Edward Jenner School –

SAFEGUARDING CHILDREN & CHILD PROTECTION - POLICY & GUIDANCE

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***This Policy is reviewed annually and is subject to immediate review in line with statutory changes as and when they take place.***

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# Introduction

## Safeguarding and promoting the welfare of children is everybody’s responsibility. Every child deserves to grow up in a safe, stable and loving home. Edward Jenner School is committed to safeguarding and promoting the welfare and wellbeing of young people and staff. We believe that everyone, without exception, has a right to be safe and to be treated with dignity and respect regardless of background and live a life free from discrimination. The School recognises that children and young people learn best when they are healthy, safe and secure.

## Safeguarding and promoting the welfare of children is defined as

## providing help and support to meet the needs of children as soon as problems emerge

## protecting children from maltreatment, whether that is within or outside the home, including online

## preventing the impairment of children’s mental and physical health or development

## ensuring that children grow up in circumstances consistent with the provision of safe and effective care

## taking action to enable all children to have the best outcomes

* 1. The DFE’s Working Together to Safeguard Children (updated December 2023) brings together the existing guidance to emphasise that successful outcomes for children depend on strong multi-agency partnership working to include principles for working with parents and carers to centre the importance of building positive, trusting and co-operative relationships.

## This policy applies to all pupils in the School and on the premises.

## The purpose of this policy is to inform staff, parents, contractors, volunteers and supply teachers about the School’s responsibilities for safeguarding children and to enable all parties to have a clear understanding of how these responsibilities should be carried out. It applies wherever staff members are working with pupils – even where this is away from the School, such as on educational visits.

## This policy is published on the School website and is available to parents of current and prospective pupils from the School on request. Large print, or other accessible formats can also be made available

## The policy is drafted in accordance with all relevant legislation and the following statutory guidance:

* + - [Keeping Children Safe in Education 2024](https://assets.publishing.service.https:/assets.publishing.service.gov.uk/media/6650a1967b792ffff71a83e8/Keeping_children_safe_in_education_2024.pdf)
    - [Working Together to Safeguard Children 2023](https://assets.publishing.service.gov.uk/media/65cb4349a7ded0000c79e4e1/Working_together_to_safeguard_children_2023_-_statutory_guidance.pdf)
    - [Prevent Duty Guidance for England and Wales 2023](https://assets.publishing.service.gov.uk/media/65e5a5bd3f69457ff1035fe2/14.258_HO_Prevent+Duty+Guidance_v5d_Final_Web_1_.pdf)
    - Disqualification Under the Childcare Act August 2018
    - Education (Independent School Standards) Regulations 2014
    - Gloucestershire’s agreed inter-agency procedures [Gloucestershire Safeguarding Children Partnership](https://www.gloucestershire.gov.uk/gscp/) (GSCP)
    - What to do if you are worried a child is being abused – advice for practitioners March 2015
    - Children Missing Education September 2016
    - Safer Working Practices, Safer Recruitment Consortium, February 2023
    - Guidance from [UK Safer Internet Centre](https://www.saferinternet.org.uk/) - Helping children and young people stay safe online
    - Filtering and monitoring Standards: <https://www.gov.uk/guidance/meeting-digital-and-technology-standards-in-schools-and-colleges>
    - [Sharing nudes and semi-nudes:advice for education settings working with children and young people December 2020](https://www.gov.uk/government/publications/sharing-nudes-and-semi-nudes-advice-for-education-settings-working-with-children-and-young-people/sharing-nudes-and-semi-nudes-advice-for-education-settings-working-with-children-and-young-people)
    - [UKCIS Guidance Sharing Nudes and Semi-Nudes](https://oursaferschools.co.uk/2021/01/13/ukcis/)

## We follow the procedures of the Gloucestershire Safeguarding Children Partnership. We are advised by the local Safeguarding and Inclusion Team Manager, whom the DSL regularly consults on safeguarding matters in addition we use GCC Traded Services.

## Contact details are contained in Appendix 1. Their multi-agency safeguarding procedures can be seen [here](https://gloucestershirescp.trixonline.co.uk/)

## Every complaint or suspicion of abuse, neglect and exploitation from within or outside the School will be taken seriously and action will be taken in accordance with this policy.

## The School will continue to implement all safeguarding procedures in the case of school closures. Staff training will include reference to remote learning, and the safeguarding role of staff during those times.

# Principles

## Edward Jenner School is committed to safeguarding and promoting the welfare of all pupils in our care, and expects all staff, supply staff and volunteers to share this commitment. To achieve this, the School seeks to create a safe school environment and a strong pastoral system. Staff are trained to listen to pupils’ concerns, demonstrate professional curiosity, identify issues early and respond appropriately following agreed procedures. The School will consider for each concern what is in the best interest of the child at their heart, ensuring the child’s wishes and feelings are taken into account when determining what action to take and what services to provide. Children can confidently report abuse, neglect and exploitation, knowing their concerns will be treated seriously, with respect, without judgement or shame. They know they can safely express their views and wishes, give and receive feedback. We maintain a zero-tolerance approach to sexual violence and sexual harassment between pupils, it is never acceptable and will not be tolerated.

## The School will take all reasonable measures to:

### ensure that we practise safer recruitment in checking the suitability of staff, supply staff and volunteers (including staff employed by other organisations) to work with children and young people. Staff recruitment procedures are outlined in detail in the EJS Safer Recruitment Policy.

### ensure that, where staff from other organisations are working with our pupils on another site, we have received confirmation that appropriate child protection checks and procedures apply to those members of staff and that any such checks do not raise any issues of concern in relation to the suitability of those staff members working with children;

### follow the [Safeguarding Procedures manual](https://gloucestershirescp.trixonline.co.uk/) and contribute to inter-agency working;

### support pupils in need through early intervention and, where appropriate, support them in co-operation with multi-agencies who are working within [Graduated parthway and Levels of intervention](https://www.gloucestershire.gov.uk/education-and-learning/graduated-pathway-practice-guidance/practitioners/graduated-pathway-flowcharts-and-levels-of-intervention/gscp-levels-of-intervention/) as part of the Team around the Child (TAC) approach;

### be alert to signs of abuse, neglect and exploitation, both in the School and from outside and to protect each pupil and their siblings from any form of abuse, whether from an adult or child on child;

### deal appropriately with every suspicion or complaint of abuse, neglect and exploitation and support pupils who have been abused in accordance with their agreed child protection plan;

### design and operate procedures which promote this policy, but which, so far as possible, ensure that teachers and other staff who are innocent are not prejudiced by false allegations;

### be alert to the needs of pupils with physical and mental health conditions. All staff should be aware that:

### They are well placed to observe children day to day and identify those whose behaviour suggests that they may be experiencing a mental health problem or be at risk from developing one;

### Mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation;

### Only appropriately trained professionals should attempt to make a diagnosis of a mental health problem

### Offer open advice, guidance, a safe space and support to pupils who may be LGBTQ+ or gender questioning, ensuring a chosen trusted adult is allocated

### operate robust and sensible health and safety procedures;

### operate clear and supportive policies utilising Early Help advice on drugs, alcohol and substance misuse;

### assess the risk of children being drawn into terrorism, including support for extremist ideas that are part of terrorist ideology, based on an understanding of the potential risk in the local area;

### identify children who may be susceptible to terrorist ideals, grooming, County Lines, gangs and gang related violence and other locally identified issues and know what to do when they are identified;

### take all practicable steps to ensure that School premises are as secure as circumstances permit;

### teach pupils about age and stage appropriate safeguarding issues and about how to keep themselves safe (including on-line and when working online at home)

### ensure that any deficiencies in our child protection and safeguarding procedures are remedied without delay.

# Roles and responsibilities

## It is the responsibility of the proprietor to ensure all staff (including volunteers and supply staff) understand their safeguarding responsibilities and are under a general legal duty to:

### contribute to providing a safe environment in which children can learn;

### attend appropriate in school safeguarding and child protection training; at least annually as directed by the DSL and, as and when additional updates are required;

### be aware of indicators of the different forms of abuse, neglect and exploitation, including child on child and of emergent mental health problems;

* + - practise professional curiosity;
    - ensure they are aware that pupils may not be ready to talk about abuse, neglect and exploitation or even be aware that what they have experienced is harmful;
    - raise concerns with the DSL and together consider ways to build communication through relationships;
    - use appropriate resources to support safeguarding education and positive mental health across the curriculum;
    - assist children in need and to protect children from abuse, neglect and exploitation including grooming and risk of being drawn to terrorism

### be clear as to the school’s policy and procedures with regards to child on child abuse; to keep in mind ‘it could happen here’ and adopt a zero tolerance approach; the important role they have to play in preventing it and responding where they believe a child may be at risk from it

### be familiar with the School’s policies pertaining to safeguarding and child protection procedures (see section 16.9) and follow them;

### know how to access and implement the procedures, independently if necessary;

### keep a sufficient record including date, time, location and names of any significant complaint, conversation or event;

* + - understand as and when there is a need for an appropriate adult in cases involving the police

### report any matters of concern to the DSL or, where appropriate, to one of the key contacts in accordance with this policy; and

### support social services and any other agencies following any referral.

## The Designated Safeguarding Lead (DSL):

The School has appointed a Designated Safeguarding Lead (DSL); this individual is a member of the School Senior Leadership Team. The DSL takes lead responsibility for safeguarding, the IT filtering and monitoring systems and child protection. The DSL is the first point of contact for parents, pupils, staff and others if they have any concerns about safeguarding or child protection.

The School recognises that the role of the DSL carries a significant level of responsibility, and they should be given the time, funding, training, resources and support they need to carry out their role effectively. The School also has Deputy DSL’s, ensuring that there is always an appropriately trained and designated person in the School at all times. In the event of neither the DSL or DDSL being available, [Mandy Philips](mailto:m.phillips@thekingsschool.co.uk) the DSL from The King’s School should be contacted for advice and guidance

The responsibilities of the DSL can be summarised as follows:

### Raise Awareness:

#### provide support, advice and expertise on all matters concerning safeguarding

#### children need to feel heard and understood, to facilitate this we:

#### encourage a culture among staff of respectful listening to pupils, building trusted relationships

#### listen to and take into account pupils wishes and feelings in any measures the school may put in place to protect them

#### understand the difficulties that children may have in approaching staff about their circumstances and consider how to facilitate communication.

#### ensure this Policy is known, understood and used appropriately, and reviewed at least annually

#### monitor the operation of this policy and regularly review and update the School’s child protection procedures and their implementation

#### ensure that all members of staff and volunteers receive the appropriate training on child protection, understand their roles and responsibilities in filtering and monitoring, keep and maintain records of this training and ensure that staff are aware of training opportunities and the latest local policies on safeguarding.

### Share Information and Managing The Child Protection File

The designated safeguarding lead is responsible for ensuring that child protection files are kept up to date. Information should be kept confidential and stored securely in the office. Each child with a concern or referral has a separate physical child protection folder. Our records include:

* A front chronology sheet;
* clear and comprehensive summary of any concern or update;
* relevant emails and correspondence with the family and external agencies;
* details of how the concern was followed up and resolved;
* a note of any action taken, decisions reached and the outcome.

Files are only accessed by those who need to see it and where the file or content within it is shared, this happens in line with information sharing advice.

Where children leave the school (including in-year transfers) we ensure the folder is transferred securely with a receipt, to the named recipient in the new setting (separately from their main pupil file), within 5 days for an in-year transfer or within the first 5 days of the start of a new term. In addition to the child protection file, we telephone the DSL ahead of transfer to share any additional information and add context to help the new setting put in place the right support to safeguard this child and to help the child thrive in the school.

### Manage Referrals:

#### advise and act promptly upon all safeguarding concerns reported to them;

#### refer cases of a child who is suffering, or is likely to suffer from harm to the local authority children’s social services and the [Local Authority Designated Officer (LADO)](https://www.gloucestershire.gov.uk/health-and-social-care/children-young-people-and-families/lado-allegations/#:~:text=The%20role%20of%20the%20LADO%20is%20to%20be%20involved%20in,to%20employers%20and%20voluntary%20organisations.) where appropriate, support staff who make or consider making any such referrals and liaise with the local authority children’s social services on behalf of the School as required;

#### refer cases to the Channel programme where there is a risk of an individual being drawn into terrorism and keep a record of those staff registering the concern;

#### refer cases where a person is dismissed or left due to risk/harm to a child to the Disclosure and Barring Service and the Secretary of State via the TRA;

#### refer cases where a crime may have been committed to the police with reference to the NPCC Document: [‘When to call the Police – Guidance for Schools and Colleges’](https://www.npcc.police.uk/SysSiteAssets/media/downloads/publications/publications-log/2020/when-to-call-the-police--guidance-for-schools-and-colleges.pdf) and understanding the protocol for an appropriate adult to be present;

#### keep detailed, accurate, secure written records of concerns or referrals (in a separate file in the school office);

#### where appropriate, take part in child protection conferences or reviews by the local authority;

#### keep the relevant staff including the Head of School informed of all concerns and actions, especially ongoing enquiries under Section 47 - Children’s Act 1989 and police investigations;

#### monitor records of pupils in the School who are subject to a Section 47 child protection plan or Section 17 child in need plan, to ensure that they are maintained and updated as notifications are received;

#### monitor the confidentiality and storage of records relating to child protection and where a pupil leaves, ensure their child protection file is copied for the new school as soon as possible and transfer it separately from the main pupil file, ensuring secure transit and confirmation of receipt is obtained;

### Promote Educational Outcomes:

#### by sharing the pertinent information about the welfare, safeguarding and child protection issues that children are experiencing or have experienced, with all relevant staff

#### where children have 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).

#### understand the lasting impact that adversity and trauma can have, including on children’s behaviour, mental health and wellbeing, and what is needed in responding to this in promoting educational outcomes for children with Adverse Childhood Experiences (ACE’s)

#### remain alert to the specific needs of children in need, those with special educational needs and disabilities (SEND), those with relevant health conditions and young carers

* + - * working with the Headteacher/Proprietor to ensure any young person attending an Alternative Provision is properly safeguarded to the standards of our care

### Prevent:

#### understand and support the school with regard to the requirement of the Prevent duty and provide advice and support to staff on protecting children from the risk of those drawn to terrorism.

[Prevent Duty Guidance](https://assets.publishing.service.gov.uk/media/65e5a5bd3f69457ff1035fe2/14.258_HO_Prevent+Duty+Guidance_v5d_Final_Web_1_.pdf)

[Factors which may indicate a concern](https://www.gov.uk/government/publications/the-prevent-duty-safeguarding-learners-vulnerable-to-radicalisation/managing-risk-of-radicalisation-in-your-education-setting)

#### ensure that staff inviting visiting speakers to the school have completed a risk assessment form for them if appropriate. Prior to their visit all speakers need to have signed the speaker declaration form to ensure the materials are free from harmful or inappropriate content. Speakers are provided with a safeguarding leaflet. Notification of any incidents occurring during the talk will be made to the DSL.

### IT Filtering and Monitoring Systems

* The DSL will take lead responsibility for understand the filtering and monitoring systems and processes in place in school
* The DSL will work with the IT Manager and the Staff based Online Safety Group to ensure robust filtering and monitoring procedures exist on school devices and school networks. This will follow the [DfE Guidance - Meeting Digital and Technology Standards in Schools and Colleges](https://www.gov.uk/guidance/meeting-digital-and-technology-standards-in-schools-and-colleges/filtering-and-monitoring-standards-for-schools-and-colleges) ;

### Notifying the Staff and Outside Agencies (Including The LADO)

#### The whole staff meets weekly, safeguarding is on the agenda, which includes prepared updates and any significant issues and pertinent comments which have been recorded in the Hamster files. The key person for each child or young person is responsible for notifying the DSL or DDSL of any information which needs discussion at the meeting if they will not be there. Actions are developed in response as required.

#### The MASH or Early Help Co-ordinator is contacted for advice or guidance if required. A safeguarding referral is made if a child is deemed to be at risk of harm.

#### In addition, the Heads, with advice from the ISA, LADO and appropriate external agencies (if required) would convene to discuss significant events including:

#### Events or actions likely to result in a disciplinary offence, including suspension (to include bullying and child on child abuse)

#### Events or actions likely to result in the expulsion or withdrawal of a pupil due to a disciplinary offence (to include bullying and child on child abuse)

#### A Pupil death or serious illness

#### A pupil referral to the Local Authority

#### Allegations against a member of staff

## Deputy Designated Safeguarding Leads (DDSL)

EJS has two fully trained DDSL to the same standard as the DSL, who in the absence of the DSL, carry out those functions necessary to ensure the ongoing safety and protection of pupils. In the event of a long-term absence of the DSL, the deputies will assume responsibility for all the activities described above. On a day-to-day basis safeguarding activities may be delegated to a DDSL but ultimate lead responsibility for safeguarding and child protection remains with the DSL. A Deputy DSL meets at least weekly with the DSL.

## Proprietor/The Head Teachers

The Proprietor is responsible for ensuring that the procedures and capabilities outlined in this Policy are followed on a day-to-day basis. Advice should be sought from outside agencies on a regular basis to ensure this policy and procedures held within it are rigorously followed within our small establishment. To this end the Proprietor/Head Teachers will ensure that:

* + - the safeguarding and child protection policy and procedures adopted are implemented and followed by all staff. To ensure all staff understand and adopt our policies, weekly checks are made through quizzes, signposting of resources and short CPD sessions;
    - the allocation of sufficient time, training, funding, support and resources necessary to enable the DSL and DDSL to carry out their roles effectively is given, including allowing time for the assessment of pupils and attendance at strategy discussions and other necessary meetings;
    - matters which affect pupil welfare are adequately risk assessed by appropriately trained individuals and for ensuring that the relevant findings are implemented, monitored and evaluated;
    - systems are in place for children to express their views and give feedback which operate with the best interests of the child at heart, this includes provision for those students who find it difficult to share their views;
    - to ensure any Alternative Provision conforms to the [DfE Alternative Provision Guidance](https://www.gov.uk/government/publications/alternative-provision) and any young person attending an Alternative Provision is properly safeguarded to meet the standards of our care
    - all staff feel able to raise concerns about poor or unsafe practice and that such concerns are handled sensitively and in accordance with the School’s Whistleblowing Policy;
    - pupils are provided with opportunities throughout the curriculum and wider cross-curricular programme to learn about safeguarding, including respect and keeping themselves safe online (see Appendix 7);
    - ensure safer recruitment procedures in line with Part 3 of KCSiE, September 2024 are being adhered to;
    - they liaise with Local Authority Designated Officer (LADO) before taking any action and on an ongoing basis, where an allegation has been made against a member of staff or volunteer;
    - they notify the Disclosure and Barring Service and, where appropriate, the Teaching Regulatory Authority of anyone who has harmed or may pose a risk to a child.
    - Low level concerns relating to school staff will be recorded in personnel envelopes, low level concerns regarding contractors and supply staff will be raised with their employers

### Local authority traded services are invited at least annually to ensure compliance with child protection statutory requirements and actively promote the wellbeing of pupils. This will include an in-school audit of Safeguarding Policy and practice.

* + - GSCP recommended scheduled procedures are adhered to in order to continually monitor and improve practice
    - The school undertakes the Gloucestershire KCSiE assurance declaration of the School’s safeguarding procedures and actions the identified points
    - The Single Central Register(SCR) is checked at least 6 monthly

# Staff training

## Staff training ensures all members of staff to maintain professional curiosity and an attitude of ‘it could happen here’.

## Induction

training for all new members of staff, including temporary employees or volunteers, includes child protection training and takes place within the first 7 days of employment, it covers:

* + - This safeguarding policy and all related policies\* ;
    - Part 1 and Annex B and Part 5 of KCSIE\*;
    - the role, identity and contact details of the DSL and Deputy DSLs;
    - policies on acceptable use of IT and online safety, schools filtering and monitoring systems, and remote learning\*;
    - the EJS Behaviour Policy\*;
    - the EJS Response to Children who go Missing from Education Policy;
    - the Staff Code of Conduct\*;
    - the EJS Whistleblowing Policy\*;
    - the Gloucestershire Safeguarding Children Partnership procedures and contact details.
    - Individual roles and the Staff Handbook
    - SEND Policy

*\* Copies of these documents will be provided either in paper form or electronically as part of the induction process and new staff will be required to sign a declaration confirming they have read and understood them. A proportional, risk-based approach will be taken to determine the level of information provided to temporary staff and volunteers.*

## Child protection training

All staff, including the Head Teachers and volunteers involved in regulated activity, will undertake appropriate child protection training which, in line with GSCP guidance, is updated every three years including Prevent training. In addition, all staff will receive evidenced safeguarding updates delivered through a combination of annual INSET, weekly staff meetings, appropriate email updates and the completion of necessary e-courses. Safeguarding training is coordinated by the DSL and includes regular updates on online safety and filtering and monitoring

## All staff receive updated copies of the School policies

As referred to above via the website staff are required to confirm that they have read and understood them. In addition, Part 1, Annex B and Part 5 of KCSIE are required reading confirmation through signature to say that they have understood them, support is available if required. Staff training provides an opportunity to check and consolidate their understanding of the policies as they are updated. Time and support would be made available for translation of required reading accessed from LGfL into a different language for those members of staff who hold English as a second language.

## The DSL team will regularly assess the appropriate focus for staff training

This is so that it can respond to specific safeguarding concerns such as [mental health](https://campaignresources.phe.gov.uk/schools/topics/mental-wellbeing/overview), online safety including appropriate response to [hoax and challenge material,](https://www.gov.uk/government/publications/harmful-online-challenges-and-online-hoaxes/harmful-online-challenges-and-online-hoaxes) child on child abuse including sexual violence and harassment, those at risk of being drawn into terrorism, child sexual exploitation, child criminal exploitation, sexual violence and harassment, and female genital mutilation. All staff are trained to manage and robustly report safeguarding concerns.

## The DSL and Deputy DSLs undertake Level 3 GSCP training.

This training includes Prevent awareness training and will be updated every two years. Additional specialist training will be provided to those who have specific responsibility for safeguarding or for Looked After Children and their progress. DSL and DDSL also refresh their knowledge and skills at regular intervals (and at least annually) by following developments in safeguarding in order to:

* keep abreast of best practice for promoting a culture of listening to children;
* remain up to date on the mechanics of inter-agency working as operated by the GSCP;
* understand the assessment process for providing Early Help and intervention, for example through locally agreed common and shared assessment processes such as Early Help assessments. To be in regular contact with Early Help Co-ordinators and attend local area meetings;
* have an up-to-date working knowledge of how local authorities conduct child protection case conferences so they can contribute to these effectively when required to do so;
* be alert to the specific needs of children in need, those with special educational needs and young carers;
* understand and support the school with regard to the requirements of the Prevent duty and provide advice and support to staff on protecting children from the risk of being drawn into terrorism; and
* be able to keep proper written records of concerns and referrals. Follow up, actions, and resolution/outcomes will be recorded on our individual pupil chronology.

# Opportunities to Teach Safeguarding

## Teaching pupils to keep themselves safe

The School is committed to educating pupils about safeguarding issues. Robustly covered in our Thinking and RSHE curriculum on an age and stage basis building on prior knowledge and understanding.

## Recognising and supporting vulnerable pupils

## As a School, we will recognise our vulnerable pupils and support them through:

* The curriculum - to encourage self-esteem and self-motivation and a growth mindset;
* The School ethos - which promotes a positive, supportive and secure environment; and which gives all pupils and adults a sense of being respected and valued - asking everyone to ‘be kind’;
* The implementation of the School’s behaviour management policies;
* Regular liaison with other professionals and agencies that support the pupils and their families;
* A commitment to develop productive, supportive relationships with parents; successful outcomes for children depend on strong partnership working between parents/carers and school staff
* Recognition that statistically children with SEND are more vulnerable to abuse, neglect and exploitation;
* Keeping staff current and informed. Through information provided by national and local bodies. These include SEND safeguarding advice from [NSPCC](https://learning.nspcc.org.uk/safeguarding-child-protection-schools/safeguarding-children-with-special-educational-needs-and-disabilities-send) , GCC safeguarding Hubs and Gloucestershire police to enable us to be able to recognise locality specific dangers including grooming, gang related cultures and those at risk of being drawn into terrorism;
* Awareness of, and support for, intrafamilial impact of abuse;
* Knowledge of the impact of domestic violence and drug or alcohol abuse in their home;
* The school recognise and understand the need for an appropriate adult utilising guidance from [PACE, Section 11 Code C 2019](https://www.gov.uk/government/publications/pace-code-c-2019/pace-code-c-2019-accessible#bookmark33).

## Use of the curriculum and thinking lessons to highlight safeguarding and child protection issues to pupils

Each individual student has a bespoke curriculum route including Game Plan (tailored SEMH learning) with one to one planning and meetings with key adults. In addition, safeguarding issues are explored in a variety of contexts across the school. These include:

* thinking lessons using the Pink Curriculum and RSHE scheme
* sessions with our counsellor or Safer Solutions Mentor
* additional pastoral talks from outside speakers
* Friday voice: a chance for all pupils to be informed, supported and to be heard on a target issue
* information disseminated to parents through weekly emails including Friday voice and links we provide to support continued discussions within the home and family e.g [thinkuknow](https://www.thinkuknow.co.uk/parents/)
* and opportunities which occur spontaneously within the curriculum

## Issues covered to mitigate risk include (but not exhaustive):

### online safety including critical responses to harmful content and promoting understanding of fact and fiction

### those at risk of being drawn into terrorism

### grooming

### child sexual exploitation

### child criminal exploitation

### healthy relationships and age and stage appropriate content from the Relationship Sex and Health Education (RSHE) Curriculum

* respectful behaviour: online; in school; at home and the environment
* mental health
* substance misuse
* bullying
* British values

## Online Safety

At Edward Jenner School our e-Safety Policy outlines our approach to online safety which empowers our school to protect and educate pupils, staff, and parents in their use of technology.

We manage secure access to the internet using GSuite logins to monitor web activity via Securly. This protects us from cybercrime, offers antivirus and firewall protection and ensures filtering which is proportionate. Filtering is regularly checked for activity and efficiency. E-Safety is regularly reviewed at Weekly Staff meetings and added to by half-termly Online Safety Group meetings. The use of mobile technology is outlined in our e-safety policy and works in conjunction with the DfE’s filtering and monitoring standards.

The leadership team recognises the challenge presented to ensure Online Safety for all pupils. The DSL works as part of the ICT Management Committee to ensure online Safety. The focus for regular updates for staff, including attempted breaches of filtering systems and interrelated lesson content comes under 4 main categories:

* Content - being exposed to illegal, inappropriate or harmful content, for example; pornography, fake news, racism, misogyny, misandry, self-harm, suicide, anti-Semitism, those at risk of being drawn into terrorism and extremism
* Contact - being subjected to harmful online interaction with other users; for example; peer to peer pressure (including those across different year groups) hoaxes and challenges, adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes.
* conduct: personal online behaviour that increases the likelihood of, or causes, harm; for example; making, sending and receiving explicit images (e.g consensual and non-consensual sharing of nudes and semi-nudes and/or pornography, sharing other explicit images) and online bullying
* commerce - risks such as online gambling, inappropriate advertising, phishing and or financial scams

## Remote learning

Where children are being asked to learn online at home the [Department of Education](https://www.gov.uk/guidance/safeguarding-and-remote-education-during-coronavirus-covid-19) and the [NSPCC](https://learning.nspcc.org.uk/news/covid/undertaking-remote-teaching-safely) offer up-to-date [advice](https://www.gov.uk/guidance/safeguarding-and-remote-education-during-coronavirus-covid-19) we publish our Remote learning statement on our website. In addition, we would communicate to parents if an email address outside our domain required contact.

## Developing understanding of child on child abuse

## Edward Jenner School has an important role in developing students’ understanding of what constitutes child on child abuse and instilling behavioural norms centred around respect. All staff are familiar with what constitutes child on child abuse and Sexual harassment. Staff are aware of the importance of:

* embedding through expectation the School’s rules which are explicit about the high standards of behaviour and courtesy and kindness the School expects
* consistently implementing the Behaviour Policy
* teaching that sexual violence or sexual harassment is abusive behaviour and cannot be dismissed as ‘banter’, ‘just having a laugh’ or ‘boys being boys’
* an actively curious approach, listening and encouraging all young people to talk and discuss
* teaching the School’s anti-bullying strategy and promoting the School values
* providing children and young people with the opportunity to learn to identify and respond to dangerous or harmful content physically or online
* affording the opportunity for all children and young people to communicate by their chosen means to their trusted person

## Other strategies in place to prevent the occurrence of child on child abuse include:

* providing developmentally appropriate ‘Thinking’ lessons which enhance pupils’ understanding of acceptable behaviour. For themes covered see RSHE Policy Primary and Secondary
* CYP knowing that they will be listened to, believed and valued
* Identifying and delivering targeted work on assertiveness and keeping safe for those students identified as being potentially more vulnerable
* having robust supervision arrangements, particularly for social time and on visits including residential visits

# Hierarchy of Intervention

## GSCP

GCSP publishes threshold guidance ([here](https://www.gloucestershire.gov.uk/media/2104587/gscp-executive-published-arrangements-v8-feb1st-2021.pdf)) that all agencies, professionals and volunteers in the County can use to consider how best to meet the needs of individual children and young people. This guidance provides a summary of thresholds for intervention in relation to a continuum of need, ranging from children who need no additional intervention to those who require intensive help and specialist support. Children’s needs are not static and they may experience different needs – at different points on the continuum – throughout their childhood years.

## Within the continuum, there are four levels of intervention:

### **Level 1 Universal** - No additional support required beyond access to universal provision Children and young people are making good overall progress in all areas of their development. They are very likely to be living in a protective environment where their needs are well recognised and met accordingly. These children will require no additional support beyond that which is universally available.

### **Level 2 Additional** - A coordinated response, through an Early Help Plan – ‘My Plan’ which may require a single or multi-agency response. Children and young people with additional needs, who would benefit from extra help - often from practitioners who are already involved with them. Children and families may need help to:

* + - * Improve access to education and educational outcomes;
      * Improve parenting and/or behaviour;
      * Meet specific health or emotional needs;
      * Improve their material situation;
      * Respond to a short-term crisis such as bereavement or parental separation;
      * Support to recognise and mitigate risk;

### **Level 3 Intensive** - Targeted Early Help response taking a multi-agency approach through an Early Help Assessment - ‘My Assessment and My Plan+’. Vulnerable children and their families with multiple needs or whose needs are more complex, such as children and families who:

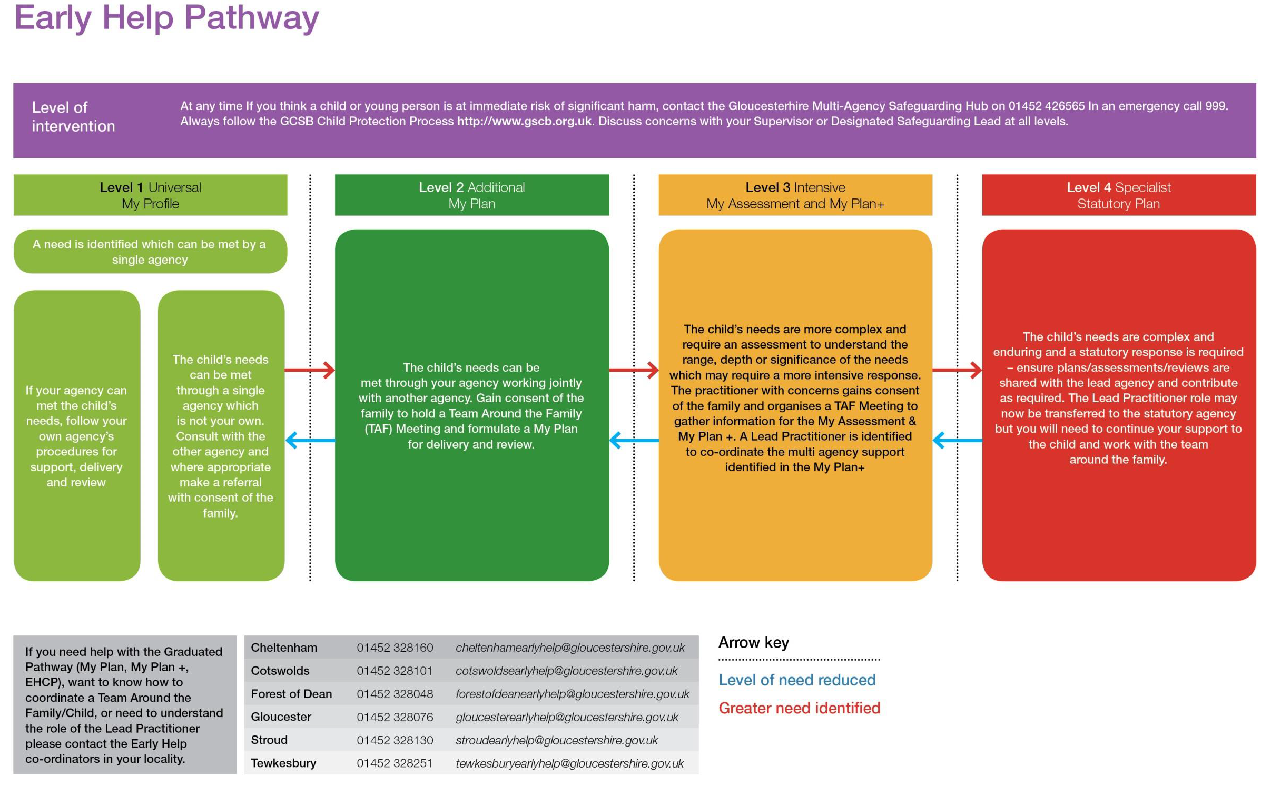
### Exhibit anti-social or challenging behaviour;

### Have poor engagement with key services, such as school and health;

### Are not in education or work long term;

### An unborn baby, child or young person living in circumstances where there is an identified risk associated with parental behaviour;

### **Level 4 Specialist** - Children in Need of Specialist Support from Children’s Social Care, including Children in Need of Protection and Children in Need of Care. A child or young person living in circumstances where there is a significant risk of abuse, neglect and exploitation where the young person themselves may pose a risk of serious harm to others or where there are complex needs in relation to disability. An unborn baby, child or young person living in circumstances where they are suffering or likely to suffer significant harm related to an identified risk associated with parental behaviour. These children will have complex needs across a range of domains that requires an assessment under the Children Act 1989



# Early Help

# Early Help is support for children of all ages that improves a family’s resilience and outcomes or reduces the chance of a problem getting worse. It is not an individual service, but a system of support delivered by local authorities and their partners working together and taking collective responsibility. Providing Early Help is more effective in promoting the welfare of children then reacting later. Early Help may be appropriate for children and families who have several needs or whose circumstances make them more vulnerable. Some Early help is provided through Universal Services which includes our school services: mentoring, game planning and parent liaison, signposting to Health services, Early Help co-ordinator advice or signposting to [Family Information Service](https://www.gloucestershire.gov.uk/health-and-social-care/children-young-people-and-families/family-information-service-fis/) FIS. These services are available to all families regardless of their needs. Where a child and family would benefit from co-ordinated support from more than one organisation or agency (for example, education, health, housing) there should be a multi-agency assessment. This may lead to Targeted Early Help. For Early Help to be effective we as a school need to work together with other agencies to**:**

## identifying children and families who may benefit from Early Help

## contribute to the assessment of the need for Early Help which considers the needs of all members of the family

## ensure good ongoing communication, for example, through regular meetings between practitioners who are working with the family

## co-ordinate and/or provide support as part of a plan to improve outcomes. This plan will be designed together with the child and family, and updated as and when the child and family needs change

## engage effectively with families and their family network

## The School recognises the importance of providing Early Help to pupils to provide support for a problem as soon as it arises, to prevent it from escalating. We recognise that young people may face many challenges that put them in need of support and ensure that staff are aware of them.

## Pupils are encouraged to raise concerns as soon as they are identified, either to their teacher, DSL or trusted adult, so that effective early support can be provided.

## If staff believe that a pupil could benefit from Early Help, they should discuss the matter with the DSL who will, taking into account Gloucestershire Levels of Intervention, consider what action should be taken.

## If Early Help is provided, the situation will be monitored carefully and a referral to children’s social services made if the pupil’s situation does not appear to be improving.

## Staff at EJS have a close monitoring role with all pupils and are very well positioned to help identify emerging problems and those who would benefit from Early Help. Monitoring includes a thorough pupil recruitment process, weekly staff discussion of all pupils referencing and updating individual Dashboards and where necessary chronologies, the thinking programme and various policies. In addition our school Solution focussed and Game Plan mentors identify children who might be in need of Early Help.

## The School recognises that children with Adverse Childhood Experiences (ACE’s) have increased vulnerability.

## Early Help may be indicated for the following groups of CYP:

* They do not have English as a first language.
* They are witness to domestic abuse including where they see, hear or experience its effects
* They are looked after children including privately fostered
* has returned home to their family from care
* They are acting as a young carer.
* They are showing early signs of abuse or neglect.
* Bereaved
* Have a parent in prison (or affected by parent offending)
* showing signs of being drawn into anti-social or criminal behaviour, including being affected by gangs and county lines and organised crime groups and/or serious violence, including knife crime
* is persistently and unexplainably missing/goes missing from education care or from home
* is at risk of modern slavery, trafficking, sexual and/or criminal exploitation
* • is at risk of being radicalised
* is viewing problematic and/or inappropriate online content (for example, linked to violence), or developing inappropriate relationships online
* is in a family circumstance presenting challenges for the child, such as drug and alcohol misuse, adult mental health issues
* is misusing drugs or alcohol themselves
* is suffering from mental ill
* has experienced multiple suspensions and is at risk of, or has been permanently excluded
* They may be subject to discrimination and maltreatment on the grounds of race, religion, ethnicity, sexual orientation or sexual identity.
* At risk of ‘honour’- based abuse such as Female Genital Mutilation or Forced Marriage.
* They are disabled, have special educational needs or certain health conditions.

Recognising abuse, neglect and exploitation may be more difficult for these children for many reasons, including:

* assumptions that indicators of possible abuse, neglect and exploitation such as behaviour, mood or injury relate to a pupil’s disability without further exploration;
* that pupils with special educational needs or disabilities can be disproportionately impacted by bullying without outwardly showing any signs;
* communication barriers and difficulties overcoming these barriers;
* a disabled child’s understanding of abuse, neglect and exploitation.

# What to look out for and when to be concerned

## All staff should be aware of the types and signs of abuse, neglect and exploitation so that they are able to identify pupils who may be in need of help or protection. If staff are unsure, they should always speak to the DSL. Behaviours linked to issues such as drug taking and or alcohol misuse, unexplainably or persistently missing education and consensual and non-consensual sharing of nudes and semi-nude images and/or videos can be signs that children are at risk.

## Child abuse is a form of maltreatment of a child. Somebody may abuse, neglect and exploit a child by inflicting harm or by failing to act to prevent harm. Harm can include ill treatment that is not physical as well as the impact of witnessing ill treatment of others. This can be particularly relevant, for example, in relation to the impact on children of all forms of domestic abuse, including where they see, hear or experience its effects. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others. Abuse or exploitation can take place wholly online, or technology may be used to facilitate offline abuse. Children may be abused by an adult or adults or by another child or children.

## Staff should be aware of the four main categories of child abuse which are commonly identified:

* **Physical abuse**: a form of abuse which may involve hitting, shaking, throwing, poisoning, burning, 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.
* **Emotional abuse**: the persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child’s emotional development. It may involve conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the child opportunities to express their views, deliberately silencing them or ‘making fun’ of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child’s developmental capability as well as overprotection and limitation of exploration and learning or preventing the child participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyber-bullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.
* **Sexual abuse**: involves forcing or enticing a child or young person to take part in sexual activities, not necessarily a high level of violence, it may occur over time or be a one-off occurrence. Child Sexual Exploitation (CSE) is a form of sexual abuse. Sexual abuse occurs whether or not the child is aware of what is happening; this also includes 16 and 17 year old CSE victims who can legally consent to have sex who believe they are in a genuine romantic relationship. The activities may involve physical contact, including assault by penetration (for example rape or oral sex) or nonpenetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse. Sexual abuse can take place online, and technology can be used to facilitate offline abuse and may happen without the child’s immediate knowledge e.g. through others sharing videos or images of them on social media. Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.
* **Neglect**: the persistent failure to meet a child’s basic physical and/or psychological needs, likely to result in the serious impairment of the child’s health or development. Neglect may occur during pregnancy 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 or shelter (including exclusion from home or abandonment); protect a child from physical and emotional harm or danger; ensure adequate supervision (including the use of inadequate care-givers); or ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child’s basic emotional needs.

## Child on child Abuse

Most instances of pupils causing harm to each other will be dealt with under the School’s Anti-bullying and Behaviour Policies and is compliant with relevant legislation including the Human Rights Act 1998. However, all staff should be aware that safeguarding concerns can arise as a result of conduct by a pupil towards another (sometimes referred to as child on child abuse). All staff should be aware of child on child abuse and that it can happen both inside and outside of school and online. They should understand, that even if there are no reports it does not mean it is not happening, it may be the case that it is just not being reported. Pupil’s may not speak about child on child abuse but comments might be overheard of behaviour changes noticed. As such it is important if staff have any concerns regarding child on child abuse they should speak to the DSL/DDSL.

It is essential that all staff understand the importance of challenging inappropriate behaviours between peers and that are actually abusive and degrading in nature. Downplaying certain behaviours, for example dismissing sexual harassment as “just banter”, “just having a laugh”, “part of growing up” or “boys being boys” can lead to a culture of unacceptable behaviours, an unsafe environment for children and in worst case scenarios a culture that normalises abuse leading to children accepting it as normal and not coming forward to report it. It is also essential to challenge physical behaviour (potentially criminal in nature), such as grabbing bottoms, breasts and genitalia, pulling down trousers, flicking bras and lifting up skirts. Addressing inappropriate behaviour (even if it appears to be relatively innocuous) can be an important intervention that helps prevent problematic, abusive and/or violent behaviour in the future. Child on child abuse is most likely to include, but may not be limited to:

* Bullying (including cyberbullying, harassment, prejudice-based and discriminatory bullying);
* Abuse in intimate personal relationships between peers;
* Physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (this may include an online element which facilitates, threatens and/or encourages physical abuse);
* Sexual violence includes the following acts without consent or a reasonable belief there is consent:
  + rape,
  + assault by penetration,
  + sexual assault: intentionally sexually touching another person (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 including forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party.
* Sexual harassment ‘unwanted conduct of a sexual nature’ that can occur online and offline and both inside and outside of school. Sexual harassment is likely to: violate a child’s dignity, and/or make them feel intimidated, degraded or humiliated and/or create a hostile, offensive or sexualised environment. Sexual harassment can include:
  + sexual comments, such as: telling sexual stories, making lewd comments, making sexual remarks about clothes and appearance and calling someone sexualised names;
  + sexual ‘jokes' or taunting;
  + physical behaviour, such as: deliberately brushing against someone, interfering with someone’s clothes
  + displaying pictures, photos or drawings of a sexual nature
  + 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 nude and semi-nude images
    - upskirting (is a criminal offence)
    - sexualised online bullying
    - unwanted sexual comments and messages, including, on social media
    - sexual exploitation; coercion and threats.
* Initiation/hazing type violence and rituals (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element).

## Evidence shows that boys are more likely to be perpetrators and girls to be victims of child on child abuse. Child on child abuse often manifests itself differently for boys than it does for girls. For example, girls seem to be at greater risk of sexual assault and/or exploitation whereas boys seem to be at greater risk of physical gang related violence and serious youth violence. Students with Special Educational Needs or Disabilities are particularly susceptible to child on child abuse.

## Sexual violence and sexual harassment can occur between two children of any age and sex. It can occur through a group of children sexually assaulting or sexually harassing a single child or group of children. It may occur in or out of a relationship. Sexual violence and sexual harassment exist on a continuum and may overlap; they can occur online and face to face (both physically and verbally) and are never acceptable. Sexual violence, such as rape, assault by penetration and sexual assault; (this may include an online element which facilitates, threatens and/or encourages sexual violence). Some groups are at greater risks than others. Girls, students with SEND, and LGBTQ+ students are more likely to be victims of these types of abuse and they are championed by identified and trusted staff members.

## 8.5 Other forms of abuse which staff are aware of are defined more fully in Appendix 2 and further information is contained in Part 1 and Annex B of KCSIE.

## 8.6 All staff should be aware that safeguarding incidents and/or behaviours can be associated with factors outside the School and/or can occur between young people outside these environments. This is known as contextual safeguarding. All staff should consider, and especially those within the safeguarding team, whether students are at risk of abuse or exploitation in situations outside their families. Extra-familial harms take a variety of forms and may be experienced differently by boys and girls. Young people may be susceptible to multiple harms including (but not limited to) sexual exploitation, criminal exploitation, and serious youth violence. The specific nature of these crimes changes rapidly, senior leaders need to ensure they regularly read updates to keep aware of the current and local threats and disseminate to the whole staff.

# Signs of abuse, neglect and exploitation

## Possible signs of abuse, neglect and exploitation can include the following (but are not exhaustive or definitive):

* + - the pupil discloses that he or she has been abused, or asks a question which gives rise to that inference
    - a pupil’s injury cannot be reasonably or consistently explained, or is unusual in type or location
    - a pattern or frequency of injuries is emerging
    - the pupil engages in extreme or challenging behaviour or there is a sudden change in the pupil’s behaviour
    - the pupil asks to drop subjects with a particular teacher and seems reluctant to discuss reasons
    - the pupil appears neglected (e.g. dirty, hungry, inadequately clothed)
    - the pupil appears reluctant to return home or has been openly rejected by parents or guardians
    - the pupil’s development is delayed in terms of emotional progress
    - the pupil withdraws emotionally – showing a lack of trust in adults
    - the pupil shies away from being touched or flinches at sudden movements
    - the pupil loses or gains weight
    - comments are overheard by staff or reported by friends
    - pupil gains possessions or appears wealthier than expected

## Further guidance is provided in Appendix 3. Other sources of information on the signs of abuse, neglect and exploitation include:

[Gloucestershire Safeguarding Children Partnership](https://www.gloucestershire.gov.uk/gscp/); the DfE advice note [What to do if you're worried a child is being abused](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/419604/What_to_do_if_you_re_worried_a_child_is_being_abused.pdf) (2015); and the [NSPCC website](https://www.nspcc.org.uk/what-is-child-abuse/spotting-signs-child-abuse/).

# Listening to pupils and record keeping

## The School provides a range of opportunities for pupils to be listened to. These include: the DSL, teachers, Head, and support staff being readily available; the School counsellors, Mentors, Pink Curriculum Lessons, Friday Voice and Game plan with Key adult.

## Contact details for the DSL, DDSL’s and the NSPCC and other support and listening services are available on posters around the school

## If a pupil discloses that he or she has been abused, neglected or exploited in some way, the member of staff should conduct a factual report in line with the school safeguarding practice:

* + - Stay calm and stop any other activity to listen
    - Never give the impression the child is creating a problem by reporting abuse, neglect and exploitation, or sexual harassment, nor should they be made to feel ashamed
    - Listen carefully to the child and keep an open mind, reflect back using the child’s language
    - Be non-judgemental, supportive and respectful, be mindful of the child’s additional needs and that trauma can affect the logical sequence of events when they are recounted
    - Do not ask leading questions, (that is, a question which suggests its own answer). Ask open questions where necessary – Where, When, What. You may ask a child if they have been harmed and ask what the nature of that harm was.
    - Reassure the child that they are being taken seriously and they will be supported and kept safe.
    - Listen to their wishes, including confidentiality but maintain boundaries and never promise to not share the information; instead explain who has to be told to ensure the proper action is taken to safeguard the child
    - Informing the Designated Safeguarding Lead (or Deputy), as soon as practically possible. Do not share the information with others.
* Staff must record in writing all concerns, discussions and decisions made about a child as soon as possible preferably on the EJS recording form. Details of how to do this can be seen in Appendix 5. The recording must be a clear, precise and factual account of the concern or observation. Where a child has made a disclosure, the record must include details of:
  + its date, time and place
  + what was said and done by whom and in whose presence
  + any noticeable non-verbal behaviour or words used by the child.
  + ensure the child’s wishes and feelings are recorded
  + Only record the facts as the child presents them. The notes should not reflect the personal opinion of the note taker. Notes of such reports could become part of a statutory assessment by children’s social care and/or part of a criminal investigation;
  + Any other evidence (for example, scribbled notes, mobile phones containing text messages, clothing, computers) must be kept securely and passed on to the DSL as soon as possible. No copies should be retained by the member of staff or volunteer.
  + Where a report includes an online element, staff should, where possible, avoid viewing illegal images of a child and under no circumstances should such images be forwarded electronically. Further advice <https://www.gov.uk/government/publications/sharing-nudes-and-semi-nudes-advice-for-education-settings-working-with-children-and-young-people/sharing-nudes-and-semi-nudes-how-to-respond-to-an-incident-overview>
* All concerns, discussions and decisions made, and the reasons for those decisions, should be recorded in writing. Making note of:
  + details of how the concern was followed up and resolved;
  + a note of any action taken, decisions reached and the outcome

# Procedure to be followed by staff if they have concerns about a pupil’s welfare

Staff should not assume a colleague, or another professional will take action and share information that might be critical in keeping children safe. They should be mindful that early information sharing to appropriate staff within EJS and external agencies is vital for the effective identification, assessment, and allocation of appropriate service provision, whether this is when problems first emerge, or where a child is already known to local authority children’s social care (such as a child in need or a child with a protection plan). The Hamster file affords staff the opportunity to record even the most minor observation which may build a picture in order to protect a CYP.

## If a member of staff has concerns about a pupil’s welfare (including any mental health concerns), they must inform the DSL as soon as possible, unless the concerns involve an allegation against a member of staff, in which case the procedures set out in the section Allegations against members of staff and volunteers below should be followed.

## All concerns, discussions, decisions made and the reasons for those decisions should be recorded in writing. If in doubt about recording requirements, staff should discuss with the DSL. Information should be kept confidential and stored securely in the separate child protection file for each child. Records should include:

### a clear and comprehensive summary of the concern

### details of how the concern was followed up and resolved

### a note of any action taken, decisions reached and the outcome.

## When a child is not considered at risk of harm, but still has an unmet need that could mean they are in a Child in Need, a referral should be made by the DSL to Children’s Social Care, including information about the child’s wider context. Parental consent for referrals of this type is not required in these circumstances. However, it is best practice for such concerns to be discussed first with parents and any subsequent referral to be made transparently with their knowledge.

## If a pupil is in immediate danger or is at risk of harm, a referral should be made to children’s social services and/or the police immediately and include information about the child’s wider context. Anyone can make a referral, although if a referral is made by someone other than the DSL, the DSL should be informed as soon as possible. Further guidance is available:

#### <https://www.npcc.police.uk/SysSiteAssets/media/downloads/publications/publications-log/2020/when-to-call-the-police--guidance-for-schools-and-colleges.pdf>

## If a member of staff or visiting health professional suspects that an act of female genital mutilation (FGM) appears to have been carried out on a girl under 18, they must report this to the police.

## The normal safeguarding procedures outlined in this Policy must be used when there are concerns about children who may be at risk of being drawn into terrorism.

## Parents can report to the DSL on the welfare of any pupil in the School, whether their own child or not. If preferred, parents may discuss concerns in private with the pupil’s teacher or other member of staff, who will notify the DSL.

## Any member of staff may refer a matter to children's social services directly. This could happen in exceptional circumstances such as in an emergency, if there is a genuine concern that appropriate action has not been taken or there is involvement of the Head Teachers or members of their immediate family; the LADO should also be informed.

# Duties of the DSL on being notified of a concern about a pupil’s welfare

## When the DSL is notified of any concerns about a pupil’s welfare, they will decide on the appropriate course of action. In particular, the DSL will decide whether a referral should be made to children’s social services.

## Factors that the DSL should bear in mind when making their decision include:

* + - the best interests of the child,
    - the nature and seriousness of the complaint; adopting a no tolerance mindset
    - the referral threshold and inter agency procedures set by the Local Safeguarding Partnership
    - the child's wishes or feelings
    - where relevant, local information sharing protocols relating to Channel referrals.
    - the context: the nature of the experiences and relationships of the young person beyond their family

12.3. If the DSL decides not to make a referral, but to support the pupil with Early Help, the DSL will keep the situation under review and consider a later referral to children’s social services if the pupil’s situation does not appear to be improving.

# Making a referral to children’s social services (Appendix 4)

## If a pupil is NOT in immediate danger or at risk of suffering harm but is in need of additional support from one or more agencies, the DSL will make a referral to children's social services in the Local Authority in which the child lives.

## If the initial referral is made by telephone, the DSL should confirm the referral in writing or via email. Confirmation of the receipt of the referral and details of the decision on what action will be taken should be received from the Local Authority within one working day. If this is not received, the DSL should contact children's social services again.

## If at any stage sufficient concern exists that a pupil may be at risk of harm or is in immediate danger, a referral to children's social services MASH 01452 426565 and/or the police will be made immediately.

## If the referral is made by a member of staff other than the DSL, the DSL should be informed as soon as possible that a referral has been made.

## If, after a referral, the pupil’s situation does not appear to be improving, the DSL should contact children’s social services again to follow the matter up and ensure that their concerns are addressed and the pupil’s situation improves.

## Where relevant, the School will co-operate with the Channel panel and the police in providing any relevant information so that each can effectively carry out its functions to determine whether an individual is vulnerable to being drawn into terrorism. The School will respond to requests for information from the police promptly and in any event within five to ten working days.

## Where a child and family would benefit from coordinated support from one or more agency (for example: education, health, housing, police) there should an inter-agency Early Help assessment and or TAF/TAC procedures will be put in place by children’s services to arrange this. The School will coordinate with the local agencies involved.

## Parents will usually be informed of any action to be taken under these procedures. However, there may be circumstances when the DSL will need to consult with the Local Authority Designated Officer, children's social services, the police or other lead professionals before discussing details with parents.

## Where a CP or Channel referral is made, the DSL will consider seeking the consent of the pupil (or their parent/guardian) when determining what information can be shared being mindful of, but not necessarily constrained by, UK GDPR or Data Protection Act 2018. Whether or not consent is sought will be dependent on the circumstances of the case but may relate to issues such as the health of the individual, law enforcement or protection of the public.

## When the School decides to refer a particular complaint of abuse, neglect and exploitation to social services or the police, the parents/guardian and pupil will be informed of their right to make their own complaint or referral to social services or the police, where appropriate, and will be provided with contact names, addresses and telephone numbers.

## For the avoidance of doubt, referrals do not require parental consent. Staff must act in the best interests of the child, even if this means making a referral against the parents’ wishes.

# Allegations about members of staff, volunteers and supply staff

## Guidance to staff

Guidance is given to staff to be circumspect about placing themselves in situations which may

* put themselves or their pupils at risk of harm; or
* give rise to allegations of abuse.

## To reduce the risk of allegations, staff should work within recommendations of [Safer Working Practice](https://c-cluster-110.uploads.documents.cimpress.io/v1/uploads/d71d6fd8-b99e-4327-b8fd-1ac968b768a4~110/original?tenant=vbu-digital) and should be familiar with the detailed guidance on acceptable behaviour and actions contained in the Staff Code of Conduct. Specific information about protecting themselves is given in individual staff inductions and in the safeguarding training. Particular care should be taken where staff have one-to-one meetings with pupils, or where they work in a therapeutic role. Additional risk assessments will be completed for some children with specific guidance for staff.

## Allegation Procedures

## The following procedures will be used where it is alleged that a member of staff, volunteer or supply teacher has met the harm threshold that is:

* + - behaved in a way that has harmed a child, or may have harmed a child;
    - possibly committed a criminal offence against or related to a child; or
    - behaved towards a child or children in a way that indicates he or she would pose a risk of harm to children.
    - behaved or may have behaved in a way that indicates they may not be suitable to work with children (this may include an incident outside of school which did not involve children but could have an impact on their suitability to work with children, for example an incident of domestic abuse).

These procedures aim to strike a balance between the need to protect children from abuse and the need to protect staff and volunteers from false, malicious or unfounded allegations. The procedures follow Part four of KCSIE.

## Reporting an allegation about staff

If an allegation is made about staff that appears to meet the criteria in paragraph 14.2:

* + - Where an allegation is made about a member of staff, supply staff, or volunteer, the matter should be reported immediately to the DSL Lorraine Phelps and Manda Brookes Headteacher, who will consult the LADO for advice. The adult to whom the allegation relates should not be informed without the explicit consent of the LADO.
    - Allegations about the Head Teacher’s or their family should be reported to the DSL Lorraine Phelps who will immediately inform the LADO Nigel Hatten

## Action to be taken by the DSL/DDSL:

* if the DSL/DDSL is unsure whether the allegation meets the criteria in para 14.2 above, the LADO will be consulted for advice.
* any allegations meeting the criteria in para 14.2 will be dealt with in accordance with the GSCP's procedures. All such allegations must be dealt with as a priority so as to avoid any delay. in the management of allegations against people who work with children - before further action is taken.
* no attempt will be made to investigate the allegation until the LADO is consulted. The purpose of the initial discussion between DSL, Head or DDSL and the LADO is to consider the nature, content and context of the allegation and agree a course of action. All discussions with the LADO should be recorded in writing.
* The initial sharing of information and evaluation may lead to a decision that no further action is to be taken, in which case this decision and a justification for it will be recorded by both the DSL/DDSL/Head and the LADO, and agreement reached on what information should be put in writing to the individual concerned and by whom.
* In situations where a person is deemed an immediate risk to children or where there is evidence of a possible criminal offence, the DSL/DDSL may, in consultation with the LADO, request police involvement from the outset.
* Allegations against a teacher who is no longer teaching and historical allegations will be referred to the police.

## Disclosure of information

* The DSL/DDSL will inform the accused person of the allegation as soon as possible after the LADO has been consulted.
* The parents of the pupil involved will be informed of the allegation as soon as possible if they do not already know of it, although where external agencies are involved, the DSL/DDSL will not inform the accused or the parents until it has been agreed what information can be disclosed. Parents will be kept informed of the progress of the case, including the outcome of any disciplinary process.
* The timing and extent of disclosures, and the terms on which they are made, will be dependent upon and subject to the laws on confidence and data protection and the advice of external agencies.

## Investigation

### Allegations about safeguarding are usually conducted by external agencies such as social services or the police rather than by the School. In some cases, the LADO may ask for further enquiries to be made before a formal decision is reached about how to proceed. When this occurs, the LADO will provide specific guidance as how and by whom the investigation should conducted.

### Where an external agency is conducting the investigation rather than the School, the School will cooperate fully with external investigators. No internal investigation into possible breaches of the School’s disciplinary code will commence until any external investigation or criminal proceedings are complete.

### The School will take the lead in any investigation involving a supply teacher to ensure that the allegation is dealt with properly and to recognise the fact that the agency would not have direct access to children or other school staff. They would therefore not be able to collect the facts or liaise with the LADO. The School will ensure that agency is fully involved in the management of any allegations.

### In accordance with DfE statutory guidance, the following definitions will be used when determining the outcome of allegation investigations:

* + Substantiated: there is sufficient evident to prove the allegation
  + Malicious: there is sufficient evidence to disprove the allegation and there has been a deliberate act to deceive
  + False: there is sufficient evidence to disprove the allegation
  + Unsubstantiated: there is insufficient evidence to either prove or disprove the allegation. The term, therefore, does not imply guilt or innocence
  + Unfounded: to reflect cases where there is no evidence or proper basis which supports the allegation being made

## Support

* + - The School has a duty of care towards its employees and will ensure that effective support is provided for anyone facing such an allegation. A representative will be appointed to keep him or her informed of the progress of the case and to consider what other support is available.
    - Support will also be offered to the pupil(s) affected and their parents/guardians. The School will consult with the children’s social services, or the police as appropriate, as to how this can be done in the most appropriate and effective way.

## Suspension

* + - * Suspension will not be an automatic response to an allegation and will only be considered in a case where there is cause to suspect a pupil or other pupils at the School is or are at risk of significant harm or the allegation is so serious that it might be grounds for dismissal. The School will consider whether the result that would be achieved by suspension could be obtained by alternative arrangements, such as redeployment. A member of staff will only be suspended if there is no reasonable alternative. The School will balance the need to ensure the safety and welfare of the pupil with the need for a full and fair investigation. The LADO will be consulted as to the appropriate action to take.
      * If suspension is deemed appropriate, the reasons and justification will be recorded by the School and the individual notified of the reasons for the suspension. The School will ensure that the suspended person is given the contact details for the representative who has been appointed to keep him or her informed about the progress of the case.
      * If it is decided that the person who has been suspended should return to work, the School will consider how to facilitate this; for example, whether a phased return would be appropriate. The School may provide a mentor and will also consider how to manage contact with the pupil who made the allegation.

## Confidentiality

* + - * The School will make every effort to guard the privacy of all parties during and after an investigation into an allegation. It is in everyone’s best interest to maintain this confidentiality to ensure a fair investigation with minimum impact for all parties.
      * A breach of confidentiality will be taken seriously and may warrant its own investigation. It is a criminal offence to publish information that could lead to the identification of a member of staff who is the subject of an allegation before they are charged with an offence. Publication includes any speech, writing, relevant programme or other communication in whatever form, which is addressed to the public at large or any section of the public.

## Malicious or unsubstantiated allegations

* + - If an allegation by a pupil is shown to have been deliberately invented or malicious, the Head will consider whether to take disciplinary action against the pupil in accordance with the School’s Behaviour Policy.
    - If a parent has made a deliberately invented or malicious allegation the Head will consider whether to require that parent to withdraw their child or children from the School, on the basis that they have treated the Head or a member of staff unreasonably.
    - Whether or not the person making the allegation is a pupil or a parent (or other member of the public), the School reserves the right to contact the police to determine whether any action might be appropriate.

## Record keeping and references

* + - Details of allegations that are found to be malicious will be removed from personnel records. For all other allegations, a comprehensive summary of the allegation, details of how the allegation was followed up and resolved, and a note of any action taken will be kept on the employee’s file. A copy of this summary will be provided to the individual concerned. Such records will be retained at least until the employee reaches the normal pension age (or for a period of ten years from the date of the allegation, if this is longer).
    - When providing employer references, Edward Jenner School will not refer to any allegation that has been proven to be false, unsubstantiated or malicious, or any history of allegations where all such allegations have been proven to be false, unsubstantiated or malicious.

## Dismissals and resignations

* + - If an allegation is substantiated and the member of staff, contractor or volunteer is dismissed because they are unsuitable to work with children, or would have been, had the person not resigned, a settlement agreement (sometimes referred to as a compromise agreement) will not be used and a report to the Disclosure and Barring Service will be made promptly and in any event within one month of the person leaving the school.
    - Any such incidents will be followed by a review of the safeguarding procedures within the School, with a report being prepared without delay, this will be shared with an appropriate representative from the ISA.
    - If a member of staff, contractor or volunteer tenders his or her resignation, or ceases to provide his or her services, any child protection allegations will still be followed up by the School in accordance with this policy and a referral will be made to the Disclosure and Barring Service as soon as possible (within one month) if the criteria for referral are met.
    - If a teacher has been dismissed, or would have been dismissed had they not resigned, in cases involving unacceptable professional conduct, conduct that may bring the profession into disrepute or a conviction for a relevant offence, the School will give separate consideration to whether a referral should be made to the Secretary of State via the Teaching Regulatory Authority. The School will follow the advice set out in the TRA documents:

[Teacher misconduct: information for teachers and Teacher misconduct](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1051784/Teacher_misconduct_-_the_prohibition_of_teachers.pdf)

## Behaviour inconsistent with the Staff Code of Conduct

## The following procedures will be used where it is alleged that a member of staff, volunteer or supply teacher has not met the harm threshold that is outlined in 14.2 but their behaviour is inconsistent with the staff code of conduct. This includes behaviours but are not limited to:

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

Whilst these behaviours may just be an act of thoughtlessness they should be shared with the DSL, Headteacher or DDSL, recorded and dealt with appropriately. This is to protect the whole school community and to create and embed a culture of openness, trust and transparency in which the school. We wish to create an environment where staff are encouraged and feel confident to confide or self-refer, where, for example, they have found themselves in a situation which could be misinterpreted, might appear compromising to others, and/or on reflection they believe they have behaved in such a way that they consider falls below the expected professional standards.

## Recording Concerns

## All low-level concerns will be recorded in writing using full names, following discussion with the person raising the concern, the person involved and any witnesses. The record should include:

* details of the concern, including date, time and location
* the context in which the concern arose
* the name(s) of the pupil(s) involved
* rationale for the decisions
* action taken.
* the name of the individual sharing their concerns if the individual wishes to remain anonymous then that should be respected as far as reasonably possible.

These records will be stored in an envelope within an individual’s personnel folder until the member of staff leaves the school. They should not normally be included in a reference unless they reflect a request to a specific enquiry. This record should be discussed between the DSL and the DDSL and mentoring or further training, may be required depending on the nature of the incident. Patterns of incidents require further action. Consideration whether the incidents meet the threshold of harm in which case warrant a referral to the LADO.

Patterns in incidents should also give rise to the question as to whether there are wider cultural issues within the school that enabled/precipitated the behaviour to occur and where appropriate policies could be revised, or extra training delivered to minimise the risk of it happening again. If an individual pupil is recurrently named further discussions should be focussed upon the behaviour policy.

# Arrangements for dealing with child on child sexual violence and sexual harassment allegations

## Both the alleged victim and the perpetrator will be treated as being at risk and safeguarding procedures in accordance with this policy will be followed.

## Responding to reports of sexual violence and sexual harassment

## The DSL or DDSL will take a leading role and using their professional judgement, supported by other agencies, such as children’s social care and the police as required when an incident is reported. There is support available for schools in KCSIE Part 5.

The school’s initial response to a report from a child is incredibly important. The school’s initial response to a report from a child is incredibly important and all should be aware that this is about child protection and not criminalisation. How the school responds to a report can encourage or undermine the confidence of future victims of sexual violence and sexual harassment to report or come forward. It is essential that all victims are reassured that they are being taken seriously, regardless of how long it has taken them to come forward and that they will be supported and kept safe. Abuse and exploitation that occurs online or outside of the school should not be downplayed and should be treated equally seriously. A victim should never be given the impression that they are creating a problem by reporting sexual violence or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report or their experience minimised. The starting point regarding any report should always be that sexual violence and sexual harassment is not acceptable and will not be tolerated. Especially important is not to pass off any sexual violence or sexual harassment as ‘banter’, ‘part of growing up’ or ‘having a laugh’.

## Disclosure

If a pupil discloses that he or she has been abused in some way, the member of staff should conduct the report in line with the school safeguarding practice outlined in section 10 ‘Listening to Pupils and Record Keeping’

## Action following a report

Actions following a report of sexual violence and/or sexual harassment should always be considered with the best interest of the child at their heart. What to consider:

* the wishes of the victim in terms of how they want to proceed. This is especially important in the context of sexual violence and sexual harassment. Victims should be given as much control as is reasonably possible over decisions regarding how any investigation will be progressed and any support that they will be offered
* the nature of the alleged incident(s), including whether a crime may have been committed and consideration of harmful sexual behaviour
* the ages of the children involved
* the developmental stages of the children involved with regard for SEND
* any power imbalance between the children. For example, is the alleged perpetrator significantly older, more mature or more confident? Does the victim have a disability or learning difficulty?
* if the alleged incident is a one-off or a sustained pattern of abuse
* are there ongoing risks to the victim, other children, adult students or school staff
* the physical vicinity of the victim and alleged perpetrator in classrooms, transport and investigations
* other related issues and wider context

## Options to manage the report

When to inform the alleged perpetrator will be a decision that should be carefully considered. Where a report is going to be made to children’s social care and/or the police, then the school will speak to the relevant agency and discuss next steps and how the alleged perpetrator will be informed of the allegations. However, as per general safeguarding principles this will not stop the school taking immediate action to safeguard our children. There are four likely scenarios for the school to consider when managing any reports of sexual violence and/or sexual harassment.

### Mentoring

* In some minor cases of sexual harassment, the school may take the view that the children concerned are not in need of Early Help and that it would be appropriate to handle the incident with using the schools own mentoring, education and school procedures
* it should be underpinned by the principle that sexual violence and sexual harassment is never acceptable and will not be tolerated.
* All concerns, discussions, decisions, and reasons for decisions will be recorded

### Early Help

* The school may decide that the children involved do not require statutory interventions but may benefit from Early Help. Early Help can be particularly useful to address non-violent harmful sexual behaviour and may prevent escalation of sexual violence.
* Full details of the Early Help process are in Chapter 3 of Working together to safeguard children.
* Multi-agency Early Help would be placed alongside engagement with parents and carers and stage 1 Mentoring

### Referrals to children’s social care

* Where a child has been harmed, is at risk of harm, or is in immediate danger, a referral to local children’s social care must be made.
* we will generally inform parents or carers unless there are compelling reasons not to (if informing a parent or carer is going to put the child at additional risk). Any such decision should be made with the support of children’s social care.
* If a referral is made, children’s social care will then make enquiries to determine whether any of the children involved are in need of protection or other services.
* Where statutory assessments are appropriate, the DSL or DDSL should be working alongside, and cooperating with, the relevant lead social worker. Collaborative working will help ensure the best possible package of coordinated support is implemented for the victim and, where appropriate, the alleged perpetrator and any other children that require support.
* The victim and other children in the school or college must be protected immediately. It will be important for the DSL and DDSL to work closely with children’s social care (and other agencies as required) to ensure any actions the school takes do not jeopardise a statutory investigation. The risk assessment will help inform any decision
* In some cases, children’s social care will review the evidence and decide a statutory intervention is not appropriate. The school (generally led by the DSL or DDSL) should be prepared to refer again if they believe the child remains in immediate danger or at risk of harm. If a statutory assessment is not appropriate, the DSL or DDSL should implement stages 1 and 2 above

### Reporting to the Police

* Where a report of rape, assault by penetration or sexual assault is made, the starting point is for this to be referred to the police.
* Any incident reported to the police will be reported in parallel with a referral to children’s social care
* the DSL or DDSL will refer to police guidance and Part 5 of KCSIE

### The end of the criminal process

* If a child is convicted or receives a caution for a sexual offence, the school should update its risk assessment, ensure relevant protections are in place for all the children at the school and, if it has not already, consider any suitable action in light of the behaviour policy. Due to the size and nature of the school an expulsion is the most likely outcome. In all cases, we will record and be able to justify our decision-making.
* Any conviction (even with legal anonymity reporting restrictions) is potentially going to generate interest among others within the school. It will essential be to ensure both the victim and perpetrator remain protected, especially from any bullying or harassment (including online).
* Where cases are classified as “no further action” (NFA) by the police or Crown Prosecution Service, or where there is a not guilty verdict, the school should continue to offer support to the victim and the alleged perpetrator for as long as is necessary. A not guilty verdict or a decision not to progress with their case will likely be traumatic for the victim. The fact that an allegation cannot be substantiated does not necessarily mean that it was unfounded. We should discuss any decisions with the victim in this light and continue to offer support. The alleged perpetrator is also likely to require ongoing support for what will have likely been a difficult experience.

### Malicious or unsubstantiated allegations

* If a report is determined to be unsubstantiated, unfounded, false or malicious, the DSL or DDSL should consider whether the child and/or the person who has made the allegation is in need of help or may have been abused by someone else and this is a cry for help. In such circumstances, a referral to children’s social care may be appropriate.
* If an allegation by a pupil is shown to have been deliberately invented or malicious, the Head will consider whether to take disciplinary action against the pupil in accordance with the School’s Behaviour Policy.

## Ongoing response

### Safeguarding and supporting the victim

* Age and the developmental stage of the victim, the nature of the allegations and the potential risk of further abuse will inform response. The school should be aware that, by the very nature of sexual violence and sexual harassment, a power imbalance is likely to have been created between the victim and alleged perpetrator.
* The needs and wishes of the victim should be paramount (along with protecting the child) in any response. It is important they feel in as much control of the process as is reasonably possible. Wherever possible, the victim, if they wish, should be able to continue in their normal routine. Overall, the priority should be to make the victim’s daily experience as normal as possible, so that the school is a safe space for them.
* The victim should never be made to feel they are the problem for making a report or made to feel ashamed for making a report. Staff should support victims to be able to safely and confidently discuss and find ways to be able to divulge relevant information; offering advocacy is necessary.

### Health Needs

* Sexual assault can result in a range of health needs, including physical, mental, and sexual health problems and unwanted pregnancy. Children and young people that have a health need arising from sexual assault or abuse can access specialist NHS support from a Sexual Assault Referral Centre (SARC). <https://www.hopehouse.nhs.uk/sarc/>
  + - SARC offer confidential and non-judgemental support to victims and survivors of sexual assault and abuse. They provide medical, practical, and emotional care and advice to all children and adults, regardless of when the incident occurred.

### Proportionality of Response

* The ongoing support required regarding a one-off incident of sexualised name-calling is likely to be vastly different from that for a report of rape, the support offered needs to be appropriate for the child’s need and available for as long as it is needed. There is a range of support available including:
  + Children and Young People’s Independent Sexual Violence Advisors (ChISVA) info@glosrasac.org.uk provide emotional and practical support for victims of sexual violence. ChISVAs will work in partnership with schools to ensure the best possible outcomes for the victim.
  + Police and social care agencies can signpost appropriate services
  + Child and adolescent mental health services (CAMHS) <https://www.2gether.nhs.uk/our-teams-and-services/cyp-glos/>
  + Rape Crisis Centre's like SARC (see above) can provide therapeutic support for children who have experienced sexual violence.
  + Internet Watch Foundation - to help child victims of sexual abuse by hunting down and removing any online record of the abuse <https://www.iwf.org.uk/>
  + Self-Reporting ‘Report Remove’ Button by Childline:  
    <https://www.childline.org.uk/info-advice/bullying-abuse-safety/online-mobile-safety/report-remove/>
* Victims may not disclose the whole picture immediately. They may be more comfortable providing information on a piecemeal basis. School needs to be mindful that the child may not have contextual understanding of the events which have taken place. It is essential that dialogue is kept open and encouraged. When it is clear that ongoing support will be required, we should ask the victim if they would find it helpful to have a designated trusted adult or they are happy to talk to their mentor.
* A victim of sexual violence is likely to be traumatised and, in some cases, may struggle in a classroom environment. There may be times when the victim finds it difficult to maintain a full-time timetable and may express a wish to withdraw from lessons and activities. This should be because the victim wants to, not because it makes it easier to manage the situation. There are a number of safe spaces within school for the victims to withdraw. Due to the small nature of our school, it may be difficult for the victim to be separate from the perpetrator, the matter will need to be discussed with the child, parents and support services at an early stage.
* It may be necessary for the school to maintain arrangements to protect and support the victim for a long time. We should be prepared for this and should work with children’s social care and other agencies as required.
* It is important that the school does everything we reasonably can to protect the victim from bullying and harassment as a result of any report they have made.
* Whilst they should be given all the necessary support to remain in school if the trauma results in the victim being unable to do this, alternative provision or a move to another school should be considered to enable them to continue to receive suitable education. This should only be at the request of the victim (and following discussion with their parents or carers).
* It is important that if the victim does move to another educational institution (for any reason), that the new educational institution is made aware of any ongoing support needs. The DSL (DDSL) should take responsibility to ensure this happens (and should discuss with the victim and, where appropriate their parents or carers as to the most suitable way of doing this) as well as safely transferring the child protection file.
* Reports of sexual assault and sexual harassment will, in some cases, not lead to a report to the police (for a variety of reasons). In some cases, rape, assault by penetration, sexual assault or sexual harassment are reported to the police and the case is not progressed or results in a not guilty verdict. None of this means the offence did not happen or that the victim lied. The process will have affected both victim and alleged perpetrator. Appropriate support should be provided to both as required.

All of the above should be considered with the needs and wishes of the victim at the heart of the process (supported by parents and carers as required). Any arrangements should be kept under review.

## Safeguarding and supporting the alleged perpetrator

### The school will have a difficult balancing act to consider. On one hand they need to safeguard the victim (and the wider pupil body) and on the other hand provide the alleged perpetrator with an education, safeguarding support as appropriate and implement any disciplinary sanctions. This could be very difficult in our small environment and discussion with the parents and carers will be needed.

### Consider the age and the developmental stage of the alleged perpetrator and nature of the allegations. Any child will likely experience stress as a result of being the subject of allegations and/or negative reactions by their peers to the allegations against them.

### Consider the proportionality of the response. Support (and sanctions) should be considered on a case-by-case basis. An alleged perpetrator may potentially have unmet needs as well as potentially posing a risk of harm to other children. Harmful sexual behaviours in young children may be a symptom of either their own abuse or exposure to abusive practices and or materials. Advice should be taken, as appropriate, from children’s social care, specialist sexual violence services and the police.

### It is important that if the alleged perpetrator does move to another educational institution (for any reason), that the new educational institution is made aware of any ongoing support needs and where appropriate, potential risks to other children and staff. The DSL should take responsibility to ensure this happens as well as transferring the child protection file safely.

# Consensual and non-consensual sharing of nudes and semi nudes images and or videos (also known as sexting or youth produced sexual imagery): how to respond to an incident

This section provides a brief overview for frontline staff of how to respond to incidents involving sharing of nudes.

## All such incidents should be reported to the Designated Safeguarding Lead (DSL)

## The term ‘sharing nudes and semi-nudes’ to mean the sending or posting of nude or semi-nude images, videos or live streams by young people under the age of 18 online. This could be via social media, gaming platforms, chat apps or forums. It could also involve sharing between devices via services like Apple’s AirDrop which works offline.

## This does not include the sharing of sexual photos and videos of under-18 year olds with or by adults. This is a form of child sexual abuse and must be referred to the police.

## The DSL should consult with the full <https://www.gov.uk/government/publications/sharing-nudes-and-semi-nudes-advice-for-education-settings-working-with-children-and-young-people/sharing-nudes-and-semi-nudes-advice-for-education-settings-working-with-children-and-young-people>

## document before continuing with any investigation into shared imagery. Procedures outlined in the document should be followed and fully documented. The device should be kept in the office whilst decisions and risk assessments are completed. This is further explained in [Searching, screening and confiscation](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1091132/Searching__Screening_and_Confiscation_guidance_July_2022.pdf) including information about an appropriate adult.

## The motivations for taking and sharing nude and semi-nude images, videos and live streams are not always sexually or criminally motivated. Such images may be created and shared consensually by young people who are in relationships, as well as between those who are not in a relationship. It is also possible for a young person in a consensual relationship to be coerced into sharing an image with their partner. Incidents may also occur where:

* children and young people find nudes and semi-nudes online and share them claiming to be from a peer
* children and young people digitally manipulate an image of a young person into an existing nude online
* images created or shared are used to abuse others e.g. by selling images online or obtaining images to share more widely without consent to publicly shame

## Producing and sharing nudes and semi-nudes of under 18’s is illegal, which causes considerable concern for us as an education setting, and amongst parents and carers. Although the production of such images will likely take place outside of school, sharing can take place and issues are often identified or reported here. We need to be able to respond swiftly and confidently to make sure children and young people are safeguarded, supported and educated.

## Whilst children and young people creating and sharing images can be risky, it is often the result of their natural curiosity about sex and their exploration of relationships. Therefore, engaging in the taking or sharing of nudes and semi-nudes may not always be ‘harmful’ to all children and young people. Situations should be considered on a case by case context, considering what is known about the children and young people involved and if there is an immediate risk of harm. Often, children and young people need education and support for example, on identifying healthy and unhealthy behaviours within relationships and understanding consent and how to give it. Safeguarding action will also be required in cases where there is risk of harm. Safeguarding not criminalisation will motivate actions and outcomes.

## If an incident comes to your attention:

* Any direct disclosure by a child or young person should be taken seriously. A child or young person who discloses they are the subject of an incident of sharing nudes and semi-nudes is likely to be embarrassed and worried about the consequences. It is likely that disclosure in the education setting is a last resort and they may have already tried to resolve the issue themselves.
* Never view, copy, print, share, store or save the imagery yourself, or ask a child to share or download – this is illegal
* If you have already viewed the imagery by accident (e.g. if a young person has showed it to you before you could ask them not to), report this to the DSL and seek support.
* Do not delete the imagery or ask the young person to delete it.
* Do not ask the child/children or young person(s) who are involved in the incident to disclose information regarding the imagery. This is the responsibility of the DSL
* Do not share information about the incident with other members of staff, the young person(s) it involves or their, or other, parents and/or carers.
* Do not say or do anything to blame or shame any young people involved.
* Do explain to them that you need to report it and reassure them that they will receive support and help from the DSL
* Report it to your Designated Safeguarding Lead (DSL) immediately.

## The DSL and DDSL should hold a review meeting to consider the initial evidence using guidance including:

* [Finkelhor and Wolak’s typology](https://scholars.unh.edu/ccrc/48/) of youth-produced imagery cases can be used to define and assess incidents according to motivations
* ‘A continuum of children and young people’s sexual behaviours’ (Hackett, 2010),
* Frameworks such as Brook’s [Sexual Behaviours Traffic Light Tool](https://www.brook.org.uk/training/wider-professional-training/sexual-behaviours-traffic-light-tool/)
* To help to make decisions as to how to proceed the meeting will aim to establish:
* whether there is an immediate risk to any child or young person
* if a referral should be made to the police and/or children’s social care
* if it is necessary to view the image(s) in order to safeguard the child or young person

( in most cases, images or videos should not be viewed for further guidance on when an image may need to be viewed see[main document](https://www.gov.uk/government/publications/sharing-nudes-and-semi-nudes-advice-for-education-settings-working-with-children-and-young-people/sharing-nudes-and-semi-nudes-advice-for-education-settings-working-with-children-and-young-people))

* what further information is required to decide on the best response
* whether the image(s) has been shared widely and via what services and/or platforms. This may be unknown
* whether immediate action should be taken to delete or remove images or videos from devices or online services
* any relevant facts about the children or young people involved which would influence risk assessment
* if there is a need to contact another education, setting or individual
* whether to contact parents or carers of the children or young people involved - in most cases they should be involved

## When assessing the risks and determining whether a referral is needed, the following should be also considered:

* Why was the nude or semi-nude shared? Was it consensual or was the child or young person put under pressure or coerced?
* Has the nude or semi-nude been shared beyond its intended recipient? Was it shared without the consent of the child or young person who produced the image?
* Has the nude or semi-nude been shared on social media or anywhere else online? If so, what steps have been taken to contain the spread?
* How old are any of the children or young people involved?
* Did the child or young person send the nude or semi-nude to more than one person?
* Do you have any concerns about the child or young person’s vulnerability?
* Are there additional concerns if the parents or carers are informed?

## In many cases, we may respond to incidents without involving the police, for example where an incident can be defined as ‘experimental’ and there is no evidence abusive or aggravating elements. The police may, however, need to be involved in some cases to ensure thorough investigation, including the collection of all evidence (for example, through multi-agency checks). Where there are abusive and/or aggravating factors, incidents should always be referred to the police through the Multi-Agency Safeguarding Hub (MASH). Involvement of the Police does not automatically lead to a criminal record, the Police have a range of responses depending upon the circumstances following investigation:

* **Action following a report**

Action following a report of sharing of nudes and semi-nude images should always be considered in the best interest of the child/ children at their heart. What to consider:

* the wishes of the victim in terms of how they want to proceed. Victims should be given as much control as is reasonably possible over decisions regarding how any investigation will be progressed and any support that they will be offered;
* the nature of the alleged incident(s), considering the factors above;

### Options to manage the report:

* Mentoring
* In some minor cases having considered the motivations and risk of harm, the school may take the view that the children concerned are not in need of Early Help and that it would be appropriate to handle the incident with mentoring, education and school procedures
* it should be underpinned by the principle that sharing of images is illegal and as such never acceptable and will not be tolerated.
* All concerns, discussions, decisions and reasons for decisions will be recorded
* Responsive SRE/ thinking lesson

### Early Help

* the school may decide that the children involved do not require statutory interventions, but may benefit from Early Help. Early Help can be particularly useful to address issues using a 3rd party to educate children in our small setting.
* Full details of the Early Help process are in Chapter 3 of Working together to safeguard children.
* Multi-agency Early Help would be placed alongside engagement with parents and carers and Mentoring
* Referrals to children’s social care
* Where a child has been harmed, is at risk of harm, or is in immediate danger, a referral to local children’s social care must be made.
* we will generally inform parents or carers, unless there are compelling reasons not to (if informing a parent or carer is going to put the child at additional risk). Any such decision should be made with the support of children’s social care.
* If a referral is made, children’s social care will then make enquiries to determine whether any of the children involved are in need of protection or other services.
* Reporting to the Police
* Any incident reported to social care will be reported in parallel with a referral to Police, the DSL (DDSL) will refer to police guidance, advice from Sharing nudes and semi-nudes: advice for education settings working with children and young people, Searching, screening and confiscation and Part 5 of KCSIE.

# Preventative Strategies for School surrounding Child on Child abuse and imagery

## It is important to develop appropriate strategies in order to prevent the issue of child on child abuse rather than manage the issues in a reactive way. Firstly, and most importantly we recognition that child on child abuse can and will occur on any site even with the most stringent of policies and support mechanisms. In which case it is important to continue to recognise and manage such risks and learn how to improve and move forward with strategies in supporting young people to talk about any issues and through sharing information with all staff.

## This can be supported by ensuring we have an open environment where young people feel safe to share information about anything that is upsetting or worrying them. This can be strengthened through our strong and positive Thinking curriculum and supportive mentoring staff. Thinking develops learning about healthy respectful relationships and online relationships, resilience, rights and responsibilities and gives children an open forum to talk things through including during Friday Voice sessions on targeted issues.

## To enable such an open and honest environment it is necessary to ensure the whole workforce feels confident and enabled to talk about issues and challenge perceptions of young people including use of inappropriate language and behaviour towards one another. In order to create such an environment, it is necessary for whole staff training and CPD around abusive behaviours and talking to young people in a way that continues to create an open and honest environment without prejudice. It is incredibly important that staff do not dismiss issues as 'banter' or 'growing up' or compare them to their own experiences of childhood. It is necessary that staff consider each issue and each individual in their own right before taking action. If staff minimise the concerns raised it may result in a young person seeking no further help or advice. All concerns are recorded by a staff in a central folder, such information provides a focus for staff meeting discussions as appropriate.

## Knowledge and understanding stems from being aware of young people’ experience and perceptions and developing skills and behaviours which are safe and desirable. We:

* Approach learning from the perspective of the child. When teaching it is important to understand what being online means to children and young people. This includes the impact on their relationships and the ability for them to explore the positive opportunities it presents, as well as the risks. We ensure they are able to establish the difference between fantasy and reality
* having a pupil voice and encouraging young people to support changes and develop 'rules of acceptable behaviour' help to create a positive ethos in school and one where all young people understand the boundaries of behaviour before it becomes abusive.
* Signposting is available to young people in the event that they don't feel confident raising an issue to staff or a peer. It is useful to have a resource bank with support services on a wide range of issues so young people can seek their own solutions should they wish to. This will be developed throughout the year in the Pink Curriculum for older students.

# Other safeguarding arrangements

## Mental Health

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

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

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

If staff have a mental health concern about a child that is also a safeguarding concern, immediate action should be taken by raising the issue with the DSL, who may in turn contact an appropriate external agency. Telephone guidance is available from CAMHs professional helpline and our Early Help Co-ordinator.

## Education of parents

The School also educates parents on safeguarding and pastoral matters through the Parents Together meetings, Friday Voice questions, email updates and specific interventions for groups of students.

## Mobile phones and cameras

The School provides mobile phones for trips and cameras for taking photographs when necessary. Mobile phones should not be used when supervising or teaching children except in cases of emergency. Images of children must not be taken or stored on any personal mobile phone.

Photographs and videos are taken of pupils by staff for a variety of purposes, including displays of work/activities, examination coursework and for the school website and newsletter. Written permission is obtained when a child joins the school, the DSL will ensure that all staff are aware of the names of children who may not be photographed. Images of pupils on the website/facebook or other subsequent social media will not be named. Images may only be captured on School cameras and the images may only be stored on those cameras and on the School’s network in a suitable domain. Additional copies may be stored on flash drives but these must be stored securely in a locked cupboard. Images must not under any circumstances be transmitted over the internet outside the school domain.

Personal mobile phones may not be used to photograph pupils.

When taking photographs or recording video footage, staff should have regard to the following guidance:

* all pupils must be appropriately dressed
* images that only show a single child with no surrounding context should be avoided - photographs should include the learning context
* use photographs that represent the diversity of children participating
* do not use images that are likely to cause distress, upset or embarrassment
* do not use images of a pupil who is considered vulnerable, unless parents/guardians have given specific written permission
* photographs must not be taken in the cloakroom/toilet/changing areas

The Data Protection Officer will review, stored images and delete unwanted and out of date material.

Parents/guardians should be made aware of the need for sensitivity and respect when filming/photographing events featuring their own child or children. Staff should monitor the use of cameras at these events and ask anyone behaving inappropriately to cease filming/taking photos. A verbal reminder is given at each event to ensure no names are used to identify individuals.

## Risk assessment

The School recognises that the evaluation of risks and putting in place measures to mitigate those risks contributes to promoting the welfare and protection of pupils. Risk assessments may pertain to the whole school, to specific curricular or extra-curricular activities that have hazards associated with them, or to individual pupils or staff. The procedures for conducting, recording and monitoring risk assessments are set out in full in the School Risk Assessment Policy.

## Safer Recruitment

Any shortlisted candidates may be subject to an online search as part of pre-recruitment checks. Shortlisted candidates should be asked to complete a self-declaration of their criminal record or information that would make them unsuitable to work with children. All prospective members of staff undergo DBS checks at the appropriate level and will also be subject to the other checks required under the Education (Independent School Standards) Regulations 2014 and in accordance with the latest version of KCSIE. At least one member of any staff recruitment panel will have had Safer Recruitment training. The School's separate Staff Recruitment Policy contains further details about how the process of staff recruitment is conducted.

## Children who are absent form education

Some children are unexplainably or persistently absent from education. All staff are aware that this is a potential indicator of a range of safeguarding issues such as: neglect, sexual abuse or exploitation, child criminal exploitation, mental health problems, substance abuse, travelling to conflict zones, female genital mutilation or forced marriage. The School has clear procedures in place for following up on unexplained absences and, where necessary, reporting to the local authority pupils who are missing from school for more than 10 school days (continuous). The procedure includes the requirement to record any incident, the action taken and the reasons given by the pupil for being absent. See the School ‘Safeguarding Response to Children Absent in Education’ for full details.

The School has a legal duty to inform the Local Authority if a pupil is to be removed from the roll at a nonstandard transition point; i.e. where a compulsory school-aged child leaves the school before completing the school’s final year. When this notification is made the following information has to be provided by the school: full name of the pupil; name, address and telephone number of the parent the pupil lives with; details of any new address for the child and parent; the name of the pupil’s destination school and expected start date; and the reason why the pupil is leaving the school.

The School is also legally required to notify the Local Authority within five days of adding a pupil’s name to the admissions register at a non-standard transition point. The notification includes all the details contained in the admissions register for the new pupil; specifically, their full name; sex; name and address known to be a parent of the pupil (and an indication of which parent the pupil normally lives with and which parents hold parental responsibility); address of new or additional places of residence; at least one contact telephone numbers at which the parent can be contacted in an emergency\*; date of birth; name and address of last school attended (if any). The information must be forwarded to the missingpupils@gloucestershire.gov.uk

This information is also logged and a record is kept in the Officefolder.

## Elective Home Education

Several children on roll at EJS are educated for part of the week at home. These children have a positive learning experience. We expect the parents’ decision to flexi-/home educate has been made with their child’s best education at the heart of the decision. However, we recognise this is not the case for all, and home education can mean some children are less visible to the services that are there to keep them safe and supported in line with their needs. We have a duty of care to ensure that these children are visible to our safeguarding procedures and are listened to.

Where a parent/carer has expressed their intention to remove a child from school with a view to educating at home, we recommend that parents discuss with the school, the LA and other key professionals working with their child before a final decision has been made. This is to ensure the parents/carers have considered what is in the best interests of each child. This is particularly important where a child has SEND, is vulnerable, and/or has a social worker.

\*Note: It is the School’s policy to hold a minimum of two emergency contact numbers for each pupil.

## The Prevent Duty

All schools are subject to a duty under section 26 of the Counter-Terrorism and Security Act 2015 to have "due regard" to the need to prevent people from being drawn into terrorism. This duty is known as the Prevent duty.

There are four specific elements to Edward Jenner School’s approach to meeting the statutory requirements imposed by the Prevent duty. In summary these are:

* Risk assessment – working with the Local Authority, who provide contextual information about the area, the School assesses the risk of pupils being drawn into terrorism, including extremist ideologies
* Working in partnership – liaising closely with the GSCP to ensure pupils requiring support are referred at a suitably early stage
* Staff training – enabling staff to identify pupils at risk of being drawn into terrorism and to challenge extremist ideas
* IT policies – to provide guidance to pupils as to how to stay safe online (see Acceptable Use Policy) and set out the filtering and monitoring mechanisms in place.

Furthermore, the Early Help and GSCP send out regular news bulletins which identify risks in the local community and nationally and is trained to respond accordingly and appropriately.

## Visiting speakers

Any pupil or member of staff who wishes to invite a speaker to address pupils must provide details of the individual to the DSL. The speaker must be supervised throughout the talk and must complete a Speaker Declaration (Appendix 8). An appropriate vetting procedure must be undertaken by the event organiser (staff) who will undertake a search via the internet to research the background of the individual and consider taking up references from other schools at which they have spoken at in the past. The event organiser should also consider carefully whether the views being expressed, or likely to be expressed, constitute extremist views that risk drawing people into terrorism or are shared by terrorist groups. In these circumstances the event will not be allowed to proceed.

It is not necessary to undertake a DBS check on every speaker. In cases where specific vetting checks are not prescribed by KCSIE, the visiting speaker will be accompanied at all times by a member of staff to ensure there is no unsupervised access to pupils. However, if a DBS check is deemed necessary, the appropriate details will be recorded on the School’s SCR. A written report will be made by the member of staff if there is any cause for concern during the talk, it would however be expected that the member of staff supervising the talk would intervene to safeguard the children listening.

## Confidentiality and information sharing

The DSL will keep all child protection records confidential, allowing disclosure only to those who need the information in order to safeguard and promote the welfare of children. The School will co-operate with police and children's social services to ensure that all relevant information is shared for the purposes of child protection investigations.

Where a pupil who is subject to a child protection plan is moving to another school, the DSL will ensure their child protection file is securely transferred to the new school as soon as possible. This file will be transferred separately from the main pupil file to the DSL at the new school and confirmation of safe receipt will be obtained. The DSL should also consider if it would be appropriate to share any information with a new school in advance of a child leaving. For example, information that would allow the new school to continue supporting victims of abuse and have support in place for when the child arrives.

Where allegations have been made against staff, the School will consult with the LADO and, where appropriate, with the police and social services to agree the information that should be disclosed and to whom.

Information sharing is essential for effective safeguarding and promoting the welfare of children and young people. The Data Protection Act 2018 and UK GDPR do not prevent, or limit, the sharing of information for the purposes of keeping children safe. Fears about sharing information must not be allowed to stand in the way of the need to promote the welfare and protect the safety of children. Information that is relevant to safeguarding is regarded as ‘special category personal data’ and as such can be shared securely on a need-to-know basis.

Further [non-statutory guidance Information Sharing](https://assets.publishing.service.gov.uk/media/66320b06c084007696fca731/Info_sharing_advice_content_May_2024.pdf) is published by the Government and should be used as a rationale for making informed decisions. This includes allowing practitioners to share information without consent where there is good reason to do so, and that the sharing of information will enhance the safeguarding of a child in a timely manner, but it is not possible to gain consent, it cannot be reasonably expected that a practitioner gains consent, or if to gain consent would place a child at risk.

## Whistleblowing

All staff are required to report to the DSL or Head any concerns about:

* poor or unsafe safeguarding practices at the school.
* potential failures by the school or its staff to properly safeguard the welfare of pupils; or
* other wrongdoing in the workplace that does not involve the safeguarding and welfare of pupils.

If the member of staff feels unable to raise their concern with the DSL or Head or if they believe any concern has not been dealt with, they should contact the LADO. The [NSPCC whistleblowing advice line](https://www.nspcc.org.uk/keeping-children-safe/reporting-abuse/dedicated-helplines/whistleblowing-advice-line/) is available for staff who do not feel able to raise safeguarding concerns internally. Any member of staff can whistleblow without fear of detriment (retribution or disciplinary action) provided the report was made in good faith. Malicious allegations may be considered as a disciplinary offence.

## Low Level Concerns

Edward Jenner School has a central electronic folder for recording low-level concerns regarding children’s behaviour and comments called ‘Hamster’. These concerns can also brought to the DSL or DDSL’s attention by their key person (Game plan mentor) and help build a picture of our young people and can provide valuable information to the context of a later safeguarding concern.

## School Premises, security and visitors

The school will take all practicable steps to ensure that premises are as secure as circumstances permit. This includes:

* Access control to buildings throughout the school
* Visitor access procedures
* CCTV at various points around the campus
* Security Lighting
* Perimeter Fencing

All visitors are identified by ID cards worn at all times during school related activities and duties. A Visitors’ log is kept at Reception. All visitors must sign in on arrival and sign out on departure and are escorted whilst on the school premises by a member of staff. All visitors will be given and mane badge with the title ‘Visitor’, which must be clearly displayed and worn at all times whilst on the premises.

## Monitoring this Policy

* Any child protection incidents at the School will be followed by a review of the safeguarding procedures in the School and a report shared with the ISA. Where an incident involves a member of staff, the LADO will be asked to assist in this review to determine whether any improvements can be made to the school’s procedures.
* The DSL will monitor the operation of this policy and procedures on a day-to-day basis and will provide regular updates at staff meetings. In addition.
* The DSL/DDSL will undertake an annual review of the policy and implementation of its procedures including good co-operation with local agencies and of the efficiency with which the related duties have been discharged. This review is supported by completing the GSCP KCSIE declaration document and advice from Traded Services.
* Any deficiencies or weaknesses in child protection and safeguarding arrangements identified at any time will be remedied without delay.
* The School will continually monitor and evaluate safeguarding and child protection. This will be achieved by:
  + Listening to feedback from parents, pupils and staff
  + Recording reports and outcomes
  + Recording the level of need for pupils by weekly discussion with staff at staff meeting
  + Discuss our procedures and decisions with Virtual schools for those with a social worker
  + Monitoring the number of referrals to Gloucestershire MASH
  + Recording and analysing the number of low-level concerns and self-reports made to the DSL
  + sharing feedback from training courses

## Other relevant policies

The following policies should be read in conjunction with this policy:

* Anti-Bullying Policy (cyber-bullying is contained within this Policy)
* Health and Safety Policy
* Risk Assessment Policy
* Educational Visits Policy
* Recruitment and Selection Policy
* Code of Conduct for Staff
* Behaviour including Rewards and Sanctions Policy
* E-Safety Policy and ICT acceptable Use Policy
* Whistleblowing Policy
* SEND

A Brookes (Head) Lorraine Phelps (DSL)

Reviewed and updated September 2023

# Appendix 1: Contact details

|  |  |  |  |
| --- | --- | --- | --- |
| Role | Name | Telephone | Email |
| Designated Safeguarding Lead DSL | Lorraine Phelps | 01452 380808 | [office@edwardjennerschool.org](mailto:office@edwardjennerschool.org) |
| Deputy DSL | Manda Brookes  Lorraine Phelps | 01452 380808 | [office@edwardjennerschool.org](mailto:office@edwardjennerschool.org) |
| Proprietor/Head | Manda Brookes | 01452 380808 | [office@edwardjennerschool.org](mailto:office@edwardjennerschool.org) |
| Head of School | Phil Brookes | 01452 380808 | [office@edwardjennerschool.org](mailto:office@edwardjennerschool.org) |
| LADO (Local Authority Designated Officer) | Nigel Hatten | 01452 426994 | [Allegations Management Referral Form](https://www.gloucestershire.gov.uk/media/2124377/am-referral-form-v4-2023.docx)  [amadmin@gloucestershire.gov.uk](mailto:amadmin@gloucestershire.gov.uk) |
| DSL The King’s School | Mandy Phillips | 01452 337337 | [m.phillips@thekingsschool.co.uk](about:blank) |

|  |  |  |
| --- | --- | --- |
| Report concerns to Children and Families Helpdesk Customer Service Operators on: | | 01452 426565 |
| Report concerns to Adults Helpdesk Customer Service Operators on: | | 01452 426868 |
| Gloucester Referral & Assessment Team | | 01452 427877 |
| Gloucester Children & Families Team (South) | | 01452 427852 |
| Gloucester Children & Families Team (North) | | 01452 328018 |
| Forest Referral & Assessment Team | | 01594 820489 |
| Forest Children & Families Team | | 01594 820577 |
| Cheltenham Referral & Assessment Team | | 01242 532447 |
| Cheltenham Children & Families Team | | 01242 532425 |
| Stroud Referral & Assessment Team | | 01452 583727 |
| Stroud Children & Families Team | | 01452 583426 |
| Cotswold Children & Families Team | | 01285 881030 |
| Tewkesbury Referral & Assessment Team | | 01452 328265 |
| Tewkesbury Children & Families Team | | 01452 328207 |
| Safeguarding Children Service | | 01452 583636 |
| Safeguarding Children Development Officer (education) | | 01452 426994 |
| Assistant Safeguarding Children Development Officer (education) | | 01452 426231 |
| Local Authority Designated Officer for Allegations | | 01452 426994 |
| Child Death Review Co-ordinator | | 01452 426238 |
| Cheltenham Families First Team | | 01452 328160 |
| Forest of Dean Families First Team | | 01452 328048 |
| Gloucester Families First Team | | 01452 328071 |
| Tewkesbury Families First Team | | 01452 328250 |
| Cotswolds Families First Team | | 01452 328101 |
| Stroud Families First Team | | 01452 328130 |
| **Early Help** | | |
| **Locality** | **Email** | **Telephone** |
| Cheltenham | [cheltenhamearlyhelp@gloucestershire.gov.uk](mailto:cheltenhamearlyhelphub@gloucestershire.gov.uk) | 01452 328160 |
| Cotswolds | [cotswoldsearlyhelp@gloucestershire.gov.uk](mailto:cotswoldsearlyhelphub@gloucestershire.gov.uk) | 01452 328101 |
| Forest of Dean | [forestofdeanearlyhelp@gloucestershire.gov.uk](mailto:forestofdeanearlyhelphub@gloucestershire.gov.uk) | 01452 328048 |
| Gloucester | [gloucesterearlyhelp@gloucestershire.gov.uk](mailto:gloucesterearlyhelphub@gloucestershire.gov.uk) | 01452 328076 |
| Stroud | [stroudearlyhelp@gloucestershire.gov.uk](mailto:stroudearlyhelphub@gloucestershire.gov.uk) | 01452 328130 |
| Tewkesbury | [tewkesburyearlyhelp@gloucestershire.gov.uk](mailto:tewkesburyearlyhelphub@gloucestershire.gov.uk) | 01452 328250 |

**Support, Training & Advice**

Gloucestershire PREVENT Partnership Board Coordinator

Tel: 01452 888766

Senior Advisor for children with a social worker

Lindsay Evans: [Lindsay.evans@gloucestershire.gov.uk](mailto:Lindsay.evans@gloucestershire.gov.uk)

07557 214097

jayne.putland@glosfire.gov.uk

Anti-terrorist hotline: 0800 789 321

Crimestoppers: 0800 555 111

101 (non-emergency)

999 (emergency)

DfE dedicated non-emergency helpline 020 7340 7264

[counterextremism@education.gsi.gov.uk](mailto:counterextremism@education.gsi.gov.uk)

<https://www.gov.uk/government/publications/pace-code-c-2019/pace-code-c-2019-accessible>

<https://www.gov.uk/government/consultations/human-rights-act-reform-a-modern-bill-of-rights/outcome/human-rights-act-reform-a-modern-bill-of-rights-consultation-response>

<https://www.mencap.org.uk/>

<https://www.lgfl.net/>

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\_data/file/1073410/TheRightToChoose\_V2\_27-04-23\_.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1073410/TheRightToChoose_V2_27-04-22_.pdf)

<https://www.csacentre.org.uk/resources/key-messages/intra-familial-csa/>

**Other contact details**

The following telephone numbers may also be useful:

Organisation Telephone

Childline 0800 1111

NSPCC 0808 800 5000

Whistleblowing advice line 0800 028 0285

What you can do to report abuse, neglect and exploitation – NSPCC dedicated helpline is available as an alternative route for staff who do not feel able to raise concerns regarding child protection failures internally or have concerns about the way a concern is being handled by their school or college. Staff can call 0800 028 0285 – line is available from 8:00 AM to 8:00 PM, Monday to Friday and email: [help@nspcc.org.uk](mailto:help@nspcc.org.uk). Website: <https://www.nspcc.org.uk/what-you-can-do/report-abuse/dedicated-helplines/whistleblowing-advice-line/>

Guidance and advice is also available in the DfE’s *What to do if you’re worried a child is being abused*

|  |  |
| --- | --- |
| Ofsted's Whistle-blower Hotline | 0300 123 3155 |
| Kidscape (Anti-bullying helpline for parents) | 0845 120 5204 |
| Citizens Advice Bureau (Cheltenham) | 01242 523491 |
| Citizens Advice Bureau (Gloucester) | 01452 527202 |
| Cheltenham General Hospital (switchboard) | 0300 423 2323 |
| Gloucester Royal Hospital (switchboard) | 0300 423 2323 |
| NSPCC Gloucester | 01452 300616 |
| Rape Crisis | 01452 526770 |
| Childline | 0800 1111 |
| Samaritans | 08457 90 90 90 |
| SHARE – Young Peoples Counselling Service | 01452 500300 |
| CYPS Practitioner Advice Line | 01452 894272 |
| GDASS Professional Helpline Number | 01452 726561 |
| GDASS Helpdesk |
| [UK Safer Internet Centre Professionals Advice line](https://www.saferinternet.org.uk/advice-centre/teachers-and-school-staff) |  |
|  |  |

# Appendix 2: Other types of abuse, neglect and exploitation

**Children absent from education (CME)**: all children of compulsory school age, regardless of their circumstances, are entitled to a full-time education which is suitable to their age, ability, aptitude and any special needs they may have. A child going **absent** from education is a potential indicator of abuse, neglect and exploitation, including possible sexual abuse, sexual exploitation or those at risk of being drawn into terrorism. The School will report to the Local Authority instances of prolonged unauthorised absence or a pupil being removed from the School roll under the circumstances outlined in KCSIE. In cases where a pupil has a prolonged period of authorised absence for a reason such as long-term illness, the School will be proactive in terms of providing support to both the parents and the pupil.

**Child Criminal Exploitation (CCE) and Child Sexual Exploitation (CSE)** Different forms of harm often overlap, and that perpetrators may subject children and young people to multiple forms of abuse, such as criminal exploitation (including county lines) and sexual exploitation. In some cases the exploitation or abuse will be in exchange for something the victim needs or wants (for example, money, gifts or affection), and/or will be to the financial benefit or other advantage, such as increased status, of the perpetrator or facilitator.

Children can be exploited by adult males or females, as individuals or in groups. They may also be exploited by other children, who themselves may be experiencing exploitation – where this is the case, it is important that the child perpetrator is also recognised as a victim. Whilst the age of the child may be a contributing factor for an imbalance of power, there are a range of other factors that could make a child more vulnerable to exploitation, including:

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

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

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

Children who have been exploited will need additional support to help maintain them in education. CSE can be a one-off occurrence or a series of incidents over time and range from opportunistic to complex organised abuse. It can involve force and/or enticement-based methods of compliance and may, or may not, be accompanied by violence or threats of violence.

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

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

Further information on signs of a child’s involvement in sexual exploitation is available in Home Office guidance: Child sexual exploitation: guide for practitioners

**County lines**

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

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

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

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

* go missing and are subsequently found in areas away from their home
* have been the victim or perpetrator of serious violence (e.g. knife crime)
* are involved in receiving requests for drugs via a phone line, moving drugs, handing over and collecting money for drugs
* are exposed to techniques such as ‘plugging’, where drugs are concealed internally to avoid detection
* are found in accommodation that they have no connection with, often called a ‘trap house or cuckooing’ or hotel room where there is drug activity
* owe a ‘debt bond’ to their exploiters
* have their bank accounts used to facilitate drug dealing.

Further information on the signs of a child’s involvement in county lines is available in guidance published by the Home Office.

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\_data/file/1101687/Child\_Exploitation\_Disruption\_Toolkit\_082023.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1101687/Child_Exploitation_Disruption_Toolkit_082022.pdf)

**Modern Slavery and the National Referral Mechanism**

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

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

Further information on the signs that someone may be a victim of modern slavery, the support available to victims and how to refer them to the NRM is available in the Modern Slavery Statutory Guidance. Modern slavery: how to identify and support victims

**Domestic abuse**

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

Types of domestic abuse include intimate partner violence, abuse by family members, teenage relationship abuse and child/adolescent to parent violence and abuse. Anyone can be a victim of domestic abuse, regardless of sexual identity, age, ethnicity, socioeconomic status, sexuality or background and domestic abuse can take place inside or outside of the home. The government will issue statutory guidance to provide further information for those working with domestic abuse victims and perpetrators, including the impact on children.

All children can witness and be adversely affected by domestic abuse in the context of their home life where domestic abuse occurs between family members. Experiencing domestic abuse and/or violence can have a serious, long lasting emotional and psychological impact on children. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result.

Young people can also experience domestic abuse within their own intimate relationships. This form of 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 should be followed and both young victims and young perpetrators should be offered support. The Act’s provisions, including the new definition, will be commenced over the coming months.

**Operation Encompass**

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

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

**National Domestic Abuse Helpline**

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

* NSPCC- UK domestic-abuse Signs Symptoms Effects:

<https://www.nspcc.org.uk/preventing-abuse/child-abuse-and-neglect/domestic-abuse/signs-symptoms-effects/>

* Refuge what is domestic violence/effects of domestic violence on children:

<http://www.refuge.org.uk/get-help-now/what-is-domestic-violence/effects-of-domestic-violence-on-children/>

* Safe Young Lives: Young people and domestic abuse:

<https://safelives.org.uk/node/1112>

* Domestic abuse: specialist sources of support (includes information for adult victims, young people facing abuse in their own relationships and parents experiencing child to parent violence/abuse):

<https://www.gov.uk/government/publications/domestic-abuse-get-help-for-specific-needs-or-situations/domestic-abuse-specialist-sources-of-support>

**Forced marriage**

Forcing a person into a marriage is a crime in England and Wales. A forced marriage is one entered into without the full and free consent of one or both parties and where violence, threats or any other form of coercion is used to cause a person to enter into a marriage. Threats can be physical or emotional and psychological. A lack of full and free consent is 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. The legal age for Marriage in England is 18 years.

**Honour-Based Abuse (HBA).**

So-called ‘honour-based’ abuse (HBA) encompasses crimes which have been committed supposedly to protect or defend the honour of the family and/or community, including FGM (see below) and practices such as breast ironing. Abuse committed in the context of preserving ‘honour’ often involves a wider network of family or community pressure and can include multiple perpetrators. All forms of HBV are abuse, are illegal in the UK (regardless of the motivation) and should be handled and escalated as such.

**Female Genital Mutilation (FGM**).

FGM comprises all procedures involving partial or total removal of the external female genitalia or other injury to the female genital organs. It is illegal in the UK and a form of child abuse with long-lasting harmful consequences. Victims of FGM are likely to come from a community that is known to practise FGM. Staff should note that girls at risk of FGM may not yet be aware of the practice or that it may be conducted on them, so sensitivity should always be shown when approaching the subject. All staff must be aware of the law requiring teachers to report cases 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 aged under 18. The duty to report resides with the teacher who becomes aware of the case not the DSL, although the DSL should be informed unless the teacher has a good reason for not doing so. The report should be made orally by calling 101 within 24 hours of the issue coming to light. Failure to report a case of FGM can result in disciplinary sanctions.

**Those at risk of being drawn into terrorism and extremism**:

Children are susceptible to extremist ideology and those at risk of being drawn into terrorism refers to the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups. Similar to protecting children from other forms of harms and abuse, protecting children from this risk should be a part of a schools’ or colleges’ safeguarding approach.

* **Extremism** is the vocal or active opposition to our fundamental values, including democracy, the rule of law, individual liberty and the mutual respect and tolerance of different faiths and beliefs. This also includes calling for the death of members of the armed forces.
* **Terrorism** is an action that endangers or causes serious violence to a person/people; causes serious damage to property; or seriously interferes or disrupts an electronic system. The use or threat must be designed to influence the government or to intimidate the public and is made for the purpose of advancing a political, religious or ideological cause.

There is no single way of identifying whether a child is likely to be susceptible to an extremist ideology. Background factors combined with specific influences such as family and friends may contribute to a child’s susceptibility. Possible reasons why a young person might become interested in extremism:

* a search for answers to questions about identity, faith and belonging
* a desire for ‘adventure’ and excitement
* a desire to enhance self-esteem of the individual and promote ‘street cred’
* the discovery of and identification with a charismatic individual and, through them, attraction to a group which can offer identity, social network and support
* a sense of grievance that can be triggered by personal experiences of racism or discrimination

Similarly, those at risk of being drawn into terrorism can occur through many different methods (such as social media or the internet) and settings (such as within the home). However, it is possible to protect susceptible people from extremist ideology and intervene to prevent those at risk of being drawn into terrorism or being radicalised. As with other safeguarding risks, staff should be alert to changes in children’s behaviour, which could indicate that they may be in need of help or protection. Staff should use their judgement in identifying children who might be at risk of being drawn into terrorism and act proportionately which may include the DSL or DDSL making a Prevent referral. The school’s DSL or DDSL should be aware of local procedures for making a Prevent referral.

School staff should use their professional judgement in identifying young people who might be at risk of those at risk of being drawn into terrorism and discuss their concerns with the DSL. On the basis of this information the DSL may conclude that a referral to the Channel Programme is appropriate.

**Channel**

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

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

**Cybercrime**

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

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

Children with particular skill and interest in computing and technology may inadvertently or deliberately stray into cyber-dependent crime. If there are concerns about a child in this area, the DSL (or DDSL), should consider referring into the Cyber Choices programme. This is a nationwide police programme supported by the Home Office and led by the National Crime Agency, working with regional and local policing. It aims to intervene where young people are at risk of committing, or being drawn into, low level cyber-dependent offences and divert them to a more positive use of their skills and interests. Note that Cyber Choices does not currently cover ‘cyber-enabled’ crime such as fraud, purchasing of illegal drugs on-line and child sexual abuse and exploitation, nor other areas of concern such as on-line bullying or general on-line safety. Additional advice can be found at:

<https://www.npcc.police.uk/SysSiteAssets/media/downloads/publications/publications-log/2020/when-to-call-the-police--guidance-for-schools-and-colleges.pdf>

<http://www.cyberchoices.uk/>

<https://www.ncsc.gov.uk/>

**Child on child/ child on child abuse**

Children can abuse other children (often referred to as child on child abuse) and it can take many forms. It can happen both inside and outside of school and online. It is important that all staff recognise the indicators and signs of child on child abuse and know how to identify it and respond to reports. This can include (but is not limited to): bullying (including cyberbullying, prejudice-based and discriminatory bullying); abuse within intimate partner relationships; physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm; sexual violence and sexual harassment; consensual and non-consensual sharing of nudes and semi-nudes images and/or videos; causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party; upskirting and initiation/hazing type violence and rituals. Addressing inappropriate behaviour (even if it appears to be relatively innocuous) can be an important intervention that helps prevent problematic, abusive and/or violent behaviour in the future.

**Upskirting**

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

**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. Further information about consent can be found at Rape Crisis England & Wales - Sexual consent

* 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.

# Appendix 3: Further information on signs of abuse, neglect and exploitation

**Physical abuse**

Physical/Behavioural signs:

* Unexplained bruises and welts on the face, throat, arms buttocks thighs or lower back in unusual patterns or shapes which suggests the use of an instrument
* Unexplained burns, especially burns found on palms, soles of feet, abdomen or buttocks
* Scald marks –immersion burns produce ‘stocking’ or ‘glove’ marks on feet and hands or upward splash marks which may suggest hot water has been thrown over a child
* Human bite marks
* Broken bones
* Behavioural extremes (withdrawal, aggression or depression)
* Unbelievable or inconsistent explanations of injuries
* Fear of parents being contacted
* Flinching when approached or touched
* Truancy or running away from home

**Emotional abuse**

Physical/Behavioural signs:

* Eating disorders, including obesity or anorexia
* Speech disorders (stammering)
* Nervous disorders (rashes, hives, facial tics, stomach aches)
* Fear of parent being approached
* Fear of making mistakes
* Developmental delay in terms of emotional progress
* Cruel behaviour towards children, adults or animals
* Self-harm
* Behavioural extremes, such as overly compliant, demanding, withdrawn-aggressive, listless, excitable

**Sexual abuse**

Physical/Behavioural signs:

* Torn, stained or bloody underclothes
* Pain or itching in genital area
* Bruises or bleeding near genital area or anus
* Sexually transmitted infections
* Pregnancy
* Discomfort when walking or sitting down
* Self-harm
* Sexual knowledge or behaviour (promiscuity) that is beyond their age/developmental level
* Sudden or unexplained changes in behaviour
* Avoidance of undressing or wearing extra layers of clothing
* Truancy
* Regressive behaviours (bed-wetting or fear of dark)

**Neglect**

Physical/Behavioural signs:

* Height and weight significantly blow age level
* Poor hygiene (lice, body odour etc)
* Inappropriate clothing for weather conditions
* Indicators of prolonged exposure to the elements (sunburn, chapped extremities, insect bites)
* Erratic attendance at School
* Chronic hunger or tiredness
* Having few friends
* Assuming adult responsibilities
* Constant hunger, sometimes stealing food from others

**Child sexual exploitation**

Physical/Behavioural signs:

* Tiredness or mood swings
* Bruising
* Sexually transmitted diseases
* Pregnancy
* Sudden decline in School performance, punctuality, attendance
* In possession of expensive goods
* Going to place they cannot afford
* Age-inappropriate clothing
* Inappropriate sexualised behaviour
* Secretive
* Mixing with older people
* Misuse of drugs and alcohol

**Child criminal exploitation and county lines**

Physical/Behavioural signs:

* See sections on physical and sexual abuse
* Carrying weapons
* Self-harming
* Unexplainable or persistent missing School or from home and/or being found out of area
* Unexplained acquisition of money, clothes or mobile phones
* Excessive receipt of texts/phone calls and/or having multiple handsets
* Relationships with controlling older individuals or groups
* Significant decline in School performance
* Gang association or isolation from peers or social networks

**Female Genital Mutilation**

Physical/Behavioural signs:

* Difficulty walking, sitting or standing
* Bladder or menstrual problems
* Severe pain and bleeding
* Infections such as tetanus, HIV and hepatitis B and C
* Abroad for a prolonged period
* Unusual behaviour after a period of absence
* May talk of a ‘special procedure’ or ‘special occasion to become a woman’
* Spending longer periods in the bathroom
* Reluctance to undergo normal medical examinations

**Forced marriage**

Physical/Behavioural signs:

* Cut or shaved hair as a form of punishment for being disobedient
* Absence from School
* Failure to return from visit to country of origin
* Self-harm or attempted suicide
* Running away from home
* Early marriage of siblings
* Sudden announcement of engagement to a stranger
* May talk of a ‘special procedure’ or ‘special occasion to become a woman’
* Spending longer periods in the bathroom
* Reluctance to undergo normal medical examinations

**Grooming**

Physical/Behavioural signs:

* See section on sexual abuse Secretiveness about who they are talking to online and what sites they visit
* Possession of electronic devices such as mobile phones or webcams that parents have not provided
* Engaging less with their usual friends
* Using sexual language that you would not expect them to know
* Going to unusual places to meet people
* Using drugs and/or alcohol
* Unexplainably or persistently missing from home or School

**Those at risk of being drawn into terrorism**

Physical/Behavioural signs:

* out of character changes in dress, behaviour and peer relationships
* Showing sympathy for extremist causes
* Glorifying violence
* Evidence of possessing illegal or extremist literature
* A sudden disrespectful attitude towards others
* Increased secretiveness, especially in relation to internet use
* Unwillingness or inability to discuss their views
* Advocating messages similar to illegal organisations such as ‘Muslims Against Crusades’ or other non-proscribed extremist groups suchas the English Defence League

**Serious Violence**

Physical/Behavioural signs:

* increased absence from school
* a change in friendships or relationships with older individuals or groups
* a significant decline in performance
* signs of self-harm or a significant change in wellbeing
* signs of assault or unexplained injuries
* unexplained gifts or new possessions could also indicate that children have been approached by, or are involved with, individuals associated with criminal networks or gangs and may be at risk of criminal exploitation . All staff should be aware of the range of risk factors which increase the likelihood of involvement in serious violence, such as being male, having been frequently absent or permanently excluded from school, having experienced child maltreatment and having been involved in offending, such as theft or robbery. Advice for schools and colleges is provided in the Home Office’s

Broad government guidance on the following is also available via the GOV.UK website (see Part one: Keeping children safe in education [September 2024)

* bullying including cyberbullying
* children absent from education
* children absent from home or care
* child sexual exploitation
* domestic violence
* drugs
* fabricated or induced illness
* faith abuse
* female genital mutilation (FGM)
* Serious violence :gangs and youth violence
* gender-based violence/violence against women and girls (VAWG)
* hate
* mental health
* Absent children and adults
* private fostering
* children and the court system, witness guidance for [5-11yrs](https://www.gov.uk/government/publications/young-witness-booklet-for-5-to-11-year-olds) and [12-17yrs](https://www.gov.uk/government/publications/young-witness-booklet-for-12-to-17-year-olds)
* preventing those at risk of being drawn into terrorism
* relationship abuse
* sexting
* trafficking

# Appendix 4: Actions where there are concerns about a child

## GSCP Flowcharts

The following are the GSCP Flow Diagrams to facilitate the processes of:

* + - The Child Protection Process
    - Referrals to Social Care
    - The Child Protection Conference Process

Available at: <https://www.gloucestershire.gov.uk/media/2106284/child-protection-process-flowchart-nov-2021.pdf>

# Appendix 5: Reporting Form

## Introduction

* 1. This form comprises part of the School's safeguarding suite of documents and should be read in conjunction with the Safeguarding (child protection) policy, which is available on the School's website and in association with the GSCP DSL Handbook This form is designed to be completed by any member of staff who receives information raising child protection concerns either through observation or direct disclosure, from a pupil or from another source. The purpose of this form is to ensure that an adequate amount of information is recorded at the outset. This form must be completed as soon as possible after the information is received even where this happens away from the School, for example on an educational visit. Do not allow the completion of the form to delay notification of the concerns to the School's DSL but pass the completed form to the DSL, the Head or the LADO.
  2. The School's DSL for child protection is Lorraine Phelps, DDSL Manda Brookes, Lorraine Phelps
  3. The LADO Nigel Hatten **01452 42 6994**
  4. If for any reason you are not able to speak to the DSL, DDSL If you are not able to follow this referral procedure and there are urgent concerns, contact the Children and Families Helpdesk on 01452 426565.

If there is an immediate emergency, dial 999 and report the matter to the police.

2. Data protection information notes

2.1 The School holds personal information about pupils in order to safeguard and promote their welfare, promote the objects and interests of the School, facilitate the efficient operation of the School and ensure compliance with all relevant legal obligations.

2.2 The contents of a Reporting Form, when completed, will contain personal information which is subject to the provisions of the Data Protection Act 1998. Pupils, and in certain circumstances their parents, have the right to request access to personal information about them held by the School, including the content of this form, although exemptions may apply depending on the circumstances. Legal advice should be sought before any information of this nature is disclosed to pupils or parents.

2.3 The School will keep this record confidential, allowing disclosure only to those who need the information in order to safeguard and promote the welfare of children. For example, where, in the professional opinion of the Head or the DSL, it is deemed necessary we may share this information with the social services or the police for the purpose of child protection investigations.

**To be completed by a member of staff**

Remember:

Ask "open" questions and not leading questions, that is, a question which suggests its own answer- You can ask about harm

listen carefully and keep an open mind

report in third person narrative using full names of staff and pupils involved

do not take a decision as to whether or not the alleged abuse, neglect and exploitation has taken place.

Factual- not inference, own words if possible.

|  |  |
| --- | --- |
| Please Type or Complete in Black Ink | |
| Date |  |
| Time |  |
| Place |  |
| Member of staff present and position |  |
| Full name of pupils(s) |  |
| Ask the child to explain their concerns or allegations and record details of the matter in the space below. Use a separate sheet if necessary and attach it to the form. | |
| A non- exhaustive list of the details to be included:  what was said or done, by whom, to whom and in whose presence  when and where the incidence took place  whether the child wishes their parent or legal guardian to be informed | |
| Any additional comments or evidence | |
| Details may include: any concerns you may have about signs of physical, emotional, sexual abuse, neglect and exploitation from outside of school  Any body language observations  Please also include a note of other evidence e.g. written notes, items of clothing or mobile phone messages relating to this matter. | |
| Any suspicion or complaint of abuse must be reported to the DSL Lorraine Phelps or in her absence, the DDSL Manda Brookes/ David Fisher. If the complaint involves a member of staff or volunteer, it should be reported to the Head.  DO NOT investigate the matter, as this could prejudice the investigations of outside agencies.  Where the concern or allegation is made against the Head or member of their family, you must immediately inform the GSCP LADO Nigel Hatten without first notifying the Head. | |
| Please record what action you have taken, when, any decisions or outcome | |
|  | |
| Full name of member of staff |  |
| Signature |  |

# Appendix 6: What should you report to DSL/DDSL?

Any issue which concerns you about a pupil or an incident you have witnessed. This might include:

* Concerns about a pupil being anxious, depressed, showing different behaviour – a subtle change over time or a rapid change
* A significant pastoral concern such as a friendship difficulty, inability to form good relationships with peers
* Any safeguarding concern – mental health issues, self-harm, suicidal ideation including online challenges, eating disorder, abuse, exploitation, drugs, inappropriate behaviour, bullying and child on child abuse of any sort, alcohol use, inappropriate use of online technology including accessing pornography, hoaxes and challenges, gambling, criminal activity of any sort etc
* Home issues – parental divorce, significant illness, parental mental health concerns, lack of supervision, family member in prison, domestic abuse including when they see, hear or experience its effects
* Witnessing or overhearing nasty comments about a pupil / seeing another pupil being unkind to another
* A safeguarding “event” – finding pupils in a compromising situation, a member of the public trespassing or accessing area of the School that they are not allowed, a significant accident. An event does not have to have a pupil assigned to it (especially if you are uncertain who the pupil might have been – it is more important to report what you saw)

**Always be professionally curious, report.**

# Appendix 7 Resources to Inform Teaching Safeguarding in the School Curriculum

The Department has produced a one-stop page for teachers on GOV.UK, which can be accessed here: [Teaching about relationships sex and health](https://www.gov.uk/guidance/teaching-about-relationships-sex-and-health). This includes teacher training modules on the RSHE topics and non-statutory implementation guidance.

The following resources may also help schools and colleges understand and teach about safeguarding:

* DfE advice for schools: [teaching online safety in schools](https://www.gov.uk/government/publications/teaching-online-safety-in-schools)
* UK Council for Internet Safety (UKCIS) guidance[: Education for a connected world](https://www.gov.uk/government/publications/education-for-a-connected-world)
* UKCIS guidance: [Sharing nudes and semi-nudes: advice for education settings working with children and young people](https://www.gov.uk/government/publications/sharing-nudes-and-semi-nudes-advice-for-education-settings-working-with-children-and-young-people/sharing-nudes-and-semi-nudes-advice-for-education-settings-working-with-children-and-young-people)
* The UKCIS [external visitors guidance](https://www.gov.uk/government/publications/using-external-visitors-to-support-online-safety-education-guidance-for-educational-settings) will help schools and colleges to ensure the maximum impact of any online safety sessions delivered by external visitors
* National Crime Agency's CEOP education programme: [Thinkuknow](https://www.thinkuknow.co.uk/)
* Public Health England Every Mind Matters: [Rise Above](https://campaignresources.phe.gov.uk/schools/topics/rise-above/overview)
* [GSCP Traded Services resources](https://www.gloucestershire.gov.uk/gscp/traded-services-for-educational-settings/)

# Appendix 8: Speaker Declaration

**Speaker Declaration**

Thank you for taking time to speak to our children today, you may be aware of the government’s Prevent Strategy which requires us to ask all speakers in school to be aware of our Safeguarding and Prevent policy and procedures- these are available to read on our website.

Our children are encouraged to discuss ideas including politics and religion. Our school is a safe space where sensitive topics including terrorism and extremist ideas can be discussed and our children can learn and have the confidence to challenge these ideas. The Government Prevent duty is not intended to limit the discussion of these issues. We offer a balanced view of politics and forbid the indoctrination of our pupils. A member of our school staff will be present throughout your talk today. They will become involved in the discussion if the children ask questions which need challenging or seem to support a view which does not support the values of democracy, mutual respect and understanding.

Name: Date

My talk is on:

I have read the statement and I agree to comply with the procedures:

Signed:

# Appendix 9 Useful Glossary of Terms

**Child protection** refers to the processes undertaken to meet statutory obligations laid out in the Children Act 1989 and associated guidance (see Working Together to Safeguard Children), in respect of those children who have been identified as suffering, or being at risk of suffering significant harm.

## Safeguarding and promoting the welfare of children is defined for the purposes of this guidance as:

## providing help and support to meet the needs of children as soon as problems emerge

## protecting children from maltreatment, whether that is within or outside the home, including online

## preventing the impairment of children’s mental and physical health or development

## ensuring that children grow up in circumstances consistent with the provision of safe and effective care

## taking action to enable all children to have the best outcomes

**Keeping Children Safe in Education** states that “safeguarding and promoting the welfare of children is everyone’s responsibility”. Everyone who comes into contact with children and their families and carers has a role to play in safeguarding children.’ This means that the School should consider, at all times, ‘what is in the best interests of the child.’ All staff should be aware that behaviours linked to the likes of domestic abuse, drug taking, alcohol abuse, truanting and sexting put children in danger. Safeguarding issues can manifest themselves via child on child abuse.

This is most likely to include, but is not limited to:

* Bullying (including cyberbullying),
* Physical abuse such as hitting, shaking, biting, hair pulling, or otherwise causing physical harm
* Sexual violence and sexual harassment
* Upskirting, down blousing which typically involves taking a picture under a person’s clothing without them knowing, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm. It is a criminal offence. Anyone of any gender can be a victim.
* Sexting (also known as youth produced sexual imagery)
* Initiation/hazing type violence and rituals

Safeguarding and promoting the welfare of children is defined for the purposes of this guidance as:

* Protecting children from maltreatment
* Preventing the impairment of children's mental and physical health or development
* Ensuring that children grow up in circumstances consistent with the provision of safe and effective care
* Taking action to enable all children to have the best outcomes.

**Staff** refers to all those working for or on behalf of the School, full time or part time, in either a paid or voluntary capacity.

**Child** refers to all young people who have not yet reached their 18th birthday.

**Parent** refers to birth parents and other adults who are in a parenting role, for example step-parents, foster carers and adoptive parents.

**Extremism** refers to the Government’s ‘Prevent Strategy’ which defines extremism as: “Vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs. We also include in our definition of extremism, calls for the death of members of our armed forces”.

**Radicalisation** is the process of a person legitimising support for, or use of, terrorist violence.

**Prevent** is part of the UK’s Counter Terrorism Strategy, preventing people from becoming involved in terrorism or supporting terrorism. Prevent duty guidance for England and Wales: guidance for schools in the Counter -Terrorism and Security Act 2015 to have due regard to the need to prevent people from being drawn into terrorism. The guidance is set out in three themes leadership and partnership, capabilities and reducing permissive environments.

**Those at risk of being drawn into terrorism** is the process where someone has their vulnerabilities or susceptibilities exploited towards crime or terrorism – most often by a third party, who have their own agenda, who have attempted to radicalise susceptible children and young people to hold extreme views including views justifying political, religious, sexist or racist violence or to steer them into a rigid and narrow ideology that is intolerant of diversity and leaves them susceptible to future risk of being drawn into terrorism. [Managing risk of radicalisation in your Educational setting](https://www.gov.uk/government/publications/the-prevent-duty-safeguarding-learners-vulnerable-to-radicalisation/managing-risk-of-radicalisation-in-your-education-setting) provides useful support.

**Terrorism** is an action that endangers or causes serious violence to a person/people; causes serious damage to property; or seriously interferes or disrupts an electronic system. The use or threat must be designed to influence the government or to intimidate the public and is made for the purpose of advancing a political, religious or ideological cause.

**Abuse** is a form of maltreatment of a child. Somebody may abuse, neglect and exploitation a child by inflicting harm or by failing to act to prevent harm. Harm can include ill treatment that is not physical as well as the impact of witnessing ill treatment of others. This can be particularly relevant, for example, in relation to the impact on children of all forms of domestic abuse, including where they see, hear or experience its effects. Children may be abused in a family or in an institution or community setting by those known to them or, more rarely, by others (e.g. via the internet). They may be abused by an adult or adults or another child or children. All staff should be aware that abuse, neglect and exploitation and safeguarding issues are rarely standalone events that can be covered by one definition or label. In most cases multiple issues will overlap with one another.

**Early Help** means providing support as soon as a problem emerges at any point in a child’s life, from the foundation years through to the teenage years. In the first instance staff should discuss Early Help requirements with the DSL.

Staff may be required to support other agencies and professionals in an Early Help assessment. If Early Help is appropriate the DSL should support the staff member in liaising with other agencies and setting up an inter-agency assessment as appropriate. If Early Help and or other support is appropriate the case should be kept under constant review and consideration given to a referral to children’s social care if the child’s situation does not appear to be improving. While the School understands that the acronym ‘LADO’ has been removed from KCSIE in favour of ‘designated officer’, it continues to use it for the sake of brevity, as allowed by the Independent Schools Inspectorate Handbook- ‘The Regulatory Requirements’.

**Contextual safeguarding**: Safeguarding incidents and/or behaviours can be associated with factors outside the school or School and/or can occur between children outside the school or School. All staff, but especially the designated safeguarding lead (and deputies) should consider whether children are at risk of abuse or exploitation in situations outside their families. Extra-familial harms take a variety of different forms and children can be vulnerable to multiple harms including (but not limited to) sexual exploitation, criminal exploitation, and serious youth violence. (KCSIE, 2023)

**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

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

**Children who are lesbian, gay, bisexual, or gender questioning**

This section of KCSiE 2024 remains under review pending the outcome of the gender questioning children guidance consultation, and final gender questioning guidance documents being published.

A child or young person being lesbian, gay, or bisexual is not in itself an inherent risk factor for harm, however, they can sometimes be targeted by other children. In some cases, a child who is perceived by other children to be lesbian, gay, or bisexual (whether they are or not) can be just as vulnerable as children who are.

Some safeguarding concerns surrounding a gender questioning child may need a more informed approach. When required the DSL or DDSL will discuss with our Early Help Co-ordinator to enable us to work with the most appropriate outside agencies to inform our practice and support the child/young person and their family.