



## **CHILD SAFEGUARDING POLICY**

Policy Updated: September 2019

Review Date: September 2020

Matrix Academy Trust Designated Safeguarding Lead:  
Mr C Walton (Dame Elizabeth Cadbury)

Nominated Trustee for Safeguarding:  
Mrs D Williams

## 1. Policy Statement for Child Safeguarding

1.1 Schools in the Matrix Academy Trust are committed to safeguarding children and young people. We expect everyone who works in our schools to share this commitment. Adults in our schools take all welfare concerns seriously and we always act in the best interests of the child.

1.2 The protection of our pupils from suffering or the likelihood of suffering significant harm is the responsibility of **all** staff within our school, superseding any other considerations. Action should also be taken to promote the welfare of a pupil in need of additional support, even if they are not suffering harm or at immediate risk.

1.3 In this policy, we clearly outline the responsibilities of all adults working in the school to be aware of their duty and how to act upon any concerns with regard to child safeguarding. (*Children includes everyone under the age of 18 and students who are over 18 but still attend school.*)

## 2. Aims

### 2.1 All of our schools will aim:

- To recognise signs and symptoms of pupils suffering harm or likely to suffer harm at the earliest possible moment to prevent concerns from escalating
- To respond to concerns through the appropriate agencies with all due speed and consideration
- To protect our pupils and staff
- To maintain a 'child-centred' approach and always act in the best interests of the child
- To create a culture of vigilance
- To ensure that pupils recognise when they are at risk and know how to get help when they need it

### 2.2 To achieve these aims the school:

- Appoints a Designated Safeguarding Lead (DSL) and Deputy
- Delivers child protection training which is regularly updated for all staff
- Requires staff to attend Safeguarding courses
- Provides INSET for the whole staff on the most current safeguarding issues
- Consulted with external agencies on this policy
- Has firmly embedded safeguarding in the curriculum

### 2.3 The role of Contextual Safeguarding :

We recognise the role of Contextual Safeguarding within our policy and procedures. Traditional safeguarding focuses very much on internal family dynamics, however Contextual Safeguarding recognises the impact of the public and social context on young people's lives, and consequently their safety. Contextual safeguarding seeks to identify and respond to harm and abuse posed to young people outside their home, either from adults or other young people. Therefore when considering the safety of our students we will always consider the impact of the wider environment, their peers and society as a whole.

2.4 All Staff must read 'Keeping Children Safe in Education September 2019 (Part one and Annex A), Staff Code of Conduct and Child Safeguarding Policy.

2.5 This policy should be read alongside the school's Behaviour, Anti-Bullying, Attendance, E safety, ICT Acceptable Use, Whistleblowing and Use of Control and Reasonable Force Policies.

2.6 This policy has been written in conjunction with 'Working Together to Safeguard Children July 2018', 'Keeping Children Safe in Education September 2019', 'Guidance on Sexting in Schools and Colleges' (UKCCIS August 2016), 'Sexual Violence and Sexual Harassment Between Children in Schools and Colleges (DfE May 2018)' and 'Criminal Exploitation of Children and Vulnerable Adults: County Lines Guidance' (Home Office July 2017), 'Children Missing Education 2017' and 'Information Sharing Guidance 2018'.

2.7 This policy can be found on the school's website and on the shared area for staff. Supporting documentation and guidance for staff can also be found on the staff area.

### 3. Procedures in Response to Disclosures or Concerns

#### 3.1 There is a named person in each school who is the Designated Safeguarding Lead.

3.2 If any staff member suspects that a child may be a victim of abuse, they immediately inform the named person of their concerns. Abuse can be of a sexual, emotional or physical nature. It can also be the result of neglect.

3.3 All staff should have an awareness of any children who may benefit from 'Early Help' support to prevent concerns from escalating. Staff should discuss any concerns with the Designated Safeguarding Lead.

#### 3.4 If a pupil personally confides an incident and only wishes to speak to you, you should:

- i) Inform them that you have a responsibility to report all incidents of abuse
- ii) Reassure them they have done the right thing
- iii) Leave questioning to the Police / Children's Services. If you contaminate evidence with incorrect questioning you may put the child at risk
- iv) Be honest about what happens next. If a child has told you about an incident, it is because they want help and look to you to give help
- v) Contact the Designated Safeguarding Lead, personally and immediately (in their absence, the Deputy Designated Safeguarding Lead or the Headteacher).
- vi) Make detailed notes immediately (no later than one hour later) of what the child has said quoting the child's words verbatim
- vii) Be aware that if you are unable to speak to the Designated Safeguarding Lead (e.g. out of school hours), you have a **duty** to report your concerns to Children's Services

#### 3.5 The member of staff should not:

- i) Investigate the matter independently, especially through questioning the pupil
- ii) Implement Child Protection procedures without first consulting the Designated Safeguarding Lead unless, and only in exceptional circumstances such as in emergency or when there is a genuine concern that appropriate action has not been taken, staff members can speak directly to Children's Services. If a referral is made, the Designated Safeguarding Lead should be informed as soon as possible.

#### 3.6 If a member of staff is concerned that a pupil is at risk according to any of the definitions, they should discuss the matter with the school's Designated Safeguarding Lead, who will:

- i) Collect any other relevant information from colleagues / other agencies
- ii) Make a decision as to whether or not there are sufficient grounds to refer the matter to the appropriate agencies
- iii) Inform the member of staff and others concerned of the decision and future action to be taken, where appropriate
- iv) if, at any point, there is a risk of **immediate serious harm** to a child, make a referral to Children's Services **immediately**

#### 4. Note:

4.1 In most circumstances when a child alleges abuse the Designated Safeguarding Lead will notify the parents at the earliest opportunity. However, in certain circumstances (usually in response to an allegation of physical or sexual abuse within the family) referral to Children's Services (and thereby to the Police) may be made first.

4.2 The Designated Safeguarding Lead will log all concerns and work with the appropriate agencies e.g. Children's Services. The schools receive advice and guidance from their local Child Safeguarding Advisors. Schools use the common referral procedures available on line as per their Local Authority.

4.3 The Designated Safeguarding Lead (supported by other safeguarding staff), will call Early Help meetings and when necessary, Multi-agency Professionals' Meetings in order to support early intervention for children and families in need. Children's Services will be consulted at every stage.

4.4 The School will also have regard to Contextual Safeguarding and will consider wider environmental factors in a child's life that may be a threat to their safety and/or welfare.

4.5 The school will send a representative to Child Protection Conferences and will forward full written reports if attendance is not possible. The Designated Safeguarding Lead receives and acts upon any updates or minutes. The Designated Safeguarding Lead will ensure participation by an appropriate member of staff in all Core Group activities forming a part of the Child Protection Plan established following a conference.

4.6 The Designated Safeguarding Lead will liaise with staff on matters of safety and safeguarding and act as a source of support, advice and expertise for staff. Safeguarding training will be completed as part of the new staff induction process.

4.7 The school will also work with agencies to ensure the monitoring of children not on the Child Protection List (not deemed to be *in need of a child protection plan*), but who may be living in risky situations - through a Child in Need plan or an Early Help Assessment.

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

## **5. Safeguarding is not just about protecting children from deliberate harm. It includes issues such as:**

- pupils' health and safety
- bullying, including cyber-bullying (by text message, on social networking sites, and so on)
- racist abuse
- homophobic and transphobic bullying
- harassment and discrimination
- domestic violence
- radicalisation and extremism
- gender or honour-based violence (including FGM)
- teenage relationship abuse
- use of physical intervention
- meeting the needs of pupils with medical conditions
- providing first aid
- drug and substance misuse
- educational visits
- gangs and youth violence
- internet or e-safety
- issues which may be specific to our local area or population, for example gang activity
- peer-on-peer abuse (see Anti-Bullying Policy)
- sexual violence and sexual harassment
- impact of new technologies on sexual behaviour, e.g. sexting (youth produced imagery)
- private fostering
- children who go missing from education
- children's mental health
- children required to give evidence in criminal courts
- children with family members in prison

5.1 Each trust school delivers Safeguarding across the curriculum to its pupils. This allows pupils to recognise when they are at risk, and how to get help when they need it, and to support them to keep physically and mentally healthy. Individual schools identify how they achieve this within the appendix.

## 6. Internal Communication

6.1 All Child Safeguarding concerns/issues will be CONFIDENTIAL. Sharing of relevant information to staff will be strictly at the discretion of the Designated Safeguarding Lead following the guidance issued by HM Government July 2018 - 'Information Sharing: advice for practitioners providing safeguarding services' (DfE 2018).

6.2 Information in relation to a student should not be kept "Confidential" if it is obtained through an external route. For example a member of staff learnt of a concern through a social encounter with a parent.

## 7. External Communication

7.1 In line with 'Keeping Children Safe in Education September 2019', data protection is not a barrier to sharing information where failure to do so would result in a child being placed at risk of harm.

7.2 The Data Protection Act 2018 and GDPR do not prevent, or limit the sharing of information for the purposes of keeping children safe. This includes allowing practitioners to share information without consent. (Paragraphs 75 & 77 Keeping Children Safe in Education September 2019).

7.3 All schools follow the guidance in 'Keeping Children Safe in Education' September 2019 regarding transferring child protection files if a child leaves the school.

## 8. Allegations Against Members of Staff

### 8.1 Whistleblowing

8.2 Whistleblowing is the act of disclosing wrongdoing. This must be in the public interest. Please see the Matrix Whistleblowing Policy for further information or contact the NSPCC Whistleblowing Helpline on 0800 028 0285.

8.3 Allegations against members of staff are not the responsibility of the Designated Safeguarding Lead. Any allegations of abuse by a member of staff should be reported **directly to the Headteacher**, who will implement locally agreed procedures. The first priority for the Headteacher will be to contact the Chair of the Governance Advisory Board and the LA appointed Designated Officer (LADO), before any other action is taken, including informing the member of staff.

8.4 In the event of the allegation being made against the Headteacher, the Chief Executive of Matrix Academy Trust (Dame M. Brennan) should be informed and can be contacted on 01922 211264. The Chief Executive Officer (and in her absence the Chair of the Governance Advisory Board) will seek advice from the Local Authority before any other action is taken. The Chief Executive will then manage the allegation. Further guidance can be found in pages 50-61 (Part Four) of Keeping Children Safe in Education September 2019.

8.5 Please refer to the school's Disciplinary Policy.

8.6 In the event of the allegation being made against Matrix Central Team, the Chief Executive should be informed on 01922 211264.

8.7 On the conclusion of a case, the school will abide by its legal duty to make a referral to the DBS any individual who has harmed, or poses a risk of harm to a child or vulnerable adult (ref paragraph 153, page 43 of 'Keeping Children Safe in Education' September 2019).

## 9. Procedures in Relation to Management and Recruitment of Staff

9.1 Our recruitment procedure pays full regard to 'Keeping Children Safe in Education' September 2019 and our safer recruitment practice includes: scrutinising applicants; verifying identity and academic or vocational qualifications; obtaining professional and character references; checking previous employment history and ensuring that the candidate has the health and physical capacity for the job. It also includes interviews and undertaking appropriate checks through the Disclosure and Barring Service (DBS).

9.2 Additional checks are carried out on applicants who have lived or worked outside the UK to ensure any relevant events that occurred outside the UK can be considered.

9.3 We acknowledge that Safer Recruitment is an integrated element of safeguarding and that the principles are on-going through induction, monitoring and performance management.

9.4 Relevant staff undertake Safer Recruitment training and there is always at least one person on every interview panel who has completed Safer Recruitment training.

9.5 A central record is maintained within school of all staff and teacher trainees, indicating whether the following checks have been carried out or certificates obtained, and the date on which each check was completed / certificate obtained:

identity; barred list; enhanced DBS; prohibition from teaching; qualifications; the person's right to work in the UK.

9.6 Where checks are carried out on volunteers, the details will be recorded on the single central register.

9.7 The specific vulnerability of supply staff and volunteers is recognised by the school and they are appropriately supported by senior staff. Provisions include issue of guidelines of our Behaviour Management Procedures and Child Safeguarding Procedures to all supply staff and volunteers whilst they are engaging with the children in the school.

9.8 Members of staff undergo safeguarding and child protection training at induction followed up by regular updates including annual refresher training to ensure they are fully briefed on safeguarding and child protection developments. Staff induction includes awareness sessions on the Safeguarding Policy, the school's Behaviour Policy and the response from schools when a child goes missing from education. In addition:

- All staff and volunteers receive Level 1 Basic Awareness Safeguarding Children and Young People training at least every 2 years, delivered by the Designated Safeguarding Lead and safeguarding staff.
- Members of staff also receive training to raise their awareness of appropriate behaviour in relation to physical contact, professional relationships and so on, in order to keep pupils safe and to keep staff safe from inappropriate allegations (see Staff Code of Conduct).
- Designated Safeguarding Lead and Deputies receive Level 2 Advanced Training every 2 years.
- Designated Safeguarding Lead receives regular training, at least annually, to keep up to date with any developments relevant to the role which includes:
  - Management/support for the Early Help process
  - Providing advice and support to other staff on child welfare and child protection matters
  - Taking part in strategy discussions and inter-agency meetings
  - Contributing to the assessment of children
  - Liaising with the Local Authority and working with other agencies in line with 'Working Together to Safeguard Children' (July 2018) and 'Keeping Children Safe in Education' September 2019

9.9 There may be times when adults in our school, in the course of their duty, use physical intervention to restrain children. The Headteacher requires the adult involved in any such incident to report this to him/her **immediately** so it can be recorded appropriately.

*NB: Physical intervention is appropriate in line with guidelines in section 50A of the Education Act 1996.*

9.10 Members of staff are aware of their rights, responsibilities, duties and powers relating to managing pupils' behaviour in school (see Policy for the Use of Control & Reasonable Force), during school activities offsite. They are also aware of the need to **report** issues for action by the school Leadership, even when these occur beyond school and other than during an offsite activity - if there are safeguarding implications for the individual children involved, other children or members of the public.

*NB: These powers and those of the Headteacher to take action against a child who causes a problem even beyond the school and outside school hours are outlined in the Education & Inspections Act 2006.*

9.11 Our primary school will follow the DfE statutory guidance 'Disqualification under the childcare Act 2006' updated 31 August 2018. Staff at the Primary school should declare on appointment they are not disqualified but if their circumstances change they must inform the Headteacher.

9.12 Staff relationships and associations in and out of school (and online) may have implications for the safeguarding of students. Staff should discuss any changes to personal circumstances with the DSL and/or Headteacher if it may impact the safeguarding of any student.

## 10. Procedures in Relation to Visitors to the School Site

- Visitors are required to report **directly** to the reception by the main entrance.
- Once inside the school, all visitors must sign the visitors' book.
- The Visitor Information Booklet must be read and signed for at reception.
- A visitor's lanyard will be issued which is to be worn at all times.
- Any unaccompanied visitors on site who are not recognised must be politely approached, questioned about their business in school and escorted **immediately** to reception.
- The schools reserve the right to refuse entry or terminate a visit at any time.

## 10.1 Classification of Visitors

Visitors can be classified according to their degree of access to children:

## 10.2 People working with children

Peripatetic teachers, sports coaches, LA employees, school nurses, volunteers, Children's Services staff.

- Unless the visit is expected or the visitor is well known to the person admitting them, authority must be obtained from a member of the Leadership Team before allowing access to the school.
- The identity of the visitor must be confirmed.
- All such visitors will have enhanced DBS clearance.
- If the clearance is not held by us, we will require confirmation that appropriate clearance has been obtained and the visitor will wear a badge issued by the organisation holding their DBS clearance.
- Material and key messages planned by guest speakers will be vetted prior to the event and, where appropriate, a social media check will be carried out.
- School Experience Programme participants are **accompanied at all times by school staff**.

## 10.3 People not working with children

Examples: builders and gardeners etc.

- Unless the visit is expected or the visitor is well known to the person admitting them, their identity should be confirmed and the authority of a member of the Leadership Team must be obtained before allowing access to the school.
- They are to be **supervised while pupils are on the premises**. The amount of supervision required is dependant on the visitors' actual or potential proximity to pupils and the school's knowledge of them.

## 10.4 Escorted visitors

Examples: parents/carers, prospective parents, job candidates.

- These people **must be accompanied at all times**.

# 11. Governance

11.1 All Matrix Trustees and members of the Governance Advisory Boards have an Enhanced DBS Check (without barred list, unless they are additionally in regulated activity).

11.2 The Trustees receive training in their legal responsibilities for safeguarding. This includes ensuring there are policies and procedures in place in order for appropriate action to be taken in a timely manner to safeguard and promote pupils' welfare. This includes ensuring:

- statutory safer recruitment procedures are adhered to
- all staff undergo safeguarding training and child protection training at induction and this is regularly updated in line with advice from the local Safeguarding Children's Board
- appropriate filters and appropriate monitoring systems are in place to safeguard pupils from accessing potential harmful and inappropriate online material from the Academy IT system (please refer to the school's E-Safety Policy and ICT Acceptable Use Policies)
- pupils are taught about safeguarding, including online, through teaching and learning opportunities, as part of providing a broad and balanced curriculum
- the expertise of staff contributes to and shapes safeguarding arrangements and the Child Protection Policy

11.3 The Matrix Trust appointed Mrs D Williams, as the Nominated Governance Lead for Safeguarding and E-Safety. She is responsible for liaising with the Headteacher and Designated Safeguarding Leads over matters regarding child protection issues. The role is strategic and does not involve concerns about individual pupils. Mrs D Williams can be contacted via our main office on 01922211264.

11.4 The Trust have allocated the role of Designated Teacher to promote the educational achievement of children who are looked after, or previously looked after, to the Designated Lead. This is because the most

common reason for children becoming looked after is as a result of abuse/neglect. The School's Designated Lead works with the Local Authority's Virtual School Headteacher to identify individual pupil needs and to develop and implement a Personal Educational Plan for every pupil in Local Authority care.

11.5 The Trust acknowledges its retained responsibility for any activities carried out with children on site or using the school's facilities - even if delivered by an external body or organisation. In such circumstances, the governing body satisfies itself that the group or organisation has its own safeguarding policy and procedures for safer recruitment of staff or leaders, or that the organisation signs up to the policy and procedure of the school. Therefore, the Trust and Headteacher will only grant permission for use of the premises to recognised bodies (usually a national affiliation and a written statement of their adherence to safeguarding principles).

## 12. Types of Abuse and Neglect

12.1 It is important to remember that abuse, neglect and safeguarding issues are rarely standalone events that can be covered by one definition or label. In most cases, multiple issues will overlap with one another.

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

### 12.3 Physical abuse

may involve hitting, shaking, throwing, poisoning, suffocating, burning or scalding, drowning 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 whom they are looking after. This situation is commonly described using terms such as factitious illness by proxy or Munchausen's Syndrome by proxy.

### 12.4 Emotional abuse

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

It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond 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 ill-treatment of a child, though it may occur alone.

### 12.5 Sexual abuse

involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration, or non penetrative acts. They may include non-contact activities, such as involving children in looking at, or in the production of, pornographic material or watching sexual activities, or encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (including via the internet). Sexual abuse is not only perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.

### 12.6 Neglect

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

## 13. Further information on Specific Safeguarding Issues

### 14. Childhood Mental Health

14.1 Mental illness and suicidal thoughts can affect anyone, of any age, of any background, at any time. Like with physical illnesses, people don't choose to have a mental health problem. It can be difficult to know if a child is suffering as they often keep it to themselves.

14.2 Some of the signs to be aware of may be:

- becoming withdrawn from family and friends
- persistent low moods and unhappiness
- tearfulness and irritability
- worries that stop them carrying out day to day tasks
- sudden outbursts of anger directed towards others or themselves
- loss of interest in activities that they used to enjoy
- problems eating or sleeping
- physical indicators, such as self harm

14.3 Any member of staff who suspects a child or young person is suffering with their mental health should share their concerns with the **Designated Safeguarding Lead**.

### 15. Children Missing from Education

15.1 All children, regardless of their circumstances, are entitled to a full time education which is suitable to their age, ability, aptitude and any special educational needs they may have. Local authorities have a duty to establish, as far as it is possible to do so, the identity of children of compulsory school age who are missing education in their area.

15.2 A child going missing from education is a potential indicator of a range of safeguarding possibilities. The pastoral team follow the school's procedures for dealing with children that go missing from education, particularly on repeat occasions, to help identify the risk of abuse and neglect, including sexual abuse or exploitation and child criminal exploitation, and to help prevent the risks of them going missing in future.

15.3 It is essential that all staff are alert to signs to look out for and the individual triggers to be aware of when considering the risks of potential safeguarding concerns such as; travelling to conflict zones, Female Genital Mutilation and forced marriage.

15.4 Each school will inform their Local Authority of any pupil who is going to be removed from the admission register where the pupil:

- has been taken out of school by their parents and the school has received written notification from the parent they are being educated outside the school system e.g. home education;
- has ceased to attend school and no longer lives within reasonable distance of the school at which they are registered;
- has been certified by the school medical officer as unlikely to be in a fit state of health to attend school before ceasing to be of compulsory school age, and neither he/she nor his/her parent has indicated the intention to continue to attend the school after ceasing to be of compulsory school age;
- are in custody for a period of more than four months due to a final court order and the proprietor does not reasonably believe they will be returning to the school at the end of that period;
- has been permanently excluded.

**15.5 Our schools will inform the Local Authority of any pupil who fails to attend school regularly, adhering to the authority's guidelines. Our schools work closely with the Local Authority Attendance Officer, who will carry out 'safe and well' checks where necessary, in discussion with the Designated Safeguarding Lead. Our schools will always liaise with, and take advice from Children's Services.**

**15.6 The school will inform the Local Authority of any first day absence of a Looked After Child, where contact with carers could not be made.**

15.7 For further information and guidance please refer to the relevant school policies in conjunction with this policy. For further guidance on **Children Missing from Education**, please also refer to the school's Attendance Policy. Parents/Carers must ensure the school has at least two emergency contacts for their child.

## 16. Children with Special Educational Needs and Disabilities

16.1 Children with Special Educational Needs and Disabilities (SEND) can face additional safeguarding challenges. Staff in our school recognise that additional barriers can exist when recognising abuse and neglect in this group of children. This can include:

- assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's disability without further exploration;
- children with SEN and disabilities can be disproportionately impacted by things like bullying - without outwardly showing any signs;
- communication barriers and difficulties in overcoming these barriers.

16.2 Looked after and Previously looked after children may also have additional barriers to overcome in relation to safeguarding. The staff member for each school with responsibility for LAC and PLAC children are named in their schools appendix.

## 17. Child Sexual Exploitation

17.1 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. Like all forms of child sex abuse, child sexual exploitation:

- can affect any child or young person (male or female) under the age of 18 years, including 16 and 17 year olds who can legally consent to have sex;
- can still be abuse even if the sexual activity appears consensual;
- can include both contact (penetrative and non-penetrative acts) and non-contact sexual activity;
- can take place in person or via technology, or a combination of both;
- can involve force and/or enticement-based methods of compliance and may, or may not, be accompanied by violence or threats of violence;
- may occur without the child or young person's immediate knowledge (e.g. through others copying videos or images they have created and posted on social media);
- can be perpetrated by individuals or groups, males or females, and children or adults. The abuse can be a one-off occurrence or a series of incidents over time, and range from opportunistic to complex organised abuse; and
- is typified by some form of power imbalance in favour of those perpetrating the abuse. Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including gender, sexual identity, cognitive ability, physical strength, status, and access to economic or other resources.

17.2 Some of the following signs may be indicators of child sexual exploitation:

- children who appear with unexplained gifts or new possessions;
- children who associate with other young people involved in exploitation;
- children who have older boyfriends or girlfriends;
- children who suffer from sexually transmitted infections or become pregnant;
- 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; and
- children who regularly miss school or education or do not take part in education.

## 18. Criminal Exploitation of Children (County Lines)

18.1 County lines is the police term for urban gangs supplying drugs to suburban areas and market and coastal towns using dedicated mobile phone lines or “deal lines”. It involves child criminal exploitation (CCE) as gangs use children and vulnerable people to move drugs and money.

18.2 County lines is a major, cross-cutting issue involving drugs, violence, gangs, safeguarding, criminal and sexual exploitation, modern slavery, and missing persons.

18.3 Like other forms of abuse and exploitation, county lines exploitation:

- can affect any child or young person under the age of 18 years;
- can still be exploitation even if the activity appears consensual;
- can involve force and/or enticement-based methods of compliance and is often accompanied by violence or threats of violence;
- can be perpetrated by individuals or groups, males or females, and young people or adults and
- is typified by some form of power imbalance in favour of those perpetrating the exploitation. Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors, including gender, cognitive ability, physical strength, status, and access to economic or other resources.

18.4 One of the key factors found in most cases of county lines exploitation is the presence of some form of exchange (e.g. carrying drugs in return for something). Where it is the victim who is offered, promised or given something they need or want, the exchange can include both tangible (such as money, drugs or clothes) and intangible rewards (such as status, protection or perceived friendship or affection).

18.5 The national picture on county lines continues to develop but there are recorded cases of the use of social media to make initial contact with children and young people.

## 19. Domestic Abuse

19.1 Any incident or pattern of incidents of controlling, coercive, threatening behaviour, violence or abuse between those aged 16 or over who are, or have been, intimate partners or family members regardless gender or sexuality. The abuse can encompass, but is not limited to:

- psychological;
- physical;
- sexual;
- financial; and
- Emotional

19.2 Exposure to domestic abuse and/or violence can have a serious, long lasting emotional and psychological impact on children. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result. Domestic abuse affecting young people can also occur within their personal relationships, as well as in the context of their home life.

## 20. Homelessness

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

## 21. ‘Honour Based’ Violence (HBV)

21.1 So-called ‘honour-based’ violence (HBV) encompasses crimes which have been committed to protect or defend the honour of the family and/or the community, including Female Genital Mutilation (FGM), forced marriage, and practices such as breast ironing. All forms of so-called HBV are abuse (regardless of the motivation) and should be handled and treated as such. If in any doubts staff should speak to the Designated Safeguarding Lead. 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 HBV,

or already having suffered HBV.

## 22. Female Genital Mutilation (FGM)

22.1 Female Genital Mutilation (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.

22.2 There is a range of potential indicators that a child or young person may be at risk of FGM, which individually may not indicate risk but if there are two or more indicators present this could signal a risk to the child or young person. Possible warning signs that FGM might be about to take place are:

- Mention of a female relative coming to visit
- A girl becoming easily distressed, fearful or anxious
- Referencing FGM (or its other alternative names)
- A child talking about a special procedure/ceremony that is going to take place
- The family making preparations to take the girl abroad 'on holiday' e.g. arranging vaccinations or requesting a prolonged absence from school

22.3 There is a range of symptoms of FGM that could consist of:

- severe and/or constant pain
- infections, such as tetanus, HIV and hepatitis B and C
- infertility
- bleeding, cysts and abscesses
- difficulties urinating or incontinence

22.4 Victims of FGM are likely to come from a community that is known to practise FGM. Teachers must personally report to the police, after informing the Designated Safeguarding Lead, if they discover that FGM appears to have been carried out on a girl under the age of 18.

## 23. Forced Marriage

23.1 Forcing a person into a marriage is a crime in England and Wales. A forced marriage is one entered into without the full and free consent of one or both parties and where violence, threats, or any other form of coercion is used to cause a person to enter into a marriage. Threats can be physical or emotional and psychological. A lack of full and free consent can be where a person does not consent or where they cannot consent (if they have learning disabilities, for example). Nevertheless, some communities use religion and culture as a way to coerce a person into marriage.

## 24. Online Safety

24.1 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 to protect and educate the whole school community in their use of technology and establishes mechanisms to identify, intervene and escalate any incident where appropriate.

24.2 The breadth of issues classified within online safety is considerable, but can be categorised into three areas of risk:

- Content: being exposed to illegal, inappropriate or harmful material
- Contact: being subjected to harmful online interaction with other users
- Conduct: personal online behaviour that increases the likelihood of, or causes, harm

24.3 Please refer to the school's E-Safety and ICT Acceptable Use Policies. All schools use specialist online monitoring software to ensure that inappropriate content or sites are not accessed by pupils or staff. Please also refer to the Matrix 'Staff Code of Conduct'.

## 25. Preventing Radicalisation

25.1 The Counter-Terrorism and Security Act places a duty on specified authorities, including local authorities and childcare, education and other children's services providers, in the exercise of their functions, to have due regard to the need to prevent people from being drawn into terrorism ("The

Prevent duty”). The Internet and use of social media has become a major factor in the radicalisation of young people.

25.2 All staff should be aware of the signs and symptoms of a young person being at risk of becoming radicalised:

- spending increasing time in the company of other suspected extremists;
- changing their style of dress or personal appearance to accord with the group;
- their day-to-day behaviour becoming increasingly centred around an extremist ideology, group or cause;
- loss of interest in other friends and activities not associated with the extremist ideology, group or cause;
- possession of material or symbols associated with an extremist cause (e.g. the swastika for far right groups);
- attempts to recruit others to the group/cause/ideology;
- communications with others that suggest identification with a group/cause/ideology.

The examples above are not exhaustive and vulnerability may manifest itself in other ways.

25.3 Concerns may result in a referral to the Channel Programme. The Channel Programme is a voluntary process which supports people identified as being vulnerable to being drawn into terrorism.

25.4 Since 2010, when the Government published 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 several occasions both locally and nationally in which extremist groups have attempted to radicalise vulnerable 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 vulnerable to future radicalisation.

25.5 Our schools value freedom of speech and the expression of beliefs/ideology as fundamental rights underpinning our society's values. Both pupils and teachers have the right to speak freely and voice their opinions. However, freedom comes with responsibility and free speech that is designed to manipulate the vulnerable or that leads to violence and harm of others goes against the moral principles in which freedom of speech is valued. Free speech is not an unqualified privilege; it is subject to laws and policies governing equality, human rights, community safety and community cohesion.

25.6 The current threat from terrorism in the United Kingdom may include the exploitation of vulnerable people, to involve them in terrorism or in activity in support of terrorism. The normalisation of extreme views may also make children and young people vulnerable to future manipulation and exploitation. Each school is clear that this exploitation and radicalisation should be viewed as a safeguarding concern.

25.7 We seek to protect children and young people against the messages of all violent extremism including, but not restricted to, those linked to Islamist ideology, or to the Far Right / Neo Nazi / White Supremacist ideology, Irish Nationalist and Loyalist paramilitary groups, and extremist Animal Rights movements.

25.8 Please refer to our 'Radicalisation and Extremism' guidance and our 'Prevent' risk assessment.

**25.9 If you have any concerns about any of the above please report immediately to the Designated Safeguarding Lead.**

## **26. Private Fostering**

26.1 Where schools have not been involved in making the arrangement but a member of staff at a school becomes aware that a pupil may be in a private fostering arrangement, where a child under the age of 16 (or 18 if disabled) is provided with care and accommodation by someone to whom they are not related in that person's home, with the intention that it should last for 28 days or more, parents and private foster parents both have a legal duty to inform the relevant local authority at least 6 weeks before the arrangement is due to start; not to do so is a criminal offence. The member of staff should raise this in the first instance with the Designated Safeguarding Lead. The school will notify the Local Authority of the circumstances and the Local Authority will check that the arrangement is suitable and safe for the child.

## 27. Peer on Peer Abuse

27.1 All staff are aware of safeguarding issues that can manifest themselves via peer on peer abuse. This is most likely to include, but not limited to, bullying (including cyber bullying), physical abuse such as; hitting, kicking, shoving, biting, hair-pulling, gender based violence / sexual assaults and sexting. This could, for example, include pupils being sexually touched/assaulted, sexting or being subjected to initiation/hazing type violence. Abuse will never be passed off as 'banter' or 'part of growing up'.

27.2 Staff are clear as to the school policy and procedures with regards to peer on peer abuse as defined in the Anti-Bullying and Behaviour Policy and broader child protection procedures.

27.3 Pupils who abuse others will be responded to in a way that meets their needs as well as protecting others within the school community through a multi-agency risk assessment. We ensure that the needs of children and young people who abuse others will be considered separately from the needs of their victims.

## 28. Sexting (Youth Produced Imagery)

28.1 Sexting is the sharing of sexual imagery by young people.

28.2 Creating and sharing sexual photos and videos of under-18s is illegal and therefore causes the greatest complexity for schools and other agencies when responding. It also presents a range of risks which need careful management.

28.3 The school adheres to guidance from the UK Council for Child Internet Safety (UKCCIS August 2016) which acknowledges the current broad usage of the term 'sexting' and introduces the phrase 'youth produced sexual imagery'. The guidance covers the following incidents:

- A person under the age of 18 creates and shares sexual imagery of themselves with a peer under the age of 18.
- A person under the age of 18 shares sexual imagery created by another person under the age of 18 with a peer under the age of 18 or an adult.
- A person under the age of 18 is in possession of sexual imagery created by another person under the age of 18.

28.4 The advice does not cover the sharing of sexual imagery of people under the age of 18 by adults as this constitutes child sexual abuse and requires immediate police involvement.

28.5 All incidents of youth produced sexual imagery are dealt with as safeguarding concerns. Staff must follow the safeguarding referral system if any such incident comes to their attention.

## 29. Sexual Violence and Sexual Harassment

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

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

29.3 Staff should be aware of the importance of:

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

## 30. What is sexual violence and sexual harassment?

### 30.1 Sexual Violence

30.2 It is important that school and college staff are aware of sexual violence and the fact children can, and sometimes do, abuse their peers in this way. When referring to sexual violence we are referring to sexual offences under the Sexual Offences Act 2003 as described below:

**30.3 Rape:** A person (A) commits an offence of rape if: he intentionally penetrates the vagina, anus or mouth of another person (B) with his penis, B does not consent to the penetration and A does not reasonably believe that B consents.

**30.4 Assault by Penetration:** A person (A) commits an offence if: s/he intentionally penetrates the vagina or anus of another person (B) with a part of her/his body or anything else, the penetration is sexual, B does not consent to the penetration and A does not reasonably believe that B consents.

**30.5 Sexual Assault:** A person (A) commits an offence of sexual assault if: s/he intentionally touches another person (B), the touching is sexual, B does not consent to the touching and A does not reasonably believe that B consents.

### 31. What is consent?

31.1 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 had the freedom and capacity to make that choice.

### 32. Sexual Harassment

32.1 When referring to sexual harassment we mean 'unwanted conduct of a sexual nature' that can occur online and offline. When we reference sexual harassment, we do so in the context of child on child sexual harassment. Sexual harassment is likely to; violate a child's dignity and/or make them feel intimidated, degraded or humiliated and/or create a hostile, offensive or sexualised environment.

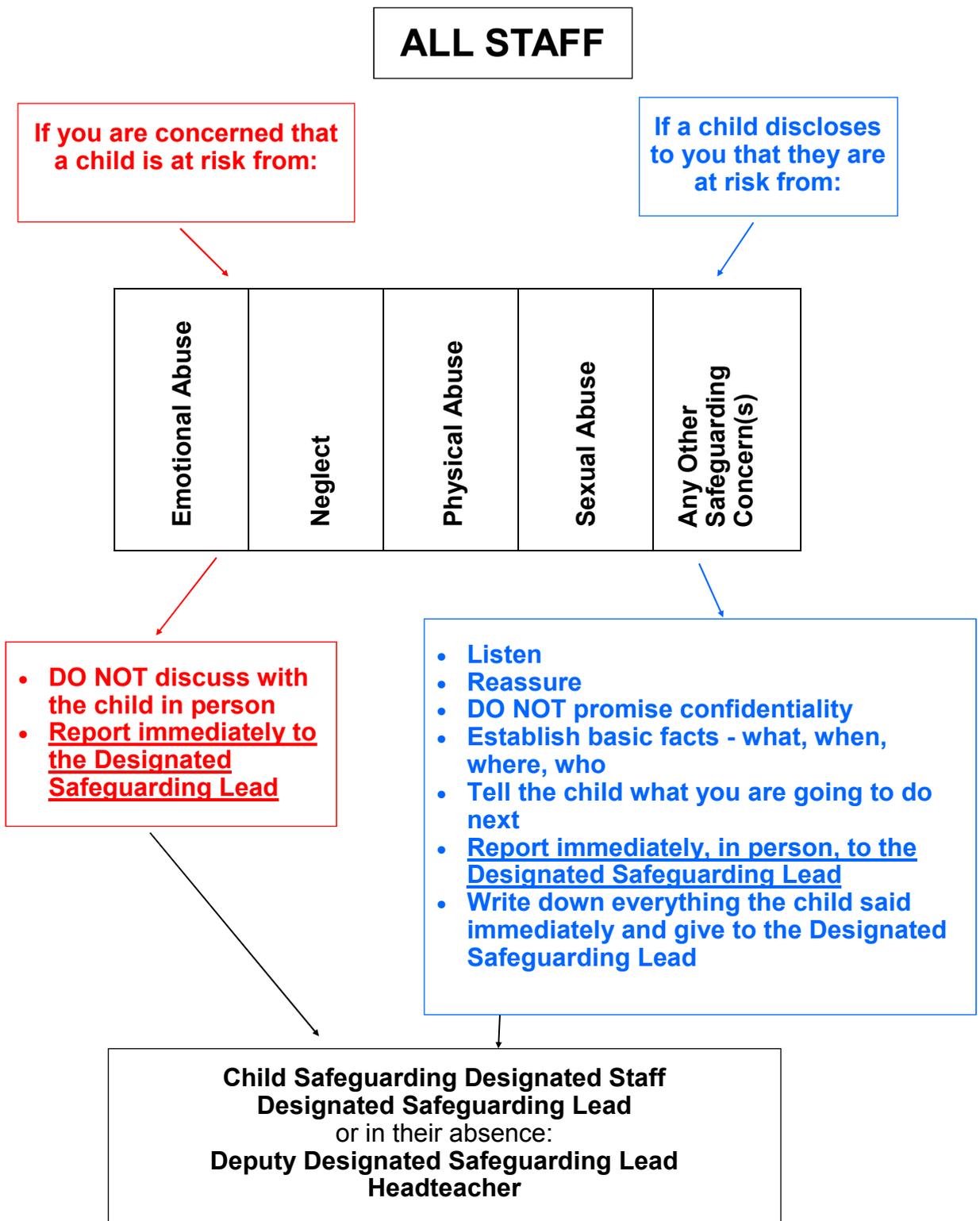
32.2 Whilst not intended to be an exhaustive list, sexual harassment can include:

- Sexual comments, such as: telling sexual stories, making lewd comments, making sexual remarks about clothes and appearance and calling someone sexualised names;
- Sexual 'jokes' or taunting;
- Physical behaviour, such as: deliberately brushing against someone, interfering with someone's clothes (schools should be considering when any of this crosses a line into sexual violence - it is important to talk and consider the experience of the victim) and displaying pictures, photos or drawings of a sexual nature; and
- Online sexual harassment. This may be standalone, or part of a wider pattern of sexual harassment and/or sexual violence. It may include:
  - non-consensual sharing of sexual images and videos;
  - sexualised online bullying;
  - unwanted sexual comments and messages, including, on social media; and
  - sexual exploitation; coercion and threats

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

33.1 The response to a report from a child is important. It is **essential** that all victims are reassured that they are being taken seriously and that they will be supported and kept safe. A victim should **never** be given the impression that they are creating a problem by reporting sexual violence or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report.

# PROCEDURES



Members of staff with Advanced Level Child Safeguarding and Multi Agency Working training are identified within the schools individual appendix.



## Etone College

# Safeguarding through the Curriculum

Safeguarding topics at Etone College are covered primarily through our 'Learning for Life' curriculum, with some safeguarding matters also being covered in other subject areas – for example, healthy eating is discussed within the PE curriculum. Two form-time activities per week are also dedicated to the development of the 'Learning for Life' curriculum and will develop the awareness of safeguarding matters. Our 'Theme of the Week' supports local, national and international matters, and assemblies are delivered to all pupils on a weekly basis that will also develop knowledge and understanding of key topics for pupils to keep themselves both physically and mentally healthy.

# Etone College

## Designated Safeguarding Staff:

If you are concerned about a child please report **immediately** to:

Mrs R Price (Assistant Headteacher & Designated Safeguarding Lead), or in her absence

Miss L Bailey (Head of Griffin House & Deputy Designated Safeguarding Lead) or

Mr I Smith (Headteacher)

Prevent single point of contact (SPOC) Mrs R Price

Designated teacher for looked after and previously looked after children—Mrs R Price / Mr W Astall

## Reporting Procedure

A face-to-face conversation with the Designated Safeguarding Lead **immediately** and the completion of a green form (see attached).

## Children's Services Contacts

Warwickshire MASH (Multi-Agency Safeguarding Hub)	01926 414144
Coventry Children's Services	02476 788555
Leicestershire Children's Services	0116 3055500
Emergency Duty Team (EDT)	01926 886922
Adrian Over (Education Safeguarding Manager)	01926 742525 / 07966 224286
Manjit Sidhu (Prevent Co-ordinator)	01386 591825
Police	101 / 999

## LADO Contacts

LADO (Local Authority Designated Officer)

[lado@warwickshire.gcsx.gov.uk](mailto:lado@warwickshire.gcsx.gov.uk)

01926 743433

### Staff with Multi-Agency Advanced Safeguarding Training are:

I Smith (Headteacher), R Price (Assistant Headteacher), L Bailey (Head of Griffin House), P Bowen (Deputy Head), W Astall (Head of Centaur House)

Etone College is a **no mobile phone** site for Years 7-11. Please refer to our E-Safety and Behaviour Policies.

Form C (green paper) – This form **must** be completed in black ink



## Logging a concern about a child's safety and welfare

(NB **All** concerns must be recorded but a Designated Safeguarding Lead must be informed **immediately** about **all** disclosures by a child of abuse and **any** situation where a child may be at immediate risk of harm at the end of their school day – this form should then be filled in and passed to the DSL as soon as possible after the DSL has been informed)

Pupil's Name:	Date of Birth:	Year Group:	Form:
Date:	Time (of writing this record):		
Name of person completing this form (please print):			
Job Title:			
Signature:			
Reason(s) for recording the incident/concern (headline):			
<p>Record the following factually: <b>When</b> (date &amp; time of incident or concern arising)? <b>Where</b> did your concerns arise? <b>Who else</b> - were any other children or staff present? <b>What</b> exactly did you see/hear/smell that raised your concern? N.B. Please record any direct disclosures/statements/comments using the child or adult's exact words in quotation marks.</p>			
NB if additional pages are used, these must be attached securely to this form			
<p><b>Professional opinion:</b> Your professional opinions, impressions and worries are important. Facts should be recorded in the box above but please record your opinions, impressions and worries here and state what has led you to form them (e.g. something you have noticed, feel or suspect).</p>			
Action taken, including names of everyone spoken to about the incident/concern:			
Name of Designated Safeguarding Lead this form was passed to:			
Date and time incident/concern was shared with Designated Safeguarding Lead:			

Please check to make sure your report is clear, and will be clear to someone else reading it next year  
**NOW PLEASE PASS THIS FORM TO YOUR DESIGNATED SAFEGUARDING LEAD FOR COMPLETION OVERLEAF** (NB by end of working day at latest if child is not at immediate risk of harm)

(Following sections to be completed by Designated Safeguarding Lead)

<b>Time &amp; date information received by DSL and from whom</b>	
<b>Any advice sought by DSL (date, time, name, role, organisation &amp; advice given)</b>	
<b>DSL's analysis of presenting issues/concerns and advice received</b>	
<b>Action taken (referral to or consultation with MASH or local Children's Services team/ monitoring advice given to appropriate staff/ Early Help etc.) If decision not to refer, state reason.  Note time/date/names/ who information shared with and when etc.</b>	
<b>Outcome  (include names of individuals/agencies who have given you information regarding outcome of any referral (if made))</b>	
<b>Parents informed Yes/no – reasons if no</b>	
<b>Where can additional information regarding child/ incident be found? (e.g. pupil file, serious incident book)</b>	
<b>Signed</b>	
<b>Printed Name</b>	
<b>Date</b>	

<b>Date/time/how member of staff submitting this form received feedback about action taken from DSL (please circle below as appropriate)</b>	<b>Date:</b>	<b>Time:</b>
<b>Face to face</b>	<b>Phone call</b>	<b>e mail (copy retained)</b>
Signature of reporting M of S	Signature of reporting M of S	