

7. Record Keeping & Data Protection

In relation to maintaining safeguarding (including early help) and child protection records, the Academy will:

- Record as soon as possible after the conversation. Use the Academy recording system which could be electronic, MyConcern or CPoms, or paper-based, a record of concern sheet.
- Do not destroy the original notes in case they are needed by a court.
- Record the date, time, witness, place and any noticeable non-verbal behaviour and the words used by the child.
- Indicate the position of any injuries.
- Record statements and observations rather than interpretations or assumptions.
- Agree and record actions and outcomes.

All records must be given to the DSL promptly. The member of staff or volunteer should not retain copies. The DSL will ensure that all safeguarding records are managed in accordance with the Education (Pupil Information) (England) Regulations 2005.

If a pupil who is/ or has been the subject of a child protection plan changes provision, the DSL will inform the social worker responsible for the case and transfer the appropriate records to the DSL at the receiving provision in a secure manner, and separate from the child's academic file.

All child protection recordings should be scrutinised regularly to ensure the action and outcome has been carried, and any drift avoided. All records are kept in accordance with SSE Record keeping guidance available on the Support Services for Education website under the Education Safeguarding section policy and guidance.

The Data Protection Act 2018 and GDPR do not prevent 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 safeguard and promote the welfare and protect the safety of children.

Also see **Appendix I** for further details on information sharing and GDPR.

8. Confidentiality

Safeguarding and protecting children raises issues of confidentiality that must be clearly understood by all staff/volunteers in education. All staff, both teaching and non-teaching staff, have a responsibility to share relevant information about the protection of children with other professionals, particularly the investigative agencies (Children's Services: Safeguarding and Specialist Services and the Police).

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

Staff/volunteers who receive information about children and their families during their work should share that information only within appropriate professional contexts.

9. Reporting a Concern

When a member of staff is concerned about a child, she/he will inform the DSL who will decide whether the concerns should be referred to Children's Services. If it is decided to make a request for involvement to Children's Services this will be discussed with the parents, unless to do so would place the child at further risk of harm.

See **Appendix J** for reporting a concern and referral routes

While it is the DSL's role to make request for involvement, any staff member can make a referral to Children's Services. If a child is in immediate danger or is at risk of harm (e.g. concern that a family might have plans to carry out Female Genital Mutilation), a referral should be made to Children's Services and/or the Police immediately. Where referrals are not made by the DSL, the DSL must be informed as soon as possible.

Attention must be paid to the attendance and development of any child about whom the Academy has concerns, or who has been identified as being the subject of a Child Protection Plan, a written record will be kept, and attendance procedures followed.

If a pupil who is/or has been the subject of a Child Protection Plan changes provision, the DSL will inform the Social Worker responsible for the case and transfer the appropriate records to the DSL at the receiving provision, in a secure manner, and separate from the child's academic file.

Should the child's whereabouts be unknown or they move to elective home education the Social Worker must be informed and the procedure for reporting children missing education and elective home education should be followed.

The DSL is responsible for making the senior leadership team aware of trends in behaviour or concerns that may affect pupil welfare. Gathering safeguarding data and impact will be embedded into the Academy's process to measure effective safeguarding practice and resolve any weaknesses.

10. Communication with Parents/Carers

We are fully committed to working in partnership with Parents and carers. RHT will ensure the Safeguarding & Child Protection Policy is available publicly either via the school and Trust website or by other means.

Parents should be informed prior to referral, unless it is considered to do so might place the child at increased risk of significant harm by:

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

(The Academy may also consider not informing parent(s) where it would place a member of staff at risk).

The Academy will ensure that parents/carers understand the responsibilities placed on the Trust and staff for safeguarding children.

11. Allegations involving staff, supply teachers, volunteers and contractors

This should be read in conjunction with Part Four of KCSIE 2021; Section One for allegations that meet the threshold and Section Two for allegations that do not meet the threshold, ie low level concerns.

An allegation is any information which indicates that a member of staff, volunteer, supply teacher or contractor may have:

- (i) behaved in a way that has, or may have harmed a child;
- (ii) possibly committed a criminal offence against/related to a child;
- (iii) behaved towards a child or children in a way, which indicates s/he would pose a risk of harm if they work regularly or closely with children;
- (iv) behaved or may have behaved, outside of the school, in a way that indicates they may be not suitable for work with children.

This applies to any child the adult has contact with in their personal, professional or community life.

If staff members have concerns about another staff member then this should be referred to the Headteacher. Where there are concerns about the Headteacher, this should be referred to the Chair of Governors who will report it directly to the Local Authority Designated Officer (LADO). In the event of allegations of abuse being made against the Headteacher, where a staff member feels unable to raise an issue with their Academy or feels that their genuine concerns are not being addressed, allegations should be reported directly to the Local Authority Designated Officer (LADO). Staff may consider discussing any concerns with the Designated Safeguarding Lead if appropriate and make any referral via them.

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

Actions to be taken include:

- Making an immediate written record of the allegation using the informant's words – including time, date and place where the alleged incident took place, brief details of what happened, what was said, who was present and whether there is any CCTV footage. This record should be signed, dated and immediately passed on to the Headteacher.
- Looking after the welfare of the child. The DSL is responsible for ensuring that the child is not at risk and referring suspected cases of abuse to the LADO.

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

The Headteacher/Chair of Governors **will not investigate** the allegation itself, or take written or detailed statements, but will assess whether it is necessary to refer the concern to the LADO.

If the allegation meets any of the four criteria set out at the start of this section, contact should always be made with the LADO without delay. If it is decided that the allegation meets the threshold for safeguarding, this will take place in accordance with SSCP Inter-agency Child Protection and Safeguarding Children Procedures. The Headteacher should, as soon as possible following briefing from the LADO inform the subject of the allegation.

If it is decided that the allegation does not meet the threshold for safeguarding, it will be handed back to the Academy for review and action where 'low level' concerns remain. Low level concerns could include:

- Being over-friendly with children
- Having favourites
- Engaging with a child on a 1:1 basis in a secluded area or behind closed doors
- Using inappropriate language

Schools can work to minimise the risk of low level concerns by:

- ensuring their staff are clear about what appropriate behaviour is, and are confident in distinguishing expected and appropriate behaviour from concerning, problematic or inappropriate behaviour, in themselves and others
- empowering staff to share any low-level safeguarding concerns
- addressing unprofessional behaviour and supporting the individual to correct it at an early stage
- providing a responsive, sensitive and proportionate handling of such concerns when they are raised
- identifying any weakness in the school's safeguarding system.

Appropriate whistleblowing procedures, which are suitably reflected in staff training and staff behaviour policies/codes, should be in place and easily accessed for such concerns to be raised with the Academy senior leadership team. Where a staff member feels unable to raise an issue with their Academy through the whistleblowing procedure or feels that their genuine concerns are not being addressed, other whistleblowing channels may be open to them. See **Appendix I** for NSPCC Whistleblowing Helpline.

Supply Teachers and Contractors Whilst schools are not the employer of supply teachers or contractors, they should ensure allegations are dealt with properly. In no circumstances should a school decide to cease to use an individual due to safeguarding concerns, without finding out the facts and liaising with the LADO to determine a suitable outcome. LGBs should discuss with the agency or business whether it is appropriate to suspend the supply teacher or contractor, or redeploy them to another part of the school, whilst they carry out their investigation.

Agencies and businesses should be involved and co-operate in any enquiries from the LADO, police and/or children's social services. They will usually take the lead because agencies do not have direct access to children or other school staff, so they will not be able to collect the facts when an allegation is made, nor do they have all the relevant information required by the LADO as part of the referral process.

Supply teachers and contractors, whilst not employed by the school, are under the supervision, direction and control of the LGB when working in the school. They should be advised to contact their trade union representative if they have one, or a colleague for support. The allegations management meeting, which is often arranged by the LADO, should address issues such as information sharing, to ensure that any previous concerns or allegations known to the agency or business are taken into account by the school during the investigation.

When using an agency or contractor employed by a business, the school should inform them of its process for managing allegations. This should include inviting the agency's or business' HR manager or equivalent to meetings as appropriate and keeping them up to date with information about its policies.

12. Safer Working Practices

To reduce the risk of allegations, all staff should be aware of safe working practices and should be familiar with the guidance contained in the Staff Handbook or Code of Conduct and safer recruitment document guidance for those working with children and young people in education settings. These documents seek to ensure that the responsibilities of Academy leaders towards children and staff are discharged by raising awareness of illegal, unsafe, unprofessional and unwise behaviour. This includes guidelines for staff on positive behaviour management in line with the ban on corporal punishment (School Standards and Framework Act 1998).

Supervision The Academy will ensure supervision at break times, lunchtimes, before and after school, on trips and educational visits, and when providing intimate care is assessed and policies written where needed.

Technology and Social Media Use of personal phones, smart technology, private email address etc. must not be used to communicate with parents or children. Always use the Academy telephones and a professional email address. Personal social media networks should be protected and not used for professional purposes.

Changing for PE /Sport Clear guidelines are recommended because:

- getting changed can make some children feel vulnerable
- getting changed can cause anxiety for some children
- staff can feel unsure about PE changing supervision and how to ensure children and adults are safe.

Changing areas should be designated single-gender changing rooms or areas. Academies will make adequate and sensitive arrangements for changing which consider the needs of pupils with disabilities and children from different religions, beliefs and cultural backgrounds or gender identity.

Reasonable force refers to the physical contact to restrain and control children using no more force than is needed. The use of reasonable force is down to the professional judgement of the staff member concerned and will be determined by individual circumstances and the vulnerability of any child with Special Educational Needs or Disability (SEND) will be considered. The use of reasonable force will be minimised through positive and proactive behaviour support and de-escalation.

There is robust recording of any incident where positive handling or restraint has been used. Further review of the incident is carried out to reflect on how the incident could be avoided, this will involve the child and their family.

13. Site Security

The Academy will make *reasonable* effort to provide a secure, healthy, hazard-free environment for everyone at and visiting. Consequently, the school will:

- maintain suitable physical boundaries and barriers such as fencing, gates and locks on doors
- directly supervise children at all times, ensuring they remain on the premises and are never permitted to enter hazardous or insecure sections areas
- take all reasonable steps to monitor contractors, visitors and volunteers using the premises, requiring them to report to Reception, take and read the Information and Guidance for Contractors and Visitors leaflet, sign in to confirm they have received, read and understood it, and wear a visitor's badge
- update the SCR with staff/volunteers /governors that are in regulated activity with children
- have procedures for fire drills, first aid and one focusing on 'Reducing the Risk and Impact of Terrorist and Extremist Incidents' (Lockdown Policy);
- Early Years must comply to EYFS regulations with regards to paediatric first aid and first aid incidents regularly reviewed and acted upon should patterns of accidents emerge;

Richard Huish Trust and its Academies believes good safe security allows both staff and students to feel safe and confident in their surroundings, and offers reassurance to parents and carers. We note that clearly defined risk management of the site allows staff to manage the site by limiting trespass and by channelling visitors to the site through appropriate entrances. Where the school premises are used for non-school activities by a separate body, safeguarding requirements are included in the lease or hire agreement failure to comply with which will lead to the termination of the agreement.

14. Online Safety and Security

The use of technology has become a significant component of many safeguarding issues. Child sexual exploitation; radicalisation; sexual predation: technology often provides the platform that facilitates harm. An effective approach to online safety empowers a school or college to protect and educate the whole school or college community in their use of technology and establishes mechanisms to identify, intervene in, and escalate any incident where appropriate.

The breadth of issues classified within online safety can be categorised into four areas of risk:

- Content: being exposed to illegal, inappropriate or harmful material; for example pornography, fake news, racist or radical and extremist views
- Contact: being subjected to harmful online interaction with other users; for example commercial advertising as well as adults posing as children or young adults
- Conduct: personal online behaviour that increases the likelihood of, or causes, harm; for example making, sending and receiving explicit images, or online bullying. Education Opportunities to teach safeguard
- Commerce: risks such as online gambling, inappropriate advertising, phishing or financial scams

Whilst filtering and monitoring are an important part of the online safety picture, Governors will consider a whole Academy approach to online safety. This will include a clear policy on the use of mobile technology in the Academy. Many children have unlimited and unrestricted access to the internet via 3G and 4G in particular and the Academy makes it clear that (within the Pupil Code of Conduct) the misuse of this will lead to sanctions. Staff are also instructed to monitor student use of technology, as appropriate. We will ensure that there is an online safety policy for the Academy that will include the use of smart phone technology.

15. Safer Recruitment

All Academies will ensure that safer recruitment practices are always followed at all times in line with the RHT Recruitment & Selection Procedures and safer recruitment practices detailed in Keeping Children Safe in Education (2021; Part 3), which include:

- Scrutinising applicants, verifying identity and academic or vocational qualifications, obtaining professional and character references, checking previous employment history, and ensuring that a candidate has the health and physical capacity for the job. References are always obtained, scrutinised and concerns resolved satisfactorily before appointment is confirmed. In addition, all references will be verified and recorded.
- Undertaking appropriate checks through the Disclosure and Barring Service (DBS), the barred list checks and prohibition checks (and overseas checks if appropriate), dependent on the role and duties performed, including regulated and non-regulated activity.
- All recruitment materials to include reference to the Trust's commitment to safeguarding and promoting the well-being of pupils.

16. Staff Suitability *(This section is only for Academies providing education to pupils under the age of eight. Secondary schools should not use this section of the form provided in **Appendix G**)*

All centres providing care for pupils under eight must ensure that staff and volunteers working in these settings are not disqualified from doing so under the Childcare (Disqualification) and Childcare (Early Years Provision Free of Charge) (Extended Entitlement) (Amendment) Regulations 2018.

A person may be disqualified if they:

- Have certain orders or other restrictions placed upon them.
- Have committed certain offences.

All staff members are required to sign the declaration form provided in the appendices of this policy confirming that they are not disqualified from working in a schooling environment. A disqualified person will not be permitted to continue working at the academy, unless they apply for and are granted a waiver from Ofsted. The Academy will provide support with this process.

APPENDICES

Appendix A Types of Abuse

This section includes all types of abuse: physical, sexual and emotional abuse, neglect, domestic abuse and fabricated/induced-illness.

Physical abuse is deliberately hurting a child causing injuries such as bruises, broken bones, burns or cuts. It is not accidental - children who are physically abused suffer violence such as being hit, kicked, poisoned, burned, and slapped or having objects thrown at them. Shaking or hitting babies can cause non-accidental head injuries (NAHI). Sometimes parents or carers will make up or cause the symptoms of illness in their child, perhaps giving them medicine they do not need and making the child unwell – known as fabricated or induced illness (FII). There is no excuse for physically abusing a child. It causes serious, and often long-lasting, harm – and in severe cases, death.

Sexual abuse is forcing or persuading a child to take part in sexual activities. This does not have to be physical contact and it can happen online. Sometimes, the child will not understand that what is happening to them is abuse. They may not even understand that it is wrong.

Emotional abuse is the ongoing emotional maltreatment of a child. It has sometimes called psychological abuse and can seriously damage a child's emotional health and development. Emotional abuse can involve deliberately trying to scare, humiliate a child, isolating, or ignoring them. Children who are emotionally abused are often suffering another type of abuse or neglect at the same time – but this is not always the case.

Neglect is the ongoing failure to meet a child's basic needs and is abuse. A child left hungry or dirty, without adequate clothing, shelter, supervision, medical or health care. A child put in danger or not protected from physical or emotional harm. They may not get the love, care and attention they need from their parents. A neglected child will often suffer from other abuse as well. Neglect is dangerous and can cause serious, long-term damage - even death.

Domestic abuse may take many forms. Witnessing the physical and emotional suffering of a parent may cause considerable distress to children, and both the physical assaults and psychological abuse suffered by adult victims who experience domestic abuse can have a negative impact on their ability to look after their children. Children can still suffer the effects of domestic abuse, even if they do not witness the incidents directly. However, in up to 90% of incidents involving domestic violence where children reside in the home, the children are in the same or the next room. Children's exposure to parental conflict, even where violence is not present, can lead to serious anxiety and distress among children. Children can see the Academy as a safe retreat from problems at home or alternatively not attend the Academy through a perceived need to be at home to protect abused parents or siblings.

Domestic abuse can therefore have a damaging effect on a child's health, educational attainment and emotional well-being and development. The potential scale of the impact on children is not always easy to assess, but may manifest itself as behavioural, emotional or social difficulties, including poor self-esteem, withdrawal, absenteeism, adult-child conflict. Children sometimes disclose what is happening or may be reluctant to do so, hoping that someone will realise something is wrong.

Fabricated or Induced Illness (FII) is a condition whereby a child suffers harm through the deliberate action of their carer and which is attributed by the adult to another cause. FII can cause significant harm to children.

FII involves a well-child being presented by a carer as ill or disabled, or an ill or disabled child being presented with a more significant problem than he or she has in reality and suffering harm as a consequence. There are three main ways of the parent/carer fabricating or inducing illness in a child: Fabrication of signs and symptoms, including fabrication of past medical history. Fabrication of signs and symptoms and falsification of hospital charts, records, letters and documents, and specimens of bodily fluids. Induction of illness by a variety of means.

The possibility of fabricated and induced illness should be considered where there are discrepancies between professional and parental perceptions of the child's needs or of any illness or disability and where there is a possibility of significant harm to the child. Where there are suspicions of FII in a child, the Academy's DSL must make a referral to Children's Social Care and/or the Police. Parents should not be informed of suspicions at this stage.

Appendix B Peer on Peer Abuse, Sexual Harassment and Sexual Violence

At West Buckland Primary School & Nursery we have a zero tolerance approach to all types of abuse. Incidents will be taken seriously and all staff must recognise that children can and do abuse their peers; both Primary and Secondary children are capable of abusing their peers and this must not be tolerated or passed off as 'banter', 'just having a laugh', 'part of growing up' or 'boys being boys'. It is important that incidents of abuse and harm are treated in line with the Safeguarding Policy and in conjunction with the school's Behaviour Policy and Anti-Bullying Policy.

Peer on peer abuse can include but is not limited to:

- Bullying including cyber-bullying and on line abuse
- Physical abuse including hitting, kicking, biting, hair pulling
- Abuse in intimate personal relationships between peers
- Sexual harassment such as sexual remarks, comments, jokes and online sexual harassment,
- Sexual violence such as sexual assault, assault by penetration and rape
- Consensual and non-consensual sharing of nude and semi-nude images or videos (sexting)
- Upskirting which involves taking a picture under a person's clothing without their permission with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm
- Initiation and hazing types of violence including rituals, challenges and other activities involving harassment, abuse of humiliation as a way of initiating a person into a group
- Gang violence, threats or coercion

Peer on peer abuse can manifest itself in many ways and different gender issues can be prevalent. Severe harm may be caused to children by abusive and bullying behaviour of other children, which may be physical, sexual or emotional and can include gender based violence/ sexual assaults, sexting, teenage relationship abuse, peer-on-peer exploitation, serious youth violence, sexual bullying or harmful sexual behaviour.

In order to minimise the risk of peer on peer abuse, the Academy will:

- Have a planned curriculum in place as part of a whole school approach, and relevant policies in place - Behaviour Policy, Anti-Bullying Policy) and reflective learning.
- Deliver an appropriate programme - Relationship Education (Primary), Relationship & Sex Education (Secondary) and Health Education for all pupils - develop pupils understanding of acceptable behaviour and keeping themselves safe.
- Have a system in place for any pupil to raise concerns with a member of staff, knowing that they will be listened to, believed and valued. Promote this in a place where it can be seen and heard by pupils for example on notice boards, in toilets, assembly, class/tutor time.
- Adopt a contextual approach to safeguarding. This enables the school and other support services to better identify high-risk groups, areas and environments within our community that increase the risk of abuse occurring and take appropriate action.
- The DSL/Deputies will review and consider whether any practice or environmental changes can be made in relation to any areas for development. This might include making changes to staffing and supervision, making changes to the physical environment and considering the utilisation and delivery of safeguarding topics on the curriculum.

Responding to incidents of peer on peer abuse, the Academy will:

- Ensure the immediate safety of pupils involved in an incident and sourcing support for other young people affected.
- Listening carefully to the child, being non-judgmental, being clear about boundaries and how the report will be progressed, not asking leading questions and only prompting the child where necessary with open questions – where, when, what, etc.
- Ensuring that victims will never be given the impression that they are creating a problem by reporting abuse, sexual violence, or sexual harassment. They will never be made to feel ashamed for making a report.
- Ensuring the child's wishes are taken into consideration in any intervention and any action is taken to ensure safety of the target and other members of the wider peer cohort.
- Not promising confidentiality. Staff must keep a record of the conversation and take further action as appropriate, which could include involving the DSL or a senior member of staff. Actions should be in line with those for a child making a disclosure. If the concern raised by the pupil relates to peer on peer abuse, it must be correctly recorded, written or electronically.
- When there has been a report of a sexual nature, the DSL should make a risk and needs assessment.

- The DSL will take appropriate action depending on the disclosure which could be to manage the incident internally, refer to Early Help, refer to Children's Social Care, or report to the Police.
- The victim must be supported at all times and it is good practice to meet with the victim's parents or carers to discuss arrangements to safeguard the victim.

A diagram outlining the process for responding to peer-on-peer abuse can be found in **Appendix J (2)**.

The Academy will take the following actions when responding to incidents of sexual violence and sexual harassment:

- Incidents will be reported immediately to the DSL/Deputy DSL who will undertake further assessment of what action should be taken proportionate to the factors that have been identified.
- The Brook Tool should be utilised to inform assessment of risk and what actions to subsequently take. Somerset County Council recommends that education settings use The Sexual Behaviours Traffic Light Tool by the **Brook Advisory Service** to help professionals; assess and respond appropriately to sexualised behaviour. The traffic light tool can be found at www.brook.org.uk/our-work/the-sexual-behaviours-traffic-light-tool.
- Proportionate action will be taken and consideration given to whether a case can be managed internally or whether support from other support agencies is required.
- When an incident involves an act of sexual violence (rape, assault by penetration, or sexual assault):
 - Cases will be reported to the Police regardless of the age of criminal responsibility (10 years old)
 - A concurrent referral to Children Social Care must also be made
 - Children Social Care will determine whether an assessment is required under sections 17 or 47 of the Children Act 1989
 - Where the report includes an online element, the setting will follow the following government guidance: Searching, Screening and Confiscation at School and Sharing Nude and Semi-Nude Images
- Risk assessments and or safety plans will be developed for individual children who have been involved in an incident. This should be reviewed regularly or every time there is an occurrence of an incident. These should involve the child and parents/carers and address contextual risks.

Appendix C Key Safeguarding Areas

This section includes CSE, CCE, County Lines, Dangerous Drugs, Radicalisation and Extremism, Prevent Duty, Honour-based Abuse, FGM, Forced Marriage, Breast Ironing, Faith Abuse, Historical Abuse, Hate Crime, Online Abuse, Grooming, Missing Children and Private Fostering.

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

There will be circumstances that give cause for serious concern about the welfare of children; such as Child Exploitation (CE). The exploitation of children and young people under 18 involves exploitative situations, contexts and relationships where young people (or a third person or persons) receive something (e.g. food, accommodation, drugs, alcohol, cigarettes, affections, gifts, money) as a result of them performing, and/or another or others performing on them, sexual activities.

CSE can occur using technology without the child's immediate recognition; for example, being persuaded to post sexual images on the Internet/mobile phones. In all cases, those exploiting the child/young person have power over them virtue of their age, gender, intellect, physical strength and/or economic or other resources. Violence, coercion and intimidation are common; involvement in exploitative relationships being characterised in the main by the child or young person's limited availability of choice resulting from their social/economic and/or emotional vulnerability.

The current definition updated March 2017 states:

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

CCE occurs when an individual or group take advantage of an imbalance of power to coerce, control, manipulate or deceive a child into any criminal activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial or other advantage of the perpetrator or facilitator and/or (c) through violence or the

threat of violence. The victim may have been criminally exploited even if the activity appears consensual. CCE does not always involve physical contact; it can also occur using technology. CCE can include children being forced to work in cannabis factories, being coerced into moving drugs or money across the country, forced to shoplift or pickpocket, or to threaten other young people. Some of the following can be indicators of CCE:

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

Somerset's CSE screening tool: <https://sscb.safeguardingsomerset.org.uk/cse-risk-assessment-tool/>

County Lines, Cross Borders, Gangs, Trafficking and Cuckooing

These are Police terms for urban gangs supplying drugs to suburban areas and market/or coastal towns using dedicated mobile or 'deal lines'. Gangs use children and vulnerable people to move drugs and money. Often they take over the homes of vulnerable adults and children by force or coercion in a practice referred to as cuckooing. Getting involved in gang culture can have serious and potentially devastating consequences, with dealers/offenders/members not afraid to use violence. There are people themselves vulnerable and at risk of exploitation by gang members from outside the county. Any activity that seems to be suspicious, or involve drug dealing/crime/exploitation should be passed to the Police on 101. Should young people thought to be involved the early help assessment is a useful tool. A request for involvement to CSC/police is needed if the child is at immediate risk of harm.

Further information on county lines <https://www.childrenssociety.org.uk/what-is-county-lines>

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

Dangerous Drugs

As part of the statutory duty on education providers to promote pupils' wellbeing, the academy has a clear role to play in preventing drug misuse as part of their pastoral responsibilities. To support this, the Government's Drug Strategy 2010 ensures that education staff have the information, advice and power to:

- Provide accurate information on drugs and alcohol through education and targeted information, including via the FRANK service;
- Tackle problem behaviour in schools with wider powers of search and confiscation;
- Work with local voluntary organisations, health partners, the police and others to prevent drug or alcohol misuse.
- Have a designated, senior member of staff with responsibility for the drug policy and all drug issues within the setting.
- Establish relationships with local children and young people's services, health services and voluntary sector organisations to ensure support is available to pupils affected by drug misuse (including parental drug or alcohol problems).

Searching and Confiscation Advice can be found in Screening, searching and confiscation; advice for Head teachers, staff and governing bodies.

Radicalisation and Extremism is defined as the process by which people come to support terrorism and extremism and, in some cases, to then participate in terrorist groups.

"Extremism is vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs. We also include in our definition of extremism calls for the death of members of our armed forces, whether in this country or overseas" (HM Government Prevent Strategy 2011).

Prevent is one part of the United Kingdom's counter-terrorism strategy (CONTEST) and aims to stop people from being exposed to extreme ideologies and becoming radicalised. The CONTEST strategy is divided up into four priority objectives:

- Pursue – stop terrorist attacks
- Prepare – where we cannot stop an attack, mitigate its impact
- Protect – strengthen overall protection against terrorist attacks
- Prevent – stop people becoming terrorists and supporting violent extremism

It is an approach that involves many agencies and communities, to safeguard people who may be at risk of radicalisation. Since the publication of the Prevent Strategy, there has been an awareness of the specific need to safeguard children, young people and families from violent extremism. There have been attempts to radicalise vulnerable children and young people to develop 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 vulnerable to future radicalisation.

We take the 'Prevent' duty seriously and recognise that Safeguarding against extremism and radicalisation is no different from Safeguarding against any other vulnerability; it is about protecting children and young people from being groomed and exploited by others. DSLs and other senior leaders should familiarise themselves with the revised Prevent duty guidance: for England and Wales, especially paragraphs 57-76, which are specifically concerned with schools (and also covers childcare). The guidance is set out in terms of four general themes: risk assessment, working in partnership, staff training, and IT policies. <https://www.gov.uk/government/publications/prevent-duty-guidance>

Further advice for schools on the Prevent duty

The Home Office has developed three e-learning modules:

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

Educate against Hate <https://educateagainsthate.com> is a government website designed to support teachers and leaders to help them safeguard their students from radicalisation and extremism. The platform provides free information and resources to help school staff identify and address the risks, as well as build resilience to radicalisation. For advice specific to further education, the Education and Training Foundation (ETF) hosts the Prevent for FE and Training.

Keeping children safe from these risks is a safeguarding matter and should be approached in the same way as safeguarding children from other risks. Children should be protected from messages of all violent extremism.

Honour-Based Abuse (HBA)

So-called 'honour based' abuse (HBA) encompasses crimes which have been committed to protect or defend the honour of the family and/or the community, including Female Genital Mutilation, Forced Marriage, practices such as breast ironing and non-violent forms of abuse.

All forms of so-called HBA are abuse (regardless of the motivation) and should be handled and escalated as such. If in any doubt, staff should speak to the DSL. Professionals in all agencies, and individuals and groups in relevant communities, need to be alert to the possibility of a child being at risk of HBA, or already having suffered HBA.

Female Genital Mutilation (FGM)

FGM comprises all procedures that involve partial or total removal of the external female genitalia, or other injury to the female genital organs for non-medical reasons (World Health Organisation). It is also sometimes referred to as female genital cutting or female circumcision. The practice is illegal in the UK.

FGM is not an issue that can be decided on by personal preference – it is an illegal, extremely harmful practice, and a form of child abuse and violence against women and girls. Professionals in health, social care and teaching have a statutory duty to report all cases of FGM to the Police where disclosure or signs of FGM are noted, or where a person knows or suspects FGM has been – or will be – perpetrated. When someone reports FGM to the Police, they should ask for a crime reference number.

If there is an IMMEDIATE RISK, call the Police on 999 (emergency number).

If there is NO immediate risk, call the Police on 101 (non-emergency number).

Forced Marriage

The UK Government describes this as taking someone, usually overseas, to force them to marry (whether or not the FM takes place), or marrying someone who lacks the mental capacity to consent to the marriage (whether they're pressured to or not). Breaching a Forced Marriage Protection Order is also a criminal offence.

When a disclosure or signs of FM are noted, staff should always alert the Headteacher and DSL immediately. We should never attempt to intervene directly as an academy or through a third party. In such situations, the DSL will always call either Somerset Direct/Police and/or the **Forced Marriage Unit on 020 7008 0151**.

Breast Ironing/Binding

Breast ironing (also known as breast flattening) is the pounding and massaging of a pubescent girl's breasts, using hard or heated objects, to try to make them stop developing or to disappear. When a disclosure or signs of breast ironing are noted, staff should always alert the DSL immediately.

Faith Abuse

Faith abuse is linked to a belief in witchcraft or possession by spirits and demons. In such instances, physical and/or psychological violence may be used in order to "get rid" of the possessing spirit.

Child abuse is never acceptable in any community, in any culture, in any religion, under any circumstances. This includes abuse that might arise through a belief in spirit possession or other spiritual or religious beliefs." Faith abuse usually occurs in the household where the child lives. It may also occur in a place of worship where alleged "diagnosis" and "exorcism" may take place.

When a disclosure or signs of faith abuse are noted, staff should always alert the DSL immediately. The DSL will always call Somerset Children's Social Care Emergency Duty Team on 0300 123 2224.

Historical Abuse

Historical abuse (also known as non-recent abuse) is an allegation of neglect, physical, sexual or emotional abuse made by or on behalf of someone who is now 18 years or over, relating to an incident which took place when the alleged victim was under 18 years old.

The Police should be informed about allegations of crime at the earliest opportunity. Any reports of historic abuse made to Avon and Somerset Police must be to the Safeguarding Co-ordination Unit 01823 349037.

Hate Crime

A Hate Incident is any incident which the victim, or anyone else, thinks is based on someone's prejudice towards them because of their race, religion, sexual orientation, disability or because they are transgender. If you, or anyone you know, has been called names, been bullied or had anything happen to them that you think may be because of one of these factors, then you should report this as a hate incident. Not all hate incidents will amount to criminal offences, but those that do become hate crimes.

Online Abuse

This type of abuse happens on the web, through social networks, playing online games or using a mobile phone. Children and young people may experience cyberbullying, grooming, sexual abuse, sexual exploitation or emotional abuse. Children can be at risk of online abuse from people they know, as well as from strangers. Online abuse may be part of abuse that is taking place in the real world (for example bullying or grooming). Or it may be that the abuse only happens online (for example persuading children to take part in sexual activity online). Children can feel like there is no escape from online abuse – abusers can contact them at any time of the day or night, the abuse can come into safe places like their bedrooms, and images and videos can be stored and shared with other people.

Grooming

Is when someone builds an emotional connection with a child to gain their trust for the purposes of sexual abuse, sexual exploitation or trafficking. Children and young people can be groomed online or face-to-face, by a stranger or someone they know for example a family member, friend or professional. Groomers may be male or female. They could be any age. Many children and young people don't understand that they have been groomed or that what has happened is abuse.

Missing Children

Anyone under the age of 18 years is to be considered "missing" if he/she is absent from his/her place of residence without authority to a degree or in circumstances where the absence causes concern for safety of the child or a danger to the public" This includes children and young people who have been forced to leave home and those whose whereabouts are unknown and those who feel they have had to leave home (rather than making a positive choice to do so).

High risks concerns include where:

- The responsible adult has no indication when the child is likely to return
- The child develops a pattern of going missing repeatedly

- The child's location is unknown, or reason for absence is unknown there is cause for concern for the child because of their vulnerability
- The child is at high risk of CSE/gangs
- The child is pregnant or has a young child
- The child has a history of suicidal thoughts or behaviours
- The child is at risk of radicalisation

Private Fostering

Private fostering is when a child under the age of 16 (18 if they are disabled) lives with someone who is not a close relative, guardian or person with parental responsibility for 28 days or more. Private fostering is not the same as fostering arranged by the local authority.

Children and young people become privately fostered for a variety of reasons:

- Their parents live overseas and they come to this country to attend school
- Their parents are ill and cannot look after them
- Their parents work away from home, possibly abroad
- Their parents have come to the UK to study or work and require someone to look after their children
- They are teenagers who are estranged from their families

The Children Act 1989, and section 44 of the Children Act 2004, outlines the legal duty of LA to make sure that the welfare of all privately fostered children is safeguarded and promoted. The law says that the Local Authority (LA) must be told about all private fostering arrangements. The child's parents or carers should notify the LA of the arrangement, although anyone else involved in making the arrangement or who is aware of it also has a responsibility to inform us.

A Social Worker will need to check the placement is suitable and that all the needs of the child or children are being met. They will also speak to the child or children to make sure that a thorough assessment of the placement is carried out. When the LA are made aware a child may be privately fostered, a request for involvement will be made to Somerset Direct.

Appendix D Sample Letter for Schools

To be completed in hard copy using the template letter below (or similar) or electronically via staff signatures on 'My Concern'

Staff confirm they have read the Safeguarding & Child Protection Policy 2021 and KCSIE Part 1

School Name **Academic Year 2021-2022**

Please sign and return to [Name of DSL] **By Monday 27 September 2021**

I, _____ [insert name] _____ have read and understood the contents of the following documents and understand my role and responsibilities as set out in these documents: RHT Safeguarding & Child Protection Policy and Part 1 KCSIE 2021

I am aware that the DSLs are:

and I am able to discuss any concerns that I may have with them.

I know that further guidance, together with copies of the policies mentioned above, are available in[insert location].....

Signed _____ Date _____

Appendix E Attendance *This section should read in conjunction with the Attendance Policy*

Children Missing from Education

A pupil missing from education is a potential indicator of abuse or neglect, or maybe an indicator of need for Early Help support. Staff should follow procedures for unauthorised absence and for dealing with children that go missing from education, particularly on repeat occasions. These should be discussed with the DSL.

The school will follow the guidance detailed in Children Missing Education (2016) and Somerset Education Safeguarding Policy for Children Missing Education.

This will include notifying the local authority in which the child lives:

- of any pupil who fails to attend school regularly
- of any pupil who has been absent without the school's permission for a continuous period of 10 school days or more

Children on roll Where there are children on roll but missing education through complex, refusal or medical need (including those cases open to education welfare service, health or SEN) remain in the setting responsibility for safeguarding and procedures will be put in place to monitor their wellbeing. Should a child/parent refuse or be non-attending due to a court process for poor attendance the Academy needs to escalate and monitor welfare. Cases should be referred to *The Team around the School* who will consider support or escalation.

Children with Medical Needs Long-term absence due to medical need: pupils at Academies with medical conditions must be supported so that they have full access to education, including Academy trips and PE.

- LGBs must ensure arrangements are in place to support students with medical conditions.
- LGBs should ensure that Academy leaders consult health and social care professionals, pupils and parents to ensure that the needs of children with medical conditions are properly understood and effectively supported.

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/638267/supporting-pupils-at-school-with-medical-conditions.pdf

Elective Home Education

The school will notify the Local Authority of whenever a parent or carer chooses to withdraw their child from school to be educated at home. Any concerns about the suitability of home education will be shared with the Education Safeguarding Service. If there are significant safeguarding concerns, appropriate action will be taken to ensure the right support is put in place to keep the child safe.

Home-stays (Exchange Visits)

If children are staying with parents from overseas as part of an exchange, the guidance is an enhanced DBS check needs to be carried out on the host family. If there are other people in the family aged over 16, then the Academy will decide whether they will do an enhanced DBS check for those 16 and 17-year olds who live in the house.

Appendix F Single Central Record (SCR)

Keeping an accurate Single Central Record is a statutory requirement and an essential part of keeping children safe in education and forms part of the statutory guidance KCSIE 2020, which applies to all maintained schools and academies.

The SCR is covered by the statutory guidance included within KCSIE and is a requirement of the School Staffing Regulations (and Independent School Regulations for Academies). Guidance about what information should be held on the SCR is outlined at paragraphs 164-171 of the guidance.

Single Central Record Checklist

	Yes	No	Action Required
Is a single central record (SCR) in place for all staff including supply staff and additional music/PE staff?			
Does the SCR include all others who work regularly or intensively with children, including volunteers?			
Does the SCR indicate that identity checks have been carried out and by whom?			
Is there evidence on the SCR that all staff have been checked against the Barred List (previously List 99)?			
Does the SCR record the date when the DBS and/or Barred List checks was carried out and who carried out the check?			
Does the SCR record that further overseas criminal checks have been undertaken as appropriate?			
Does the SCR record professional qualifications – where the qualification is a requirement of the job?			
Does the SCR record evidence that a Prohibition from Teaching check has been carried out on all teaching staff employed since September 2013?			
Does the SCR record evidence a check of 'Right to Work' in the UK and suitability checks as appropriate?			
Have all <i>relevant (domestic settings only)</i> staff been asked been asked to complete a declaration confirming that they are not disqualified in line with the Childcare Act 2006 and the (Disqualification) Regulations 2009? Is evidence of these checks included on the SCR?			
Have copies of documents used to verify identity, qualifications and Right to Work in the UK been retained in individual personnel files?			
Does the SCR evidence that checks in respect of Section 128 directions have been undertaken for persons taking part in the management and head of departments of all settings? This includes maintained schools.			

NB: You are not required to keep copies of DBS certificates and in line with the Data Protection Act; copies of DBS certificates should not be retained for longer than 6 months.

Appendix G Staff Disqualification Declaration

For Academies providing education to pupils under the age of eight only

Name of school:		
Name of staff member:	Position:	
Orders and other restrictions		Yes/No
Have any orders or other determinations related to childcare been made in respect of you?		
Have any orders or other determinations related to childcare been made in respect of a child in your care?		
Have any orders or other determinations been made which prevent you from being registered in relation to childcare, children's homes or fostering?		
Are there any other relevant orders, restrictions or prohibitions in respect of you as set out in Schedule 1 of the Childcare (Disqualification) and Childcare (Early Years Provision Free of Charge) (Extended Entitlement) (Amendment) Regulations 2018?		
Are you barred from working with children by the DBS?		
Are you prohibited from teaching?		
Specified and statutory offences		
Have you ever been cautioned, reprimanded, given a warning for or convicted of:		
• Any offence against or involving a child?		
• Any violent or sexual offence against an adult?		
• Any offence under The Sexual Offences Act 2003?		
• Any other relevant offence?		
Have you ever been cautioned, reprimanded for or convicted of a similar offence in another country?		
Provision of information		
If you have answered yes to any of the questions above, provide details below. You may provide this information separately, but you must do so without delay.		
Details of the order restriction, conviction or caution:		
The date(s) of the above:		
The relevant court(s) or body/bodies:		
You should also provide a copy of the relevant order, caution, conviction, etc. in relation to cautions/convictions, a DBS Certificate may be provided.		
Declaration		
In signing this form, I confirm that the information provided is true to the best of my knowledge and that:		
<ul style="list-style-type: none"> • I understand my responsibilities to safeguard children. • I understand that I must notify my Headteacher immediately of anything that affects my suitability to work within the school. This includes any cautions, warnings, convictions, orders or other determinations made in respect of me that would render me disqualified from working with children. 		
Signed:		
Print name:		
Date:		

Appendix H SSCP - Somerset Safeguarding Children Partnership

The Somerset Safeguarding Children Partnership (SSCP) is the statutory, multi-agency partnership with responsibility for coordinating, monitoring and challenging all activity relating to safeguarding children and young people living in Somerset. Safeguarding Children Partnerships were set up as a result of the 2004 Children Act and are regulated by that law.

The work of the SSCP is broad and varied but includes:

- Developing multi-agency policies and procedures for safeguarding.
- Communicating the need to safeguard and promote the welfare of children to professionals and the public.
- Conducting Serious Case Reviews when a child dies or is seriously harmed and abuse or neglect is suspected.
- Ensuring procedures to ensure a coordinated response to unexpected child deaths.
- Collecting and analysing information about all child deaths that occur in the area to identify issues of concern.
- Providing multi-agency training and development to staff on safeguarding children.
- Participating in the strategic planning of children's services.

The SSCP have developed a range of training opportunities and a variety of information, advice, tools and resources is located on the website: <http://sscb.safeguardingsomerset.org.uk/>.

Appendix I Safeguarding Contacts and useful information/websites

If you have concerns about a child or young person in Somerset

If a child is at immediate risk call the POLICE	Call the POLICE on 999	
To make an URGENT referral (i.e., a child is likely to suffer or is suffering significant harm)	Phone Somerset Direct on 0300 122 2224	
To make a NON-URGENT referral, complete an Early Help Assessment and send to	Email SDInputters@somerset.gov.uk	
To raise concerns or ask for advice about radicalisation	Phone PREVENT DUTY on 01278 647466 or Email PreventSW@avonandsomerset.police.uk	
To liaise with the specialist Safeguarding Police unit	Phone the Lighthouse Safeguarding on 01278 649228	
DSL Consultation Line 0300 123 3078	Early Help Hub 01823 3555803	Critical Incident Support EPS SSE 01823 357000

If you have concerns about a professional working with a child

To raise concerns and ask for guidance in relation to the conduct of someone who works with children	Local Authority Designated Officer (LADO) Anthony Goble 0300 122 2224
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For information and guidance relating to safeguarding practice, policy and procedures

Education Safeguarding Service	Email ESS@somerset.gov.uk
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Child sexual exploitation & child criminal exploitation	Operation Topaz (Avon and Somerset Police) www.avonandsomerset.police.uk/forms/vul
Child Missing from Education	Online notification form – Somerset County Council
Children affected by Forced Marriage	Forced Marriage Unit Phone 020 7008 0151 Email fm@fco.gov.uk
Online Safety Advice	Professional Online Safeguarding Helpline Phone 0344 381 4772 Email helpline@saferinternet.org.uk
Reporting online sexual abuse and grooming	Child Exploitation and Online Protection Command https://www.ceop.police.uk/ceop-reporting/
FGM advice	NSPCC FGM Helpline Phone 0800 028 3550 Email fgmhelp@nspcc.org.uk
Domestic Abuse Helpline	Phone 0800 6949999
Young Carers – advice and support	Phone 0300 123 2224 Email YoungCarersmailbox@somerset.gov.uk
Whistleblowing professional policy	NSPCC Whistleblowing hotline Phone 0800 028 0285 Email help@nspcc.org.uk
Primary Mental Health Advice (CAMHS)	Email CYP@somerset.org
LGBT	https://www.stonewall.org.uk/ 2BU Somerset https://www.2bu-somerset.co.uk/

Useful information and websites

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

UK Council for Internet Safety (UKCIS) guidance
<https://www.gov.uk/government/publications/education-for-a-connected-world>

National Crime Agency's CEOP education programme <https://www.thinkuknow.co.uk/>

Public Health England <https://campaignresources.phe.gov.uk/schools/topics/rise-above/overview>

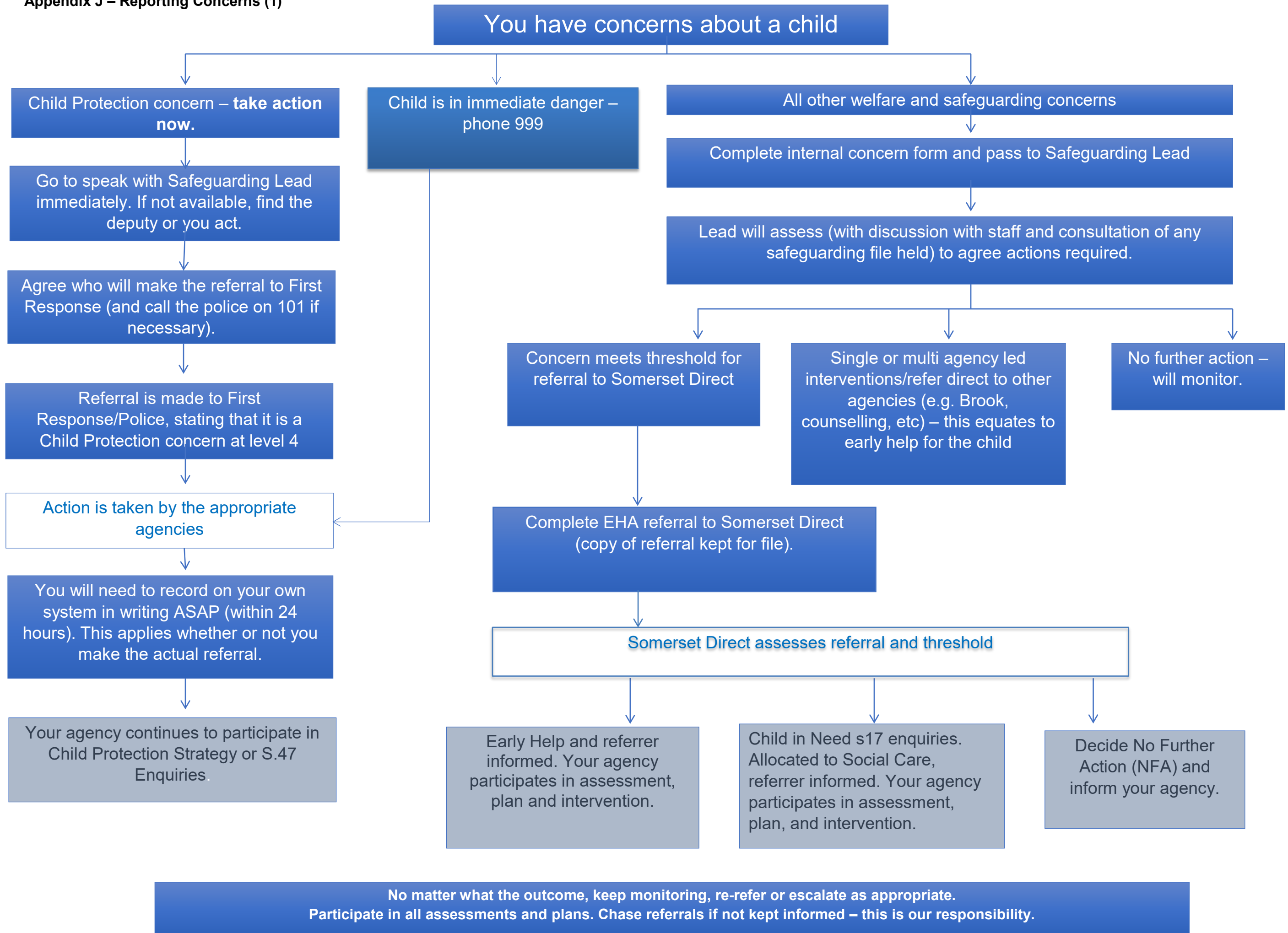
Reasonable Force [Use of Reasonable Force in Schools \(2013\)](#)
[Reducing the need for restraint and restrictive intervention \(2019\)](#)

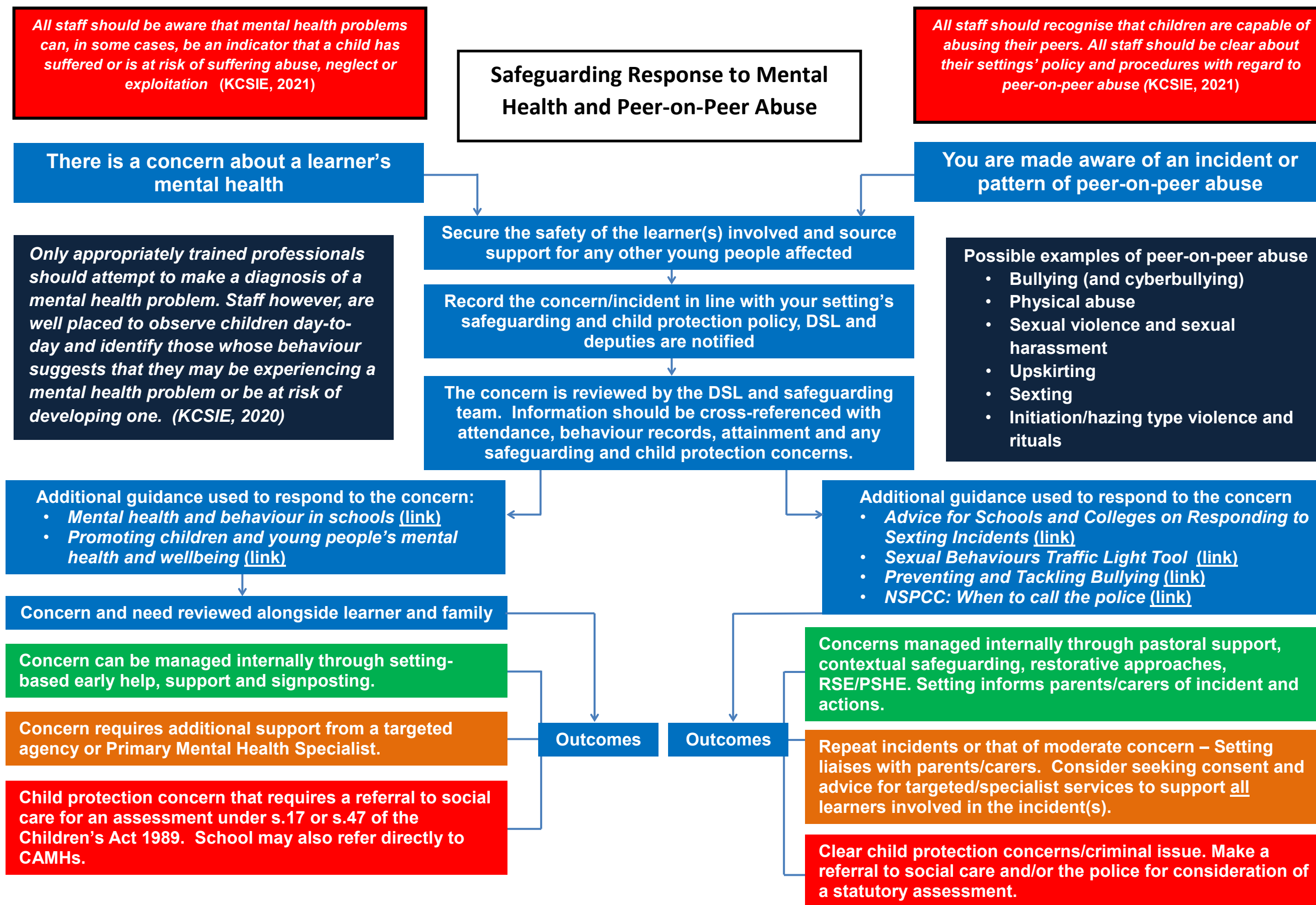
Information sharing & GDPR

- Chapter 1, Working Together to Safeguard Children, which includes a guide to information sharing.
- Information Sharing: Advice for Practitioners Providing Safeguarding Services to Children, Young People, Parents and Carers. The seven golden rules for sharing information will be especially useful.
- The Information Commissioner's Office (ICO), which includes ICO GDPR FAQs and guidance
- Data protection: toolkit for schools

<https://www.gov.uk/government/publications/data-protection-toolkit-for-schools>

Appendix J – Reporting Concerns (1)





All actions, risk assessments and responses should be recorded on the Safeguarding/Child Protection file. Plans/risk assessments should be reviewed every 2 months or on any occasion another concern is raised.

