



**ST JOHN'S SCHOOL**  
SIDMOUTH, UNITED KINGDOM

# **Child Protection and Safeguarding Policy**

Policy reviewed	22 August 2024
Next review date	August 2025

## Key Personnel - SCHOOL

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*\*Out of hours contact details will be made available to staff*

### DEVON COUNTY COUNCIL CONTACTS

**Early Help, Consultation and Enquiries (Multi-Agency Safeguarding Hub - MASH) please contact:**

Telephone: **0345 155 1071**

Email: [Local Authority Safeguarding Hubsecure@devon.gov.uk](mailto:Local Authority Safeguarding Hubsecure@devon.gov.uk)

Request for Support available at:

[DCC - Request for support \(outsystemsenterprise.com\)](http://DCC - Request for support (outsystemsenterprise.com))

**Emergency Duty Team** out of hours **0345 6000 388**

**Police** non-emergency 101

Professional Safeguarding Consultation line: (01392) 388428

**For all LADO enquiries** Exeter (01392) 384964

[ladosecure-mailbox@devon.gcsx.gov.uk](mailto:ladosecure-mailbox@devon.gcsx.gov.uk)

Further info: <https://new.devon.gov.uk>

[Managing allegations - Devon Children and Families Partnership \(dcfp.org.uk\)](http://Managing allegations - Devon Children and Families Partnership (dcfp.org.uk))

#### Early Help Team

Senior Manager: Sarah Hunt

Early Help Locality Contact information:

[Early Help Locality Contact Information - Devon Children and Families Partnership \(dcfp.org.uk\)](http://Early Help Locality Contact Information - Devon Children and Families Partnership (dcfp.org.uk))

Locality Early Help Mailbox

North: [earlyhelpnorthsecure-mailbox@devon.gov.uk](mailto:earlyhelpnorthsecure-mailbox@devon.gov.uk)

Mid & East: [earlyhelpmideastsecure-mailbox@devon.gov.uk](mailto:earlyhelpmideastsecure-mailbox@devon.gov.uk)

South & West: [earlyhelpsouthsecure-mailbox@devon.gov.uk](mailto:earlyhelpsouthsecure-mailbox@devon.gov.uk)

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For emergencies outside of office hours please call: 0345 600 0388

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# Child Protection and Safeguarding Policy

## Safeguarding Statement

St John's School recognises our moral and statutory responsibility to safeguard and promote the welfare of all pupils and expects all staff, governors, and volunteers to share this commitment. We recognise that all children, regardless of age, disability, SEND, gender reassignment, race, religion or belief, sex, or sexual orientation have an equal right to protection from all types of harm or abuse, including through the use of technology. We endeavour to provide a safe and welcoming environment where children are respected and valued. We are alert to the signs of abuse and neglect and follow procedures to ensure that children receive timely and effective support, protection, and justice. We listen to our pupils, take seriously what they tell us and pupils are aware of the adults they can talk to if they have a concern. If there are concerns about a child's welfare, we may need share information and work in partnership with other agencies. We will ensure concerns are discussed with parents/carers first unless we have reason to believe that by doing so would be contrary to the child's welfare. This Child Protection and Safeguarding policy underpins and guides all our safeguarding procedures and protocols. It applies to all pupils, including those in the EYFS and applies whenever staff or volunteers are working or interacting with pupils, including when this is away from the school, for example on an educational visit.

## Terminology

Safeguarding and promoting the welfare of children is defined as:

- providing help and support to meet the needs of children as soon as problems emerge
- protecting children from maltreatment, whether that is within or outside the home, including online
- preventing the impairment of children's mental and physical health or development,
- ensuring that children grow up in circumstances consistent with the provision of safe and effective care; and
- taking action to enable all children to have the best outcomes.

Child Protection is a part of safeguarding and promoting welfare. It refers to the activity that is undertaken to protect specific children who are suffering, or are likely to suffer harm.

When the word "staff" is used within this policy, it applies to all adults within the school and all categories of staff including Governors, supply and self-employed staff, contractors, volunteers, students and those on work experience.

Child includes everyone under the age of 18 or 25 if a care leaver.

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

## Safeguarding Legislation and Guidance

The following safeguarding legislation and guidance has been considered when drafting this policy:

- The Education (Independent School Standards) (England) Regulations 2014
- [Working Together to Safeguard Children](#) (WT) (2023 updated February 2024)
- [Keeping Children Safe in Education \(September 2024\)](#)
- Advice and guidance from Devon CC Safeguarding Children Partnership
- Statutory Framework for the Early Years Foundation Stage (2023)
- Prevent Duty Guidance (2023)

- [Teachers' Standards \(Guidance for school leaders, school staff and governing bodies\)](#)
- [Information Sharing 2024 DfE](#) Advice for practitioners providing safeguarding services to children, young people, parents and carers (2024)
- [What to do if you're worried a child is being abused \(March 2015\)](#)
- [Filtering and monitoring standards in schools and colleges \(DfE\)](#)
- [DfE's Searching Screening and Confiscation Advice](#)
- DfE Statutory Guidance "Relationships Education, Relationships and Sex Education (RSE) and Health Education" (2019 updated 2021)
- Promoting and supporting mental health and wellbeing in schools and colleges (2024)
- Disqualification under the Childcare Act 2006 (September 2018)
- DfE guidance 'Teaching online safety in school' (2023)
- Mental health and behaviour in schools: departmental advice (November 2018)
- Equality Act 2010: advice for schools ([updated 2018](#))
- Police and Criminal Evidence Act (PACE) Code C 2019

#### 4. Policy Principles, Aims and Values

##### The welfare of the child is paramount:

- All children regardless of age, disability, SEND, gender, culture, language, race, ability, sexual identity or religion have equal rights to protection, safeguarding and opportunities.
- All staff have a duty to protect children from harm and have an equal responsibility to act on any suspicion or disclosure that may suggest a child is at risk of harm, including harm online.
- All staff must aim to provide a caring, positive, safe and stimulating environment that promotes the social, physical, mental wellbeing and moral development of the individual child.
- Pupils and staff involved in child protection issues receive appropriate support and supervision.

##### This policy aims to:

- Ensure that all staff are aware of their responsibilities to safeguard children
- Ensure all staff follow the procedures within this policy in the event that they suspect a child, young person may be experiencing, or be at risk of experiencing, harm.
- For all staff to be fully aware of the need to report any concerns about the actions of members of staff, volunteers or visitors
- Ensure the DSL/DDSL use appropriate assessments, resources and agency support.
- Provide an environment in which children and young people feel safe, secure, valued, and respected, and that they will be listened to.
- Raise awareness that abuse can be both familial and/or contextual; and abusers can be both adult/s to child/ren or child/ren to child/ren.
- Demonstrate the school's commitment with regard to safeguarding and child protection to pupils, parents and other partners.
- Provide a systematic means of monitoring children known or thought to be at risk of harm.
- To emphasise the need for high levels of communication between staff and the School's DSL/DDSLs and with external agencies and partners, including our contribution to assessments, referrals, and support plans.

- To develop and promote effective working relationships with other partnership agencies, particularly Children's Social Care, Police and Health.
- Support the child's development in ways that will foster security, confidence, and independence.
- To be alert to the risks to pupils online and to ensure, through appropriate filtering and monitoring systems, that they are safeguarded in school from potentially harmful and inappropriate online material.
- Ensure that all staff recruited have been checked as to their suitability prior to contact with pupils according to Part 3 of KCSIE, and that a single central record is kept.
- Provide clarity and expectations on professional behaviours and code of conduct including lone working requirements.

#### Supporting and Protecting Children:

- We recognise that a child who is abused or witnesses abuse may feel helpless and humiliated and could experience barriers to making a disclosure. They may not feel ready or know how to tell someone that they are being abused, exploited, or neglected, and/or they may not recognise their experiences as harmful.
- We understand that the behaviour of a child in these circumstances may vary widely from that which is perceived to be normal to being aggressive or withdrawn or exhibiting signs of mental health problems. We understand the impact on a child's mental health, behaviour, and education from familial and/or contextual abuse.
- School may not only provide stability in the lives of children who have been abused or who are at risk of harm, but play a significant part in the prevention of harm to children.

#### Our school will support all children by:

- encouraging self-esteem and self-assertiveness, through the curriculum as well as our relationships, whilst not condoning aggression or bullying (incl. cyber bullying).
- promoting a caring, safe, and positive environment within the school and providing children with good lines of communication with trusted adults, supportive friends and an ethos of protection.
- responding sympathetically to any requests for time out to deal with distress and anxiety.
- offering details of helplines, counselling, or other avenues of external support.
- liaising and working together with all other settings, support services and those agencies involved in the safeguarding of children.
- supporting those pupils who may be in need of Early Help including support from other agencies apart from Children's Services e.g., Child and Adolescent Mental Health Services (CAMHS)
- notifying Children's Social Care as soon as there is a concern which meets local thresholds.
- ensuring child protection records are shared confidentially with the future school when a pupil leaves or transfers, including school medical records.
- children are taught to understand and manage risk through our Personal, Social, Health and Economic (PSHE) education and Relationship and Sex Education (RSE) and through all aspects of school life. This includes online safety.

- by accessing and utilising the necessary resources, guidance and toolkits to support the identification of children requiring mental health support, support services and assessments
- reassuring victims that they are being taken seriously and that they will be supported and kept safe.

The school community will protect children by:

- establishing and maintaining an ethos where children feel secure, are encouraged to talk and are always listened to.
- Having systems in place which make it easy for pupils to report concerns as well as ensuring that all children know there are adults in the school whom they can approach if they are worried or in difficulty.
- including regular consultations with children, parents and staff, gathering their voice.
- including safeguarding across the curriculum to equip children with the skills they need to stay safe from harm and to know to whom they should turn for help; in particular this will include anti-bullying work, information about child on child abuse (sexual harassment and sexual violence, consent), relationships & sex education, online-safety, road safety, pedestrian and cycle training; provide focussed activities to prepare key year groups for transition to new settings and/or key stages e.g. more personal safety/independent travel
- ensuring all staff, pupils and parents are aware of the school policy for the use of technology of all kinds and the safeguarding issues around its use, including the use of social media and the associated risks.

## 5. Roles and Responsibilities

### Responsibility of the Proprietor

#### To ensure:

- safeguarding and child protection underpins all relevant aspects of process and policy development, and that processes and policies operate with the best interests of pupils at their heart.
- policies, procedures and training in the school is effective and complies with the law at all times.
- there is a nominated governor for safeguarding, who takes leadership responsibility at Board level for all safeguarding matters.
- the nominated governor has the required knowledge, skills and expertise to take responsibility for the school's safeguarding arrangements.
- there is an effective Safeguarding Policy in place, which is consistent with statutory guidance and the requirements of Devon SCP and the policy is available publicly on the school website.
- child protection files are maintained, which show a clear chronology and the reason for decisions taken.

- there are other appropriate policies and procedures in place to safeguard and promote children's welfare including, but not limited to an Anti-bullying Policy, Behaviour Policy, Digital Usage Policy, Relationships & Sex Education Policy, Recruitment Policy.
- there is an effective Staff Code of Conduct (including online conduct) which is implemented throughout the school.
- that the school holds at least two emergency contact numbers for each child.
- that the school operates a safer recruitment procedure in accordance with Part 3 of KCSIE and that relevant checks are carried out on all staff before starting their employment and recorded in the school's Single Central Record (SCR).
- that there is at least one person on every recruitment panel who has completed safer recruitment training.
- the school has procedures for dealing with low level concerns and allegations of abuse by staff (including the Headteacher), supply staff, contractors and volunteers
- that a referral is made to the DBS if a person in regulated activity has been dismissed or removed from regulated activity due to safeguarding concerns or would have been dismissed had they not resigned.
- a member of the senior leadership team has been appointed as the Designated Safeguarding Lead (DSL) who will take lead responsibility.
- the DSL and deputy(ies) undertake appropriate Level 3 identified training offered by the Local Authority or other provider at least every two years.
- All other staff have safeguarding training updated as appropriate; but at least annually.
- Children are taught about safeguarding (including online safety) as part of a broad and balanced curriculum covering relevant issues to meet their needs including children who have recognised vulnerabilities.
- Appropriate safeguarding responses are in place for children who go missing from education.
- To ensure appropriate online filtering and monitoring systems are in place to block harmful and inappropriate content without unduly restricting access for educational purposes, and to review their effectiveness regularly.
- To ensure that the leadership team and staff have an awareness and understanding of the online safety provisions in place, manage them effectively and know how to escalate concerns when identified.
- To have policies and procedures in place relating to the use of cameras and technology within the EYFS.
- To review the Safeguarding Policy at least annually (or earlier in the case of a serious incident or change in regulations), including an update and review of the effectiveness of the procedures and their implementation.
- Any weaknesses in Child Protection procedures which are identified are remedied immediately.

### **The Headteacher:**

#### **Roles and responsibilities will include:**

- Promoting an overarching culture of safeguarding so the welfare of children is embedded within all the school's processes and procedures operating with the best interests of the child at their heart.
- Ensuring the School's Child Protection and Safeguarding Policy and procedures are implemented and followed by all staff

- Enabling sufficient time, training, support, resources, including cover arrangements where necessary, is allocated to the DSL and deputy(ies) DDSL(s) to carry out their roles effectively,
- Ensuring that wherever possible child/ren's wishes and feelings are taken into account when determining what action to take and what services to provide.
- To ensure systems are in place, which are easily understood and easily accessible for pupils to report concerns, including abuse.
- Ensuring systems are in place for children to express their views and give feedback, e.g., surveys, drop-in sessions, school councils.
- To ensure that all staff feel able to raise concerns, including about poor or unsafe practice and that such concerns are handled sensitively in accordance with the school's Whistleblowing procedures.
- To follow procedures and liaise with the Local Authority Designated Officer (LADO) immediately if there are any reports regarding concerns or allegations related to the conduct of adults (this includes behaviour outside of school that might indicate an individual is unsuitable to work with children), including low level concerns
- To liaise with the Local Authority Designated Officer (LADO) and be responsible for referring anyone who has harmed or may pose a risk to a child to the Disclosure and Barring Service and the Teaching Regulation Agency (if applicable).
- That pupils are provided with opportunities throughout the curriculum to learn about safeguarding, including keeping themselves safe online.
- To monitor the effectiveness of this policy and its procedures in liaison with the Proprietor and SLT and to remedy any deficiencies which are identified immediately.

### **The Designated Safeguarding Lead (DSL):**

#### **Role and responsibilities will include:**

- To promote a culture of safeguarding so the welfare and best interests of children is embedded within all the school's processes and procedures
- Availability – being available during school hours
- To ensure the Head and safeguarding governor are informed about safeguarding concerns including any referrals
- Working with others – e.g. a point of contact with safeguarding partners, a source of support and advice for staff, to promote supportive engagement with parents and/or carers and the SMT/Safeguarding Governor
- To understand child protection processes, including Section 17 and Section 47 assessments under the Children's Act (1989) and 'Early Help' processes
- Immediately upon the receipt of any concerns, to act upon the report
- To be responsible for procedures in the school and to keep detailed, accurate records, including action taken. This includes keeping records for those cases where there is no need to make a referral to any other service
- Manage referrals to external agencies – to e.g. Children's Social Care, Channel programme, the Police
- Updating training, knowledge and skills required to carry out the role of DSL

- Ensure that all staff, including temporary staff and volunteers, are provided with an induction and refresher training programme.
- Ensure that staff have read Keeping Children Safe in Education Part 1\* and Annex B and those mechanisms are in place to assist staff in understanding and discharging their roles and responsibilities as set out in the guidance. (\* or Annex A if not working directly with children)
- To maintain a regular training programme for all members of the school's staff and volunteers in line with advice from Devon SCP
- To ensure all new staff receive induction training in safeguarding and understand their responsibilities
- To ensure that all staff are assisted to understand and discharge their roles and responsibilities as set out in KCSIE and in this policy.
- To ensure that when pupils leave the school any child protection information is copied for the new school within 5 days and transferred securely and separately from the main file
- To ensure that a record of any safeguarding information is obtained from any previous school or nursery for a new pupil joining the school within 5 days of their entry
- To promote the educational achievement and care of any children who are looked after. The DSL will take lead responsibility for any looked-after children.
- To be responsible for overseeing online safety in the school with the support of the school's IT manager, including understanding the filtering and monitoring systems in place and conducting an annual audit to ensure effectiveness

#### **The Deputy Designated Safeguarding Leads (DDSLs):**

Are trained to the same standard as the Designated Safeguarding Lead and, in the absence of the DSL, carry out those functions necessary to ensure the ongoing safety and protection of pupils. In the event of the long-term absence of the DSL the deputies will assume all of the functions above with one DDSL taking overall responsibility.

Whilst the activities of the designated safeguarding lead can be delegated to appropriately trained deputies, the ultimate lead responsibility for child protection, as set out above, remains with the designated safeguarding lead, this lead responsibility should not be delegated.

#### **Staff:**

##### **Roles and responsibilities will include:**

- maintaining an attitude of 'it could happen here' where safeguarding is concerned.
- exercising professional curiosity, knowing what to look for and the type of behaviour which may indicate a child is suffering neglect or abuse
- identifying concerns early, provide help for children, promote children's welfare and prevent concerns from escalating.
- to provide a safe environment in which children can learn.
- to educate pupils about how to keep themselves safe and manage risk
- knowing what to do if a child tells them they are being abused, exploited, or neglected.
- being able to reassure victims that they are being taken seriously and that they will be supported and kept safe.

- recognising the barriers for children when wanting to make a disclosure (verbal or non-verbal)
- to be aware that that even if there are no reports of child-on-child abuse, or any other form of abuse, it does not mean it is not happening, it may just not be being reported.
- identifying children who may benefit from early help, (providing support as soon as a problem emerges) and the part they play in these support plans.
- raising any concerns for a child following the schools safeguarding policies and procedures
- being aware of local authority referral processes and supporting social workers and other agencies following any referral.
- adhering to the School's Code of Conduct and the Teachers' Standards 2012 - that teachers (which includes headteachers) should safeguard children's wellbeing and maintain public trust in the teaching profession as part of their professional duties.
- Being aware of systems within school which support safeguarding e.g. safeguarding policy, anti-bullying policy, behaviour policy, code of conduct, CME, online filtering, and monitoring, CPOMS
- Attending regular safeguarding and child protection training.
- Recognising that children missing, or absent from education can act as a vital warning sign to a range of safeguarding issues including neglect, sexual abuse and child sexual and criminal exploitation.
- to report to the Head any concerns about the conduct of adults, including low level concerns (this includes behaviour outside school that might indicate an individual is unsuitable to work with children)

## 6. Recognising and Responding to Safeguarding Concerns

### Recognising:

Any child, in any family, in any school, could become a victim of abuse. Staff should always maintain an attitude of **"It could happen here"**.

Abuse, neglect and safeguarding issues are complex and are rarely standalone events that can be covered by one definition or label. Staff are aware that in most cases multiple issues will overlap one another.

- Abuse and neglect are forms of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Harm can include ill treatment that is not physical as well as the impact of witnessing the ill treatment of others, such as witnessing domestic abuse. Children may be abused in the family or in an institutional or community setting by those known to them or, more rarely, by others. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. They may be abused by an adult or adults or by another child or children.
- Abuse and Neglect may also take place outside of the home and this may include (but is not limited to), sexual abuse, sexual exploitation, domestic abuse in their own intimate relationships (teenage relationship abuse), criminal exploitation, serious youth violence, county lines and radicalisation.
- Staff are aware that behaviours linked to drug taking, alcohol abuse, truanting and sexting put children in danger and that safeguarding issues can manifest themselves via child-on-child abuse.
- All staff should be aware of the risks posed through technology and the risk children face

online. Abuse may also take place concurrently both online and offline. Children can also abuse other children online, this can take the form of abusive, harassing, and misogynistic/misandrist messages, the non-consensual sharing of indecent images, especially around chat groups, and the sharing of abusive images and pornography to those who do not want to receive such content.

Further information about the four categories of abuse; physical, emotional, sexual and neglect, (familial and contextual) and indicators that a child may be being abused can be found in appendices 1 - 17 and in Keeping Children Safe in Education Part 1/Annex A/Annex B. There are also a number of specific safeguarding concerns that we recognise our pupils may experience.

<ul style="list-style-type: none"> <li>● child missing or absent from education</li> <li>● child missing from home or care</li> <li>● child sexual exploitation (CSE), child criminal exploitation (CCE)</li> <li>● bullying including cyberbullying</li> <li>● domestic abuse</li> <li>● drugs</li> <li>● fabricated or induced illness</li> <li>● faith abuse</li> <li>● female genital mutilation (FGM)</li> <li>● forced marriage</li> <li>● gangs and youth violence</li> </ul>	<ul style="list-style-type: none"> <li>● gender-based violence/violence against women and girls (VAWG)</li> <li>● mental health difficulties</li> <li>● private fostering</li> <li>● radicalisation</li> <li>● youth produced sexual imagery (sexting)</li> <li>● teenage relationship abuse</li> <li>● trafficking</li> <li>● child on child abuse</li> <li>● upskirting</li> <li>● serious violence</li> <li>● sexual harassment</li> </ul>
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- There will be occasions when staff may suspect that a pupil may be at risk but have no ‘real’ evidence. The pupil’s behaviour may have changed, their artwork could be bizarre, and they may write stories or poetry that reveal confusion or distress, or physical or inconclusive signs may have been noticed. Staff will be aware that they can record pastoral and safeguarding concerns on CPOMS and these will be discussed during the weekly safeguarding meeting.
- We recognise that the signs may be due to a variety of factors, for example, a parent has moved out, a pet has died, a grandparent is very ill, or an accident has occurred. However, they may also indicate a child is being abused or is in need of safeguarding.
- In these circumstances staff will try to give the child the opportunity to talk. It is fine for staff to ask the pupil if they are OK or if they can help in any way.

Further information on the different types of safeguarding concerns and schools’ response can be found in the Appendices section –

App 1. Categories of Abuse
App 2. Anti-Bullying / Cyberbullying
App 3. Racist Incidents
App 4. Radicalisation and Extremism
App 5. Domestic Abuse (including Operation Encompass)
App 6. Exploitation (including CSE, CCE and County Lines)
App 7. Female Genital Mutilation
App 8. Forced Marriage

App 9. Honour based Abuse
App 10. One Chance Rule
App 11. Mental Health Difficulties
App 12. Private Fostering Arrangements
App 13. Looked After Children & Previously Looked After Children
App 14. Children Missing Education
App 15. Child on Child Abuse (incl Sexual Violence, Sexual Harassment and HSB)
App 16. Online Safety
App 17. Youth Produced Sexual Imagery (Sexting)
App 18. Additional Resources

**In all cases, even if staff are unsure, they must always speak to the DDSL or a DDSL.**

**Responding:**

- Following an initial conversation with the pupil or if a member of staff has a concern about a pupil, they should discuss their concerns with the DSL and put them in writing, see FLOW CHART A.
- **Records must always be recorded on CPOMS and should include:**
  - a clear and comprehensive summary of the concern.
  - details of how the concern was followed up and resolved.
  - a note of any action taken, decisions reached and the outcome.
- If the pupil does begin to reveal that they are being harmed, staff should follow the advice in FLOW CHART A and in the table below ‘pupil making a disclosure’.
- All concerns, however small they may appear, must be recorded on CPOMS and shared with the DSL, as this information could provide the ‘missing’ piece of the bigger picture of the lived experience for the child

## FLOW CHART A

1. Offer reassurance, listen and take seriously what is being said. Never promise to keep secrets or be persuaded by the child, young person or their family not to take action.



2. Recognise that it is not your job to investigate, verify what is being said or examine the individual disclosing; this is the statutory responsibility of the child protection services and/or the Police. However, it is important to ascertain relevant information.



3. Explain the process to the individual; that you will need to pass this information on, to whom, the reasons why and possible actions.



4. Any concerns be recorded, including the child's voice, body map (if necessary) and other relevant information in line with our schools recording procedure. Concerns may also be shared with the DSL/DDSL verbally, these conversations will also be recorded in writing

### If a pupil discloses to a member of staff

- We recognise that it takes a lot of courage for a child to disclose they are being abused. They may feel ashamed, guilty or scared, their abuser may have threatened that something will happen if they tell, they may have lost all trust in adults or believe that what has happened is their fault. Sometimes they may not be aware that what is happening is abuse.
- A child who makes a disclosure may have to tell their story on a number of subsequent occasions to the police and/or social workers. Therefore, it is vital that their first experience of talking to a trusted adult is a positive one.

### During their conversation with the pupil staff will:

- listen to what the child has to say and allow them to speak freely.
- remain calm and do not overreact or act shocked or disgusted – the pupil may stop talking if they feel they are upsetting the listener.
- reassure the child that it is not their fault and that they have done the right thing in telling someone.
- not be afraid of silences – staff must remember how difficult it is for the pupil and allow them time to talk.
- take what the child is disclosing seriously.
- ask open questions and avoid asking leading questions. It is very important to use neutral, open-ended questions that allow children to express themselves without being guided towards a particular response or the interviewer suggesting what the response might be.
- avoid jumping to conclusions, speculation or make accusations.
- not automatically offer any physical touch as comfort. It may be anything but comforting to a child who is being abused.

- Do not attempt any examination or remove a pupil's clothes to look further at an injury. Under no circumstances should photographs be taken of a pupil's injury. It may be possible to observe the pupil during the normal school routine, for example in a physical education (PE) class. If a pupil wants to show you his or her injuries, make sure that a colleague is with you as a witness. Try to arrange for one of you to be the same sex as the pupil
- avoid admonishing the child for not disclosing sooner. Saying things such as 'I do wish you had told me about it when it started' may be the staff member's way of being supportive but may be interpreted by the child to mean they have done something wrong.
- tell the child what will happen next, that they cannot keep secrets and that information will be shared to ensure the right level of support is given.
- Do not attempt to investigate matters further; your role is to listen, record and report your concerns to the DSL.
- Do not speak to other staff or parents about your concerns or any matters disclosed to you by a pupil. You must only speak to the DSL who will then decide what will be communicated to others and by whom.

#### Notifying Parents

- The school will normally seek to discuss any concerns about a pupil with their parents. This must be handled sensitively and normally the DSL/DDSL will make contact with the parent in the event of a concern, suspicion or disclosure of abuse of that the child has been harmed in some way.
- However, if the school believes that notifying parents could increase the risk to the child or exacerbate the problem, advice will first be sought from children's Local Authority Safeguarding Hub e.g. familial sexual abuse.
- Where there are concerns about forced marriage or honour-based abuse parents should not be informed a referral is being made as to do so may place the child at a significantly increased risk. In some circumstances, it would be appropriate to contact the police.

#### Making a referral

- Concerns about a child or a disclosure should be immediately raised with the DSL who will help decide whether a referral to children's Local Authority Safeguarding Hub or other support is appropriate in accordance with Devon's Threshold Framework. <https://www.devonscp.org.uk/training-and-resources/levels-of-need/lon-framework/>
- If the DSL is uncertain about whether a concern raised should be referred to the Local Authority Safeguarding Hub, a consultation will be sought with the Local Authority to seek further support and guidance.
- If a referral is needed, the DSL should make this rapidly no later than the same working day and have the necessary systems in place to enable this to happen. It is the School's policy that the DSL makes all referrals; however, anyone can make a referral and if for any reason a staff member thinks a referral is appropriate and one hasn't been made, they can, and should, consider making a referral themselves.
- The child (subject to their age and understanding) and the parents will be told that a referral is being made, unless to do so would increase the risk to the child.

- If after a referral the child's situation does not appear to be improving the designated safeguarding lead (or the person that made the referral) should press for re-consideration to ensure their concerns have been addressed, and most importantly the child's situation improves.
- If a child is in immediate danger or is at risk of harm a referral should be made to children's Local Authority Safeguarding Hub and/or the police immediately. Anybody can make a referral.
- Where referrals are not made by the DSL, the DSL should be informed as soon as possible.

### **Recording safeguarding concerns**

- Effective recording and reporting of concerns is essential.
- All staff have an appropriate level of access to CPOMS which enables them to record concerns. The DSL and Deputy DSL have full access to enable them to record actions and store all safeguarding records securely.
- All safeguarding concerns must be recorded on CPOMS, the school's management system for safeguarding.
- If the DSL is not available for any reason the Deputy DSL must be contacted to deal with the concern initially.
- With regard to any conversations directly with a pupil or overheard, staff must keep a written record of the conversation and concerns arising.
- The record should include the date, time and place of the conversation, who was present and what was said by the pupil. The record should use names, not initials, for all references to people.
- The record should be specific. Record the actual behaviour and language used by a pupil rather than more vague terms such as inappropriate language/behaviour.
- Staff should make the record as soon as possible after speaking to the pupil so the pupil is not alarmed by notes being taken and before the conversation is discussed with anyone else. It is important to record as much as can be remembered, using the pupil's own words.
- The record should contain facts and information only, taking care to avoid personal opinion.
- Notes made of such disclosures or concerns could become part of a statutory assessment by Children's Services and/or part of a criminal investigation so must be completed accurately.
- If more than one member of staff is present when a pupil discloses information or behaves in a manner which gives rise to concerns, each member of staff must make a separate safeguarding report on CPOMS.
- The report must be completed so all the facts known are recorded and so the DSL has a full picture of what has given rise to the concern.
- It is important to record all concerns regarding the welfare of pupils, even those which may appear minor. This is because it is common for minor pieces of evidence to emerge over time and build up a pattern. This type of recording also allows information from various members of staff to be collated.

### **Supporting our Staff**

- We recognise that staff working in the school who have become involved with a child who has suffered harm or appears to be likely to suffer harm may find the situation stressful and upsetting.
- We will support such staff by providing an opportunity to talk through their anxieties with the DSL/DDSLs and to seek further support as appropriate.

St John's School recognises that some children are more vulnerable to abuse, neglect and contextual safeguarding concerns and that additional barriers may exist when recognising abuse for such children.

We understand that this increase in risk is due more to societal attitudes and assumptions or child protection procedures which fail to acknowledge children's diverse circumstances, rather than the individual child's personality, impairment, or circumstances.

Staff should be aware that:

- assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's disability without further exploration
- some children can be more prone to peer group isolation or bullying (including prejudice-based bullying) than other children
- the potential for children with SEND or certain medical conditions being disproportionately impacted by behaviours such as bullying, without outwardly showing any signs
- communication barriers and difficulties in managing or reporting these challenges.
- cognitive understanding – being unable to understand the difference between fact and fiction in online content and then repeating the content/behaviours in school or the consequences of doing so.

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

- is disabled or has certain health conditions and has specific additional needs
- has special educational needs (whether or not they have a statutory Education, Health and Care plan)
- has a mental health need
- is a young carer
- is showing signs of being drawn in to anti-social or criminal behaviour, including gang involvement and association with organised crime groups or county lines
- is frequently missing/goes missing from education, home or care,
- has returned home to their family from care
- has experienced multiple suspensions, is at risk of being permanently excluded from schools, colleges and in Alternative Provision or a Pupil Referral Unit.
- is at risk of modern slavery, trafficking, sexual and/or criminal exploitation
- is at risk of being radicalised or exploited
- has a parent or carer in custody, or is affected by parental offending
- is in a family circumstance presenting challenges for the child, such as drug and alcohol misuse, adult mental health issues and domestic abuse
- is misusing alcohol and other drugs themselves
- is at risk of so-called 'honour'-based abuse such as Female Genital Mutilation or Forced Marriage
- is a privately fostered child.

## **Use of technology, cameras, mobile phones and other devices, including in the EYFS. Also see Mobile Phone Policy**

- a) Staff must not take video footage or photographs of pupils except for school purposes.
- b) Any such images must not be placed in the public domain without the permission of the Head.
- c) School devices should be used wherever possible. If a personal device is used, photographs or videos of pupils must not be stored or retained on personal cameras, mobile phones or other devices. Any images must be uploaded to the school's server as soon as possible and permanently deleted from the personal device.
- d) Permitted images are stored securely on a password-protected section of the school intranet. They are deleted when no longer required.
- e) Cameras, mobile phones or other devices are not allowed in any areas where pupils may be washing or changing, nor should photography be used in a manner that may offend or cause upset.
- f) Parents are asked to restrict photography whether on cameras, mobile phones or other devices to major school events published in the school calendar only. General filming in school by parents is never permitted.
- g) Parents should be aware that other parents in the school may object to photographs being taken which, inadvertently or otherwise, include their child; therefore, any images taken must be for personal use only and should not be shared on social media.
- h) Other visitors, volunteers and contractors in school are not permitted to take photographs in any area of the school without specific permission from the Head.
- i) The general use of mobile telephones in all areas of the school (calls, texting and email) by parents is not permitted.
- j) Through curriculum and information evenings, as well as other regular parental communication systems, parents are made aware of what their children are asked to do online, including any apps or sites they will be asked to access and who (if anyone) their child is going to be interacting with online.
- k) Staff may only communicate with pupils through the school email system and the designated apps used by older pupils for homework.
- l) **Staff must not use their mobile phones or other personal devices for calls or messaging when engaged with pupils and all devices must be out of sight.**

## **8. Whistleblowing**

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

All staff should be aware of their duty to raise any concerns about the management of child protection, which may include the attitude or actions of colleagues, poor or unsafe practice and potential failures in the school's safeguarding arrangements. If it becomes necessary to consult outside the school, they should speak in the first instance, to the LADO following the Whistleblowing Policy.

The NSPCC whistleblowing helpline is available for staff who do not feel able to raise concerns regarding child protection failures internally. Staff can call: 0800 028 0285 line is available from 8:00 AM to 8:00 PM, Monday to Friday and email: [help@nspcc.org.uk](mailto:help@nspcc.org.uk)

Whistleblowing relating to the actions of the Headteacher should be made to the Safeguarding Governor, whose contact details are available at the front of this policy.

## **9. Allegations against staff and Low Level Concerns**

As part of its overall safeguarding ethos, the school ensures that it promotes an open and transparent culture in which staff feel confident to report all concerns about adults working in the school (including self-employed staff, supply teachers, volunteers and contractors).

All members of staff must follow the Staff Code of Conduct and conduct themselves in a professional manner at all times, both to ensure the safety of the pupils, and to reduce the risk of any allegation of improper behaviour.

### **Allegations against staff**

If any allegation of abuse or suspected abuse is made against a member of staff or volunteer, the school will follow the guidance in Part 4 of KCSIE and the procedures of Devon SCP.

Allegations that might indicate that a person is unsuitable to work with children are where a person has:

- behaved in a way that has harmed a child, or may have harmed a child and/or;
- possibly committed a criminal offence against or related to a child and/or;
- behaved towards a child or children in a way that indicates he or she may pose a risk of harm to children; and/or
- behaved or may have behaved in a way that indicates they may not be suitable to work with children.

The following procedures relate to all members of all staff, (including the self-employed, supply staff and contractors) governors and volunteers or any other adults who are currently working in the school, regardless of whether the school is where the abuse is alleged to have taken place and regardless of whether it involves pupils at this school.

### **Reporting an allegation or concern**

- a) Staff must never think that abuse by an adult is not possible in this school, or immediately disbelieve an accusation against someone who is known well and trusted.
- b) A member of staff receiving an allegation of abuse by another member of staff, or with concerns about another member of staff, should report this immediately to the Head, unless the Head is the one against whom the allegation is made.
- c) An allegation against the Head should be reported to the Safeguarding Governor, without notifying the Head first.
- d) In the Head's absence, an allegation against a member of staff must be reported to the Safeguarding Governor.
- e) In any instance where there may be a conflict of interest about reporting an allegation or concern to the Head or to the Safeguarding Governor, the LADO should be contacted directly and without hesitation.
- f) Concerns may be reported verbally, directly to the relevant senior member of staff, or by email. Any staff who make a report verbally in the first instance will also be required to make a written record of the information they have disclosed.

## **Procedures & Informing the Local Authority Designated Officer (LADO)**

- a) If the allegation constitutes a possible serious criminal offence, or in the case of serious harm, or if a pupil is in immediate danger, a referral to Children's Services and/or the police will be made immediately.
- b) An allegation of abuse by an adult will always result in a senior person from the school (as detailed above) contacting the LADO of Devon SCP who will advise on the next steps to be taken.
- c) Under no circumstances will the school conduct an investigation without first informing the LADO and seeking advice about the course of action to be taken. Borderline cases will also be discussed and, following discussions, the LADO will advise what further steps should be taken.
- d) There are two aspects to consider when an allegation is made:-
  - Look after the welfare of the child - the DSL is responsible for ensuring that the child is not at risk and for referring cases of suspected abuse to Children's Social Care as described earlier.
  - Investigate and support the person subject to the allegation - the case manager (usually the head, unless the head is the subject of the allegation) should discuss with the LADO, the nature, content and context of the allegation, and agree a course of action.
- e) The school's aim will be to achieve a quick resolution of the allegation in a fair and consistent way that provides effective protection for any child involved and at the same time supports the person who is the subject of the allegation.
- f) The Head will obtain written details of the allegation, signed and dated, from the person who received the allegation or the person who is making the allegation. If a pupil has made an allegation, a written note of what the pupil has said will be made by the member of staff to whom the pupil made the allegation.
- g) The Head will also record any basic information to establish the facts, including dates, times, locations and names of potential witnesses and any CCTV footage.
- h) Any allegation against staff, including those considered borderline, must be reported and discussed with the LADO without delay, and within one working day.
- i) An initial assessment of any allegation referred will be made by the LADO and the Head. They will judge whether there is a need for immediate action, whether the allegation is demonstrably false or whether there has been inappropriate behaviour or poor practice that can be dealt with through the school's usual staff disciplinary procedures.
- j) Where the initial discussion leads to no further action, the case manager and the LADO should:
  - record the decision and justification for it; and
  - agree on what information should be put in writing to the individual concerned and by whom.
- k) Where further enquiries are required the LADO and case manager will discuss how and by whom the investigation will be undertaken. In straightforward cases, the investigation will normally be undertaken by the Head. If the nature or complexity of the allegation requires it, the allegation may require an independent investigator.
- l) In the case of a referral and investigation, the Head must ensure, before contacting any interested parties, that there is no objection by the investigating agencies.

- m) Where there are no objections from the investigating agencies, the Head will:
- inform the person making the allegation and explain the likely course of action
  - ensure the parents of the pupil(s) who is the alleged victim have been informed about the allegation and the likely course of action
  - inform the member of staff against whom the allegation is made and explain the likely course of action
  - keep a written record of the above.
- n) The Head, in consultation with the LADO, will make the decision whether or not to suspend the teacher involved.
- o) If an allegation is made, every effort will be made to maintain confidentiality and guard against unwanted publicity while the allegation is being investigated. The Education Act (2011) prevents the ‘publication’ of material by any person that may lead to the identification of a teacher who is the subject of an allegation. Parents and carers will also be made aware of the prohibition on reporting or publishing allegations about teachers.
- p) The Head will take advice from the LADO, the Safeguarding Governor and other agencies to agree:
- Who needs to know and exactly what information can/cannot be shared
  - How to manage speculation and gossip
  - What, if any, information can be given to the wider community to reduce speculation
  - If necessary, how to manage the press.
- q) The school has a duty of care towards its employees and will ensure that effective support is provided for anyone facing an allegation. The individual concerned will be advised to contact their trade union representative, if they have one, or a colleague for support.
- r) The following definitions will be used when determining the outcome of allegation investigations:
- **Substantiated:** there is sufficient evidence to prove the allegation;
  - **Malicious:** there is sufficient evidence to disprove the allegation and there has been a deliberate act to deceive;
  - **False:** there is sufficient evidence to disprove the allegation;
  - **Unsubstantiated:** there is insufficient evidence to either prove or disprove the allegation. The term, therefore, does not imply guilt or innocence;
  - **Unfounded:** to reflect cases where there is no evidence or proper basis which supports the allegation being made.
- s) Allegations that are found to have been malicious will be removed from personnel records and any that are not substantiated, are unfounded or are malicious will not be referred to in employer references.
- t) Records concerning allegations of abuse must be preserved until the accused has reached normal pension age or for 10 years from the date of the allegation if longer.

### **Allegations relating to supply teachers/employees of third party**

The School’s procedures for managing allegations against staff above also apply to staff not directly employed by the School, for example, supply teachers provided by an employment agency or business (‘the agency’). The school will usually take the lead but agencies/ third party employers

will be notified and should co-operate in any enquiries from the LADO, police and/or Children's Services.

In no circumstances will the school decide to cease to use a supply teacher due to safeguarding concerns, without finding out the facts and liaising with the LADO to determine a suitable outcome. The school will discuss with the agency whether it is appropriate to suspend the supply teacher an investigation is carried out but this decision rests with the Head and the LADO.

### **Referral to the Disclosure & Barring Service (DBS) and Teaching Regulation Agency (TRA)**

If the school ceases to use the services of any person (whether employed, contracted, a volunteer or a student) because that person was considered unsuitable to work with children, a prompt and detailed report will be made to the DBS.

For teaching staff, the school also has a legal responsibility to report the matter to the to the Teaching Regulation Agency (TRA) which may result in a prohibition order being issued by the Secretary of State for Education, as required by sections 141D and 141E of the Education Act 2002. A report to the TRA may also be made for additional reasons 'unacceptable professional conduct', 'conduct that may bring the profession into disrepute' or a 'conviction, at any time, for a relevant offence'. Advice about whether an allegation against a teacher is sufficiently serious to refer to the TRA can be found in [Teacher misconduct: the prohibition of teachers](#) (October 2015). Further guidance is published on the [TRA website](#).

### **Low Level Concerns**

- a) A low level concern is any concern – no matter how small, and even if no more than causing a sense of unease or a 'nagging doubt' - that an adult working in or on behalf of the school may have acted in a way that is inconsistent with the Staff Code of Conduct, including inappropriate conduct outside of work, and does not appear to meet the allegations threshold or is otherwise not considered serious enough to consider a referral to the LADO.
- b) A member of staff may have doubts about the behaviour of another adult towards a pupil, or another child, or concerns about how their own behaviour might be interpreted.
- c) Examples of such behaviour could include, but are not limited to:
  - being over friendly with children
  - having favourites
  - taking photographs of children on their mobile phone/other device
  - engaging with a child on a 1:1 basis in a secluded area or behind a closed door
  - using inappropriate sexualised, intimidating or offensive language,
  - Email, messaging, use of social media sites or other communication between adults and pupils outside agreed protocols
  - Any incident where he/she feels that his/her actions or behaviour towards a pupil or that of another adult, may have been misinterpreted or may have given rise to a risk or misinterpretation;
- d) Staff must report any low level concerns whatsoever to the Head or Safeguarding Governor following the procedures as outlined above in Paragraph 24.1.
- e) Staff are also encouraged, and to feel confident if the need arises, for them to self-refer, where, for example, they have found themselves in a situation which could be misinterpreted, might appear compromising to others, and/or on reflection they believe they

have behaved in such a way that they consider falls below the expected professional standards.

- f) When a low-level concern has been raised by a third party, the head (or safeguarding governor) will collect as much evidence as possible by speaking where possible with the person who raised the concern, to the individual involved and to any witnesses. The name of the person making the report will be noted and requests to remain anonymous will be respected as far as reasonably possible.
- g) The school will also consider if any wider issues in the school enabled the behaviour to occur or contributed to it, and if appropriate policies could be revised or extra training delivered to minimise the risk of recurrence.
- h) All low-level concerns will be recorded in writing. The record will include:
  - details of the concern;
  - the context in which it arose;
  - evidence collected by the Head where the concern has been raised via a third party;
  - the decision categorising the type of behaviour;
  - action taken;
  - the rationale for decisions and action taken;
  - the name of the individual sharing the concerns (respecting any wish to remain anonymous as far as possible)
- i) Records will be kept confidential, held securely and comply with the Data Protection Act 2018 and the UK General Data Protection Regulation (UK GDPR)
- j) Records will be reviewed so that potential patterns of concerning, problematic or inappropriate behaviour can be identified. Where a pattern of such behaviour is identified, the school will decide on a course of action, either through its disciplinary procedures or where a pattern of behaviour moves from a concern to meeting the harms threshold, in which case it will be referred to the LADO.
- k) The purpose of low level reporting is to protect both pupils and the staff working with them, and allows a system for a simple record to be kept in case events are later referred to or any patterns emerge.
- l) Low level concerns relating to supply staff and staff employed by a third party will be reported to the agency/employer in order that any patterns of behaviour may be identified.
- m) A staff member who reports a Low Level concern, or a more serious allegation, in good faith will suffer no detriment as a result, and will benefit from the protection set out in the school's Whistleblowing Policy.

### **Non-recent allegations**

Abuse can be reported no matter how long ago it happened.

Where an adult makes an allegation to the school that they were abused as a child, the individual will be advised to report the allegation to the police.

Non recent allegations made by a child, will be reported to the LADO in line with Devon SCP procedures for dealing with non-recent allegations. The LADO will coordinate with Children's Services and the police.

Guidance about conduct and safe practice, including safe use of mobile phones by staff and volunteers will be given at induction<sup>1</sup>.  
In line with KCSiE part 4 guidelines,



## 10. Physical Intervention

We acknowledge that staff must only ever use physical intervention as a last resort, when a child is endangering him/herself or others, and that at all times it must be the minimal force necessary to prevent injury to another person.

Such events must be recorded and signed by a witness.

Staff who are likely to need to use physical intervention will be appropriately trained.

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

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<sup>1</sup> Refer to “Guidance for Safe Working Practice”

We recognise that touch can be appropriate in the context of working with children e.g. correct hand position when playing a musical instrument or specific guidance in sports. Further guidance can be found in section 42 of the Staff Handbook.

## 11. Confidentiality, Sharing Information and GDPR

It is recognised that in order to effectively meet a child's needs, safeguard their welfare and protect them from harm the School must contribute to inter-agency working in line with Working Together to Safeguard Children (2023) and must share information between professionals and agencies where there are concerns.

All staff must be aware that they have a professional responsibility to share information with other agencies in order to safeguard children and that the Data Protection Act is not a barrier to sharing information where the failure to do so would place a child at risk of harm.

All staff will understand that child protection issues warrant a high level of confidentiality, not only out of respect for the pupil and staff involved but also to ensure that information is not in the public domain.

Staff should be proactive in sharing information as early as possible to help identify, assess and respond to risks or concerns about the safety and welfare of children, whether this is when problems are first emerging, or where a child is already known to local authority children's social care.

Staff should only discuss concerns with the DSL, Head of School or the Safeguarding Governor (depending on who is the subject of the concern). That person will then decide who else needs to have the information and they will disseminate it on a 'need-to-know' basis.

The School will always undertake to share with the parents /carers the intention to refer their child to the Local Authority Safeguarding Hub, unless to do so may put the child at greater risk of harm or impede a criminal investigation. If in doubt, the School will contact the Local Authority Safeguarding Hub consultation line.

Child protection information will be stored and handled in line with the Data Protection Act 2018 and HM Government Information Sharing and Advice for practitioners providing safeguarding services to children, young people, parents and carers (2024).

All children's safeguarding files will be kept confidential and stored securely. Safeguarding files will be kept separate from pupils' school files.

At the point a child formally transfers to a new school, their safeguarding file will be transferred to the DSL at the new school. This must be transferred securely in line with GDPR expectations as soon as possible, but within 5 working days. A receipt will be obtained confirming records have been received. NB: Parental permission is not required for records to be shared with a new school.

The School will also consider if it is appropriate to share information prior to the child's formal transfer to their new setting; this could also include key staff from their new setting being invited to meetings e.g. Child Protection, Core group or Team Around a Family (with consent of parents and professionals).

Information sharing is guided by the following principles:

- necessary and proportionate
- relevant
- adequate
- accurate
- timely

- secure

Fears about sharing information cannot be allowed to stand in the way of the need to promote the welfare and protect the safety of children.

St John's will ensure that images of children used within publications, publicity and on the website are only used if prior written parental consent has been obtained. This consent will be obtained in line with school's annual data collection process.

## 12. Policy Links

This policy also links to our policies on:

- |  |   |
|--|---|
| <ul style="list-style-type: none"> <li>● Behaviour</li> <li>● Staff Handbook which includes the Staff Code of Conduct</li> <li>● Whistleblowing</li> <li>● Anti-bullying</li> <li>● Health &amp; Safety</li> <li>● Allegations against staff</li> <li>● Parental concerns</li> <li>● Children Missing from Education</li> <li>● Curriculum</li> <li>● PSHE</li> <li>● Teaching and Learning</li> </ul> | <ul style="list-style-type: none"> <li>● Administration of medicines</li> <li>● Drug Education</li> <li>● Relationships and Sex Education</li> <li>● Physical intervention/Restraint</li> <li>● Online Safety, including staff use of mobile phones</li> <li>● Risk Assessment</li> <li>● Recruitment and Selection</li> <li>● Intimate Care (EYFS)</li> <li>● Radicalisation and Extremism</li> <li>● Data Protection/GDPR Guidance</li> </ul> |
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# Appendix 1

## 1. Categories of Abuse

Also see Part 1 of Keeping Children Safe in Education

### Categories of Abuse:

- Physical Abuse
- Emotional Abuse (including Domestic Abuse)
- Sexual Abuse (including child sexual exploitation)
- Neglect

### Signs of Abuse in Children:

The following non-specific signs may indicate something is wrong:

- Significant change in behaviour
- Extreme anger or sadness
- Aggressive and attention-needing behaviour
- Bruises/injuries with unsatisfactory explanations for their cause
- Lack of self-esteem
- Self-injury
- Depression and/or anxiousness
- Age-inappropriate sexual behaviour
- Child Sexual Exploitation
- Criminality
- Substance abuse
- Mental health problems
- Poor attendance

### Risk Indicators

The factors described in this section are frequently found in cases of child abuse. Their presence is not proof that abuse has occurred, but:

- Must be regarded as indicators of the possibility of significant harm
- Justifies the need for careful assessment and discussion with the DSL (or in their absence, an experienced colleague)
- May require consultation with and / or referral to Children's Services

The absence of such indicators does not mean that abuse or neglect has not occurred.

In an abusive relationship the child may:

- Appear frightened of the parent/s
- Act in a way that is inappropriate to her/his age and development (though full account needs to be taken of different patterns of development and different ethnic groups)

The parent or carer may:

- Persistently avoid child health promotion services and treatment of the child's episodic illnesses
- Have unrealistic expectations of the child
- Frequently complain about/to the child and may fail to provide attention or praise (high criticism/low warmth environment)
- Be absent or misusing substances
- Persistently refuse to allow access on home visits
- Be involved in domestic abuse

Staff should be aware of the potential risk to children when individuals, previously known or suspected to have abused children, move into the household.

## Recognising Physical Abuse

The following are often regarded as indicators of concern:

- An explanation which is inconsistent with an injury
- Several different explanations provided for an injury
- Unexplained delay in seeking treatment
- The parents/carers are uninterested or undisturbed by an accident or injury
- Parents are absent without good reason when their child is presented for treatment
- Repeated presentation of minor injuries (which may represent a “cry for help” and if ignored could lead to a more serious injury)
- Family use of different doctors and A&E departments
- Reluctance to give information or mention previous injuries

## Bruising

Children can have accidental bruising, but the following must be considered as non-accidental unless there is evidence, or an adequate explanation provided:

- Any bruising to a pre-crawling or pre-walking baby
- Bruising in or around the mouth, particularly in small babies which may indicate force feeding
- Two simultaneous bruised eyes, without bruising to the forehead, (rarely accidental, though a single bruised eye can be accidental or abusive)
- Repeated or multiple bruising on the head or on sites unlikely to be injured accidentally
- Variation in colour possibly indicating injuries caused at different times
- The outline of an object used e.g. belt marks, handprints or a hairbrush
- Bruising or tears around, or behind, the earlobe/s indicating injury by pulling or twisting
- Bruising around the face
- Grasp marks on small children
- Bruising on the arms, buttocks and thighs may be an indicator of sexual abuse

Mongolian Blue Spot: Bruising in non-mobile children is rare and may indicate abuse or neglect. Birth marks, especially Mongolian Blue Spots, can mimic bruising. Mongolian Blue Spot can be identified (see below), however if in any doubt as to the cause of the bruise refer to [Southwest Child Protection Procedures \(proceduresonline.com\)](http://Southwest Child Protection Procedures (proceduresonline.com)) local authority guidance and consultation.

- Areas of skin hyperpigmentation – flat, not raised, swollen or inflamed
- Not painful to touch
- Usually present at birth/ develop soon afterwards
- Will not change in shape or colour within a few days
- Normally uniform blue/ grey in colour across the mark
- Common in African, Middle Eastern, Mediterranean and Asian children
- While most occur at the lower back and buttocks, they can appear anywhere (e.g. back of shoulder or limb). Scalp/ face rarely affected
- Can be single/ multiple, vary in size, but mostly few centimetres diameter
- Gradually fade over many years

## Bite Marks

Bite marks can leave clear impressions of the teeth. Human bite marks are oval or crescent shaped. Those over 3 cm in diameter are more likely to have been caused by an adult or older child. A medical opinion should be sought where there is any doubt over the origin of the bite.

## Burns and Scalds

It can be difficult to distinguish between accidental and non-accidental burns and scalds and will always require experienced medical opinion. Any burn with a clear outline may be suspicious e.g.:

- Circular burns from cigarettes (but may be friction burns if along the bony protuberance of the spine)
- Linear burns from hot metal rods or electrical fire elements
- Burns of uniform depth over a large area
- Scalds that have a line indicating immersion or poured liquid (a child getting into hot water is his/her own accord will struggle to get out and cause splash marks)
- Old scars indicating previous burns/scalds which did not have appropriate treatment or adequate explanation

Scalds to the buttocks of a small child, particularly in the absence of burns to the feet, are indicative of dipping into a hot liquid or bath.

### **Fractures**

Fractures may cause pain, swelling and discolouration over a bone or joint. Non-mobile children rarely sustain fractures.

There are grounds for concern if:

- The history provided is vague, non-existent or inconsistent with the fracture type
- There are associated old fractures
- Medical attention is sought after a period of delay when the fracture has caused symptoms such as swelling, pain or loss of movement
- There is an unexplained fracture in the first year of life

### **Scars**

A large number of scars or scars of different sizes or ages, or on different parts of the body, may suggest abuse.

### **Recognising Emotional Abuse**

Emotional abuse may be difficult to recognise, as the signs are usually behavioural rather than physical. The manifestations of emotional abuse might also indicate the presence of other kinds of abuse. The indicators of emotional abuse are often also associated with other forms of abuse.

The following may be indicators of emotional abuse:

- Developmental delay
- Abnormal attachment between a child and parent/carer e.g. anxious, indiscriminate or not attachment
- Indiscriminate attachment or failure to attach
- Aggressive behaviour towards others
- Scapegoated within the family
- Frozen watchfulness, particularly in pre-school children
- Low self-esteem and lack of confidence
- Withdrawn or seen as a “loner” – difficulty relating to others

### **Recognising Signs of Sexual Abuse**

Boys and girls of all ages may be sexually abused and are frequently scared to say anything due to guilt and/or fear. This is particularly difficult for a child to talk about, and full account should be taken of the cultural sensitivities of any individual child/family.

Recognition can be difficult, unless the child discloses and is believed. There may be no physical signs and indications are likely to be emotional/behavioural.

Some behavioural indicators associated with this form of abuse are:

- Inappropriate sexualised conduct
- Sexually explicit behaviour, play or conversation, inappropriate to the child's age

- Continual and inappropriate or excessive masturbation
- Self-harm (including eating disorder), self-mutilation and suicide attempts
- Involvement in prostitution or indiscriminate choice of sexual partners
- An anxious unwillingness to remove clothes e.g. for sports events (but this may be related to cultural norms or physical difficulties)

Some physical indicators associated with this form of abuse are:

- Pain or itching of genital area
- Blood on underclothes
- Pregnancy in a younger girl where the identity of the father is not disclosed
- Physical symptoms such as injuries to the genital or anal area, bruising to buttocks, abdomen and thighs, sexually transmitted disease, presence of semen on vagina, anus, external genitalia or clothing

### **Recognising Neglect**

Evidence of neglect is built up over a period of time and can cover different aspects of parenting.

Indicators include:

- Failure by parents or carers to meet the basic essential needs e.g. adequate food, clothes, warmth, hygiene and medical care
- A child seen to be listless, apathetic and unresponsive with no apparent medical cause
- Failure of child to grow within normal expected pattern, with accompanying weight loss
- Child thrives away from home environment
- Child frequently absent from school
- Child left with adults who are intoxicated or violent
- Child abandoned or left alone for excessive periods

### **Affluent Neglect**

Affluent neglect refers to the neglect which may be experienced by children in more wealthy families. This can be more difficult to spot, as the kind of neglect experienced by children and young people in these circumstances is often emotional.

In such families, parents may work long hours, leaving children in the care of paid nannies or au pairs. This can create a disconnect emotionally and leave children feeling lonely, with their emotional needs unfulfilled by their parents. Affluent parents may also put a high amount of pressure on their children to succeed at school, which can sometimes lead to psychological and emotional problems for children.

Parental alcohol and substance abuse, domestic abuse, and parental mental illness are frequently considered as problems that only occur in poorer families, but they can be found in any type of family and can have lasting effects on the children in the home.

There may also be a lack of parental supervision and guidance as parents aren't sufficiently present or available to know about what their children are doing. This can lead to increased risks for the children, who often have the financial access to facilitate drug abuse and the independence to engage in harmful sexual activity.

There are several barriers that may prevent more affluent children, who are experiencing these types of neglect, from accessing the support they need. Firstly, their symptoms may be harder to spot as the nature of emotional neglect can make it much harder to identify than other types of neglect.

The role of unconscious bias also needs to be considered when working with children from wealthier families. Schools and school staff may miss important pieces of the puzzle when they assume that children from wealthy families are less at risk than those from poorer backgrounds.

Children attending boarding school can be even more difficult to identify as neglected. Their parents may live out of the area or out of the country. This adds another layer of complexity and can prove challenging, not only for identifying issues in their home life, but also for corresponding with parents to improve child outcomes.

The neglect faced by children from affluent families can affect brain development and change how a person's body responds to stress. This can have a lasting impact on an individual and the consequences of these adverse experiences can lead to long-term mental and physical health problems, as well as substance misuse and addiction in adulthood.

## • 2. Anti-Bullying/Cyberbullying

(Also see Paragraph 15 below on Child on Child Abuse and the school's policies on Anti-Bullying and Behaviour)

Our school policy on anti-bullying is set out in a separate document and acknowledges that to allow or condone bullying may lead to consideration under child protection procedures. This includes all forms e.g. cyber, racist, homophobic and gender related bullying, dealt with by the Pastoral Leads. We keep a record of known bullying incidents which is shared with and analysed by the safeguarding team. All staff are aware that children with SEND and / or differences/perceived differences are more susceptible to being bullied / victims of child abuse.

If the bullying is particularly serious, or the anti-bullying procedures are seen to be ineffective, the Head of School and the DSL will consider implementing child protection procedures.

The subject of bullying is addressed at regular intervals in PHSE education.

## 4. Radicalisation and Extremism

The Prevent Duty for England and Wales (2023) places a duty on education and other children's services to have due regard to the need to prevent people from being drawn into terrorism.

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

Some children are at risk of being radicalised; adopting beliefs and engaging in activities which are harmful, criminal or dangerous.

School is clear that exploitation of vulnerable children and radicalisation should be viewed as a safeguarding concern and follows the Department for Education guidance for schools and childcare providers on preventing children and young people from being drawn into terrorism<sup>2</sup>.

School seeks 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 Far Right / Neo Nazi / White Supremacist ideology, Irish Nationalist and Loyalist paramilitary groups, and extremist Animal Rights movements.

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<sup>2</sup> [The Prevent duty](#)

School staff receive training to help identify early signs of radicalisation and extremism. Indicators of vulnerability to radicalisation are in detailed in the Appendix section.

Opportunities are provided in the curriculum to enable pupils to discuss issues of religion, ethnicity and culture and the school follows the DfE advice ‘Promoting Fundamental British Values as part of SMSC (spiritual, moral, social and cultural education) in Schools’ (2014)<sup>3</sup>.

If any member of staff has concerns that a pupil may be at risk of radicalisation or involvement in terrorism, they should speak with the DSL. They should then follow normal safeguarding procedures. If the matter is urgent then the Police must be contacted by dialling 999. In non-urgent cases where police advice is sought then dial 101. The Department of Education has also set up a dedicated telephone helpline for staff and governors to raise concerns around Prevent (020 7340 7264).

### **Indicators of Vulnerability to Radicalisation**

1. Radicalisation refers to the process by which a person comes to support terrorism and forms of extremism leading to terrorism.
2. Extremism is defined by the Government in the Prevent Strategy as:  
*Vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs. We also include in our definition of extremism calls for the death of members of our armed forces, whether in this country or overseas.*
3. Extremism is defined by the Crown Prosecution Service as:  
The demonstration of unacceptable behaviour by using any means or medium to express views which:
  - Encourage, justify or glorify terrorist violence in furtherance of particular beliefs.
  - Seek to provoke others to terrorist acts.
  - Encourage other serious criminal activity or seek to provoke others to serious criminal acts; or
  - Foster hatred which might lead to inter-community violence in the UK.

There is no such thing as a “typical extremist”: those who become involved in extremist actions come from a range of backgrounds and experiences, and most individuals, even those who hold radical views, do not become involved in violent extremist activity.

Pupils may become susceptible to radicalisation through a range of social, personal and environmental factors - it is known that violent extremists exploit vulnerabilities in individuals to drive a wedge between them and their families and communities. It is vital that school staff are able to recognise those vulnerabilities.

### **Indicators of vulnerability include:**

- Identity Crisis – the student / pupil is distanced from their cultural / religious heritage and experiences discomfort about their place in society.
- Personal Crisis – the student / pupil may be experiencing family tensions; a sense of isolation; and low self-esteem; they may have dissociated from their existing friendship group and become involved with a new and different group of friends; they may be searching for answers to questions about identity, faith and belonging.
- Personal Circumstances – migration; local community tensions; and events affecting the student / pupil’s country or region of origin may contribute to a sense of grievance that

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<sup>3</sup> [Promoting Fundamental British Values](#)

is triggered by personal experience of racism or discrimination or aspects of Government policy.

- Unmet Aspirations – the student / pupil may have perceptions of injustice; a feeling of failure; rejection of civic life.
- Experiences of Criminality – which may include involvement with criminal groups, imprisonment, and poor resettlement / reintegration.
- Special Educational Need – students / pupils may experience difficulties with social interaction, empathy with others, understanding the consequences of their actions and awareness of the motivations of others.

However, this list is not exhaustive, nor does it mean that all young people experiencing the above are at risk of radicalisation for the purposes of violent extremism.

More critical risk factors could include:

- Being in contact with extremist recruiters.
- Accessing violent extremist websites, especially those with a social networking element.
- Possessing or accessing violent extremist literature.
- Using extremist narratives and a global ideology to explain personal disadvantage.
- Justifying the use of violence to solve societal issues.
- Joining or seeking to join extremist organisations; and
- Significant changes to appearance and / or behaviour.
- Experiencing a high level of social isolation resulting in issues of identity crisis and / or personal crisis.

The Prevent duty ensures schools and colleges have ‘due regard’ to the need to prevent people from being drawn into terrorism.

Channel is the voluntary, confidential support programme which focuses on providing support at an early stage to individuals that have been identified as being vulnerable to radicalisation. Prevent referrals may be passed to the multi-agency Channel panel to determine whether individuals require support.

[The Prevent Duty can be accessed via this link.](#) (School specific para’s 57-76)  
[Summary of The Prevent Duty for Schools and Childcare Providers \(June 2015\)](#)

[The Prevent Duty, for Further Education Institutions](#)

Guidance on Channel <https://www.gov.uk/government/publications/channel-guidance>

Further information can be obtained from the Home Office website.

## 5. Domestic Abuse (incl Operation Encompass)

Domestic abuse represents one quarter of all violent crime. It is actual or threatened physical, emotional, psychological or sexual abuse. It involves the use of power and control by one person over another. It occurs regardless of race, ethnicity, gender, class, sexuality, age, and religion, mental or physical ability. Domestic abuse can also involve other types of abuse.

We use the term domestic abuse to reflect that a number of abusive and controlling behaviours are involved beyond violence.

### How does it affect children?

Domestic abuse can encompass a wide range of behaviours and may be a single incident or a pattern of incidents. That abuse can be, but is not limited to, psychological, physical, sexual, financial or emotional. Children can be victims of domestic abuse. They may see, hear, or

experience the effects of abuse at home and/or suffer domestic abuse in their own intimate relationships (teenage relationship abuse). All of which can have a detrimental and long-term impact on their health, well-being, development, and ability to learn. In some cases children may blame themselves for the abuse or may have had to leave the family home as a result. Children who witness domestic abuse are at risk of significant harm.

### **What are the signs to look out for?**

Children affected by domestic abuse reflect their distress in a variety of ways. They may change their usual behaviour and become withdrawn, tired, start to wet the bed and have behavioural difficulties. They may not want to leave their house or may become reluctant to return. Others will excel, using their time in your care as a way to escape from their home life. None of these signs are exclusive to domestic abuse so when you are considering changes in behaviours and concerns about a child, think about whether domestic abuse may be a factor.

If a member of staff suspects a family is affected by domestic abuse the DSL should be informed without delay. The DSL will decide on the course of action.

Staff should not approach a family unless directed to do so by the DSL.

**Splitz Support Service** is a charity delivering support services to women and young people experiencing the trauma of domestic abuse and sexual violence. Telephone 0345 155 1074 or email [admin@splitzdevon.org](mailto:admin@splitzdevon.org)

**SAFE (Stop Abuse For Everyone)** is a charity based in Exeter providing help and support to children and families who have experienced domestic abuse and violence. Telephone 030 30 30 0112 or email [hello@safe-services.org.uk](mailto:hello@safe-services.org.uk) (Monday to Friday, 9am – 5pm)

**National Domestic Abuse Helpline** Refuge runs the National Domestic Abuse Helpline, available 24hour a day 0808 2000 247 and its website offers guidance and support for potential victims.

**Refuge:** <https://www.refuge.org.uk/>

### **Operation Encompass**

Operation Encompass helps police and schools work together to provide emotional and practical help for children. Police will inform the ‘key adult’ within school if they have been called to an incident of domestic abuse, where there are children in the household before registration the next day.

## **6. Exploitation (incl Child Sex Exploitation, Child Criminal Exploitation & County Lines)**

Both CSE and CCE are forms of abuse and both occur where an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a child into sexual or criminal activity. This power imbalance could be due to age, gender, sexual identity, cognitive ability, physical strength, status, and /or access to economic or other resources. The abuse could be linked to an exchange for something the victim perceives that they need or want and/or will be to the financial benefit or other advantage (such as increase status) of the perpetrator or facilitator.

The abuse can be perpetrated by individuals or groups, males or females, and adults or children (who themselves may be experiencing exploitation). The abuse can be a one-off occurrence or a series of incidents over time and range from opportunistic to complex organised abuse. It may involve force and/or enticement-based methods of compliance and may, or may not, be accompanied by violence or threats of violence.

Victims can be exploited even when the activity appears consensual, and it should be noted exploitation as well as being physical can be facilitated and/or take place online. The experience of girls who are criminally exploited can be very different from boys, the indicators may not be the same and both boys and girls that are being criminally exploited may be at higher risk of sexual exploitation.

Any concerns that a child is being or is at risk of being sexually or criminally exploited should be passed without delay to the DSL. We aware there is a clear link between regular school absence/truanting, CSE and CCE. Staff should consider a child to be at potential CSE/CCE risk in the case of regular school absence/truanting and make reasonable enquiries with the child and parents to assess this risk.

The DSL will use the appropriate Local Authority Assessment tool e.g. the Exploitation Toolkit, the Devon Children and Families Partnership Adolescent Safety Framework Safer Me Assessment<sup>4</sup> on all occasions when there is a concern that a child is being or is at risk of being sexually or criminally exploited or where indicators have been observed that are consistent with a child who is being or who is at risk of being sexually or criminally exploited. These assessments will indicate to the DSL whether e.g. a Safer Me Early Help approach or referral to the Exploitation Hub/Local Authority Safeguarding Hub is required. If the DSL is in any doubt, they will contact the Safeguarding Hub for consultation.

In all cases, if the assessment identifies any level of concern the DSL should contact their local MACE<sup>5</sup> (Missing and Child Exploitation) and email the completed (e.g. Safer Me) assessment along with a Safeguarding Hub enquiry form. If a child is in immediate danger the police should be called on 999.

School is aware that a child often is not able to recognise the coercive nature of the abuse and does not see themselves as a victim. As a consequence, the child may resent what they perceive as interference by staff. However, staff must act on their concerns as they would for any other type of abuse.

School includes the risks of sexual and criminal exploitation in the PHSE and RSE curriculum. Pupils will be informed of the grooming process and how to protect themselves from people who may potentially be intent on causing harm. They will be supported in terms of recognising and assessing risk in relation to CSE/CCE, including online, and knowing how and where to get help. The following list of indicators is not exhaustive or definitive, but it does highlight common signs which can assist professionals in identifying children or young people who may be victims of sexual or criminal exploitation.

Signs include:

- going missing from home or school
- regular school absence/truanting
- underage sexual activity
- inappropriate sexual or sexualised behaviour
- sexually risky behaviour, 'swapping' sex
- repeat sexually transmitted infections
- in girls, repeat pregnancy, abortions, miscarriage
- receiving unexplained gifts or gifts from unknown sources
- having multiple mobile phones and worrying about losing contact via mobile
- online safety concerns such as youth produced sexual imagery or being coerced into sharing explicit images.
- having unaffordable new things (clothes, mobile) or expensive habits (alcohol, drugs)
- changes in the way they dress

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<sup>4</sup> [DCFP Adolescent Safety Framework info and Safer Me Assessment](#)

<sup>5</sup> [DCFP MACE guidance](#)

- going to hotels or other unusual locations to meet friends
- seen at known places of concern
- moving around the country, appearing in new towns or cities, not knowing where they are
- getting in/out of different cars driven by unknown adults
- having older boyfriends or girlfriends
- contact with known perpetrators
- involved in abusive relationships, intimidated and fearful of certain people or situations
- hanging out with groups of older people, or anti-social groups, or with other vulnerable peers
- associating with other young people involved in sexual exploitation
- recruiting other young people to exploitative situations
- truancy, exclusion, disengagement with school, opting out of education altogether
- unexplained changes in behaviour or personality (chaotic, aggressive, sexual)
- mood swings, volatile behaviour, emotional distress
- self-harming, suicidal thoughts, suicide attempts, overdosing, eating disorders
- drug or alcohol misuse
- getting involved in crime
- police involvement, police records
- involved in gangs, gang fights, gang membership
- injuries from physical assault, physical restraint, sexual assault.

Child Criminal Exploitation can include children being forced or manipulated into transporting drugs or money through county lines, working in cannabis factories, shoplifting or pickpocketing. They can also be forced or manipulated into committing vehicle crime or threatening/committing serious violence to others

County lines is a term used to describe gangs and organised criminal networks involved in the exporting of illegal drugs (primarily crack cocaine and heroin) into one or more importing areas (within the UK), using dedicated mobile phone lines or other form of ‘deal line.’

Exploitation is an integral part of the county lines offending model with children and vulnerable adults being exploited to move (and store) drugs and money. The same grooming models used to coerce, intimidate and abuse individuals for sexual and criminal exploitation are also used for grooming vulnerable individuals for county lines.

CSE is a form of child sexual abuse. CSE can occur over time or be a one-off occurrence. CSE can affect any child, who has been coerced into engaging in sexual activities. This includes 16 and 17-year-olds who can legally consent to have sex.

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

**For further information on signs of a child’s involvement in sexual exploitation:** [Child sexual exploitation: guide for practitioners](#)

**For further information on County Lines:** [Criminal exploitation of children and vulnerable adults: county lines guidance](#)

## 7. Female Genital Mutilation (FGM)

It is essential that staff are aware of FGM practices and the need to look for signs, symptoms and other indicators of FGM. If a member of staff, in the course of their work, discovers that an act of FGM appears to have been carried out, the member of staff must report this to the Police.

Female Genital Mutilation (FGM) is illegal in England and Wales under the FGM Act 2003 (“the 2003 Act”). It is a form of child abuse and violence against women. FGM comprises all procedures involving partial or total removal of the external female genitalia for non-medical reasons.

Section 5B of the 2003 Act<sup>1</sup> introduces a mandatory reporting duty which requires regulated health and social care professionals and teachers in England and Wales to report ‘known’ cases of FGM in under 18s which they identify in the course of their professional work to the police. The duty came into force on 31 October 2015.

What is FGM?

It involves procedures that intentionally alter/injure the female genital organs for non-medical reasons.

4 types of procedure:

Type 1 Clitoridectomy – partial/total removal of clitoris

Type 2 Excision – partial/total removal of clitoris and labia minora

Type 3 Infibulation entrance to vagina is narrowed by repositioning the inner/outer labia

Type 4 all other procedures that may include: pricking, piercing, incising, cauterising and scraping the genital area.

Why is it carried out?

Belief that:

- FGM brings status/respect to the girl – social acceptance for marriage
- Preserves a girl’s virginity
- Part of being a woman / rite of passage
- Upholds family honour
- Cleanses and purifies the girl
- Gives a sense of belonging to the community
- Fulfils a religious requirement
- Perpetuates a custom/tradition
- Helps girls be clean / hygienic
- Is cosmetically desirable
- Mistakenly believed to make childbirth easier

### **Is FGM legal?**

FGM is internationally recognised as a violation of human rights of girls and women. Female Genital Mutilation (FGM) is illegal in England and Wales under the FGM Act (2003). It is a form of child abuse and violence against women. A mandatory reporting duty requires teachers to report ‘known’ cases of FGM in under 18s, which are identified in the course of their professional work, to the police<sup>6</sup>.

The duty applies to all persons in our School who is employed or engaged to carry out ‘teaching work’ in the school, whether or not they have qualified teacher status. The duty applies to the individual who becomes aware of the case to make a report. It should not be transferred to the Designated Safeguarding Lead; however the DSL should be informed.

If a teacher is informed by a girl under 18 that an act of FGM has been carried out on her, or a teacher observes physical signs which appear to show that an act of FGM has been carried out on a girl under 18, and they have no reason to believe the act was necessary for the girl’s physical or

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<sup>6</sup> [FGM procedural information](#)

mental health or for purposes connected with labour or birth, the teacher should personally make a report to the police force in which the girl resides by calling 101. The report should be made by the close of the next working day.

Risk indicators of FGM are identified in this section of the Appendix. Concerns about FGM outside of the mandatory reporting duty should be reported as per our school's child protection procedures. Staff should be particularly alert to suspicions or concerns expressed by female pupils about going on a long holiday during the summer vacation period. There should also be consideration of potential risk to other girls in the family and practicing community.

Where there is a risk to life or likelihood of serious immediate harm the teacher should report the case immediately to the police, including dialling 999 if appropriate.

There are no circumstances in which a teacher or other member of staff should examine a girl.

**Circumstances and occurrences that may point to FGM happening are:**

- Child talking about getting ready for a special ceremony
- Family taking a long trip abroad
- Child's family being from one of the 'at risk' communities for FGM (Kenya, Somalia, Sudan, Sierra Leon, Egypt, Nigeria, Eritrea as well as non-African communities including Yemeni, Afghani, Kurdistan, Indonesia and Pakistan)
- Knowledge that the child's sibling has undergone FGM
- Child talks about going abroad to be 'cut' or to prepare for marriage

**Signs that may indicate a child has undergone FGM:**

- Prolonged absence from school and other activities
- Behaviour changes on return from a holiday abroad, such as being withdrawn and appearing subdued
- Bladder or menstrual problems
- Finding it difficult to sit still and looking uncomfortable
- Complaining about pain between the legs
- Mentioning something somebody did to them that they are not allowed to talk about
- Secretive behaviour, including isolating themselves from the group
- Reluctance to take part in physical activity
- Repeated urinal tract infection
- Disclosure

## 8. Forced Marriage

A forced marriage is a marriage in which one or both people do not (or in cases of people with learning disabilities cannot) consent to the marriage but are coerced into it. Coercion may include physical, psychological, financial, sexual and emotional pressure. It may also involve physical or sexual violence and abuse.

Forced marriage is an appalling and indefensible practice and is recognised in the UK as a form of violence against women and men, domestic/child abuse and a serious abuse of human rights. Since June 2014 forcing someone to marry has become a criminal offence in England and Wales under the Anti-Social Behaviour, Crime and Policing Act 2014.

A forced marriage is not the same as an arranged marriage which is common in several cultures. The families of both spouses take a leading role in arranging the marriage but the choice of whether or not to accept the arrangement remains with the prospective spouses.

School staff should never attempt to intervene directly as a school or through a third party. Contact should be made with the Local Authority Safeguarding Hub.

## 9. Honour-based Abuse

Honour based abuse (HBV) can be described as a collection of practices, which are used to control behaviour within families or other social groups to protect perceived cultural and religious beliefs and/or honour. Such abuse can occur when perpetrators perceive that a relative has shamed the family and/or community by breaking their honour code.

Honour based abuse might be committed against people who.

- become involved with a boyfriend or girlfriend from a different culture or religion.
- want to get out of an arranged marriage.
- want to get out of a forced marriage.
- wear clothes or take part in activities that might not be considered traditional within a particular culture.

It is a violation of human rights and may be a form of domestic and/or sexual abuse. There is no, and cannot be, honour or justification for abusing the human rights of others.

## 10. One Chance Rule

All staff should be aware of the ‘One Chance Rule’ in relation to forced marriage, FGM and HBV. Staff recognise they may only have one chance’ to speak to a pupil who is a potential victim and have just one chance to save/change a life.

School is aware that if the victim is not offered support following disclosure that the ‘One Chance’ opportunity may be lost. Therefore, all staff are aware of their responsibilities and obligations when they become aware of potential forced marriage, FGM and HBV cases.

## 11. Mental Health

Staff will be aware that mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation. Whilst school recognise that only appropriately trained professionals can diagnose mental health problems; staff are able to make day to day observations of children and identify such behaviour that may suggest they are experiencing a mental health problem or be at risk of developing one.

Early intervention to identify issues and provide effective support is crucial. The school’s role in supporting and promoting mental health and wellbeing can be summarised as:

- **Prevention:** the creation of a safe, calm school environment where mental health problems are less likely, improving the mental health and wellbeing of the whole school population, and equipping pupils to be resilient so that they can manage the normal stresses of life effectively. This includes teaching pupils about mental wellbeing through the curriculum and reinforcing this teaching through school activities.
- **Identification:** recognising emerging issues as early and accurately as possible
- **Early support:** helping pupils to access early support and intervention
- **Access to specialist support:** working effectively with external agencies to provide swift access or referrals to specialist support and treatment.

When the school suspects that a pupil is having mental health difficulties, support will be put in place, using a graduated response process.

1. an assessment to establish a clear analysis of the pupil's needs;
2. a plan to set out how the pupil will be supported;
3. action to provide that support
4. regular reviews to assess the effectiveness of the provision

Adverse Childhood Experiences (ACEs) and other events may also have an impact on pupils. These include:

- loss or separation – resulting from death, parental separation, divorce, hospitalization
- loss of friendships (especially in adolescence)
- family conflict or breakdown that may result in the child having to live elsewhere, being taken into care or adopted, deployment of parents in armed forces families
- life changes – such as the birth of a sibling, moving house or changing schools or during transition from primary to secondary school
- traumatic experiences such as abuse, neglect, domestic violence, bullying, violence, accidents or injuries
- other traumatic incidents such as a natural disasters or terrorist attacks

Where children experience a range of emotional and behavioural problems that are outside the normal range for their age, they might be described as experiencing mental health problems or disorders.

Mental health professionals have classified these as:

- emotional disorders - phobias, anxiety states and depression
- conduct disorders - stealing, defiance, fire-setting, aggression and anti-social behavior
- hyperkinetic disorders - disturbance of activity and attention
- developmental disorders - delay in acquiring certain skills such as speech, social ability or bladder control, primarily affecting children with autism and those with pervasive developmental disorders
- attachment disorders - children who are markedly distressed or socially impaired as a result of an extremely abnormal pattern of attachment to parents or major care givers
- Trauma disorders, such as post-traumatic stress disorder, as a result of traumatic experiences or persistent periods of abuse and neglect
- other mental health problems including eating disorders, habit disorders, somatic disorders; and psychotic disorders such as schizophrenia and manic depressive disorder

If staff have any concerns about the mental health of a child they should report this to the DSL immediately following the procedures outlined in this policy.

How traumatic Adverse Childhood Experiences and experiences of abuse and neglect can impact on a child's mental health, behaviour and education through to adolescence and adulthood will be covered in safeguarding awareness training and updates.

If staff have a concern about a child's mental health they should report this to the DSL or deputies following the procedures outlined in this policy. School will also refer to the mental health and behaviour in schools' guidance<sup>7</sup>.

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<sup>7</sup> [Mental health and behaviour in schools: guidance](#)

When supporting children experiencing mental health difficulties school will explore resources such as

[Senior Mental Health Lead Training](#)

[Promoting children and young people's mental health and wellbeing](#)

[Rise Above: Resources for School from Public Health England #esafety](#)

[Every Interaction Matters Webinar](#)

[Wellbeing for Education Recovery](#)

[Preventing and Tackling Bullying](#)

[Promoting and supporting mental health and wellbeing in schools and colleges](#)

## **12. Private Fostering Arrangements**

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

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

School recognise that most privately fostered children remain safe and well but are aware that safeguarding concerns have been raised in some cases. Therefore, all staff are alert to possible safeguarding issues, including the possibility that the child has been trafficked into the country.

By law, a parent, private foster carer or other persons involved in making a private fostering arrangement must notify children's services as soon as possible. However, where a member of staff becomes aware that a pupil may be in a private fostering arrangement, they will raise this with the DSL and the DSL will notify MASH of the circumstances.

## **13. Looked after children and previously looked after children**

The most common reason for children becoming looked after is as a result of abuse and neglect. Our school will ensure that staff have the necessary skills and understanding to keep looked after/previously looked after children safe. Appropriate staff have information about a child's looked after legal status and care arrangements, including the level of authority delegated to the carer by the authority looking after the child and contact arrangements with birth parents or those with parental responsibility.

The designated teacher for looked after children and the DSL have details of the child's social worker and the name and contact details of the Local Authority's virtual school head for children in care.

The designated teacher will follow the statutory guidance 'Promoting the education of Looked After Children'.

## **14. Children Missing Education**

Attendance, absence and exclusions are closely monitored. The school will hold more than one emergency contact number for pupils and students where reasonably possible. A child going missing or absent from education is a potential indicator of abuse and neglect, including sexual abuse and sexual exploitation.

The DSL and Head of School will monitor unauthorised absences and take appropriate action including notifying the local authority particularly where children go missing on repeat occasions

and/or are missing for periods during the school day in conjunction with ‘Children Missing Education: Statutory Guidance for Local Authorities’<sup>8</sup>.

Staff must be alert to signs of children at risk of travelling to conflict zones, female genital mutilation and forced marriage.

## 15. Child on Child Abuse (including Sexual Violence, Sexual Harassment and HSB)

The DSL, Proprietor and Head Teacher will pay due regard to Part 5, KCSiE.

In most instances, the conduct of pupils towards each other will be covered by our behaviour policy. However, some allegations may be of such a serious nature that they may raise safeguarding concerns. School recognise that children are capable of abusing their peers. It will not be passed off as ‘banter’ or ‘part of growing up’. The forms of child-on-child abuse are outlined below.

- domestic abuse – an incident or pattern of actual or threatened acts of physical, sexual, financial and/or emotional abuse, perpetrated by an adolescent against a current or former dating partner regardless of gender or sexuality.
- bullying (including cyberbullying, prejudice-based and discriminatory bullying).
- child sexual exploitation – children under the age of 18 may be sexually abused in the context of exploitative relationships, contexts and situations by peers who are also under 18.
- harmful sexual behaviour – children and young people presenting with sexual behaviours that are outside of developmentally ‘normative’ parameters and harmful to themselves and others
- upskirting – which typically involves taking a picture under a person’s clothing without them knowing, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm.
- serious youth violence<sup>9</sup> – any offence of most serious violence or weapon enabled crime, where the victim is aged 0-19’ i.e. murder, manslaughter, rape, wounding with intent and causing grievous bodily harm. ‘Youth violence’ is defined in the same way, but also includes assault with injury offences. All staff will receive training so that they are aware of indicators which may signal that children are at risk from or involved with serious violence and crime.
- initiation/hazing type violence and rituals (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element); and
- consensual and non-consensual sharing of nudes and semi nudes’ images and or videos (also known as sexting or youth produced sexual imagery).

The term child-on-child abuse can refer to all of these definitions and a child may experience one or multiple facets of abuse at any one time. Therefore, our response will cut across these definitions and capture the complex web of their experiences.

There are also different gender issues that can be prevalent when dealing with child-on-child abuse (i.e. girls being sexually touched/assaulted, or boys being subjected to initiation/hazing type violence).

School aims to reduce the likelihood of child-on-child abuse through:

- the established ethos of respect, friendship, courtesy and kindness.
- high expectations of behaviour.
- clear consequences for unacceptable behaviour.

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<sup>8</sup> [CME Statutory Guidance for Local Authorities](#)

<sup>9</sup> [Preventing youth violence and gang involvement](#)

- providing a developmentally appropriate PSHE curriculum which develops pupils' understanding of healthy relationships, acceptable behaviour, consent and keeping themselves safe.
- systems for any pupil to raise concerns with staff, knowing that they will be listened to, valued and believed.
- robust risk assessments and providing targeted work for pupils identified as being a potential risk to other pupils and those identified as being at risk.
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Research indicates that young people rarely disclose child-on-child abuse and that if they do, it is likely to be to their friends. Therefore, School will also educate pupils in how to support their friends if they are concerned about them, that they should talk to a trusted adult in the school and what services they can contact for further advice.

Any concerns, disclosures or allegations of child-on-child abuse in any form should be referred to the DSL using the school's child protection procedures as set out in this policy. Where a concern regarding child-on-child abuse has been disclosed to the DSL, advice and guidance will be sought from the Local Authority Safeguarding Hub and where it is clear a crime has been committed or there is a risk of crime being committed the Police will be contacted.

Working with external agencies the school will respond to the unacceptable behaviour. If a pupil's behaviour negatively impacts on the safety and welfare of other pupils, then safeguards will be put in place to promote the well-being of the pupils affected and the victim and perpetrator will be provided with support.

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

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

For children who may be questioning their gender there remain many unknowns about the impact of social transition and children may well have wider vulnerabilities, including having complex mental health and psychosocial needs, and in some cases additional diagnoses of autism spectrum disorder and/or attention deficit hyperactivity disorder.

It is recommended that when families/carers are making decisions about support for gender questioning children, they should be encouraged to seek clinical help and advice.

When supporting a gender questioning child, schools are advised to take a cautious approach and consider the broad range of their individual needs, in partnership with the child's parents (other than in the exceptionally rare circumstances where involving parents would constitute a significant risk of harm to the child), including any clinical advice that is available and how to address wider vulnerabilities such as the risk of bullying.

Risks can be compounded where children lack trusted adults with whom they can be open. It is therefore vital that staff endeavour to reduce the additional barriers faced and create a culture where pupils can speak out or share their concerns with members of staff.

### **Sexual Harassment, Sexual Violence and Harmful Sexual Behaviour**

The boundary between what is abusive and what is part of normal childhood or youthful experimentation can be blurred. The determination of whether behaviour is developmental, inappropriate or abusive will hinge around the related concepts of true consent, power imbalance and exploitation. Children's sexual behaviour exists on a wide continuum, ranging from normal and developmentally expected to inappropriate, problematic, abusive and violent. Problematic, abusive and violent sexual behaviour is developmentally inappropriate and may cause developmental damage. This may include children and young people who exhibit a range of sexually problematic behaviour such as indecent exposure, obscene telephone calls, fetishism, bestiality and sexual abuse against adults, peers or children. Staff should be vigilant to:

- bullying (including cyberbullying)
- physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm
- sexual violence and sexual harassment
- sexting (also known as youth produced sexual imagery)
- initiation/hazing type violence and rituals
- upskirting

### **Developmental Sexual Activity**

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

### **Inappropriate Sexual Behaviour**

Can be inappropriate socially, inappropriate to development, or both. In considering whether behaviour fits into this category, it is important to consider what negative effects it has on any of the parties involved and what concerns it raises about a child or young person. It should be recognised that some actions may be motivated by information seeking, but still cause significant upset, confusion, worry, physical damage, etc. It may also be that the behaviour is "acting out" which may derive from other sexual situations to which the child or young person has been exposed. If an act appears to have been inappropriate, there may still be a need for some form of behaviour management or intervention. For some children, educative inputs may be enough to address the behaviour.

Abusive sexual activity included any behaviour involving coercion, threats, aggression together with secrecy, or where one participant relies on an unequal power base. In order to more fully determine the nature of the incident the following factors should be given consideration. The presence of exploitation in terms of:

**Equality** – consider differentials of physical, cognitive and emotional development, power and control and authority, passive and assertive tendencies

**Consent** – agreement including all the following:

- Understanding that is proposed based on age, maturity, development level, functioning and experience
- Knowledge of society's standards for what is being proposed
- Awareness of potential consequences and alternatives
- Assumption that agreements or disagreements will be respected equally
- Voluntary decision
- Mental competence
-

**Coercion** – the young perpetrator who abuses may use techniques like bribing, manipulation and emotional threats of secondary gains and losses that is loss of love, friendship, etc. Some may use physical force, brutality or the threat of these regardless of victim resistance. In evaluating sexual behaviour of children and young people, the above information should be used only as a guide. Further information and advice is available in the Devon multi-agency protocol “Working with Sexually Active Young People” available at [https://www.proceduresonline.com/swcpp/devon/p\\_underage\\_sexual\\_act.html](https://www.proceduresonline.com/swcpp/devon/p_underage_sexual_act.html) or go to South West Child Protection Procedures ([www.proceduresonline.com](http://www.proceduresonline.com)) choose Child Protection Procedures, scroll down to Safeguarding Practice Guidance.

## 16. Online Safety

Our pupils increasingly use electronic equipment on a daily basis to access the internet and share content and images via social media sites such as Facebook, Twitter (X), Instagram, Snapchat and ooVoo.

The school adopts a whole school approach to online safety which seeks to reduce risk as far as possible without depriving pupils of the significant benefits provided by technology and the internet.

Unfortunately, some adults and other children use these technologies to harm children.

The breadth of issues classified within online safety is considerable, but can be categorised into four main 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.
- **commerce:** - risks such as online gambling, inappropriate advertising, phishing and or financial scams

The harm might range from sending hurtful or abusive texts or emails, to grooming and enticing children to engage in sexual behaviour such as webcam photography or face-to-face meetings. Pupils may also be distressed or harmed by accessing inappropriate material such as pornographic websites or those which promote extremist behaviour, criminal activity, suicide or eating disorders. The School has an online safety policy which explains how we try to keep pupils safe in school and how we respond to online safety incidents (See flowchart, Appendix 7).

School will also provide advice to parents when pupils are being asked to learn online at home and consider how best to safeguard both pupils and staff.

Pupils are taught about online safety throughout the curriculum and all staff receive online safety training which is regularly updated including an understanding of the expectations, applicable roles and responsibilities in relation to filtering and monitoring.

## 17. Youth produced sexual imagery (sexting)

The practice of children sharing images and videos via text message, email, social media or mobile messaging apps has become commonplace. However, this online technology has also given children the opportunity to produce and distribute sexual imagery in the form of photos and videos. Such imagery involving anyone under the age of 18 is illegal.

Youth produced sexual imagery refers to both images and videos where.

- 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.

All incidents of this nature should be treated as a safeguarding concern and in line with the UKCIS guidance ‘Sexting in schools and colleges: responding to incidents and safeguarding young people’<sup>10</sup>, and ‘Sharing nudes and semi-nudes: how to respond to an incident.’<sup>11</sup>

Cases where sexual imagery of people under 18 has been shared by adults and where sexual imagery of a person of any age has been shared by an adult to a child is child sexual abuse and should be responded to accordingly.

If a member of staff becomes aware of an incident involving youth produced sexual imagery, they should follow the child protection procedures and refer to the DSL as soon as possible.

**The member of staff should confiscate the device involved and set it to flight mode or, if this is not possible, turn it off. Staff should not forward, view, copy or print the youth produced sexual imagery as this is a criminal offence.**

The DSL should hold an initial review meeting with appropriate school staff and subsequent interviews with the children involved (if appropriate). Parents should be informed at an early stage and involved in the process unless there is reason to believe that involving parents would put the child at risk of harm. At any point in the process if there is concern a young person has been harmed or is at risk of harm a referral should be made to the Local Authority Safeguarding Hub and/or the Police as appropriate.

Immediate referral at the initial review stage should be made to the Local Authority Safeguarding Hub/Police if.

- The incident involves an adult.
- There is good reason to believe that a young person has been coerced, blackmailed or groomed or if there are concerns about their capacity to consent (for example, owing to special education needs).
- What you know about the imagery suggests the content depicts sexual acts which are unusual for the child’s development stage or are violent.
- The imagery involves sexual acts.
- The imagery involves anyone aged 12 or under.
- There is reason to believe a child is at immediate risk of harm owing to the sharing of the imagery, for example the child is presenting as suicidal or self-harming.

If none of the above apply then the DSL will use their professional judgement to assess the risk to pupils involved and may decide, with input from the Headteacher, to respond to the incident without escalation to the Local Authority Safeguarding Hub or the police. Such decisions will be recorded on CPOMS.

In applying judgement the DSL will consider if.

- there is a significant age difference between the sender/receiver.
- there is any coercion or encouragement beyond the sender/receiver.
- the imagery was shared and received with the knowledge of the child in the imagery.
- the child is more vulnerable than usual i.e. at risk.
- there is a significant impact on the children involved.
- the image is of a severe or extreme nature.

<sup>10</sup> [Sexting in schools and colleges](#)

<sup>11</sup> [Sharing nudes and semi-nudes: how to respond to an incident \(UCKIS\)](#)

- the child involved understands consent.
- the situation is isolated or if the image been more widely distributed.
- there other circumstances relating to either the sender or recipient that may add cause for concern i.e. difficult home circumstances.
- the children have been involved in incidents relating to youth produced imagery before.

If any of these circumstances are present the situation will be escalated according to child protection procedures, including reporting to the police or the Local Authority Safeguarding Hub. Otherwise, the situation will be managed within the school.

The DSL will record all incidents of youth produced sexual imagery, including both the actions taken, actions not taken, reasons for doing so and the resolution in line with safeguarding recording procedure (CPOMS)

## 18. Additional Resources

Further advice on child protection is available from:

NSPCC: <http://www.nspcc.org.uk/>

Childline: <http://www.childline.org.uk/pages/home.aspx>

Anti-Bullying Alliance: <http://anti-bullyingalliance.org.uk/>

Beat Bullying: <http://www.beatbullying.org/>

Childnet International –making the internet a great and safe place for children. Includes resources for professionals and parents <http://www.childnet.com/>

Thinkuknow (includes resources for professionals and parents) <https://www.thinkuknow.co.uk/>

Safer Internet Centre <http://www.saferinternet.org.uk/>

Provision for transgender pupils: [Guidance for maintained schools and academies in England on provision for transgender pupils November 2022](#)