SAFEGUARDING POLICY

AREA:	MELKSHAM HOUSE
AUDIENCE:	ALL STAKEHOLDERS
REVIEW FREQUENCY:	ANNUALLY
DATE ISSUED:	July 2024
LAST REVIEW DATE:	December 2024
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OWNED & REVIEWED BY:	HEADTEACHER
APPROVED BY:	BRUNEL BOARD OF TRUSTEES
LAST APPROVAL DATE:	16.07.2024

Brunel Academies Trust (BAT) is a company limited by guarantee with registration number 10074054 and registered offices at Unit B4C Orbital Retail Park, Thamesdown Drive, Swindon, SN25 4AN; BAT is the parent company and Sole Corporate Member of the subsidiary company, Brunel Education (BE), a company limited by guarantee with registration number 11991915 and registered offices also at Unit B4C Orbital Retail Park, Thamesdown Drive, Swindon, SN25 4AN.

The Brunel Education (BE) Board have approved and adopted the majority of BAT policies and procedures. policies are centrally held policies relating to Governance, People Services, Finance, ICT and Operations and are the direct responsibility of BAT. Policies are created by the BAT Central Services Team but adopted and reviewed by the BAT Board.

We are committed to a sustainable future and to improving the social, economic, and environmental well being of the community. We are dedicated to environmental improvements that foster a sustainable future and lead to social and economical improvements in the communities we operate within.

Where this policy refers to BAT this also therefore consistently applies to BE.

PROVISION IMPORTANT CONTACTS		
Safeguarding e-mail	Monitored by Safeguarding team	mhsafeguarding@melkshamhouse.uk
DSL	Steph Berry	Sbery@melkshamhouse.uk

		07962845814
DDSL	**Ash Wadland**	**Awadland@melkshamhouse.uk**
		07962845081
	Beckie Deacon	**Rdeacon@melkshamhouse.uk**
		07425384544

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1. Important Contacts

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DDSL	Ash Wadland Beckie Deacon	Awadland@melkshamhouse.uk 07962845081 Rdeacon@melkshamhouse.uk 07425384544

2. Definitions

Safeguarding and promoting the welfare of children is defined in Keeping Children Safe in Education 2024 as:

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

'Children' includes everyone under the age of 18.

- Child protection is part of this definition and refers to activities undertaken to protect specific children who are suspected to be suffering, or likely to suffer, significant harm. This includes harm that occurs inside or outside the home, including online.

- Abuse is a form of maltreatment of a child, and may involve inflicting harm or failing to act to prevent harm. Appendix A explains the different types of abuse.

- Neglect is a form of abuse and is the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development.

- Sharing of nudes and semi-nudes (also known as sexting or youth-produced sexual imagery) is where children share nude or semi-nude images, videos or live streams. This also includes pseudo-images that are computer-generated images that otherwise appear to be a photograph or video.

- Victim is a widely understood and recognised term, but we understand that not everyone who has been subjected to abuse considers themselves a victim, or would want to be described that way. When managing an incident, we will be prepared to use any term that the child involved feels most comfortable with.

- Alleged perpetrator(s) and perpetrator(s) are widely used and recognised terms. However, we will think carefully about what terminology we use (especially in front of children) as, in some cases, abusive behaviour can be harmful to the perpetrator too. We will decide what's appropriate and which terms to use on a case-by-case basis.

The following three safeguarding partners are identified in Working Together 2023, Keeping Children Safe in Education (and defined in the Children Act 2004, as amended by chapter two of the Children and Social Work Act 2017). They will make arrangements to work together to safeguard and promote the welfare of local children, including identifying and responding to their needs:

a. The local authority (LA)

b. Integrated care boards (previously known as clinical commissioning groups) for an area within the LA

c. The chief officer of police for a police area in the LA area

3. Policy Scope

All children are in the scope of this policy.

Those learners above the age of 18 are also in the scope of this policy by respect of the following laws and statutory guidance:

- government funded post 16 Education; 16-19 Academies, Special Post-16 institutions and Independent Training Providers, who are required to have regard to Working Together to Safeguard Children 2023 and Keeping Children Safe in Education 2024 (KCSiE) following the enactment of The Education and Training (Welfare of Children) Act 2021.

- providers of post 16 Education as set out in the Apprenticeships, Skills, Children and Learning Act 2009 (as amended): 16-19 Academies, Special Post-16 institutions and Independent Training Providers.

- the FE and Training sector which includes

  o Art, Design & Performing Art Colleges.

  o Employer Providers.

  o FE Colleges.

  o Independent Training Providers.

  o Institutes for Adult Learning.

  o Local Authority Adult Community Education Providers.

  o National Specialist Colleges.

  o Sixth Form Colleges.

  o Specialist Designated Colleges.

  o Third Sector Adult Community Education Providers

- Free schools as these are legally a type of academy

This policy is applicable to all of the education provisions that sit within Brunel Academies Trust or Brunel Education.

4. Whole Provision Approach

All policies which address issues of potential harm are linked to ensure we have a whole provision approach.

The safeguarding policy cannot be separated from the general ethos of our provision, which ensures that children and young people are treated with respect and dignity, taught to treat each other with respect, feel safe, have a voice, and are listened to.

Employees working with children are encouraged to maintain an attitude of 'it could happen here' where safeguarding is concerned. When concerned about the welfare of a child, employees should always act in the best interests of the child.

This policy links to the following policies and procedures

- Behaviour
- Employee code of conduct
- Complaints
- Managing allegations and low level concerns
- Safer recruitment
- Health and safety
- Attendance
- Acceptable Use
- Equality & Diversity
- PHSCE
- First aid
- GDPR

5. Equality Statement

Some children have an increased risk of abuse, both online and offline, and additional barriers can exist for some children with respect to recognising or disclosing it. We are committed to anti-discriminatory practice and recognise children's diverse circumstances. We ensure that all children have the same protection, regardless of any barriers they may face.

We give special consideration to children who:

- Have special educational needs and/or disabilities (SEND) or health conditions
- Are young carers
- May experience discrimination due to their race, ethnicity, religion, gender identification or sexuality
- Have English as an additional language (EAL)
- Are known to be living in difficult situations – for example, temporary accommodation or where there are issues such as substance abuse or domestic violence
- Are at risk of female genital mutilation (FGM), sexual exploitation, forced marriage, or radicalisation
- Are asylum seekers
- Are at risk due to either their own or a family member's mental health needs
- Are looked after or previously looked after
- Are missing or absent from education for prolonged periods and/or repeat occasions
- Whose parent/carer has expressed an intention to remove them from school to be home educated

6. Roles and Responsibilities

At Melksham House safeguarding and promoting the welfare of children is **everyone's** responsibility. **Everyone** at Melksham House who comes into contact with children and their families and carers has a role to play in safeguarding children. Melksham House recognises that we are an important part in the wider safeguarding system. **All employees** will understand and recognise that a one size fits all approach may not be appropriate for all children and personalised or contextualised approach

for more vulnerable children, such as children who are victims of abuse and some SEND children, may be needed. In order to fulfil this responsibility effectively, all employee will make sure their approach is child centred. This means that they will consider, at all times, what is in the **best interests** of the child.

Melksham House has an expectation that all employees have a responsibility to safeguard and promote the welfare of children by:

- The provision of a safe environment in which children and young people can learn;

- Reporting any concerns about a child's welfare

- Fulfilling our statutory responsibilities to identify children who may be in need of extra help or who are suffering, or are likely to suffer, significant harm.

- Supporting social workers and other professionals in multi-agency assessments and plans

- Working to protect children from maltreatment, to prevent the impairment of children's mental and physical health or development

- Always taking action to enable all children to have the best outcomes

- Having a culture of zero tolerance of sexism, misogyny/misandry, homophobia, biphobia, transphobia and sexual violence/harassment

6.1 All Employees

All employees at Melksham House have a duty and responsibility to safeguard children and young people attending our provision, irrespective of their role:

- Employees who work directly with children are expected to read at least part 1 of Keeping Children Safe in Education 2024 (KCSIE).

- All employees will be responsible for identifying concerns early and providing help for children and young people, to prevent concerns from escalating to a point where statutory intervention would be needed i.e. Section 17 (Children in Need) and Section 47 (a child suffering harm, or likely to suffer significant harm). Concerns will always be discussed with our provision's Designated Safeguarding Lead (DSL) or their deputy.

All employees should be aware of:

- The systems within our school which support safeguarding, this includes the child protection/safeguarding policy, behaviour policy, code of conduct, whistleblowing and the safeguarding response to children who go missing from education

- The local early help process and understand their role within it.

- The signs of different types of abuse, neglect and exploitation and what to look for to identify children who need help or protection

- New and emerging threats, including online harm, grooming, sexual exploitation, criminal exploitation, radicalisation, and the role of technology and social media in presenting harm

- The importance of reassuring victims that they are being taken seriously and that they will be supported and kept safe

- The fact that children can be at risk of harm inside and outside of their home, at school and online

- The fact that children who are (or who are perceived to be) lesbian, gay, bisexual or gender questioning (LGBTQ+) can be targeted by other children

- That a child and their family may be experiencing multiple needs at the same time

- The process and principles for sharing information within the provision, which supports safeguarding.

- The expectations, applicable roles and responsibilities in relation to filtering and monitoring systems and processes in place

- That safeguarding incidents and/or behaviours can be associated with factors outside the school and/or can occur between children outside of these environments.

- That children can be at risk of abuse or exploitation in situations outside the home. Extra-familial harms take a variety of different forms and children can be vulnerable to multiple harms including (but not limited to) sexual exploitation, criminal exploitation, and serious youth violence.

6.2 The Designated Safeguarding Lead (DSL)

The Designated Safeguarding Lead (DSL) is a senior leadership member, who undertakes lead responsibility for safeguarding and child protection (including online safety and understanding the filtering and monitoring systems and processes in place) within the provision. The DSL carries a significant level of responsibility and they are given time, funding, resources and support to carry out the role effectively.

During term time, the DSL will be available during school hours for employees to discuss any safeguarding concerns. Out of school hours, the DSL, Steph Berry, can be contacted through the safeguarding inbox (mhsafeguarding@melkshamhouse.uk) for non-urgent or, for urgent matters or direct contact, with the following details

Email: Sbery@melkshamhouse.uk

Phone: 07962845814

When the DSL is absent, the Deputy DDSL's – [Ash Wadland (Assistant Headteacher/SENDCO) and Beckie Deacon (headteacher)– will act as cover. This information can be found on Melksham House website, our newsletters or the notice board in Reception. Out of hours, they can be contacted in the following ways:

Ash Wadland:

Email: Awadland@melkshamhouse.uk

Phone: 07962845081

Beckie Deacon

Email: Rdeacon@melkshamhouse.uk

Phone: 07425384544

If the DSL and Deputies are not available, Helen Atkin (office manager) will act as cover (for example, during out-of-hours/out-of-term activities) and can be contacted on hatkin@melkshamhouse.uk 07726494058. Alternatively, please contact Catherine Clark, Brunel Academy's safeguarding lead on cclark@brunel.org.uk.

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The DSL will:

- Provide advice and support to other employees on child welfare and child protection matters

- Have a thorough understanding of local multi-agency thresholds guidance

- Take part in strategy discussions and inter-agency meetings and/or support other employees to do so

- Contribute to the assessment of children

- Liaise with local authority case managers and designated officers for child protection concerns as appropriate

- Refer suspected cases, as appropriate, to the relevant body (local authority children's social care, Channel programme, Disclosure and Barring Service, and/or police), and support employees who make such referrals directly

- Work with the virtual school head to ensure there is effective support and oversight of the educational attendance, attainment and progress of children in kinship care and those children with a social worker.

- Have a good understanding of harmful sexual behaviour

- Have a good understanding of the filtering and monitoring systems and processes in place at our school

- Discuss the local response to sexual violence and sexual harassment with police and local authority children's social care colleagues as appropriate

- Be confident that they know what local specialist support is available to support all children involved (including victims and alleged perpetrators) in sexual violence and sexual harassment, and be confident as to how to access this support

6.3 Local Management Committee

The governing board will:

- Facilitate a whole-school approach to safeguarding, ensuring that safeguarding and child protection are at the forefront of, and underpin, all relevant aspects of process and policy development

- Evaluate and approve this policy at each review, ensuring it complies with the law, and hold the headteacher to account for its implementation

- Be aware of its obligations under the Human Rights Act 1998, the Equality Act 2010 (including the Public Sector Equality Duty), and our school's local multi-agency safeguarding arrangements

- Appoint a link governor to monitor the effectiveness of this policy in conjunction with the full governing board.

- Ensure all employees undergo safeguarding and child protection training, including online safety, and that such training is regularly updated and is in line with advice from the safeguarding partners

- Ensure that the school has appropriate filtering and monitoring systems in place, and review their effectiveness. This includes:
  o Making sure that the leadership team and employees are aware of the provisions in place, and that they understand their expectations, roles and responsibilities around filtering and monitoring as part of safeguarding training
  o Reviewing the DfE's filtering and monitoring standards, and discussing with IT employees and service providers what needs to be done to support the school in meeting these standards

In addition they will ensure:

- The DSL has the appropriate status and authority to carry out their job, including additional time, funding, training, resources and support

- The DSL has lead authority for safeguarding, including online safety and understanding the filtering and monitoring systems and processes in place

- The school has procedures to manage any safeguarding concerns (no matter how small) or allegations that do not meet the harm threshold (low-level concerns) about employee members (including supply staff, volunteers and contractors).

- Online safety is a running and interrelated theme within the whole-school approach to safeguarding and related policies
- That this policy reflects that children with SEND, or certain medical or physical health conditions, can face additional barriers to any abuse or neglect being recognised

Where another organisation is providing services or activities (regardless of whether or not the children who attend these services/activities are children on the school roll) the local governing body will:

- Seek assurance that the organisation has appropriate safeguarding and child protection policies/procedures in place, and inspect them if needed
- Make sure there are arrangements for the organisation to liaise with the school about safeguarding arrangements, where appropriate
- Make sure that safeguarding requirements are a condition of using the school premises, and that any agreement to use the premises would be terminated if the other body fails to comply

All governors will read Keeping Children Safe in Education in its entirety.

6.4 The Headteacher

The headteacher is responsible for the implementation of this policy, including:

- Ensuring that employees (including temporary staff) and volunteers:
  - Are informed of our systems that support safeguarding, including this policy, as part of their induction
  - Understand and follow the procedures included in this policy, particularly those concerning referrals of cases of suspected abuse and neglect
  - Communicating this policy to parents/carers when their child joins the school and via the school website
  - Ensuring there is always adequate cover if the DSL is absent
  - Acting as the 'case manager' in the event of an allegation of abuse made against another employee or volunteer, where appropriate
  - Making decisions regarding all low-level concerns
  - Ensuring the relevant staffing ratios are met, where applicable

7. Information Sharing and Confidentiality

All employees should be aware that:

- Timely information sharing is essential to effective safeguarding
- Fears about sharing information must not be allowed to stand in the way of the need to promote the welfare, and protect the safety, of children
- Employees should never promise a child that they will not tell anyone about a report of abuse, as this may not be in the child's best interests
- The Data Protection Act (DPA) 2018 and the UK GDPR do not prevent, or limit, the sharing of information for the purposes of keeping children safe
- The DPA 2018 allows practitioners to share information without consent if there are concerns about the safeguarding of children and individuals at risk

The DSL should consider that:

- Parents or carers should normally be informed about any concerns for their children (unless this would put the victim at greater risk)

- The basic safeguarding principle is: if a child is at risk of harm, is in immediate danger, or has been harmed, a referral should be made to local authority children's social care

The government's <u>information sharing advice for safeguarding practitioners</u> includes 7 'golden rules' for sharing information, and will support employees who have to make decisions about sharing information

If employees are in any doubt about sharing information, they should always speak to the DSL (or deputy)

8. Identification of those at Increased Risk, or have Additional Safeguarding Needs

Certain groups of children and young people within provisions are more likely to be identified as requiring extra support to meet their safeguarding needs; these could include:

- Disabled children

- Care experienced children

- Young carers

- Children who are bereaved

- Children who are showing signs of being drawn into anti-social or criminal behaviour

- Children with mental health concerns

- Children living in households where there is domestic abuse, mental health concerns and/or substance misuse

- Children who are frequently missing from education care or home

- Children with parents who are currently in prison or affected by parental offending

- Children who at risk of being radicalised or exploited

- Children at risk of modern slavery, trafficking, sexual and/or criminal exploitation

- Children missing education, or persistently absent from school, or not in receipt of full-time education

- Children viewing problematic and/or inappropriate online content (for example, linked to violence), or developing inappropriate relationships online

- Is a privately fostered child

Employees, volunteers and governors must follow the procedures set out below in the event of a safeguarding concern.

9. If a Child is in IMMEDIATE DANGER or is at RISK OF HARM

Make a referral to local authority children's social care and/or the police immediately (see appendix A) if a child is suffering or likely to suffer from harm, or is in immediate danger. Anyone can make a referral. Tell the DSL (see section 6.2) as soon as possible if you make a referral directly. See also <u>When to Call the Police</u>

9.1 Managing Disclosures

If a child discloses a safeguarding issue to you, you should:

- Listen to and believe them

- Allow them time to talk freely and do not ask leading questions

- Stay calm and do not show that you are shocked or upset

- Tell the child they have done the right thing in telling you. Do not tell them they should have told you sooner

- Explain what will happen next and that you will have to pass this information on. Do not promise to keep it a secret

- Write up your conversation as soon as possible in the child's own words and pass it on to the DSL.

- Alternatively, if appropriate, make a referral to local authority children's social care and/or the police directly and tell the DSL as soon as possible that you have done so. Aside from these people, do not disclose the information to anyone else unless told to do so by a relevant authority involved in the safeguarding process

More advice about dealing with disclosures is in appendix D

None of this should stop you from having a 'professional curiosity' and speaking to the DSL if you have concerns about a child.

9.2 Concerns about Female Genital Mutilation (FGM)

Keeping Children Safe in Education explains that FGM comprises "all procedures involving partial or total removal of the external female genitalia, or other injury to the female genital organs".

FGM is illegal in the UK and a form of child abuse with long-lasting, harmful consequences. It is also known as 'female genital cutting', 'circumcision' or 'initiation'.

Possible indicators that a pupil has already been subjected to FGM, and factors that suggest a pupil may be at risk, are set out in appendix F of this policy.

Any teacher who either:

- Is informed by a girl under 18 that an act of FGM has been carried out on her; or

- 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 that the act was necessary for the girl's physical or mental health or for purposes connected with labour or birth

Any other employee who discovers that an act of FGM appears to have been carried out on a pupil under 18 must speak to the DSL and follow safeguarding procedures.

The duty for teachers mentioned above does not apply in cases where a pupil is at risk of FGM or FGM is suspected but is not known to have been carried out. Employees should not examine pupils.

Any employee who suspects a pupil is at risk of FGM or suspects that FGM has been carried out should speak to the DSL and follow local safeguarding procedures.

Phone 101 if a known case (999 if the child is in immediate risk of harm). It is also good practice to inform MASH of these actions.

Mandatory reporting of FGM

10. Concerns about a Child (as opposed to believing a child is suffering or likely to suffer from harm, or is in immediate danger)

Where possible, always speak to the DSL to agree a course of action.

If in exceptional circumstances the DSL is not available, this should not delay appropriate action being taken. Speak to a member of the senior leadership team and/or take advice from local authority children's social care on 0300 456 0108 . You can also seek advice at any time from the NSPCC helpline on 0808 800 5000. Share details of any actions you take with the DSL as soon as practically possible.

Early help assessments

If an early help assessment is appropriate, the DSL will agree who will lead on liaising with other agencies and setting up an inter-agency assessment as appropriate. Employees may be required to support other agencies and professionals in an early help assessment, in some cases acting as the lead practitioner.

The DSL will keep the case under constant review and the school will consider a referral to local authority children's social care if the situation does not seem to be improving. Timelines of interventions will be monitored and reviewed.

Referrals to children's services

If it is appropriate to refer the case to local authority children's social care or the police, the DSL will make the referral or support other employees to do so.

If any employee makes a referral directly they must tell the DSL as soon as possible.

The local authority will make a decision about what course of action to take and will let the person who made the referral know the outcome. The DSL or person who made the referral must follow up with the local authority if this information is not made available, and ensure outcomes are properly recorded.

If the child's situation does not seem to be improving after the referral, the DSL or person who made the referral must follow local escalation procedures to ensure their concerns have been addressed and that the child's situation improves.

Melksham House will use the local safeguarding partnerships' policies on resolution of professional disagreements relating to safeguarding and protection of children in all cases where escalation is required, to achieve the right outcome for children.

Wiltshire Case Resolution Protocol

10.1 Concerns about Extremism and Radicalisation

If a child is not suffering or likely to suffer from harm, or in immediate danger, where possible speak to the DSL first to agree a course of action.

If in exceptional circumstances the DSL is not available, this should not delay appropriate action being taken. Speak to a member of the senior leadership team and/or seek advice from local authority children's social care. Make a referral to local authority children's social care directly, if appropriate (see 'Referral' above). Inform the DSL as practically possible after the referral.

Where there is a concern, the DSL will consider the level of risk and decide which agency to make a referral to. This could include the police or Channel, the government's programme for identifying and supporting individuals at risk of becoming involved with or supporting terrorism, or the local authority children's social care team.

The DfE also has a dedicated telephone helpline, 020 7340 7264, which school employees and governors can call to raise concerns about extremism with respect to a pupil. You can also email counter.extremism@education.gov.uk. Note that this is not for use in emergency situations.

In an emergency, call 999 or the confidential anti-terrorist hotline on 0800 789 321 if you:

- Think someone is in immediate danger
- Think someone may be planning to travel to join an extremist group
- See or hear something that may be terrorist-related

10.2 Concerns about Mental Health

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.

Employees will be alert to behavioural signs that suggest a child may be experiencing a mental health problem or be at risk of developing one.

If you have a mental health concern about a child speak to the DSL to agree a course of action.

Refer to the Department for Education guidance on [mental health and behaviour in schools](#) for more information.

10.2   Concerns about an Employee, Supply Teacher, Volunteer or Contractor

All employees should report any concerns relating to another employee to the [Head of Provision /Headteacher] without delay, the Headteacher will report all allegations that meet the harms threshold to the LADO within 24 hours of the allegation having been received.

Where there are concerns/allegations about the Headteacher, this should be referred to the Trust CEO.

All allegations will be managed in line with the statutory guidance in KCSIE 2024 and the trust whistleblowing procedure.

Any allegation relating to an incident where an individual or organisation was using the school premises for running an activity for children, the school safeguarding policies and procedures will be followed, informing the LADO, as you would with any safeguarding allegation.

Where an allegation is of a 'low level concern' and it is felt it does not meet any of the harms threshold then Melksham House will ensure KCSIE 2024 processes are followed.

Advice will be sought from the LADO in any instances where it is unsure if the harms threshold has been met.

Where appropriate, the school will inform Ofsted of the allegation and actions taken, within the necessary timescale

Where employees feel unable to raise an issue with the Head of Provision /CEO/Trust Safeguarding Lead/Directors of Education or LGC Chair or feel their genuine safeguarding concerns are not being addressed NSPCC whistleblowing advice line is available.

Employees can call 08000 28 0285 – 8:00 AM to 8:00 PM, Monday to Friday and email: help@nspcc.org.uk. Alternatively, employees can write to: National Society for the Prevention of Cruelty to Children (NSPCC), Weston House, 42 Curtain Road, London EC2A 3NH

10.3   Allegations of Abuse Made Against other Pupils

All employees should recognise that children are capable of abusing their peers. Abuse will never be tolerated or passed off as "banter", "just having a laugh" or "part of growing up", as this can lead to a culture of unacceptable behaviours and an unsafe environment for pupils.

Employees also recognise the gendered nature of child-on-child abuse. However, all child-on child abuse is unacceptable and will be taken seriously.

Most cases of pupils hurting other pupils will be dealt with under the provision's behaviour policy, but this child protection and safeguarding policy will apply to any allegations that raise safeguarding concerns. This might include where the alleged behaviour:

- Is serious, and potentially a criminal offence

- Could put pupils in the school at risk

- Is violent

- Involves pupils being forced to use drugs or alcohol

- Involves sexual exploitation, sexual abuse or sexual harassment, such as indecent exposure, sexual assault, upskirting or sexually inappropriate pictures or videos (including the sharing of nudes and semi-nudes)

See **appendix F** for more information about child-on-child abuse.

Procedures for dealing with allegations of child-on-child abuse

If a pupil makes an allegation of abuse against another pupil:

- Employees must record the allegation and tell the DSL, but do not investigate it

- The DSL will contact the local authority children's social care team and follow its advice, as well as the police if the allegation involves a potential criminal offence

- The DSL will put a risk assessment and support plan into place for all children involved (including the victim(s), the child(ren) against whom the allegation has been made and any others affected) with a named person they can talk to if needed. This will include considering school transport as a potentially vulnerable place for a victim or alleged perpetrator(s)

- The DSL will contact external agencies, if appropriate

If the incident is a criminal offence and there are delays in the criminal process, the DSL will work closely with the police (and other agencies as required) while protecting children and/or taking any disciplinary measures against the alleged perpetrator.

Creating a supportive environment in school and minimising the risk of child-on-child abuse

Melksham House recognise the importance of taking proactive action to minimise the risk of child-on-child abuse, and of creating a supportive environment where victims feel confident in reporting incidents.

To achieve this, we will:

- Challenge any form of derogatory or sexualised language or inappropriate behaviour between peers, including requesting or sending sexual images

   o Be vigilant to issues that particularly affect different genders – for example, sexualised or aggressive touching or grabbing towards female pupils, and initiation or hazing type violence with respect to boys

   o Ensure our curriculum helps to educate pupils about appropriate behaviour and consent

   o Ensure pupils are able to easily and confidently report abuse using our reporting systems (as described in section 10.6 below)

   o Ensure employees reassure victims that they are being taken seriously

   o Be alert to reports of sexual violence and/or harassment that may point to environmental or systemic problems that could be addressed by updating policies, processes and the curriculum, or could reflect wider issues in the local area that should be shared with safeguarding partners

   o Support children who have witnessed sexual violence, especially rape or assault by penetration. We will do all we can to make sure the victim, alleged perpetrator(s) and any witnesses are not bullied or harassed

   o Consider intra-familial harms and any necessary support for siblings following a report of sexual violence and/or harassment

The DSL will take the lead role in any disciplining of the alleged perpetrator(s). Disciplinary action can be taken while other investigations are going on, e.g. by the police but will always consider how:

- Taking action would prejudice an investigation and/or subsequent prosecution – we will liaise with the police and/or local authority children's social care to determine this

- There are circumstances that make it unreasonable or irrational for us to reach our own view about what happened while an independent investigation is ongoing

10.4 Sharing of Nudes and Semi-nudes ('sexting')

If any employees are made aware of an incident involving the consensual or non-consensual sharing of nude or semi-nude images/videos, including pseudo-images, which are computer-generated images that otherwise appear to be a photograph or video (also known as 'sexting' or 'youth produced sexual imagery'), it must reported to the DSL immediately.

Employees must not:

- View, copy, print, share, store or save the imagery, or ask a pupil to share or download it (if it is already viewed the imagery by accident, this must be reported to the DSL)

- Delete the imagery or ask the pupil to delete it

- Ask the pupil(s) who are involved in the incident to disclose information regarding the imagery (this is the DSL's responsibility)

- Share information about the incident with other employees, the pupil(s) it involves or their, or other, parents and/or carers

- Say or do anything to blame or shame any young people involved

Employees should reassure children that they will receive support and help from the DSL.

10.5 Reporting Systems

Where there is a safeguarding concern, employees will take the child's wishes and feelings into account when determining what action to take and what services to provide.

Melksham House recognise the importance of ensuring pupils feel safe and comfortable to come forward and report any concerns and/or allegations.

To achieve this, there is:

- Systems in place for pupils to confidently report abuse

- Systems are well promoted, easily understood and easily accessible for pupils

- Messages to pupils that their concerns will be taken seriously, and that they can safely express their views and give feedback

- Concerns and referrals are recorded on CPOMs electronic platform. All records will 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

11. Online Safety and the use of Mobile Technology

Melksham House recognise the importance of safeguarding children from potentially harmful and inappropriate online material, and we understand that technology is a significant component in many safeguarding and wellbeing issues.

To address this, our school aims to:

- Have robust processes (including filtering and monitoring systems) in place to ensure the online safety of pupils, employees, volunteers and governors

- Protect and educate the whole school community in its safe and responsible use of technology, including mobile and smart technology (which we refer to as 'mobile phones')

- Set clear guidelines for the use of mobile phones for the whole school community

- Establish clear mechanisms to identify, intervene in and escalate any incidents or concerns, where appropriate

The 4 key categories of risk

Online safety is based on addressing the following categories of risk:

- Content – being exposed to illegal, inappropriate or harmful content, such as pornography, fake news, racism, misogyny, self-harm, suicide, antisemitism, radicalisation and extremism

- Contact – being subjected to harmful online interaction with other users, such as peer-to-peer pressure, commercial advertising and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes

- Conduct – personal online behaviour that increases the likelihood of, or causes, harm, such as making, sending and receiving explicit images (e.g. consensual and non-consensual sharing of nudes and semi-nudes and/or pornography), sharing other explicit images and online bullying; and

- Commerce – risks such as online gambling, inappropriate advertising, phishing and/or financial scams

To meet our aims and address the risks above Melksham House

- Educates pupils about online safety as part of our curriculum

- Trains employees, on safe internet use and online safeguarding issues including cyber-bullying, the risks of online radicalisation, and the expectations, roles and responsibilities around filtering and monitoring. All employees receive refresher training as required and at least once each academic year

- Educate parents/carers about online safety

- Make sure employees are aware of any restrictions placed on them with regards to the use of their mobile phone and cameras as outlines in the Employee Acceptable Use policy

- Put in place robust filtering and monitoring systems to limit children's exposure to the 4 key categories of risk (described above) from the school's/colleges IT systems

- Carry out an annual review of our approach to online safety, supported by an annual risk assessment that considers and reflects the risks faced by our school community

12. Remote Learning

At Melksham House, the safety and wellbeing of our students remains our highest priority, including during periods of remote learning. We are committed to ensuring that all online learning activities are delivered in a safe, supportive, and inclusive environment.

All remote learning provision will adhere to our existing safeguarding and child protection policies. Staff engaging in online teaching will use school-approved platforms and follow appropriate professional standards, including maintaining clear boundaries and ensuring that communication remains within agreed channels.

Parents and carers are encouraged to support their child's participation in remote learning and to report any concerns to the Designated Safeguarding Lead (DSL) without delay. Students are reminded to behave respectfully online and to speak to a trusted adult if they feel uncomfortable or unsafe.

Our approach to safeguarding during remote learning is regularly reviewed to ensure best practice and compliance with statutory guidance, including Keeping Children Safe in Education (KCSIE) and guidance from the Department for Education.

13. Communication with Parents or Carers

Where appropriate, all concerns about a child will be discussed with the child's parents or carers. The DSL will normally do this in the event of a suspected concern or disclosure.

Other employees will only talk to parents or carers about any such concerns following consultation with the DSL.

If it is thought that notifying the parents or carers would increase the risk to the child, the local authority children's social care team will be contacted for advice.

14. Children with Special Educational Needs, Disabilities or Health Issues

Children with SEND or certain health conditions can face additional safeguarding challenges. Children with disabilities are more likely to be abused than their peers. Additional barriers can exist when recognising abuse, exploitation and neglect in this group, including:

- Assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's condition without further exploration

- Children being more prone to peer group isolation or bullying (including prejudice-based bullying) than other pupils

- The potential for children with SEN, disabilities or certain health conditions being disproportionally 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 schools or colleges or the consequences of doing so

15. Children with a Social Worker

Children may need a social worker due to safeguarding or welfare needs. A child's experiences of adversity and trauma can leave them vulnerable to further harm as well as potentially creating barriers to attendance, learning, behaviour and mental health.

The DSL and all employees will work with and support social workers to help protect vulnerable children.

Where we are aware that a pupil has a social worker, the DSL will always consider this fact to ensure any decisions are made in the best interests of the pupil's safety, welfare and educational outcomes. For example, it will inform decisions about:

- Responding to unauthorised absence or missing education where there are known safeguarding risks

- The provision of pastoral and/or academic support

16. Looked-after and Previously Looked-after Children (CLA, PCLA)

Melksham House will ensure that employees have the skills, knowledge and understanding to keep looked-after children and previously looked-after children safe. In particular, we will ensure that:

- Appropriate employees have relevant information about children's looked after legal status, contact arrangements with birth parents or those with parental responsibility, and care arrangements

- The DSL has details of children's social workers and relevant virtual school heads

- There is a designated teacher, Stephanie Berry, who is responsible for promoting the educational achievement of looked-after children and previously looked-after children in line with statutory guidance.
- The designated teacher is appropriately trained and has the relevant qualifications and experience to perform the role.

As part of their role, the designated teacher will:

- Work closely with the DSL to ensure that any safeguarding concerns regarding looked-after and previously looked-after children are quickly and effectively responded to

- Work with virtual school heads to promote the educational achievement of looked-after and previously looked-after children, including discussing how pupil premium plus funding can be best used to support looked-after children and meet the needs identified in their personal education plans

17. Pupils who are Lesbian, Gay, Bisexual or Gender Questioning

Melksham House recognises that pupils who are (or who are perceived to be) lesbian, gay, bisexual or gender questioning (LGBTQ+) can be targeted by other children

We also recognise that LGBTQ+ children are more likely to experience poor mental health. Any concerns should be reported to the DSL.

When families/carers are making decisions about support for gender questioning pupils, they should be encouraged to seek clinical help and advice. This should be done as early as possible when supporting pre-pubertal children.

When supporting a gender questioning pupil, we will take a cautious approach as there are still unknowns around the impact of social transition, and a pupil may have wider vulnerability, such as complex mental health and psychosocial needs

We will also consider the broad range of their individual needs, in partnership with their parents/carers (other than in rare circumstances where involving parents/carers would constitute a significant risk of harm to the pupil). We will also include any clinical advice that is available and consider 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. We therefore aim to reduce the additional barriers faced and create a culture where pupils can speak out or share their concerns with employees.

18. Record Keeping

Melksham House will hold records in line with the trust data retention schedule.

All safeguarding concerns, discussions, decisions made and the rationale for those decisions, must be recorded in writing. This should include instances where referrals were or were not made to another agency such as local authority children's social care or the Prevent programme, etc. If you are in any doubt about whether to record something, discuss it with the DSL.

Records will 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

Concerns and referrals are recorded on CPOMS electronic platform.

Confidential information and records will be held securely and only available to those who have a right or professional need to see them.

Safeguarding records relating to individual children will be retained for a reasonable period of time after they have left the provision.

If a child for whom the school has, or has had, safeguarding concerns moves to another school, the DSL will ensure that their file is forwarded as soon as possible, securely, and separately from the main pupil file.

To allow the new school/college to have support in place when the child arrives, this should be within:

- **5 days** for an in-year transfer, or within
- **The first 5 days** of the start of a new term

In addition, if the concerns are significant or complex, and/or social services are involved, the DSL will speak to the DSL of the receiving school and provide information to enable them to have time to make any necessary preparations to ensure the safety of the child.

The DSL will ensure this file is transferred within 5 days for an in-year transfer and within 5 days of the start of a new term.

Melksham House's DSL will also consider if it would be appropriate to share any additional information with the new education setting in advance of a child leaving to help them put in place the right support to safeguard this child and to help the child thrive in the provision.

The provision will retain records for pupils where there is an existing safeguarding /child protection file or who have been withdrawn to be electively educated at home. These will be stored confidentially until the child's 25th birthday and then disposed of in a confidential and secure manner.

19. Training

In addition to this policy, **all** employees working directly with children will read and understand Part One and Annex B of **Keeping Children Safe in Education (KCSIE) 2024.**

All employees will receive appropriate safeguarding and child protection training on induction this will be refreshed annually taking into account current key learning points and trends from serious case reviews and local current and emerging issues and trends. In addition, **all** employees will receive safeguarding and child protection updates (for example, via email, e-bulletins and employee meetings), as required, but at least annually, to provide them with relevant skills and knowledge to safeguard children effectively

- Whistle blowing procedures will be covered in our whole employee training so that employees know what to do if they have concerns relating to safeguarding practice within the school

- The DSL and any deputies will undergo training to provide them with the knowledge and skills required to carry out the role. The training will be updated every two years. Deputies will be trained to the same level as the DSL In addition, they will update their knowledge and skills at regular intervals and at least annually

- The Trust through the Headteacher will ensure that all employees undergo safeguarding and child protection training at induction. The training will be regularly updated. Induction and training will be in line with advice from the local safeguarding partnerships

- Melksham House will ensure that at least one person on any appointment panel will have undertaken safer recruitment training

- The Designated Teacher appointed to promote the educational achievement of children in care will undergo appropriate training

- The DSL will undertake relevant PREVENT awareness, PREVENT referral and in turn will provide training, advice and support to employees on protecting children from the risk of radicalisation. Employees will complete appropriate training, this will include Prevent training using quality assured provision such as the [Government Online Prevent E-training learning package](#).

- Online and internet safety training for employees will be integrated, aligned and considered as part of the overarching safeguarding approach

- All governors receive training about safeguarding and child protection (including online safety) at induction, which is regularly updated.

20. Safer Recruitment and Selection

Melksham House has a culture that safeguards and promotes the welfare of children in our school. At Melksham House we have robust recruitment procedures that deter or prevent people who are unsuitable to work with children from applying or securing employment with us, this includes volunteers who may work in our provision.

Melksham House pays full regard to the safer recruitment practices detailed in 'Keeping Children Safe in Education' (2024) including:

- All our advertisements for positions in our provision contain safeguarding statements,

- Advert, job description, person specifications and application forms, include safeguarding information relating to regulated activity,

- The safeguarding policy and associated processes will be provided within the applicant pack.

- All applications including shortlisting will follow safer recruitment procedures and guidance within KCSIE 2024, which includes pre appointment vetting checks.

- As part of the shortlisting process, Melksham House will consider carrying out an online search as part of our due diligence on the shortlisted candidates. Melksham House will inform shortlisted candidates that online searches may be undertaken as part of due diligence checks.

- References will always be obtained, scrutinised and concerns resolved satisfactorily before appointment is confirmed.

All recruitment materials will include reference to Melksham House commitment to safeguarding and promoting the wellbeing of pupils.

See Brunel Safer Recruitment Policy

21. Managing Allegations made Against Employees or Volunteers

All employees should report any concerns relating to another employee to the Head of Provision /Headteacher without delay, the Headteacher will report all allegations that meet the harms threshold to the LADO within 24 hours of the allegation having been received.

Where there are concerns/allegations about the Headteacher, this should be referred to the Trust CEO. All allegations will be managed in line with the statutory guidance in KCSIE 2024

Where an allegation is of a 'low level concern' and it is felt it does not meet any of the harms threshold then Melksham House will ensure KCSIE 2024 processes are followed.
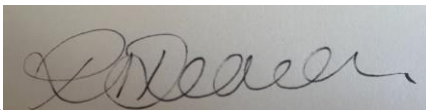
Advice will be sought from the LADO in any instances where it is unsure if the harms threshold has been met.

Where employees feel unable to raise an issue with the Head of Provision /CEO/Directors of Education/Trust Safeguarding Lead or LGC Chair or feel their genuine safeguarding concerns are not being addressed NSPCC whistleblowing advice line is available.

Employees can call 08000 28 0285 – 8:00 AM to 8:00 PM, Monday to Friday and email: help@nspcc.org.uk. Alternatively, employees can write to: National Society for the Prevention of Cruelty to Children (NSPCC), Weston House, 42 Curtain Road, London EC2A 3NH.

See Managing Allegations and Low Level Concerns Policy

This policy is adopted by Melksham House (part of the Brunel Education) and will be reviewed every year or earlier if change to legislation.

Signed …………… .... Head of Provision

Signed ……………………………… Chair of BAT Board

Date …………………………16.7.24……

Appendix A: Types of Abuse

Abuse, including neglect, and safeguarding issues are rarely standalone events that can be covered by 1 definition or label. In most cases, multiple issues will overlap.

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

Emotional abuse is the persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.

Emotional abuse may involve:

- Conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person

- Not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate

- Age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability, as well as overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction

- Seeing or hearing the ill-treatment of another

- Serious bullying (including cyber-bullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children

Sexual abuse involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve:

- Physical contact, including assault by penetration (for example, rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing

- Non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (including via the internet)

Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.

Neglect is the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy as a result of maternal substance abuse.

Once a child is born, neglect may involve a parent or carer failing to:

- Provide adequate food, clothing and shelter (including exclusion from home or abandonment)

- Protect a child from physical and emotional harm or danger

- Ensure adequate supervision (including the use of inadequate care-givers)

- Ensure access to appropriate medical care or treatment

It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

Appendix B: If you have Concerns about a Child

If the child is at immediate risk call the Police on 999 (Police must be informed of all sexual assault cases)	To make an urgent referral to children's social care 0300 456 0108 out of hours 0300 456 0100

To make a Prevent referral use the Prevent referral form and send to PreventReferrals@wiltshire.police.uk
For questions contact 01278 647466

It may be necessary to also refer to social care

Sharing / recording concerns An individual with concerns about a child takes immediate action by following the school policy and informs a designated member of the safeguarding team. The DSL will consider the information, in the context of any other concerns / disclosures, and decide on next steps. Parents / carers should be involved at this stage, **unless to do so may place the child at increased risk of significant harm, in which case advice should be sought from social care.**

No referral to children's social care Actions will be agreed to monitor the child and support the child / family where needed. An Early Help Assessment should also be considered.	If concerns continue / escalate, the decision will be reviewed to decide if a referral is necessary	DSL / DDSL make referral to social care (and call the police if necessary)

Referral to children's social care Urgent, possible chid protection concerns should always be made by telephone 0300 456 0108**If a child discloses physical or sexual abuse, where the alleged abuser is either a family member or someone resident within the household, the school must consult the social care before informing parent(s).**

Social Care Considerations: When social care receive a referral the decision, making process starts. Informed decisions are made in line with this threshold guidance, they will inform referrers of their decision within 3 working days.

Assessment Child in need of immediate protection: Appropriate emergency action taken by police, NSPCC or social worker. Section 47 assessment – child identified as at risk of significant harm, possible child protection plan Section 17 assessment – child identified as in need and appropriate support identified. All schools and colleges should allow local authorities access to facilitate arrangements.	**No Assessment** If the information supplied in the referral does not meet the threshold, an early help assessment should be started and/or onward referral to other specialist or universal services; **children's social care will feedback to the referrer.** For any concerns that Early Help is not working and things are not getting better for the child, discuss this with the child, parents/carers and refer to children's social care

At all stages, staff should consider the circumstances and re-refer if necessary. The emphasis is on ensuring that the child's best interests come first and where appropriate improve.

The multi-agency referral form IFD referral form should also be completed for all referrals to children's services

Appendix C: If you have Concerns about an Adult

All employees, and visitors, working in our provision understand and adhere to a employee code of conduct.

> If you have a concern about an adult, raise your concerns immediately with the Headteacher, who will refer to the LADO (Local Area Designated Officer).
>
> The Name of the Headteacher is Beckie Deacon.
>
> If the Headteacher is not available, contact the Trust Safeguarding Lead and Head of People Services at the Trust.
>
> If your concern is about the Headteacher contact the CEO.
>
> Jackie Fieldwick jfieldwick@brunel.org.uk 07827 296667

> LADO: 0300 456 0108
> LADO@wiltshire.gov.uk

> NSPCC 0800 028 0285
> help@nspcc.org.uk

> For help and advice or if a member of staff feels their genuine concerns are not being addressed, general guidance can be found at:
>
> Advice on whistleblowing https://www.gov.uk/whistleblowing
>
> 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.

Appendix D: Dealing with a Disclosure of Abuse

When a child tells me about abuse s/he has suffered, what must I Remember?

- Stay calm.

- Do not communicate shock, anger or embarrassment.

- Reassure the child. Tell her/him you are pleased that s/he is speaking to you.

- Never promise confidentiality. Assure her/him that you will try to help but let the child know that you may have to tell other people in order to do this. State who this will be and why.

- Encourage the child to talk but do not ask "leading questions" or press for information.

- Listen and remember.

- Check that you have understood correctly what the child is trying to tell you.

- Praise the child for telling you. Communicate that s/he has a right to be safe and protected.

- It is inappropriate to make any comments about the alleged offender.

- Be aware that the child may retract what s/he has told you. It is essential to record all you have heard.

- At the end of the conversation, tell the child again who you are going to tell and why that person or those people need to know.

- As soon as you can afterwards, make a detailed record of the conversation using the child's own language. Include any questions you may have asked. Do not add any opinions or interpretations. Add your name, date and signature to this record. Alter this to reflect your CP recording system, ensure any handwritten notes are given to the DSL for filing

- Pass this record on as soon as possible, immediately if significant risk is identified, to the DSL

It is not education employee's role to seek disclosures or investigate. Their role is to observe that something may be wrong, ask about it, listen, be available and ensure the child is supported through any disclosure process.

Appendix E: Local Contact Numbers

For Provision use only

PROVISION		
DSL	**Steph Berry**	Sberry@melkshamhouse.uk 07962845814
DDSL	**Ash Wadland (Assistant Headteacher/SENDCO)**	awadland@melkshamhouse.uk
	Beckie Deacon (Headteacher)	rdeacon@melkshamhouse.uk 07425384544

WILTSHIRE	
Integrated Front Door	Telephone 0300 456 0108 integratedfrontdoor@wiltshire.gov.uk Out of Hours 0300 456 0100.
LADO	LADO@wiltshire.gov.uk
Safeguarding Effectiveness	sea@wiltshire.gov.uk
PREVENT	Local Prevent team 01278 647466 PreventReferrals@wiltshire.police.uk
Adult Social Care	0300 456 0111

Appendix F: Specific Safeguarding Issues

Assessing adult-involved nude and semi-nude sharing incidents

This information is based on annex A of the UK Council of Internet Safety's <u>advice for education settings</u>.

All adult-involved nude and semi-nude image sharing incidents are child sexual abuse offences and must immediately be referred to police/social care. However, as adult-involved incidents can present as child-on-child nude/semi-nude sharing, it may be difficult to initially assess adult involvement.

There are two types of common adult-involved incidents: sexually motivated incidents and financially motivated incidents.

Sexually motivated incidents

In this type of incident, an adult offender obtains nude and semi-nudes directly from a child or young person using online platforms.

To make initial contact, the offender may present as themselves or use a false identity on the platform, sometimes posing as a child or young person to encourage a response and build trust. The offender often grooms the child or young person on social media, in chatrooms or on gaming platforms, and may then move the conversation to a private messaging app or an end-to-end encrypted (E2EE) environment where a request for a nude or semi-nude is made. To encourage the child or young person to create and share nude or semi-nude, the offender may share pornography or child sexual abuse material (images of other young people), including AI-generated material.

Once a child or young person shares a nude or semi-nude, an offender may blackmail the child or young person into sending more images by threatening to release them online and/or send them to friends and family.

Potential signs of adult-involved grooming and coercion can include the child or young person being:

- Contacted by an online account that they do not know but appears to be another child or young person
- Quickly engaged in sexually explicit communications, which may include the offender sharing unsolicited images
- Moved from a public to a private/E2EE platform
- Coerced/pressured into doing sexual things, including creating nudes and semi-nudes
- Offered something of value such as money or gaming credits
- Threatened or blackmailed into carrying out further sexual activity. This may follow the child or young person initially sharing the image or the offender sharing a digitally manipulated image of the child or young person to extort 'real' images

Financially motivated incidents

Financially motivated sexual extortion (often known as 'sextortion') is an adult-involved incident in which an adult offender (or offenders) threatens to release nudes or semi-nudes of a child or young person unless they pay money or do something else to benefit them.

Unlike other adult-involved incidents, financially motivated sexual extortion is usually carried out by offenders working in sophisticated organised crime groups (OCGs) overseas and are only motivated by profit. Adults are usually targeted by these groups too.

Offenders will often use a false identity, sometimes posing as a child or young person, or hack another young person's account to make initial contact. To financially blackmail the child or young person, they may:

- Groom or coerce the child or young person into sending nudes or semi-nudes and financially blackmail them
- Use images that have been stolen from the child or young person taken through hacking their account

- Use digitally manipulated images, including AI-generated images, of the child or young person

The offender may demand payment or the use of the victim's bank account for the purposes of money laundering.

Potential signs of adult-involved financially motivated sexual extortion can include the child or young person being:

- Contacted by an online account that they do not know but appears to be another child or young person. They may be contacted by a hacked account of a child or young person
- Quickly engaged in sexually explicit communications which may include the offender sharing an image first
- Moved from a public to a private/E2EE platform
- Pressured into taking nudes or semi-nudes
- Told they have been hacked and they have access to their images, personal information and contacts
- Blackmailed into sending money or sharing bank account details after sharing an image or the offender sharing hacked or digitally manipulated images of the child or young person

Children who are absent from education

A child being absent from education, particularly repeatedly, can be a warning sign of a range of safeguarding issues. This might include abuse or neglect, such as sexual abuse or exploitation or child criminal exploitation, or issues such as mental health problems, substance abuse, radicalisation, FGM or forced marriage.

There are many circumstances where a child may be absent or become missing from education, but some children are particularly at risk. These include children who:

- Are at risk of harm or neglect
- Are at risk of forced marriage or FGM
- Come from Gypsy, Roma, or Traveller families
- Come from the families of service personnel
- Go missing or run away from home or care
- Are supervised by the youth justice system
- Cease to attend a school
- Come from new migrant families

We will follow our procedures for unauthorised absence and for dealing with children who are absent from education, particularly on repeat occasions, to help identify the risk of abuse, exploitation and neglect, including sexual exploitation, and to help prevent the risks of going missing in future. This includes informing the local authority if a child leaves the school without a new school being named, and adhering to requirements with respect to sharing information with the local authority, when applicable, when removing a child's name from the admission register at non-standard transition points.

Employees will be trained in signs to look out for and the individual triggers to be aware of when considering the risks of potential safeguarding concerns which may be related to being absent, such as travelling to conflict zones, FGM and forced marriage.

If an employee suspects that a child is suffering from harm or neglect, we will follow local child protection procedures, including with respect to making reasonable enquiries. We will make an immediate referral to the local authority children's social care team, and the police, if the child is suffering or likely to suffer from harm, or in immediate danger.

Child criminal exploitation

Child criminal exploitation (CCE) is a form of abuse where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child into criminal activity. It may involve an exchange for something the victim needs or wants, and/or for the financial or other advantage of the perpetrator or facilitator, and/or through violence or the threat of violence.

The abuse can be perpetrated by males or females, and children or adults. It can be a one-off occurrence or a series of incidents over time, and range from opportunistic to complex organised abuse.

The victim can be exploited even when the activity appears to be consensual. It does not always involve physical contact and can happen online. For example, young people may be forced to work in cannabis factories, coerced into moving drugs or money across the country (county lines), forced to shoplift or pickpocket, or to threaten other young people.

Indicators of CCE can include a child:

. Appearing with unexplained gifts or new possessions

. Associating with other young people involved in exploitation

. Suffering from changes in emotional wellbeing

. Misusing drugs and alcohol

. Going missing for periods of time or regularly coming home late

. Regularly missing school or education

. Not taking part in education

If an employee suspects CCE, they will discuss this with the DSL. The DSL will trigger the local safeguarding procedures, including a referral to the local authority's children's social care team and the police, if appropriate.

Child sexual exploitation

Child sexual exploitation (CSE) is a form of child sexual abuse where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into sexual activity. It may involve an exchange for something the victim needs or wants and/or for the financial advantage or increased status of the perpetrator or facilitator. It may, or may not, be accompanied by violence or threats of violence.

The abuse can be perpetrated by males or females, and children or adults. It can be a one-off occurrence or a series of incidents over time, and range from opportunistic to complex organised abuse.

The victim can be exploited even when the activity appears to be consensual. Children or young people who are being sexually exploited may not understand that they are being abused. They often trust their abuser and may be tricked into believing they are in a loving, consensual relationship.

CSE can include both physical contact (penetrative and non-penetrative acts) and non-contact sexual activity. It can also happen online. For example, young people may be persuaded or forced to share sexually explicit images of themselves, have sexual conversations by text, or take part in sexual activities using a webcam. CSE may also occur without the victim's immediate knowledge, for example through others copying videos or images.

In addition to the CCE indicators above, indicators of CSE can include a child:

. Having an older boyfriend or girlfriend

. Suffering from sexually transmitted infections or becoming pregnant

If an employee suspects CSE, they will discuss this with the DSL. The DSL will trigger the local safeguarding procedures, including a referral to the local authority's children's social care team and the police, if appropriate.

Child-on-child abuse

Child-on-child abuse is when children abuse other children. This type of abuse can take place inside and outside of school. It can also take place both face-to-face and online, and can occur simultaneously between the 2.

Our school has a zero-tolerance approach to sexual violence and sexual harassment. We recognise that even if there are there no reports, that doesn't mean that this kind of abuse isn't happening.

Child-on-child abuse is most likely to include, but may not be limited to:

- Bullying (including cyber-bullying, prejudice-based and discriminatory bullying)

- Abuse in intimate personal relationships between children (this is sometimes known as 'teenage relationship abuse')

- Physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (this may include an online element which facilitates, threatens and/or encourages physical abuse)

- Sexual violence, such as rape, assault by penetration and sexual assault (this may include an online element which facilitates, threatens and/or encourages sexual violence)

- Sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment, which may be standalone or part of a broader pattern of abuse

- Causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party

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

- Upskirting, which typically involves taking a picture under a person's clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm

- Initiation/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)

Where children abuse their peers online, this can take the form of, for example, abusive, harassing, and misogynistic messages; the non-consensual sharing of indecent images, especially around chat groups; and the sharing of abusive images and pornography, to those who don't want to receive such content.

If employees have any concerns about child-on-child abuse, or a child makes a report to them, they will follow the procedures set out in section 10 of this policy, as appropriate. In particular, section 10.4 set out more detail about our school's approach to this type of abuse.

When considering instances of harmful sexual behaviour between children, we will consider their ages and stages of development. We recognise that children displaying harmful sexual behaviour have often experienced their own abuse and trauma, and will offer them appropriate support.

Domestic abuse

Children can witness and be adversely affected by domestic abuse and/or violence at home where it occurs between family members. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result.

Types of domestic abuse include intimate partner violence, abuse by family members, teenage relationship abuse (abuse in intimate personal relationships between children) and child/adolescent to parent violence and abuse. It can be physical, sexual, financial, psychological or emotional. It can also include ill treatment that isn't physical, as well as witnessing the ill treatment of others. This can be particularly relevant, for example, in relation to the impact on children of all forms of domestic abuse, including where they see, hear or experience its effects.

Anyone can be a victim of domestic abuse, regardless of gender, age, ethnicity, socioeconomic status, sexuality or background, and domestic abuse can take place inside or outside of the home. Children who witness domestic abuse are also victims.

Older children may also experience and/or be the perpetrators of domestic abuse and/or violence in their own personal relationships. This can include sexual harassment.

Exposure to domestic abuse and/or violence can have a serious, long-lasting emotional and psychological impact on children and affect their health, wellbeing, development and ability to learn.

If police are called to an incident of domestic abuse and any children in the household have experienced the incident, the police will inform the key adult in school (usually the designated safeguarding lead) before the child or children arrive at school the following day.

The DSL will provide support according to the child's needs and update records about their circumstances.

Homelessness

Being homeless or being at risk of becoming homeless presents a real risk to a child's welfare.

The DSL will be aware of contact details and referral routes in to the local housing authority so they can raise/progress concerns at the earliest opportunity (where appropriate and in accordance with local procedures).

Where a child has been harmed or is at risk of harm, the DSL will also make a referral to local authority children's social care.

So-called 'honour-based' abuse (including FGM and forced marriage)

So-called 'honour-based' abuse (HBA) encompasses incidents or crimes committed to protect or defend the honour of the family and/or community, including FGM, forced marriage, and practices such as breast ironing.

Abuse committed in this context often involves a wider network of family or community pressure and can include multiple perpetrators.

All forms of HBA are abuse and will be handled and escalated as such. All employees will be alert to the possibility of a child being at risk of HBA or already having suffered it. If employees have a concern, they will speak to the DSL, who will activate local safeguarding procedures.

FGM

The DSL will make sure that employees have access to appropriate training to equip them to be alert to children affected by FGM or at risk of FGM.

Section 9.2 of this policy sets out the procedures to be followed if an employee discovers that an act of FGM appears to have been carried out or suspects that a pupil is at risk of FGM.

Indicators that FGM has already occurred include:

. A pupil confiding in a professional that FGM has taken place

. A mother/family member disclosing that FGM has been carried out

. A family/pupil already being known to social services in relation to other safeguarding issues

. A girl:

- Having difficulty walking, sitting or standing, or looking uncomfortable

- Finding it hard to sit still for long periods of time (where this was not a problem previously)

- Spending longer than normal in the bathroom or toilet due to difficulties urinating

- Having frequent urinary, menstrual or stomach problems

- Avoiding physical exercise or missing PE

- Being repeatedly absent from school, or absent for a prolonged period

- Demonstrating increased emotional and psychological needs – for example, withdrawal or depression, or significant change in behaviour

- Being reluctant to undergo any medical examinations

- Asking for help, but not being explicit about the problem

- Talking about pain or discomfort between her legs

Potential signs that a pupil may be at risk of FGM include:

. The girl's family having a history of practising FGM (this is the biggest risk factor to consider)

. FGM being known to be practised in the girl's community or country of origin

. A parent or family member expressing concern that FGM may be carried out

. A family not engaging with professionals (health, education or other) or already being known to social care in relation to other safeguarding issues

. A girl:

- Having a mother, older sibling or cousin who has undergone FGM

- Having limited level of integration within UK society

- Confiding to a professional that she is to have a "special procedure" or to attend a special occasion to "become a woman"

- Talking about a long holiday to her country of origin or another country where the practice is prevalent, or parents/carers stating that they or a relative will take the girl out of the country for a prolonged period

- Requesting help from a teacher or another adult because she is aware or suspects that she is at immediate risk of FGM

- Talking about FGM in conversation – for example, a girl may tell other children about it (although it is important to take into account the context of the discussion)

- Being unexpectedly absent from school

- Having sections missing from her 'red book' (child health record) and/or attending a travel clinic or equivalent for vaccinations/anti-malarial medication

The above indicators and risk factors are not intended to be exhaustive.

Forced marriage

Forcing a person into marriage is a crime. A forced marriage is one entered into without the full and free consent of 1 or both parties and where violence, threats, or any other form of coercion is used to cause a person to enter into a marriage. Threats can be physical or emotional and psychological.

It is also illegal to cause a child under the age of 18 to marry, even if violence, threats or coercion are not involved.

Employees will receive training around forced marriage and the presenting symptoms. We are aware of the '1 chance' rule, i.e. we may only have 1 chance to speak to the potential victim and only 1 chance to save them.

If an employee suspects that a pupil is being forced into marriage, they will speak to the pupil about their concerns in a secure and private place. They will then report this to the DSL.

The DSL will:

. Speak to the pupil about the concerns in a secure and private place

. Activate the local safeguarding procedures and refer the case to the local authority's designated officer

- Seek advice from the Forced Marriage Unit on 020 7008 0151 or fmu@fco.gov.uk

- Refer the pupil to an education welfare officer, pastoral tutor, learning mentor, or school counsellor, as appropriate

Preventing radicalisation

- Radicalisation refers to the process of a person legitimising support for, or use of, terrorist violence

- Extremism is the promotion or advancement of an ideology based on violence, hatred or intolerance, that aims to:

  • Negate or destroy the fundamental rights and freedoms of others; or

  • Undermine, overturn or replace the UK's system of liberal parliamentary democracy and democratic rights; or

  • Intentionally create a permissive environment for others to achieve the results outlined in either of the above points

- Terrorism is an action that:

  • Endangers or causes serious violence to a person/people;

  • Causes serious damage to property; or

  • Seriously interferes or disrupts an electronic system

The use or threat of terrorism must be designed to influence the government or to intimidate the public and is made for the purpose of advancing a political, religious or ideological cause.

Schools have a duty to prevent children from becoming involved with or supporting terrorism. The DSL, or designated Prevent lead, will undertake in-depth Prevent awareness training, including on extremist and terrorist ideologies. They'll make sure that employees have access to appropriate training to equip them to identify children at risk.

We will assess the risk of children in our school from becoming involved with or supporting terrorism. This assessment will be based on an understanding of the potential risk in our local area, in collaboration with our local safeguarding partners and local police force.

We will ensure that suitable internet filtering is in place, and equip our pupils to stay safe online at school and at home.

There is no single way of identifying an individual who is likely to be susceptible to radicalisation into terrorism. Radicalisation can occur quickly or over a long period.

Employees will be alert to changes in pupils' behaviour.

The government website Educate Against Hate and charity NSPCC say that signs that a pupil is being radicalised can include:

- Refusal to engage with, or becoming abusive to, peers who are different from themselves

- Becoming susceptible to conspiracy theories and feelings of persecution

- Changes in friendship groups and appearance

- Rejecting activities they used to enjoy

- Converting to a new religion

- Isolating themselves from family and friends

- Talking as if from a scripted speech

- An unwillingness or inability to discuss their views

- A sudden disrespectful attitude towards others

- Increased levels of anger

- Increased secretiveness, especially around internet use
- Expressions of sympathy for extremist ideologies and groups, or justification of their actions
- Accessing extremist material online, including on Facebook or Twitter
- Possessing extremist literature
- Being in contact with extremist recruiters and joining, or seeking to join, extremist organisations

Children who are at risk of radicalisation may have low self-esteem, or be victims of bullying or discrimination. It is important to note that these signs can also be part of normal teenage behaviour – employees should have confidence in their instincts and seek advice if something feels wrong.

If employees are concerned about a pupil, they will follow our procedures set out in section 7.5 of this policy, including discussing their concerns with the DSL.

Employees should **always** take action if they are worried.

Sexual violence and sexual harassment between children in schools

Sexual violence and sexual harassment can occur:

- Between 2 children of any age and sex
- Through a group of children sexually assaulting or sexually harassing a single child or group of children
- Online and face to face (both physically and verbally)

Sexual violence and sexual harassment exist on a continuum and may overlap.

Children who are victims of sexual violence and sexual harassment will likely find the experience stressful and distressing. This will, in all likelihood, adversely affect their educational attainment and will be exacerbated if the alleged perpetrator(s) attends the same school.

If a victim reports an incident, it is essential that employees make sure they are reassured that they are being taken seriously and that they will be supported and kept safe. A victim should never be given the impression that they are creating a problem by reporting any form of abuse or neglect. Nor should a victim ever be made to feel ashamed for making a report.

When supporting victims, employees will:

- Reassure victims that the law on child-on-child abuse is there to protect them, not criminalise them
- Regularly review decisions and actions, and update policies with lessons learnt
- Look out for potential patterns of concerning, problematic or inappropriate behaviour, and decide on a course of action where we identify any patterns
- Consider if there are wider cultural issues within the school that enabled inappropriate behaviour to occur and whether revising policies and/or providing extra employee training could minimise the risk of it happening again
- Remain alert to the possible challenges of detecting signs that a child has experienced sexual violence, and show sensitivity to their needs

Some groups are potentially more at risk. Evidence shows that girls, children with SEN and/or disabilities, and lesbian, gay, bisexual and transgender (LGBT) children are at greater risk.

Employees should be aware of the importance of:

- Challenging inappropriate behaviours
- Making clear that sexual violence and sexual harassment is not acceptable, will never be tolerated and is not an inevitable part of growing up
- Challenging physical behaviours (potentially criminal in nature), such as grabbing bottoms, breasts and genitalia, pulling down trousers, flicking bras and lifting up skirts. Dismissing or tolerating such behaviours risks normalising them

If employees have any concerns about sexual violence or sexual harassment, or a child makes a report to them, they will follow the procedures set out in section 7 of this policy, as appropriate. In particular, section 7.8 and 7.9 set out more detail about our school's approach to this type of abuse.

Serious violence

Indicators which may signal that a child is at risk from, or involved with, serious violent crime may include:

. Increased absence from school

. Change in friendships or relationships with older individuals or groups

. Significant decline in performance

. Signs of self-harm or a significant change in wellbeing

. Signs of assault or unexplained injuries

. Unexplained gifts or new possessions (this could indicate that the child has been approached by, or is involved with, individuals associated with criminal networks or gangs and may be at risk of criminal exploitation (see above))

Risk factors which increase the likelihood of involvement in serious violence include:

. Being male

. Having been frequently absent or permanently excluded from school

. Having experienced child maltreatment

. Having been involved in offending, such as theft or robbery

Employees will be aware of these indicators and risk factors. If an employee has a concern about a pupil being involved in, or at risk of, serious violence, they will report this to the DSL.

Checking the identity and suitability of visitors

All visitors will be required to verify their identity

If the visitor is unknown to the setting, we will check their credentials and reason for visiting before allowing them to enter the setting. Visitors should be ready to produce identification.

Visitors are expected to sign in and wear a visitor's badge.

Visitors to the school who are visiting for a professional purpose, such as educational psychologists and school improvement officers, will be asked to show photo ID and:

. Will be asked to show their DBS certificate, which will be checked alongside their photo ID; or

. The organisation sending the professional, such as the LA or educational psychology service, will provide prior written confirmation that an appropriate level of DBS check has been carried out (if this is provided, we will not ask to see the DBS certificate)

All other visitors, including visiting speakers, will be accompanied by an employee at all times. We will not invite into the school any speaker who is known to disseminate extremist views, and will carry out appropriate checks to ensure that any individual or organisation using school facilities is not seeking to disseminate extremist views or radicalise pupils or employees.