especially new and part time staff.
- monitor and update the safeguarding training records ensuring all staff, governors and volunteers have updated training when required.
- are alert to the specific needs of children in need, those with special educational needs and other vulnerable groups.
- are able to keep detailed, accurate and secure written records of concerns and referrals; understand and support the school 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 extremism and/ radicalisation.
- 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 school may put in place to protect them.

Raising Awareness

The DDSL should support the DSL to:

- ensure the Trust's child protection policies are known, understood, and used appropriately.
- ensure the Trust's child protection Policy is reviewed annually (as a minimum) and the procedures and implementation are updated and reviewed regularly, and work with Local Academy Boards regarding this.
- ensure the child protection Policy is available publicly and parents/carers are aware of the fact that referrals about suspected abuse or neglect may be made and the role of the school in this; and
- know how to link with the Local Safeguarding Children Board to make sure staff are aware of training opportunities and the latest local policies on safeguarding.

Child protection file (My Concerns)

Where young people leave the school, the DDSL will support the DSL to ensure their child protection file is transferred to the new school as soon as possible. This will be transferred separately from the main student file if paper copies exist and My Concerns electronically, ensuring secure transit and confirmation of receipt will be obtained.

Availability

During term time the DSL or DDSLs will always be available (during school hours) for staff in the school to discuss any safeguarding concerns. The school and the DSL will arrange adequate and appropriate cover arrangements for any out-of-hour/out-of-term activities.

APPENDIX 13
Visiting Speakers Vetting Procedure

Each school is part of a wider community. Occasionally we have speakers/performers from this community who enrich our students' experience of school, providing students with information that helps them to make decisions at different phases of their education, widening their understanding of world and global issues and providing motivational inspiration through the sharing of a speaker's/performer's experience. Our responsibility to our students is to ensure that they can critically assess the information they receive as to its value to themselves, and that the information is aligned to the values of the school. We achieve this through the following protocols:

All requests for outside speakers/performers must be discussed with the Deputy Headteacher or Headteacher of the school and a Visiting Speaker/Performer Form completed (see overleaf). To complete this form the staff member organising the event must provide:

- a brief biography of the speaker/performer or institution with the purpose clearly defined as to the information the speaker/performer wishes to communicate. The information must align to the values of the Trust. This must be discussed with the organiser prior to the request being made and the Visiting Speaker/Performer Form being completed;
- a named 'link contact' for the speaker/performer who will be the liaison with school;
- the staff member responsible for arranging the visit must ascertain that all information communicated by the speaker/performer is lawful.

On receipt of the form the Deputy Headteacher/Headteacher will make a decision regarding permission for the speaker/performer to come to the school. Please note that, whenever possible, a period of no less than one month's notice should be given prior to the speaker/performer's proposed visit to the school. The form will be forwarded to the Headteacher for final authorisation.

Please note: the staff member must send or give the speaker/performer a copy of the Visiting Speaker/Performer Agreement in advance of the visit (see below); this is to ensure the speaker/performer is able to prepare in advance of their visit regarding our values and will be familiar with the declaration before being required to sign it on arrival at school.

Further guidelines
Trust safeguarding procedures apply, and the visiting speaker/performer will be asked for evidence of identity. Unless DBS status has been verified as clear prior to the visit, the speaker/performer will not be allowed unsupervised access to the school site. A member of school staff will therefore accompany the speaker/performer at all times. Speakers/performers will be issued with further safeguarding information on arrival at Reception to ensure they are familiar with the safeguarding arrangements within the Trust. They will be issued with a visitor's lanyard which they must wear at all times.

During the speech/performance - monitoring
A member of staff must be present during the event to monitor the speech/performance. In the unlikely event that the speech/performance does not meet the requirements of an educational setting, the member of staff will take immediate action to balance the information given and to stop the performance in extreme circumstances.

Visiting Speaker/Performer Form

Date of Event	
Time of Event	
Purpose of speech/ performance (including year groups involved)	
Name of speaker/performer and organisation **How did you become aware of this visitor?**	
Brief biography of speaker/performer/ organisation (continue on additional page if necessary)	
Confirm that research (e.g.: internet search) has been carried out on the speaker/event, and the organisation they are affiliated to – record detail	
Name of link person to liaise with school	
Contact details for link person	
School staff member responsible for visit	
Venue/Room	
Authorisation by Headteacher: **Having assessed the level of risk I am satisfied that this speaker/visit is suitable and that the planned event can go ahead.** **OR** **Having completed this risk assessment I have reflected on the evidence and made the decision that this visit MUST NOT go ahead. (Headteacher to take appropriate action)**	……..……. (sign and date) Event MUST NOT go ahead and has been cancelled by the Headteacher …… (sign and date)
Confirm that you agree to ensure that the speaker is accompanied at all times, whilst on the premises	YES NO

If speaker/performer will be <u>unaccompanied at any time</u> or if they are likely to visit again in the future, please supply the following details:

DBS	
Position/job disclosure covers:	
Name of Employer:	
Name of Registered Body:	

Date of DBS Certificate:	

This is to confirm that all information communicated by the speaker/performer is lawful and will not undermine the values and ethos of the school.

Signed by Headteacher:		**Date:**	

Post visit feedback:

Visiting Speaker/Performer Agreement

We understand the importance of visitors and external agencies to enrich the experiences of our students. In order to safeguard our children and young people we expect all visiting speakers to read and adhere to the statements below.

- any messages communicated to students support fundamental British Values and our school values.
- any messages communicated to students are consistent with the ethos of the school and do not marginalise any communities, groups, or individuals.
- any messages communicated to students do not seek to glorify criminal activity or violent extremism or seek to radicalise students through extreme or narrow views of faith, religion or culture or other ideologies.
- activities are properly embedded in the curriculum and clearly mapped to schemes of learning to avoid contradictory messages or duplication.
- activities are matched to the needs of students.
- visitors will also be accompanied by a member of staff at all times.

Signed:..... Date: .....

APPENDIX 14
Risk Assessment for Volunteers

This risk assessment should be completed when considering whether a person working as a volunteer at the school should be asked to apply for an enhanced DBS certificate.

Name of Person .....

Is the volunteer in 'Regulated' Activity? Yes No
All regular volunteers (defined as those volunteering once a week or more, or 3+ days in a 30-day period) and those joining overnight residential trips undergo a mandatory Enhanced DBS check with children's barred list information prior to commencing their role.

For occasional or one-off volunteers who are not in regulated activity and remain fully supervised at all times, the school will undertake a formal, written risk assessment to determine whether an Enhanced DBS check (without a barred list check) is required. Under no circumstances will a volunteer who has not undergone any background checks be left unsupervised with children.

Areas to consider

What is the age group of the students that the volunteer will work with?	
Are these students regarded as particularly vulnerable?	
How frequently will the volunteer be in school?	
What is the connection of the volunteer to the school?	
What motivates the volunteer to want to work in the school?	
Is the volunteer in paid employment or do they work in a voluntary capacity elsewhere with children?	
Can the volunteer provide at least one reference from someone other than a family member, including a senior person at the employment or voluntary service named above?	
What information does the school already know about the person?	
Has the person's identity been verified?	
Is the person signed up to the DBS Update Service?	
Has a check been completed on the DBS Update Service?	
Is the person aware of any reason why they should not volunteer to work with children?	
Is the school aware of any reason that the person should not work with children?	
Is this volunteer with children between the hours of 2am and 6am	This is regulated activity and the person must have an Enhanced DBS check

Decision

☐ **High Risk** – the person has no previous connection with the school AND cannot provide references from elsewhere.

There is no statutory reason why this person needs to apply for an enhanced DBS Certificate. However, the school should consider whether the person's uncorroborated background would raise an unacceptable risk.

☐ **Medium Risk** – The person can provide suitable references for other work with children (either paid or unpaid), they have a connection to the school, and no issues have become known that would mean they would be unsuitable.

There is no statutory reason why this person needs to apply for an enhanced DBS Certificate. However, the school may wish to do so, as no enhanced DBS has be seen.

☐ **Low Risk** – The person is signed up to the DBS Update Service and the checks reveal no negative information OR The person is employed or volunteers elsewhere and has a recent enhanced DBS and can provide references OR the school knows the person well (e.g. may be a former employee)

There is no statutory reason why this person needs to apply for an enhanced DBS Certificate. However, unless the person uses the DBS Update service, the school may decide to obtain a new enhanced DBS.

Decision

☐ Application for enhanced DBS check is not needed. State reason(s) below:

☐ Application for an enhanced DBS check is needed. State reason(s) below:

☐ Application for an enhanced DBS check and a Barred List check is needed because the person is in Regulated Activity

Headteacher (Print Name) .....

Headteacher (Signature) .....

Date .....