

## Child Protection & Safeguarding Policy (including Looked After Children)

Status	Statutory	Date created	January 2015
Any other statutory names for this policy		Date first approved	January 2015
Responsibility for this policy	DSL	Date last reviewed	Autumn 2025
Committee with responsibility for its review	FGB	Frequency of review	Annually
		Website	Yes
Approval necessary	Whole Governing Body		

This document has been written in line with the current  
[Keeping Children Safe in Education 2025](#)

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## 1. Contacts

### School contacts

Headteacher	Marieke Forster, 01296 388222 <a href="mailto:mforster@ahs.bucks.sch.uk">mforster@ahs.bucks.sch.uk</a>
Designated Safeguarding Lead (DSL)	Harriet Queralt, 01296 388222 <a href="mailto:hqueralt@ahs.bucks.sch.uk">hqueralt@ahs.bucks.sch.uk</a>
Deputy Designated Safeguarding Lead(s)	Sarah McNally <a href="mailto:smcnally@ahs.bucks.sch.uk">smcnally@ahs.bucks.sch.uk</a>  Miranda Crafts <a href="mailto:mcrafts@ahs.bucks.sch.uk">mcrafts@ahs.bucks.sch.uk</a>  Marieke Forster <a href="mailto:mforster@ahs.bucks.sch.uk">mforster@ahs.bucks.sch.uk</a>  Andrew Skinner <a href="mailto:askinner@ahs.bucks.sch.uk">askinner@ahs.bucks.sch.uk</a>
Nominated Safeguarding Governor	Helen Bush <a href="mailto:hbush@ahs.bucks.sch.uk">hbush@ahs.bucks.sch.uk</a>
Co Chairs of Governors	Helen Bush <a href="mailto:hbush@ahs.bucks.sch.uk">hbush@ahs.bucks.sch.uk</a>  Kate Weir <a href="mailto:kweir@ahs.bucks.sch.uk">kweir@ahs.bucks.sch.uk</a>
Designated Teacher for Children Looked After	Andrew Skinner <a href="mailto:askinner@ahs.bucks.sch.uk">askinner@ahs.bucks.sch.uk</a>

### Contacts in County

<b>Education Safeguarding Advisory Service</b> ESAS offers support to education providers to assist them to deliver effectively on all aspects of their safeguarding responsibilities.	01296 387981 <a href="mailto:Secure-esasduty@buckinghamshire.gov.uk">Secure-esasduty@buckinghamshire.gov.uk</a>
<b><a href="#">First Response Team aka MASH</a></b> (Multi Agency Safeguarding Hub) including Early Help and Channel	01296 383962

The First Response Team process all new referrals to social care, including children with disabilities. Referrals are assessed by the team to check the seriousness and urgency of the concerns and whether Section 17 and/or Section 47 of the Children Act 1989 apply. The First Response Team will ensure that the referral reaches the appropriate team for assistance in a quick and efficient manner.	Out of hours: 0800 999 7677 <a href="mailto:Securecyp.firstresponse@buckinghamshire.gov.uk">Securecyp.firstresponse@buckinghamshire.gov.uk</a>
<b><a href="#">Local Authority Designated Officer (LADO)</a></b> The Buckinghamshire Local Authority Designated Officer (LADO) is responsible for overseeing the management of all allegations against people in a position of trust who work with children in Buckinghamshire on either a paid or voluntary basis	01296 382070 <a href="mailto:Secure-lado@buckinghamshire.gov.uk">Secure-lado@buckinghamshire.gov.uk</a>
<b><a href="#">Bucks Family Information Service</a></b> Information for families on a range of issues including childcare, finances, parenting and education	01296 383293 <a href="mailto:familyinfo@buckinghamshire.gov.uk">familyinfo@buckinghamshire.gov.uk</a>
<b><a href="#">Buckinghamshire Safeguarding Children Partnership</a></b> (BSCP) Procedures, policies and practice guidelines	01296 387146 <a href="mailto:bscp@buckinghamshire.gov.uk">bscp@buckinghamshire.gov.uk</a>
<b><a href="#">Schools Web</a></b> School bulletin, Safeguarding links, A-Z guide to information and services	
<b>Buckinghamshire Council School Improvement and Traded Delivery Manager</b>	01296 382461 <a href="mailto:Yvette.thomas@buckinghamshire.gov.uk">Yvette.thomas@buckinghamshire.gov.uk</a>
<b>Buckinghamshire Council Prevent Coordinator</b>	Helen Carter  01296 382321 - direct number M: 07920 298799- work mobile  T: 01296 387981 - central ESAS numbersecure-esasduty@buckinghamshire.gov.uk  <a href="mailto:Helen.Carter@buckinghamshire.gov.uk">Helen.Carter@buckinghamshire.gov.uk</a>
<b>Thames Valley Police</b>	101 (999 in case of emergency)

#### Other contacts

NSPCC <a href="#">NSPCC</a>	0800 800 5000
Childline <a href="#">Childline</a>	0800 11 11
Kidscape - Parent Advice Line (bullying) (Mon-Weds from 9:30am to 2:30pm)	020 7823 5430

<a href="#">Kidscape</a>	
Female Genital Mutilation Helpline (NSPCC) <a href="#">NSPCC FGM Helpline</a>	0800 028 3550 <a href="mailto:help@nspcc.org.uk">help@nspcc.org.uk</a>
Samaritans - Helpline <a href="#">Samaritans</a>	116 123
Forced Marriages Unit - Foreign and Commonwealth Office <a href="#">Forced marriage - GOV.UK</a>	020 7008 0151 <a href="mailto:fmufco.gov.uk">fmufco.gov.uk</a>
Crimestoppers <a href="#">Crimestoppers</a>	0800 555 111
SAFE	<a href="https://www.safeproject.org.uk/">https://www.safeproject.org.uk/</a>
<a href="#">Karma Nirvana</a> Support for Honour Based Abuse and Forced Marriage	0800 5999 247
<a href="#">CEOP</a> (Child Exploitation and Online Protection)	

### Linked Policies

This policy should be read in conjunction with the following policies:

- Anti-bullying
- Attendance
- Children with Health Needs who can't attend school
- Complaints
- Behaviour and Exclusions including the use of reasonable force
- Equality, Diversity and Community Cohesion Policy
- GDPR
- SEND
- Health & Safety
- Hire of School Premises
- E-Safety (including use of social media)
- Low Level Concerns Policy (which is in the Staff Professional Behaviour Code)
- Managing Allegations Against Staff
- Staff Professional Behaviour Code (Formerly Code of Conduct)
- Relationships and Sex Education
- Whistleblowing
- Safer Recruitment
- Supporting Students with Medical Needs
- Children with health needs that cannot attend school

### Definitions

Safeguarding and promoting the welfare of children means:

- 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 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
- Promoting the upbringing of children with their birth parents, or otherwise their family network through a kinship care arrangement, whenever possible and where this is in the best interests of the children
- Taking action to enable all children to have the best outcomes inline with outcomes set out in the Children's Social Care National Framework.

Child protection is part of safeguarding and promoting the welfare of children and is defined for the purpose of this guidance as activity that is 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.'

(Working Together December 2023)

Abuse is a form of maltreatment of a child and may involve inflicting harm or failing to act to prevent harm. Further information regarding the categories of abuse can be found in the appendix to this document.

Children includes everyone under the age of 18

## 2. Introduction

At Aylesbury High School (AHS) we believe that a policy on child protection is founded on the right of all children to be safe. We expect all members of our school community including staff, governors, supply staff and volunteers to share this commitment. Every member of our school community is responsible for contributing to a positive culture of safeguarding.

The aim of this policy is to provide staff, supply staff, governors and volunteers with the framework they need to keep children at AHS safe and secure and to provide parents and carers with the information about how we will safeguard their children whilst in our care.

This policy has been developed in accordance with following legislation and guidance:

- Children Act 1989 (amended 2004)
- ['Working together to safeguard children 2023'](#)
- ["Keeping Children Safe in Education"](#)- statutory guidance for schools and further education colleges
- Information Sharing Guidance for Safeguarding Practitioners [Information Sharing Guidance](#) - DfE May 2024
- Children Missing Education; Statutory Guidance for Local Authorities - Sept 2016 [Children missing education - GOV.UK](#)
- Statutory Guidance issued under section 29 of the Counter-Terrorism and Security Act - 2024 [Prevent Duty Guidance](#)
- The Equality Act - 2010 [Equality Act 2010: guidance](#) - GOV.UK

- What to do if you're worried a child is being abused - March 2015 [What to do if you are worried a child is being abused](#)
- Statutory guidance on FGM [Multi-agency Statutory Guidance on Female Genital Mutilation](#)

We believe clear governance and leadership is central to embedding a safeguarding culture. The Governing Body takes its responsibility seriously under **section 175 of the Education Act 2002** to safeguard and promote the welfare of children; working together with other agencies to ensure effective and robust arrangements are in place within our school to identify and support those children who are suffering harm or whom may be at risk of harm. As an academy, Part 3 of the schedule to the Education (Independent School Standards) Regulations 2014 places a duty on academies and independent schools to safeguard and promote the welfare of pupils at the school.

Governors will ensure all staff at the school have read and understood their responsibilities pertaining to **Part 1, Part 5 and Annexe B of Keeping Children Safe in Education**.

All staff are required to read and adhere to the **Staff Professional Behaviour Code** AHS recognises that as well as risks to the welfare of children from within their families, children may be vulnerable to abuse or exploitation from outside their homes, including online and from other children. Staff must remain vigilant and alert to these potential risks.

The aims of this policy are:

- To provide an environment in which children feel safe, secure, valued and respected
- Children feel confident that they can talk to adults within school to share any concerns that they may have
- To ensure all teaching staff, non-teaching staff, supply staff, governors and volunteers:
  - are aware of the need to safeguard and promote the wellbeing of children
  - identify the need for early support
  - promptly report concerns, in line with guidance from the Buckinghamshire Continuum of Need
  - are trained to recognise signs and indicators of abuse
- For all staff to recognise that safeguarding and promoting the welfare of children is defined as:
  - providing help and support to meet the needs of children as soon as problems emerge
  - protecting children from maltreatment, whether that is within or outside the home, including online
  - preventing 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
  - promoting the upbringing of children with their birth parents, or otherwise their family network through a kinship care arrangement, whenever possible and where this is in the best interests of the children
  - taking action to enable all children to have the best outcomes in line with the outcomes set out in the Children's Social Care National Framework
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- To provide systematic means of monitoring children known to be, or thought to be at risk of harm and ensure contribution to assessments of need and support plans for those children.
  - To ensure AHS has a clear system for communicating concerns both internally and with external agencies in line with the Working Together guidance.
  - To ensure AHS has robust systems in place to accurately record safeguarding and child protection concerns.
  - To develop effective working relationships with all other agencies involved in safeguarding, supporting the needs of children at our school.
  - To ensure that all staff appointed have been through the safer recruitment process and understand the principles of safer working practices as set out in our Staff Professional Behaviour Code.
  - To ensure that any community users of our facilities have due regard to expectations of how they should maintain a safe environment, which supports children's wellbeing.

This policy is published on the Key Information page of our website, and hard copies are available from the school office.

### **3. Responsibilities**

All staff, supply staff, volunteers, visitors, governors and contractors understand safeguarding children is everyone's responsibility. All staff should be able to identify children who might benefit from early help as well as more serious safeguarding issues. Any person who receives a disclosure of abuse, an allegation or suspects that abuse may have occurred must report it immediately to Harriet Queralt (Designated Safeguarding Lead; DSL) or, in their absence, to one of the Deputy DSLs named at the top of this policy. In the absence of either of the above, concerns will be brought to the attention of the most senior member of staff on site. Staff understand that if there is an immediate risk of harm then the police or First Response will be called directly and the DSL will be updated at the earliest opportunity.

Staff must maintain a good working knowledge of the Buckinghamshire Safeguarding Children Partnership [Continuum of Need](#) and any updates and how it should be used to inform decision making regarding a referral to First Response.

Staff have the skills, knowledge and understanding to keep both looked after children and previously looked after children safe.

Staff understand vulnerability and that barriers exist when recognising abuse, neglect and exploitation of children. Staff understand that children may not feel ready or know how to tell someone they are being abused. Children may feel embarrassed, humiliated or threatened due to their vulnerability, disability, sexual orientation and/or language barriers. None of this should stop staff from having a 'professional curiosity' and speaking to the designated safeguarding lead. Staff understand that the following groups or situations may have or lead to increased vulnerability:

- Young carers
- Children with SEND (See Section 28 below)
- Children living with domestic abuse (See Section 25)
- Children who are experiencing poor mental health
- Children whose parents suffer with poor mental health
- Children whose parents engage in substance misuse
- Criminal exploitation, including sexual exploitation, radicalisation and gang involvement (See Appendix 2)
- Looked after children and previously looked after children (See Section 27 below)
- Homelessness
- Children who have a social worker (See Section 26)
- Privately fostered children
- Asylum seekers
- So-called Honour Based Violence, including FGM and forced marriage
- Children who frequently go missing or whose attendance is a concern
- Children who are part of the LGBTQ group. Risks can be compounded where children who are LGBT lack a trusted adult with whom they can be open. It is therefore vital that staff endeavour to reduce the additional barriers faced.
- Children who are at risk of discrimination due to faith and belief, race or ethnicity
- Children who have English as an additional language
- Children who are living in temporary accommodation
- Children who have a parent in prison
- Children involved in court proceedings

The **Governing Body** at AHS understands and fulfils its safeguarding responsibilities.

It must:

- Ensure that the Headteacher and (when not the Headteacher) the DSL creates and maintains a strong, positive culture of safeguarding within the school.
- Ensure that this policy reflects the unique features of our community and the needs of the students attending our provision. This policy will be reviewed at least annually.
- Regularly monitor and evaluate the effectiveness of this Child Protection Policy.
- Appoint a Designated Safeguarding Lead (DSL), who is a member of the Senior Leadership Team (SLT) and has the required level of authority and also appoint at least one Deputy DSL. The Headteacher has overall responsibility for safeguarding within the school. The roles and responsibilities of the DSL and Deputy DSLs are made explicit in those post-holders' job descriptions.
- Recognise the importance of the role of the DSL, ensuring they have sufficient time, training, skills and resources to be effective. Refresher training must be attended every 2 years, in addition knowledge and skills must be refreshed at regular intervals, at least annually.
- Ensure measures are in place for the Governing Body to have oversight of how the school's delivery against its safeguarding responsibilities are exercised and evidenced, to include reviewing online filtering and monitoring on a regular basis and at least annually. Ensure robust structures are in place to challenge the Headteacher where there are any identified gaps in practice or procedures are not followed.
- Recognise the vital contribution that the school can make in helping children to keep safe, through incorporation of safeguarding within the curriculum. This will also be taught through the PSHE curriculum and relevant issues through Relationships and Sex Education (mandatory from Sept. 2020). Ensure that through curriculum content and delivery children understand to keep themselves safe. Governing boards should ensure that, where necessary, teaching about safeguarding, including online safety, is adapted for vulnerable children, victims of abuse and some SEND students where necessary.
- Ensure that the school is following the statutory RSE guidance - [Relationships and sex education \(RSE\) and health education - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/publications/relationships-and-sex-education-rse-guidance)
- Ensure the school has appropriate filters and monitoring systems in place and regularly reviews their effectiveness. The Governing Board should ensure that the leadership team and relevant staff have an awareness and understanding of the provisions in place and manage them effectively and know how to escalate concerns when identified.
- Ensure that all staff complete safeguarding training to include their roles and responsibilities with regards to the school IT system's online filtering and monitoring.
- Ensure safe and effective recruitment policies and disciplinary procedures are in place.
- Ensure resources are allocated to meet the needs of students requiring child protection or early intervention.

- Ensure the DSL completes an Annual Safeguarding Report for Governors and a copy is shared with the Education Safeguarding Advisory Service at Buckinghamshire Council.

It is the duty of the Chair of Governors (named above) to liaise with relevant agencies if any allegations are made against the Headteacher. If there are concerns that issues are not being progressed in an expedient manner, staff/students/parents/carers should escalate concerns to the Local Authority Designated Officer (LADO) via First Response.

The Governing Body must ensure that procedures are in place to manage safeguarding concerns of allegations against staff, supply staff, governors, volunteers, visitors or contractors where they could pose a risk of harm to children. This must include those concerns that do not meet threshold (low-level concerns).

The guidance in Part four of [Keeping Children Safe in Education](#) must be followed if there were any such concerns.

The Governing Body must ensure that a named teacher is designated for Looked After Children (named above) and that an up to date list of children who are subject to a Care Order or are accommodated by the County Council is regularly reviewed and updated. The school must work with the Virtual Schools Team to support the educational attainment for those children who are Looked After.

The Governing Body must have assurance that any alternative provision attended by children on roll has appropriate safeguarding arrangements and child protection policies in place. The Governing Body must ensure that any children, at such a provision, are visited whilst they are attending, that the curriculum is appropriate to the needs of the child and that attendance is monitored daily. Any outside agencies providing services or activities to the school have provided assurances that they have safeguarding policies and procedures in place.

The Governing Body has a statutory duty to appoint a Nominated Governor for safeguarding (named above). The Nominated Governor must be familiar with [Buckinghamshire Safeguarding Children Partnership](#) procedures, Local Authority procedures and guidance issued by the Department for Education. The Nominated Governor must:

- Work with the DSL to produce the Child Protection Policy annually
- Undertake appropriate safeguarding training, to include Prevent and Safer Recruitment training
- Ensure child protection is regularly discussed at Governing Body meetings
- Meet at least termly with the DSL to review and monitor the school's delivery on its safeguarding responsibilities, to review the Single Central Record and to complete an audit of the staff files.
- Ensure that filtering and monitoring systems are in place and take part in the review.
- Take responsibility to ensure that the school is meeting the OFSTED requirements as set out in the inspection guidance:

[Education inspection framework \(EIF\) - GOV.UK \(www.gov.uk\)](#)

All governors must complete safeguarding training on appointment, to also include Prevent training. This training must be regularly updated in line with national or local guidance. This training should equip them with the knowledge to provide strategic challenge to test and assure themselves that the safeguarding policies and procedures in place are effective and support the delivery of a robust whole school approach to safeguarding.

The Governing Body Should be aware of its obligations under the [Human Rights Act 1998](#), the Equality Act 2010 and its [Advice for Schools](#), (including the Public Sector Equality Duty, and their local multi-agency safeguarding arrangements).

The Governing Body must ensure that relevant staff have due regard to the relevant data protection principles set out in the Data Protection Act 2018 and the GDPR, which allow them to share or withhold personal information when it is necessary to safeguard any child.

We have a **Designated Safeguarding Lead (DSL)**, Harriet Queralt, who is responsible for:

- Creating a culture of safeguarding within the school, where children are protected from harm. Ensuring all staff receive an effective induction and ongoing training to support them to recognise and report any concerns. Full Safeguarding training is provided on induction and thereafter at least every 3 years. Safeguarding refresher training is held every September and regular safeguarding reminders are given in weekly staff briefings and bulletins.
- Encouraging a culture of listening to children and taking account of their wishes and feelings, among all staff, and in any measures the school or college may put in place to protect them. Understand the difficulties that children may have in approaching staff about their circumstances and consider how to build trusted relationships, which facilitate communication. Ensure children receive the right help at the right time using the Buckinghamshire [Continuum of Need](#) document.
- Contributing effectively to multi agency working, for the safeguarding and promotion of the welfare of children. Ensuring referrals to partner agencies are followed up in writing, including referrals to agencies such as First Response, Channel, the Disclosure and Barring Service and the Police. Consulting with the local authority designated officer(s) (LADO) for child protection concerns in cases which concern a staff member.
- Establishing a safe and secure system (CPOMS) for reporting and recording safeguarding and child protection records. Records must be audited regularly to ensure all actions are completed. Understand relevant data protection legislation and regulations, especially the Data Protection Act 2018 and the UK General Data Protection Regulation (UK GDPR)
- Ensuring all child protection files are held separately from students' educational records. Ensuring that records for students who leave mid-year are transferred securely to the new school or college as soon as possible and that incoming records for new students are added to our system. (See further information on record keeping in Section 5 below).
- Ensuring that the safeguarding team contact details and photos are displayed in prominent areas around the school (such as reception, the staffroom and in tutor rooms) and also on the website.
- Being the designated point of contact for staff to be able to discuss and share their concerns.

- Being available to staff and outside agencies during school hours and term time for consultation on safeguarding concerns raised. Having responsibility to ensure that cover is arranged outside of term-time during working hours.
- During residential and extended school hours, ensuring arrangements are in place for staff to have a point of contact.
- Liaising with school staff to ensure we are working together to protect our young people, as follows:
  - liaise with the Headteacher to inform them of issues- especially ongoing enquiries under section 47 of the Children Act 1989 and police investigations. In the case of police searches we are aware of the requirement for children to have an Appropriate Adult present. Further information can be found in the Statutory guidance - [PACE Code C 2019](#) and the 2022 guidance on [Searching, Screening and Confiscation](#).
  - liaise with staff (especially teachers, pastoral support staff, school nurses, IT Technicians, Special Educational Needs Coordinators (SENCOs), and Senior Mental Health Leads) on matters of safety and safeguarding and welfare (including online and digital safety) and when deciding whether to make a referral by liaising with relevant agencies so that children's needs are considered holistically
  - liaise with the Senior Mental Health Lead and, where available, the Mental Health Support Team, where safeguarding concerns are linked to mental health
  - work with the Headteacher and relevant strategic leads, taking lead responsibility for promoting educational outcomes by knowing the welfare, safeguarding and child protection issues that children in need are experiencing, or have experienced, and identifying the impact that these issues might be having on children's attendance, engagement and achievement at school or college. This includes:
    - ensure that the school or college knows who its cohort of children who have or have had a social worker are, understanding their academic progress and attainment, and maintaining a culture of high aspirations for this cohort; and
    - support teaching staff to provide additional academic support or reasonable adjustments to help children who have or have had a social worker reach their potential, recognising that even when statutory social care intervention has ended, there is still a lasting impact on children's educational outcomes
    - promote supportive engagement with parents and/or carers in safeguarding and promoting the welfare of children, including where families may be facing challenging circumstances
- Providing the Headteacher with an annual report for the Governing Body, detailing how the school delivers on its safeguarding responsibilities and any child protection issues within the school. The Governing Body will use this report to fulfil its responsibility to provide the Local Authority with information about their safeguarding policies and procedures.

- Meeting regularly (at least once a term) with the Nominated Governor to share oversight of the safeguarding provision within the setting, monitor performance and develop plans to rectify any gaps in policy or procedure.
- Meeting the statutory requirement to keep up to date with knowledge, enabling them to fulfil their role. DSLs will update their training at least every two years and will be Prevent trained. In addition to their formal training, their knowledge and skills is updated via e-bulletins, meeting other Designated Safeguarding Leads at regular forums, and taking time to read and digest safeguarding developments at regular intervals, to keep up with any developments relevant to their role.
- Referring immediately to the Police, using the guidance, When to Call the Police, for any cases where a criminal offence may have been committed or risk of harm is imminent.
- Ensuring the online filtering and monitoring system is reviewed regularly, at least annually.
- Completing DSL refresher training every 2 years and updating their skills and knowledge on a regular basis and at least annually, through means such as training, reading bulletins or attending DSL forums.
- To fulfil the DSL responsibilities as set out in the KCSIE, Annexe C.

**The School's Headteacher is responsible for:**

- Ensuring that this policy is updated annually or before to reflect any changes to guidance and/or legislation.
- Ensuring that this policy is published on the school website.
- Recording, reviewing and making decisions on any low-level concerns, may be in conjunction with the DSL.
- Liaising with the LADO in the event of an allegation being made against a member of the staff, volunteer or an organisation using the school premises.
- Liaising with the DSL to ensure they have appropriate time, funding, training and resources to fulfil their role.
- Ensuring that appropriate cover is in place to attend strategy meetings or CP conferences that take place during the school holidays or in the event that the DSL is absent
- Ensuring that a designated 'Appropriate Adult' is in place in order to support children in line with the Police and Criminal Evidence (PACE) act, PACE Code C 2023 (accessible) - GOV.UK ([www.gov.uk](http://www.gov.uk)) which advises that "The role of the appropriate adult (AA) is to safeguard the rights, entitlements and welfare of juveniles and vulnerable persons", with there being further elaboration that the AA is expected to observe that the police are acting properly and fairly in relation to a vulnerable detained persons rights and entitlements, as well as helping the detained person understand their rights.

## **4. Procedures**

Our school procedures for all staff, supply staff, governors, volunteers, visitors and contractors in safeguarding and protecting children from harm are in line with

Buckinghamshire Council and [Buckinghamshire Safeguarding Children Partnership](#) safeguarding procedures, [Working Together to Safeguard Children 2023](#), [Keeping children safe in education](#) and statutory guidance issued under section 29 of the **Counter-Terrorism and Security Act 2015**: [Revised Prevent duty guidance: for England and Wales - GOV.UK \(www.gov.uk\)](#).

All staff will be aware of the **early help process** and their role in it, including identifying emerging problems, supporting students themselves, liaising with the Head of Year, Key Stage LT link or DSL, and sharing information with other professionals (such as those listed in the contacts at the top of this policy) to support early identification and assessment.

**In the event of a child disclosing abuse staff must:**

- Listen to the child, allowing the child to tell what has happened in their own way, and at their own pace. Staff must not interrupt a child who is freely recalling significant events.
- Remain calm. Be reassuring and supportive, endeavouring to not respond emotionally.
- Not ask leading questions. Staff are reminded to ask questions only when seeking clarification about something the child may have said or to gain sufficient information to know that this is a safeguarding concern. Staff are trained to use TED; Tell, Explain, Describe.
- Make an accurate record of what they have seen/heard using CPOMS, recording; times, dates or locations mentioned, using as many words and expressions used by the child, as possible. Staff must not substitute anatomically correct names for body part names used by the child.
- Reassure the child that they did the right thing in telling someone.
- Staff must explain to the child what will happen next and the need for the information to be shared with the DSL.
- In the unlikely event the DSL and deputy DSLs are not available, staff are aware they must share concerns with the most senior member of staff.
- If the child is in immediate danger and urgent protective action is required, the police and/or ambulance must be called, via 999. The DSL must notify First Response of the occurrence, what action has been taken and to take advice about informing parents/carers
- The child will be monitored/accompanied at all times following a disclosure, until a plan is agreed as to how best they can be safeguarded.

If there are specific **child protection concerns**, all staff, including supply staff, must follow this **reporting procedure**:

- Staff must ensure the child is in a safe place and in receipt of support
- Staff must initially make a verbal report to the DSL to alert them to the safeguarding/child protection concern
- Staff must make a written report using the school record keeping process ([CPOMS](#)) which is accessed from the Staff Apps folder of the AHS Bookmark tab



- Staff must ensure the time and date of the incident is recorded
- A factual account of the incident must be recorded, including who was involved, what was said/seen/heard, where the incident took place and any actual words or phrases used by the child
- Use a body map to record any injuries seen or reported by the child if applicable
- The DSL must record on CPOMS what action was taken alongside any outcomes achieved and give reasons for decisions made.

**Following a report of concerns the DSL must:**

- Decide whether there are sufficient grounds for suspecting significant harm, in which case a referral must be made to First Response and the police if it is appropriate, referring to the guidance, [When to Call the Police](#). The rationale for this decision should be recorded by the DSL
- School should try to discuss any concerns about a child's welfare with parents/carers and, where possible, obtain consent before making a referral to First Response. However, in accordance with DfE guidance, this should only be done when it will not place the child at increased risk or could impact a police investigation. Where there are doubts or reservations about involving the child's family, the DSL should clarify with First Response or the police whether the parents/carers should be told about the referral and, if so, when and by whom. This is important in cases where the police may need to conduct a criminal investigation. The child's views should also be taken into account.
- If there are grounds to suspect a child is suffering or is likely to suffer significant harm, the DSL (or Deputy) must contact First Response by telephone immediately, in the first instance and then complete the Multi Agency Referral Form ([MARF](#)).
- If the child is in immediate danger and urgent protective action is required, the police must be called. The DSL must then notify [First Response](#) of the occurrence and what action has been taken.
- If a child needs urgent medical attention, the DSL (or Deputy) should call an ambulance via 999. DSL to contact First Response; advice to be sought from First Response about informing parents/carers.

**Checking the identity and suitability of visitors**

- Staff who are expecting visitors should have informed reception in advance
- All visitors will be required to verify their identity to the satisfaction of staff and to ensure that mobile phones are not used in front of students
- If the visitor is unknown to the setting, we will check their credentials and reason for visiting before allowing them to enter. Visitors should be ready to produce identification
- Visitors are expected to sign in and wear a visitor's lanyard
- Visitors will be given a safeguarding leaflet to read, which clearly tells them how to report any concerns.
- Visitors will be given access to students restricted to the purpose of their visit

- 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
- Reception staff have a list of any regular visitors who have DBS checks
- All other visitors, including visiting speakers, will be accompanied by a member of staff 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 staff.

### **Attendance**

- Through our attendance policy we have a robust system for monitoring attendance and will act to address absenteeism (including unexplainable and/or persistent absence) with parents / carers and students promptly and identify any safeguarding issues arising. Our first day absence reporting system ensures that any unexplained absences are followed up on the morning of the absence. Our escalation process is detailed in our Attendance Policy.
- All students are required to have a minimum of two identified emergency contacts.
- Any student whose absence is causing concern and where it has not been possible to make contact with a parent / carer will be reported as a Child Missing in Education (CME) using the Buckinghamshire CME Protocol.
- Any unknown absence of a pupil who is currently subject to a child protection or child in need plan is immediately referred to their social worker.
- Parents / carers must inform school if there are any changes to a student's living arrangements
- AHS has a mandatory duty to inform the local authority via First Response if a child under the age of 16 lives with someone other than their parent, step parent, aunt, uncle or grandparent for a period of more than 28 days. This is defined as being a private fostering arrangement.

### **Training**

All members of staff must complete safeguarding training every 3 years, attend annual refresher training and partake in any training opportunities arranged or delivered by the DSL. Updates must be cascaded to all staff throughout the year. All new staff will receive safeguarding and child protection training on induction to include online safety and the school's filtering and monitoring system.

All staff will read the Child Protection, Behaviour and Whistleblowing policies, the Staff Professional Behaviour Code and Part 1 and Part 5 of KCSIE, at least annually. They will sign a declaration to show that the guidance has been reviewed and they have a clear understanding of their role. There are audit methods in place to ensure that staff have understood the content.

## **5. Record Keeping & Retention of Records**

### **Student Records**

All safeguarding concerns, discussions and decisions made (including referrals) are recorded on CPOMS. This means that any safeguarding records are kept separately from other information about a student.

There is a statutory requirement for our school to pass any child protection records to the student's next school within 5 days of the first day of term or within 5 days of an in-year transfer. There must be an auditable system in place to evidence this has taken place. Safeguarding records must be sent separately from the general files using a secure method. No records should be maintained within the school once the files have been transferred. We have a robust system for reviewing our archived information. Our files are stored and disposed of in line with GDPR protocols.

We have a procedure in place to ensure that safeguarding records are transferred to a student's new school if they leave AHS. If a student with a Safeguarding record leaves before the end of Year 13, the DSL at the new school is contacted to confirm that the student has started at the school. The file is then downloaded from CPOMS and sent as a password protected document.

We send a form to the previous schools of any students joining AHS asking the DSL to confirm whether any safeguarding records need to be transferred to us.

The last statutory school maintains the child protection files until a young person reaches the age of 25. Therefore if the transfer school is unknown or a student is going to be electively home educated, any child protection files will remain at our school. The Safeguarding records of students who leave at the end of Year 13 will be retained at AHS for 25 years from the child's date of birth. Any records that could be needed for an official enquiry, such as in the case of sexual abuse, will be kept for 75 years.

### **Records of concerns about staff**

All low-level concerns will be recorded in writing. In addition to details of the concern raised, records will include the context in which the concern arose, any action taken and the rationale for decisions and action taken.

If allegations of abuse made about a member of staff were found to be malicious or false, details of those allegations will be removed from personnel records.

For all other allegations, we will:

- Keep a clear and comprehensive summary of the allegation, including details of how it was followed up; how it was resolved; any action taken; any decisions reached; and the outcome
- Provide a copy of the report to the person concerned, where agreed by children's social care or the Police
- Keep a declaration on whether the information will be referred to in any future reference

This is to make sure:

- Accurate information can be given in response to requests for a reference in future
- Clarification can be given where future DBS checks reveal information about allegations that did not result in criminal convictions

Records of allegations should be retained. Records will be:

- Kept confidential, held securely and comply with the DPA 2018 and UK GDPR
- Reviewed so that potential patterns of concerning, problematic or inappropriate behaviour can be identified. Where a pattern of such behaviour is identified, we will decide on a course of action, either through our disciplinary procedures or, where a pattern of behaviour moves from a concern to meeting the harms threshold, we will refer it to the designated officer at the local authority
- Retained at least until the accused person has reached normal pension age, or for a period of 10 years from the date of the allegation if that is longer
- Where a low-level concern relates to a supply teacher or contractor, we will notify the individual's employer, so any potential patterns of inappropriate behaviour can be identified

## References

We will not include low-level concerns in references unless:

- The concern (or group of concerns) has met the threshold for referral to the designated officer at the local authority and is found to be substantiated and/or
- The concern (or group of concerns) relates to issues, which would ordinarily be included in a reference, such as misconduct or poor performance

## 6. Alternative Provision

When a child is accessing an alternative provision, the school remains responsible for the safeguarding of that child. It will ensure that the provision has secure and robust safeguarding arrangements in place and meets the needs of the child. A member of staff, from school, will regularly visit the provision and meet with the child to hear their voice and ensure regular attendance.

AHS will obtain written information from the alternative provider that appropriate safeguarding checks have been carried out on individuals working at their establishment (i.e. those checks that schools would otherwise perform on their own staff).

AHS will always know where a child is based during school hours. This includes having records of the address of the alternative provider and any subcontracted provision or satellite sites the child may attend. We will regularly review the alternative provision placements.

We are familiar with the DFE statutory guidance: [Alternative provision - GOV.UK](#) And [Education for children with health needs who cannot attend school](#)

## 7. Confidentiality

We recognise that all matters relating to child protection are confidential and the DSL team will only disclose personal information about a child to other members of staff on a need to know basis.

In order to deliver the best safeguarding decisions that ensure timely, necessary and proportionate interventions, decision makers need the full information picture concerning an individual and their circumstances to be available to them. Information viewed in isolation is unlikely to give the full picture or identify the true risk.

Therefore, all the relevant information from various agencies needs to be available. By ensuring all statutory partners have the ability to share information, it will help to identify

those who are subject to, or likely to be subject to, harm, in a timely manner, which will keep children and young people safe from harm.

Working Together to Safeguard Children states that:

“Effective sharing of information between professionals and local agencies is essential for effective identification, assessment and service provision.

Early sharing of information is the key to providing effective early help where there are emerging problems. At the other end of the continuum, sharing information can be essential to put in place effective child protection services. Serious Case Reviews (SCRs) have shown how poor information-sharing has contributed to the deaths or serious injuries of children.

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

The Data Protection Act 1998 and human rights laws are not barriers to justified information sharing but provide a framework to ensure that personal information about living individuals is shared appropriately.

Therefore, we will ensure that the information we share is:

- Necessary for the purpose for which we are sharing it
- Is shared only with those people who need to have it
- Is accurate and up-to-date
- Is shared in a timely fashion and
- Is shared securely

All staff are aware that they cannot promise a child to keep secrets which might compromise the child’s safety or well-being. Staff must, however, reassure the child that information will only be shared with those people who will be able to help them and therefore need to know.

## **8. Recognising Abuse**

All staff must be aware of what abuse looks like. See Appendix 2: Categories of Abuse and Appendix 3: Additional Information about abuse and safeguarding issues from KCSiE Annex B.

In the event of a child disclosing abuse staff must refer to the following guidance:

[“What to do if You’re Worried a Child is Being Abused”](#)

## **9. Multi-agency working**

- The AHS DSL team knows what the role of schools is, as a relevant agency, within the three safeguarding partner arrangements and as required, will contribute to multi-agency working, in line with the statutory guidance ‘Working Together to Safeguard Children’.
- When named as a relevant agency and involved in safeguarding arrangements, AHS will co-operate alongside other agencies with the published arrangements.
- AHS will contribute to inter-agency plans to offer children support of early help and those children supported through child protection plans.

- AHS will allow access for and work with children's social care to conduct or consider whether to conduct a section 17 or section 47 assessment.

## **10. Supporting Staff**

- We recognise that staff becoming involved with a child who has suffered harm, or appears to be likely to suffer harm, could find the situation stressful and upsetting.
- We will support such staff by providing an opportunity to talk through their anxieties with the DSL and to seek further support if necessary. This could be provided by the Headteacher or another trusted colleague, Occupational Health, and/or a representative of a professional body, Employee Assistance Programme or trade union, as appropriate.

## **11. Safer Recruitment**

See Appendix 5

## **12. Safeguarding concerns and allegations against staff, supply teachers, volunteers and contractors (including Governors)**

The school will follow KCSiE and the local safeguarding procedures for managing allegations against staff, supply staff, volunteers and contractors, as set out in the AHS policy for Managing Allegations Against Staff. Complaints or concerns about our policies, which do not require a CP/safeguarding response, will be dealt with through our school complaints and resolutions policy, which can be found on our website.

Part four of KCSiE contains comprehensive guidance covering the two levels of allegations/concern:

1. Allegations that may meet the harms threshold and must be referred to the LADO
2. Allegations/concerns that do not meet the harms threshold- referred to for the purpose of this guidance as 'low level concerns' A low-level concern is any concern that an adult has acted in a way that:
  - is inconsistent with the staff professional behaviour code of conduct, including inappropriate conduct outside of work
  - doesn't meet the threshold of harm or is not considered serious enough for the school or college to refer to the local authority.

Low-level concerns are part of a spectrum of behaviour. This includes:

- inadvertent or thoughtless behaviour
- behaviour that might be considered inappropriate depending on the circumstances
- behaviour which is intended to enable abuse.

Examples of such behaviour could include:

- being over friendly with children
- having favourites
- adults taking photographs of children on their mobile phone

- engaging with a child on a one-to-one basis in a secluded area or behind a closed door
- using inappropriate sexualised, intimidating, humiliating or offensive language.

We ensure that all staff are aware of what constitutes a low level concern, sharing examples from KCSiE and from the NSPCC [here](#). At AHS, all staff know they have a responsibility to share any concerns, no matter how small, about any adults working in school. We create an environment whereby all staff feel that they are able to safely report concerns to the Headteacher and we encourage staff to use the staff report a concern form (available on the staff homepage). All reports will be dealt with effectively and recorded, enabling the school to identify any concerning behaviour and support any adults becoming the subject of false low-level concerns.

KCSiE Appendix D paragraph 26 gives guidance on the retention period for records of low-level concerns and what to do when a member of staff moves to a new setting.

All school staff, supply staff, volunteers and contractors must take care not to place themselves in a vulnerable position with a child. It is always advisable for interviews or work with individual children or parents/carers to be conducted in view of other adults. In line with Buckinghamshire safeguarding advice, all home visits should be conducted by more than one person. This could be two members of AHS staff or one member of staff and another professional, such as a social worker.

We understand that a student may make an allegation against a member of staff, member of supply staff, volunteer or contractor. If such an allegation is made, the member of staff notified of the allegation will immediately inform the Headteacher or the most senior teacher if the Headteacher is not present. If the allegation is made against the Headteacher, the Chair of Governors must be informed.

At AHS we recognise that an allegation may be made if a member of staff, a member of supply staff, a volunteer or a contractor has:

- Behaved in a way that has harmed a child, or may have harmed a child
- Possibly committed a criminal offence against or related to a child
- Behaved towards a child or children in a way that indicates he or she may pose a risk of harm to children
- Behaved or may have behaved in a way that indicates they may not be suitable to work with children. This includes behaviours both inside and outside of school

The Headteacher/DSL/Chair of governors (where the allegation is in reference to the Head Teacher) on all such occasions must immediately discuss the content of the allegation with the Local Authority Designated Officer (LADO).

The Head Teacher/DSL must:

- Follow all advice given by the LADO throughout the investigation process, including how to manage the staff member, supply staff member, volunteer or contractor against whom the allegation is made, as well as supporting other staff, supply staff members, volunteers and contractors within the workplace

- Follow all advice given by the LADO relating to supporting the child making the allegation, as well as other children connected to the organisation
- Ensure feedback is provided to the LADO about the outcome of any internal investigations

If the allegation is made against a member of staff supplied by an external agency, the agency will be kept fully informed and involved in any enquiries from the LADO.

Suspension of the member of staff against whom an allegation has been made needs careful consideration and, if necessary, we will consult with the LADO in making this decision. Guidance will also be sought from HR.

If a suspension is made, restrictions will apply to all staff, supply staff, volunteers and contractors regarding contact with them whilst they are suspended, including contact via social media.

Our lettings agreement for other users requires that the organiser will follow the Buckinghamshire Council procedures for managing allegations against staff and where necessary, the suspension of adults from school premises.

Should an individual staff member, supply staff member, governor, volunteer or contractor be involved in child protection, other safeguarding procedures or Police investigations in relation to abuse or neglect, they must immediately inform the Head Teacher. In these circumstances, the school will need to assess whether there is any potential for risk of transfer to the workplace and the individual's own work with children.

### 13. Whistleblowing

We have a **Whistleblowing Policy**, which can be found on our website. Staff are required to familiarise themselves with this document during their induction period and should read this annually.

All staff must be aware of their duty to raise concerns about unsafe practice or about the attitude or actions of colleagues and report their concerns to the Headteacher or Chair of Governors as appropriate.

### 14. Physical intervention/Positive handling

Our policy on physical intervention/positive handling by staff is set out separately, as part of our Behaviour and Exclusions Policy. It complies with the Department for Education Guidance, 'The Use of Reasonable Force'. This policy states that staff may only use 'reasonable force', meaning no more force than is needed, to prevent students from hurting themselves or others, from damaging property, or from causing disorder. It is always unlawful to use force as a punishment.

- The Headteacher and authorised staff can use such force as is reasonable in the circumstances to conduct a search for the following 'prohibited items': knives and weapons, alcohol, illegal drugs, stolen items, cigarettes and tobacco, fireworks, pornographic images, or any article that has been or is likely to be used to commit an offence, cause personal injury or damage to property.
- If the use of force is necessary, reasonable adjustments for disabled young people and young people with special educational needs will be made.



- Any use of force or restraint should be recorded and signed by a witness. The parent will be informed of the incident.
- We understand that physical intervention of a nature which causes injury or unnecessary distress to a C/YP may be considered under child protection or disciplinary procedures.
- Staff who are likely to need to use physical intervention will be appropriately trained by a specialist teacher or medical practitioner.

## **15. Anti-Bullying**

A 'Bully' is defined as a person who habitually seeks to harm or intimidate those whom they perceive as 'vulnerable'. Students, staff, parents and governors are supported to understand this definition.

We have a Behaviour and Exclusions Policy and an Anti-Bullying Strategy referencing measures in place to prevent and respond to all forms of bullying (including cyber-bullying), which acknowledges that to allow or condone bullying may lead to consideration under child protection procedures. These documents are available to all staff, parents and students and are written in language that is accessible to students.

Staff, students and parents are made aware of how mobile technologies are increasingly being used to bully young people both in and outside of the school environment. Cyber-bullying is therefore referenced within our E-Safety and Behaviour & Exclusions Policies.

## **16. Discriminatory Incidents**

In line with the 2010 Equality Act, our Equality, Diversity and Community Cohesion Policy addresses all forms of discriminatory incidents and their impact on the individual/group of students involved including those who may witness the incident. All incidents are recorded and will be taken seriously and consideration will be given as to whether a multi-agency approach using child protection procedures is required.

## **17. Health and Safety**

We recognise the importance of safeguarding students throughout the school day. Our Health and Safety policy reflects the consideration we give to the protection of our children or young people (C/YP) both emotionally and physically within the school environment, in relation to internet use and when away from the school when undertaking school trips and visits.

Part of the safeguarding measures we have in place include the safe dropping off and collection of students at the start and end of the school day. Students in Years 7-11 who leave the site during the school day do so only with the written permission of a parent and are collected by an authorised adult where appropriate. School should be notified by the parents regarding whom they have authorised for this task. If students are late into school or are collected early they will need to sign in and out. If students stay in school after 3.30pm they should either be in a supervised club such as homework club or in the dining room. Students cannot stay on school site after 4.30pm unless they are in a supervised club.

Staff who support C/YP during unstructured time, such as over the lunch period, have received training to remain alert to signs of concern or vulnerability, ensuring students feel safe. They follow the schools reporting process to alert the DSL of concerns.

In the event of a student going missing during the course of the school day we will carry out immediate checks to ensure the student is not on site, we will then make contact with the student's parents/carers and inform the police.

When the school is hired out to a 3rd party provider, we ensure that they have appropriate arrangements in place to keep children safe through the sight of their child protection and safer recruitment procedures.

At AHS we ensure that we are aware of the content of materials used by any visiting speakers prior to their visit.

## 18. Prevent Duty

We are aware of the Prevent Duty under **Section 26 of the Counter Terrorism and Security Act 2015** to protect young people from being drawn into terrorism.

All school staff and governors have completed Prevent training and we have training logs to evidence this.

We have in place and monitor appropriate web filtering systems.

The DSLs and senior leaders are familiar with their duties under The Prevent Duty Guidance: [Revised Prevent duty guidance: for England and Wales - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/616222/Prevent_Duty_Guidance_for_England_and_Wales.pdf)

## 19. Online Safety

All staff are aware of the school policy for **Online-Safety**, which sets out how we will:

- Create a safer online learning environment
- Give everyone the skills, knowledge and understanding to help children stay safe on-line, question the information they are accessing and support the development of critical thinking
- Inspire safe and responsible use of mobile technologies, to combat behaviours on-line, which may make students vulnerable, including the sending of nude or semi-nude images
- Manage the use of camera equipment, including smart phones
- Deal with any concerns, including the steps we will take and where to go for help

Set expectations in relation to staff use of social media as set out in the **Staff Professional Behaviour Code** which can be found on our website.

Cyber-bullying by children, via texts, social media and emails, will be treated as seriously as any other type of bullying and will be managed through our anti-bullying procedures.

AHS is aware of the risks posed by children in the online world; in particular non-age appropriate content linked to self-harm, suicide, grooming and radicalisation.

Students, staff and parents/carers are supported to understand the risks posed by:

- the CONTENT accessed by students - risks such as misinformation, disinformation, including fake news and conspiracy theories.
- their CONDUCT on-line
- who they have CONTACT within the digital world
- COMMERCE - risks such as online gambling, inappropriate advertising, phishing and or financial scams

AHS has online filtering and monitoring systems in place to ensure children are safeguarded from potentially harmful online material. These systems are regularly monitored, at least annually, by the DSL, IT provider and nominated governor. A record will be kept of the reviews.

AHS will follow the advice as given by the government, to advise and support children with any online learning taking place at home to ensure this is done so safely.

Our Online Safety and Behaviour policies set out the acceptable use of mobile technologies by students whilst onsite. This includes sanctions, which will be applied when these boundaries are not adhered to.

Visitors to our school are respectfully requested not to use mobile phones in front of students

Staff use of mobile technology whilst on site is set out in the Staff Professional Behaviour Code.

All staff receive awareness training in order to understand the risks children are exposed to.

All staff have an understanding of expectations of their roles and responsibilities with regards to the online filtering and monitoring processes.

Online safety is a key part of our PSHE package, delivered in Learning 4 Life lessons. Communications to parents and carers should be used to reinforce the importance of children being safe online. Parents and carers are likely to find it helpful to understand what systems our school uses to filter and monitor online use. It is especially important for parents and carers to be aware of what their children are being asked to do online, including the sites they will be asked to access and to be clear who from the school (if anyone) their child is going to be interacting with online.

## **20. Sending nude or semi-nude images**

Sending nude images or semi-nude images, is one of a number of 'risk-taking' behaviours associated with the use of digital technologies, social media or the internet. It is accepted that children experiment and challenge boundaries and therefore the risks associated with 'online' activity can never be completely eliminated.

Further advice and guidance can be found using the link below:

[Sharing nudes and semi-nudes](#)

Staff, students and parents/carers are supported, via training, to understand that the creation and sharing of sexual imagery, such as photos or videos, of under 18s is illegal. This includes images of students themselves if they are under the age of 18. Advice given to staff is taken from the DfE guidance on [How to Respond to an Incident](#):

- Never view, copy, print, share, store or save the imagery yourself, or ask a child to share or download - this is illegal
- If you have already viewed the imagery by accident (e.g. if a young person has showed it to you before you could ask them not to), report this to the DSL (or equivalent) and seek support
- Do not delete the imagery or ask the young person to delete it. Instead, pass the device to the DSL

Any youth produced sexual imagery disclosures will follow the normal safeguarding practices and protocols for our school. We will also use the guidelines for responding to incidents, as set out in:

[Sharing nudes and semi-nudes: advice for education settings working with children and young people produced by the UK Council for Internet Safety.](#)

If the incident meets the threshold, it may be necessary to refer to the police in a timely manner.

## **21. Child on Child Abuse, including sexual violence and sexual harassment.**

AHS believes that all children have a right to attend school and learn in a safe environment free from harm by both adults and other students. Incidents of child on child abuse are a safeguarding matter and must be reported by staff. Such incidents will be investigated and dealt with as per section 4 and section 7 of this policy.

- All staff operate a zero-tolerance policy to child on child abuse and will not pass off incidents as 'banter' or 'just growing up'.
- All staff recognise that child on child issues may include, but may not be limited to:
- Bullying (including cyber bullying, prejudiced based and discriminatory bullying)
- Racial abuse
- Physical abuse, such as hitting, hair-pulling, shaking, biting or other forms of physical harm, or threats or encouragement to do so
- Sexual violence and sexual harassment
- 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
- Abuse related to sexual orientation or identity
- Sending nude or semi-nude images (consensual & non-consensual)
- Upskirting and initiation/hazing type violence and rituals
- Emotional abuse
- Abuse within intimate partner relationships

All staff should be able to reassure victims that they are being taken seriously and that they will be supported and kept safe.

The following will be considered when dealing with incidents:

- Whether there is a large difference in power between the victim and perpetrator i.e. size, age, ability, perceived social status or vulnerabilities, including SEND, CP/CIN or CLA
- Whether the perpetrator has previously tried to harm or intimidate students
- Any concerns about the intentions of the alleged perpetrator

In order to minimise the risk of child on child abuse taking place, our school will:

- Deliver RSE/PSHE to include teaching students about how to keep safe and understanding what acceptable behaviour looks like
- Ensure that students know that all members of staff will listen to them if they have concerns and will act upon them
- Have systems in place for any student to be able to voice concerns
- Develop robust risk assessments if appropriate
- Refer to any other relevant policies when dealing with incidents, such as the Behaviour Policy and/or the Anti-Bullying Policy

We recognise that 'Upskirting' involves taking a photograph under an individual's clothing without their knowledge. We understand that it causes the victim distress and humiliation and that any gender can be a victim. Staff recognise that 'Upskirting' is a criminal offence and must promptly report any such incidents to the Headteacher, DSL or most senior member of staff, who will report it to the police.

Reference will be made to part 5 of **Keeping Children Safe in Education** to ensure that all staff have an understanding of the serious nature of sexual violence and sexual harassment between children in schools and know how they are expected to support victim, perpetrators and any other children affected.

Sexual violence and sexual harassment can occur between two children of **any age and sex**. It can occur through a group of children sexually assaulting or sexually harassing a single child or group of children. This can occur online, face to face (both physically and verbally) and can take place inside or outside of school. As set out in Part five of the KCSiE, all staff maintain an attitude of '**it could happen here**'. As detailed in Ofsted's 2021 report, we acknowledge that it does occur in all schools, that girls are more likely to be victims and that it is never acceptable.

All staff have a responsibility to address inappropriate behaviour in a timely manner, however seemingly insignificant it may appear. Staff should refer any reports of sexual violence or sexual harassment to the DSL, who will follow the steps outlined in KCSiE. All victims will be reassured that they are being taken seriously and that they will be supported and kept safe. No child will ever be made to feel ashamed for making a report or that they are creating a problem for our school. Children need to understand that the law is there to protect them, not to criminalise them.

Support will be given to both victims and alleged perpetrators as required.

## **22. Cultural Issues**

As a school, we are aware of the cultural diversity of the community around us and work sensitively to address the unique culture of our students and their families as they relate to safeguarding and child protection. This includes children at risk of harm from abuse arising from culture, ethnicity, faith and belief on the part of their parent, carer or wider community.

Staff must report concerns about abuse linked to culture, faith and beliefs in the same way as other child protection concerns.

## **23. So-Called ‘Honour’ Based Abuse**

Staff at our school understand there is a legal duty to report known cases of Female Genital Mutilation (FGM) and So Called ‘Honour’ Based Abuse to the police and they will do this with the support of the DSL and the following guidance: Mandatory reporting of female genital mutilation: procedural information - GOV.UK.

Our school is aware of the need to respond to concerns relating to forced marriage and understand that it is illegal, a form of child abuse and a breach of children’s rights. We recognise some students, due to capacity or additional learning needs, may not be able to give an informed consent and this will be dealt with under our child protection processes. AHS staff can contact the Forced Marriage Unit if they need advice or information. Contact 020 7008 0151 [fmua@fco.gov.uk](mailto:fmua@fco.gov.uk)

We are aware of the signs of FGM as laid out in: Female genital mutilation (FGM) | NSPCC  
We promote awareness through training and access to resources, ensuring that the signs and indicators are known and recognised by staff.

Staff have a legal duty to report cases of FGM to the police. Any suspicions or concerns for forced marriage must also be reported to the DSL.

## **24. Contextual Safeguarding and extra-familial harms**

Contextual Safeguarding is an approach to understanding and responding to children’s experiences of significant harm beyond their families. Extra-familial harm is linked to contextual safeguarding; these concepts refer to harms that occur outside of the family system, including harmful online contact. At AHS, all staff recognise that pupils may encounter safeguarding incidents that happen outside of school and can occur between children outside of this environment. We will respond to such concerns, reporting to the appropriate agencies in order to support and protect the pupil.

All staff and especially the DSLs, will consider the context of incidents that occur outside of school to establish if situations outside of their families may be putting the pupil’s welfare and safety at risk of abuse or exploitation, including (but not limited to) sexual exploitation, criminal exploitation and serious youth violence.

Children who may be alleged perpetrators will also be supported to understand the impact of contextual issues on their safety and welfare.

In such cases the individual needs and vulnerabilities of each child will be considered.

Further guidance can be found at: <https://contextualsafeguarding.org.uk/>

## **25. Serious Violence**

All staff are aware of signs and indicators, which may signal that children are at risk from, or are involved with, serious violent crime. These may include increased absence from school, a change in friendships or relationships with older individuals or groups, a significant decline in performance, signs of self-harm or significant change in well-being or signs of assault or unexplained injuries. Staff are aware that unexplained gifts or new possessions could also indicate that children have been approached by, or are involved with, individuals associated with criminal networks or gangs.

At AHS we are aware of the range of risk factors which increase the likelihood of involvement in serious violence such as being male, having been frequently absent or permanently excluded from school, having experienced child maltreatment and having been involved in offending such as theft or robbery. Our school will take appropriate measures to manage any situations arising as suggested in [Preventing youth violence and gang involvement - Practical advice for schools and colleges \(publishing.service.gov.uk\)](https://www.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/61662/preventing_youth_violence_and_gang_involvement.pdf).

## **26. Domestic Abuse**

All staff recognise that children can witness and be affected by domestic abuse that occurs within their home between family members and that they can suffer long lasting emotional and psychological effects. They may also experience abuse within their own intimate relationships, referred to as 'teenage relationship abuse' and can suffer long lasting emotional and psychological effects, even if the child is not directly involved. Staff must report any concerns using the school's safeguarding procedures.

Operation Encompass helps police and schools work together to provide emotional and practical help to children. The system ensures that when police are called to an incident of domestic abuse, where there are children in the household who have experienced the domestic incident, the police will inform the key adult (usually the Designated Safeguarding Lead) in school before the child or children arrive at school the following day. This ensures that the school has up to date relevant information about the child's circumstances and can enable support to be given to the child according to their needs. Police forces not signed up to Operation Encompass will have their own arrangements in place. National Domestic Abuse Helpline Refuge runs the National Domestic Abuse Helpline, which can be called free of charge and in confidence, 24 hours a day on 0808 2000 247. Its website provides guidance and support for potential victims, as well as those who are worried about friends and loved ones. It also has a form through which a safe time from the team for a call can be booked. Additional advice on identifying children who are affected by domestic abuse and how they can be helped is available at:

- NSPCC - UK domestic-abuse Signs Symptoms Effects
- Refuge - what is domestic violence/effects of domestic violence on children
- SafeLives - young people and domestic abuse

## **27. Children who need a social worker (Child Protection and Child In Need Plans)**

Staff recognise that children may have a social worker due to safeguarding or welfare needs and this can cause them to have barriers with attendance, behaviour, learning and mental health.

AHS will share information with a social worker for any child whom they are supporting to ensure decisions are made in the best interests of the child.

Informed decisions will be made by staff with regards to safeguarding for those children who are being supported by a social worker. The Virtual School lead the support for this cohort of children and AHS will work in partnership with them and the Local Authority to improve outcomes for these children.

## **28. Mental Health**

At AHS we are committed to supporting our students' mental health and have a Mental Health Lead (Sarah McNally) and two Wellbeing Assistants. We also prioritise teaching about mental health in our Learning 4 Life lessons.

At AHS we are aware that mental health problems can be an indicator that a child has suffered or may be at risk of suffering abuse, neglect, or exploitation.

Staff recognise that traumatic adverse childhood experiences can have lasting impact throughout a child's life and this can impact on mental health, behaviour and education.

Staff will report any mental health concern that is linked to a safeguarding concern to the DSL.

Where there are concerns for a child's mental health, AHS will seek advice from a trained professional, who would be able to make a diagnosis of a mental health problem.

We are aware of the advice in [Mental health and behaviour in schools \(publishing.service.gov.uk\)](https://publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/612212/mental_health_and_behaviour_in_schools.pdf)

## **29. Looked After Children**

AHS appoints a member of staff as the designated teacher for looked-after and previously looked-after children. The designated teacher promotes the educational achievement of looked-after and previously looked-after children, and supports other staff members to do this too. Staff, parents, carers and guardians are aware of the identity of the designated teacher, how to contact them and what they are responsible for.

**Our designated teacher is Andrew Skinner who can be contacted at [askinner@ahs.bucks.sch.uk](mailto:askinner@ahs.bucks.sch.uk)**

The Department for Education issues statutory guidance on the designated teacher for looked-after and previously looked-after children. It also takes into account section 2E of the Academies Act 2010.

**Looked-after children** are registered pupils that are:

- In the care of a local authority, or
- Provided with accommodation by a local authority in the exercise of its social services functions, for a continuous period of more than 24 hours

**Previously looked-after children** are registered pupils that fall into either of these categories:

- They were looked after by a local authority but ceased to be as a result of any of the following:



- A child arrangements order, which includes arrangements relating to who the child lives with and when they are to live with them
- A special guardianship order
- An adoption order
- They appear to the governing board to have:
  - Been in state care in a place outside of England and Wales because they would not have otherwise been cared for adequately, and ceased to be in that state care as a result of being adopted

**IAPLAC - Internationally Adopted Previously Looked After Children.** The [DfE published new advice](#) in July 2021 to acknowledge that this group can be amongst the most vulnerable in our society. Children who have been looked after and are subsequently adopted are also likely to have experienced abuse or neglect and need more support. Wherever possible, these children should be admitted to the school that best meets their needs. School admission authorities are now required to give looked after children and previously looked after children highest priority in the oversubscription criteria within their admission arrangements. The definition of previously looked after children now includes children who appear (to the admission authority) to have been in state care outside of England and ceased to be in state care as a result of being adopted.

**A Personal education plan (PEP)** is part of a looked-after child's care plan that is developed with the school. It forms a record of what needs to happen and who will make it happen to ensure the child reaches their full potential.

**The Virtual School Head (VSH)** is a local authority officer responsible for promoting the educational achievement of their authority's looked-after children, working across schools to monitor and support these pupils as if they were in a single school. The VSH is also responsible for providing information and advice to schools, parents and guardians in respect of previously looked-after children. The role of virtual school heads was extended in June 2021, to include a non-statutory responsibility for the strategic oversight of the educational attendance, attainment, and progress of children with a social worker.

### **Role of the designated teacher**

Our designated teacher takes lead responsibility for promoting the educational achievement of looked-after and previously looked-after children at our school. They are your initial point of contact for any of the matters set out in the section below.

### **Leadership responsibilities**

The designated teacher will:

- Act as a central point of initial contact within the school for any matters involving looked-after and previously looked-after children
- Promote the educational achievement of every looked-after and previously looked-after child on roll by:
  - Working with VSHs
  - Promoting a whole school culture where the needs of these pupils matter and are prioritised

**The designated teacher will take lead responsibility for ensuring school staff understand:**

- The things which can affect how looked-after and previously looked-after children learn and achieve:
- How the whole school supports the educational achievement of these pupils
- Contribute to the development and review of whole school policies to ensure they consider the needs of looked-after and previously looked-after children
- Promote a culture in which looked-after and previously looked-after children are encouraged and supported to engage with their education and other school activities
- Act as a source of advice for teachers about working with looked-after and previously looked-after children
- Work directly with looked-after and previously looked-after children and their carers, parents and guardians to promote good home-school links, support progress and encourage high aspirations
- Have lead responsibility for the development and implementation of looked-after children's PEPs
- Work closely with the school's Designated Safeguarding Lead to ensure that any safeguarding concerns regarding looked-after and previously looked-after children are quickly and effectively responded to
- Involve parents and guardians of previously looked-after children in decisions affecting their child's education

### **Supporting looked-after children**

The designated teacher will:

- Make sure looked-after children's PEPs meet their needs by working closely with other teachers to assess each child's specific educational needs
- Have overall responsibility for leading the process of target-setting in PEPs
- Monitor and track how looked-after children's attainment progresses under their PEPs
- If a child is not on track to meet their targets, be instrumental in agreeing the best way forward with them in order to make progress, and ensure that this is reflected in their PEP
- Ensure the identified actions of PEPs are put in place
- During the development and review of PEPs, help the school and relevant local authority decide what arrangements work best for pupils
- Ensure that:
  - A looked-after child's PEP is reviewed before the statutory review of their care plan - this includes making sure the PEP is up to date and contains any new information since the last PEP review, including whether agreed provision is being delivered
  - PEPs are clear about what has or has not been taken forward, noting what resources may be required to further support the child and from where these may be sourced
  - The updated PEP is passed to the child's social worker and VSH ahead of the statutory review of their care plan

- Transfer a looked-after child's PEP to their next school or college, making sure it is up to date and that the local authority responsible for looking after them has the most recent version

## **Supporting both looked-after children and previously looked-after children**

The designated teacher will:

- Ensure the specific needs of looked-after and previously looked-after children are understood by staff and reflected in how the school uses pupil premium funding
- Work with VSHs to agree how pupil premium funding for looked-after children can most effectively be used to improve their attainment
- Help raise the awareness of parents and guardians of previously looked-after children about pupil premium funding and other support for these children
- Play a key part in decisions on how pupil premium funding is used to support previously looked-after children
- Encourage parents' and guardians' involvement in deciding how pupil premium funding is used to support their child, and be the main contact for queries about its use
- Ensure teachers have awareness and understanding of the specific needs of looked-after and previously looked-after children in areas like attendance, homework, behaviour and future career planning
- Be aware of the special educational needs (SEN) of looked-after and previously looked-after children, and make sure teachers also have awareness and understanding of this
- Ensure the SEND code of practice, as it relates to looked-after children, is followed
- Make sure PEPs work in harmony with any education, health and care (EHC) plans that a looked-after child may have
- Ensure that, with the help of VSHs, they have the skills to identify signs of potential SEN issues in looked-after and previously looked-after children, and know how to access further assessment and support where necessary
- Ensure that they and other staff can identify signs of potential mental health issues in looked-after and previously looked-after children and understand where the school can draw on specialist services
- Put in place robust arrangements to have strengths and difficulties questionnaires (SDQs) completed for looked-after children, and use the results of these SDQs to inform PEPs
- Put in place mechanisms for understanding the emotional and behavioural needs of previously looked-after children

## **Relationships beyond the school**

The designated teacher will:

- Proactively engage with social workers and other professionals to enable the school to respond effectively to the needs of looked-after and previously looked-after children

- Discuss with social workers how the school should engage with birth parents, and ensure the school is clear about who has parental responsibility and what information can be shared with whom
- Be open and accessible to parents and guardians of previously looked-after children and encourage them to be actively involved in their children's education
- Proactively build relationships with local authority professionals, such as VSHs and SEN departments
- Consider how the school works with others outside of the school to maximise the stability of education for looked-after children, such as:
  - Finding ways of making sure the latest information about educational progress is available to contribute to the statutory review of care plans
  - Ensuring mechanisms are in place to inform VSHs when looked-after children are absent without authorisation and work with the responsible authority to take appropriate safeguarding action
  - Talking to the child's social worker and/or other relevant parties in the local authority regarding any decisions about changes in care placements which will disrupt the child's education, providing advice about the likely impact and what the local authority should do to minimise disruption
  - Making sure that, if a looked-after child moves school, their new designated teacher receives any information needed to help the transition process
- Seek advice from VSHs about meeting the needs of individual previously looked-after children, but only with the agreement of their parents or guardians
- Make sure that for each looked-after child:
  - There's an agreed process for how the school works in partnership with the child's carer and other professionals, such as their social worker, in order to review and develop educational progress
  - School policies are communicated to their carer and social worker and, where appropriate, birth parents
  - Teachers know the most appropriate person to contact where necessary, such as who has the authority to sign permission slips
- Where a looked-after child is at risk of exclusion:
  - Contact the VSH as soon as possible so they can help the school decide how to support the child to improve their behaviour and avoid exclusion becoming necessary
  - Working with the VSH and child's carers, consider what additional assessment and support needs to be put in place to address the causes of the child's behaviour
- Where a previously looked-after child is at risk of exclusion, talk to the child's parents or guardians before seeking advice from the VSH on avoiding exclusion

### **30. Children with family members in prison**

Children who have a parent in prison are at risk of poor outcomes including poverty, stigma, isolation and poor mental health. School will access support for any affected children through The National Information Centre on Children of Offenders ([NICCO](#)) who can provide information designed to support professionals working with offenders and their children.

### **31. Homelessness**

AHS recognises that being homeless or being at risk of becoming homeless presents a real risk to a child's welfare and that some 16 and 17 year olds could be living independently from their parents or guardians. If there are indicators that a family or individual is at risk, School will seek timely support from the local authority.

### **32. Modern Slavery and the National referral Mechanism**

Modern slavery encompasses human trafficking and slavery, servitude and forced or compulsory labour. Exploitation can take many forms, including sexual exploitation, forced labour, slavery, servitude, forced criminality and the removal of organs. If School is concerned that a child is being affected by modern slavery they will refer to the Home Office guidance for further information on the indicators that someone may be a victim, what support is available to victims and how to refer them to the NRM, whilst also seeking support from the local authority.

[Modern slavery: how to identify and support victims - GOV.UK \(\[www.gov.uk\]\(http://www.gov.uk\)\)](#)

### **33. Allegations against pupils**

If an allegation is made against a pupil, the school will follow the procedures in the Behaviour Policy with regards to sanctions that may need to be applied.

Where there is a risk of significant harm, a child on child referral will be made to Children's Services for either victim, perpetrator or both.

If it is necessary for a child to be interviewed by the police, or other authorities, school will ensure that parents/carers are informed as soon as possible, following advice from external agencies and that the child is supported by an appropriate adult during the interview. The safety and welfare of the child will always be carefully considered by school.

### **34. Children with health needs that cannot attend school**

At AHS, we aim to ensure that suitable education is arranged for pupils on roll who cannot attend school due to health needs. We are guided by the requirements of the Education Act 1996.

The school will attempt to make arrangements to deliver suitable education for children with health needs who cannot attend school. This will usually be overseen by our SENDCo or another member of the DSL team. Staff will be alert to any safeguarding concerns, just as they would be with a student attending school, and will raise any concerns with the DSL as outlined in Section 4 above. Please see our separate policy on Students With Health Needs Who Can't Attend School for full details.

### **35. Pupils with special educational needs and disabilities**

We recognise that pupils with special educational needs and disabilities (SEND) can face additional safeguarding challenges. Additional barriers can exist when recognising abuse and neglect in this group, including:

- Assumptions that indicators of possible abuse, such as behaviour, mood and injury relate to the child's disability without further exploration
- Pupils being more prone to peer group isolation than other pupils
- The potential for pupils with SEND being disproportionately impacted by behaviours such as bullying, without outwardly showing any signs
- Communication barriers and difficulties in overcoming these barriers

### **36. Use of Photography**

We will often use photographs and film to capture achievements, monitor a child's development and help promote successes within our school. Due consideration will be given to the appropriateness of clothing and posture and details such as a student's name or age will not be shared unless integral to the use of the image (such as the acceptance of an award) in particular when additional identifiers (i.e. a school or uniform logo) are being shared. We ask parents if they wish to opt in to photo consent and acknowledge the right of parents and students to withhold or withdraw consent at any point in time of the duration the student is at the school. Please refer to our Data Protection and Confidentiality Policy.

### **37. Policy Review**

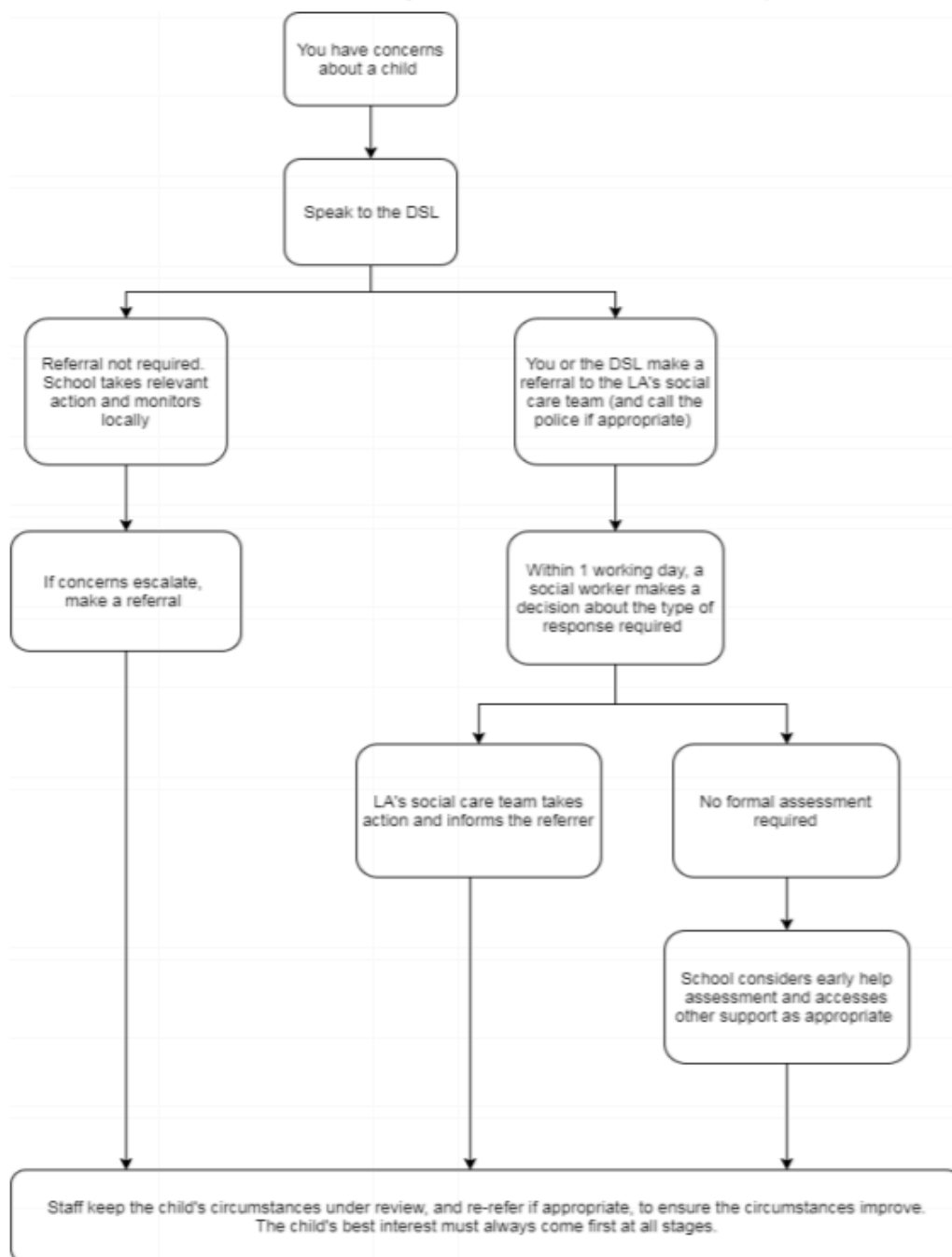
The Governing Body of our school is responsible for ensuring the annual review of this policy. The date the next review is due is on the front cover of this policy.

## Appendix

Everyone who works with children has a duty to safeguard and promote their welfare. They should be aware of the signs and indicators of abuse and know what to do and to whom to speak if they become concerned about a child or if a child discloses to them.

The following is intended as a reference for school staff and parents/carers if they become concerned that a child is suffering or likely to suffer significant harm.

### Appendix 1 - procedure if you have concerns about a child's welfare



## **Appendix 2: Categories of Abuse**

The Children Act 1989 defines abuse as when a child is suffering or is likely to suffer 'significant harm'. Harm means ill treatment or the impairment of health or development. Four categories of abuse are identified:

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

### **Physical Abuse**

A form of abuse, which 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**

The persistent emotional maltreatment of a child such as to cause severe and persistent adverse effects on the child's emotional development. It may involve conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability, as well as overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyber bullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, though it may occur alone.

### **Sexual Abuse**

Involves forcing or enticing a child 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. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse. Sexual abuse can take place online and technology can be used to facilitate offline abuse. Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.

### **Neglect**

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

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



- b) protect a child from physical and emotional harm or danger
- c) ensure adequate supervision (including the use of inadequate caregivers)
- d) ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

## **Appendix 3: Additional Information about abuse and safeguarding issues from KCSiE**

### **Annex B of Keeping Children Safe in Education**

This contains important additional information about specific forms of abuse and safeguarding issues. School and college leaders and those staff who work directly with children should read this annex so we have included it here.

#### **Child abduction and community safety incidents**

Child abduction is the unauthorised removal or retention of a minor from a parent or anyone with legal responsibility for the child. Child abduction can be committed by parents or other family members; by people known but not related to the victim (such as neighbours, friends and acquaintances); and by strangers.

Other community safety incidents in the vicinity of a school can raise concerns amongst children and parents, for example, people loitering nearby or unknown adults engaging children in conversation.

As children get older and are granted more independence (for example, as they start walking to school on their own) it is important they are given practical advice on how to keep themselves safe. Many schools provide outdoor-safety lessons run by teachers or by local police staff.

It is important that lessons focus on building children's confidence and abilities rather than simply warning them about all strangers. Further information is available at: [www.actionagainstabduction.org](http://www.actionagainstabduction.org) and [www.clevernevergoes.org](http://www.clevernevergoes.org)

#### **Children and the court system**

Children are sometimes required to give evidence in criminal courts, either for crimes committed against them or for crimes they have witnessed. There are two age appropriate guides to support children [5-11-year olds](#) and [12-17 year olds](#).

The guides explain each step of the process, support and special measures that are available. There are diagrams illustrating the courtroom structure and the use of video links is explained.

Making child arrangements via the family courts following separation can be stressful and entrench conflict in families. This can be stressful for children. The Ministry of Justice has launched an online child arrangements information tool with clear and concise information on the dispute resolution service. This may be useful for some parents and carers.

#### **Children absent from education**

All staff should be aware that children who are absent, particularly repeatedly, can act as a vital warning sign of a range of safeguarding possibilities. This may include abuse and neglect, which may include sexual abuse or exploitation and can also be a sign of child

criminal exploitation including involvement in county lines. It may indicate mental health problems, risk of substance abuse, risk of travelling to conflict zones, risk of female genital mutilation, 'honour'-based abuse or risk of forced marriage. Early intervention is necessary to identify the existence of any underlying safeguarding risk and to help prevent the risks of a child going missing in future. Staff should be aware of our unauthorised absence and children missing from education procedures: Any student whose absence is causing concern and where it has not been possible to make contact with a parent / carer will be reported as a Child Missing in Education (CME) using the Buckinghamshire CME Protocol.

### **Children with family members in prison**

Approximately 200,000 children in England and Wales have a parent sent to prison each year. These children are at risk of poor outcomes including poverty, stigma, isolation and poor mental health. The National Information Centre on Children of Offenders, NICCO provides information designed to support professionals working with offenders and their children, to help mitigate negative consequences for those children.

### **Child Criminal Exploitation (CCE) and Child Sexual Exploitation (CSE)**

We know that different forms of harm often overlap, and that perpetrators may subject children and young people to multiple forms of abuse, such as criminal exploitation (including county lines) and sexual exploitation.

In some cases the exploitation or abuse will be in exchange for something the victim needs or wants (for example, money, gifts or affection), and/or will be to the financial benefit or other advantage, such as increased status, of the perpetrator or facilitator. Children can be exploited by adult males or females, as individuals or in groups. They may also be exploited by other children, who themselves may be experiencing exploitation - where this is the case, it is important that the child perpetrator is also recognised as a victim.

Whilst the age of the child may be a contributing factor for an imbalance of power, there are a range of other factors that could make a child more vulnerable to exploitation, including, sexual identity, cognitive ability, learning difficulties, communication ability, physical strength, status, and access to economic or other resources.

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

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

Children who have been exploited will need additional support to help maintain them in education.

CSE can be a one-off occurrence or a series of incidents over time and range from opportunistic to complex organised abuse. It can involve force and/or enticement-based methods of compliance and may, or may not, be accompanied by violence or threats of violence.

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

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

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

### **County lines**

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

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

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

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

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

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

### **Modern Slavery and the National Referral Mechanism**

Modern slavery encompasses human trafficking and slavery, servitude and forced or compulsory labour. Exploitation can take many forms, including: sexual exploitation, forced labour, slavery, servitude, forced criminality and the removal of organs. Further information on the signs that someone may be a victim of modern slavery, the support

available to victims and how to refer them to the NRM is available in the Modern Slavery Statutory Guidance. Modern slavery: how to identify and support victims -GOV.UK ([www.gov.uk](http://www.gov.uk))

## **Cybercrime**

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

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

Children with particular skill and interest in computing and technology may inadvertently or deliberately stray into cyber-dependent crime.

If there are concerns about a child in this area, the Designated Safeguarding Lead (or a deputy), should consider referring into the Cyber Choices programme. This is a nationwide police programme supported by the Home Office and led by the National Crime Agency, working with regional and local policing. It aims to intervene where young people are at risk of committing, or being drawn into, low level cyber-dependent offences and divert them to a more positive use of their skills and interests. Note that Cyber Choices does not currently cover 'cyber-enabled' crime such as fraud, purchasing of illegal drugs on-line and child sexual abuse and exploitation, nor other areas of concern such as on-line bullying or general on-line safety.

Additional advice can be found at: Cyber Choices, 'NPCC- When to call the Police' and National Cyber Security Centre - NCSC.GOV.UK

## **Domestic abuse**

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

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

information for those working with domestic abuse victims and perpetrators, including the impact on children.

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

Young people can also experience domestic abuse within their own intimate relationships. This form of peer on peer abuse is sometimes referred to as 'teenage relationship abuse'. Depending on the age of the young people, this may not be recognised in law under the statutory definition of 'domestic abuse' (if one or both parties are under 16). However, as with any child under 18, where there are concerns about safety or welfare, child safeguarding procedures should be followed and both young victims and young perpetrators should be offered support. The Act's provisions, including the new definition, will commence over the coming months.

### **Operation Encompass**

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

### **National Domestic Abuse Helpline**

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

Additional advice on identifying children who are affected by domestic abuse and how they can be helped is available at:

- NSPCC- UK domestic-abuse Signs Symptoms Effects
- Refuge what is domestic violence/effects of domestic violence on children
- Safelives: young people and domestic abuse.
- Domestic abuse: specialist sources of support - GOV.UK ([www.gov.uk](http://www.gov.uk)) (includes information for adult victims, young people facing abuse in their own relationships
- and parents experiencing child to parent violence/abuse)
- Home : Operation Encompass (includes information for schools on the impact of domestic abuse on children)

## Homelessness

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

The Homelessness Reduction Act 2017 places a new legal duty on English councils so that everyone who is homeless or at risk of homelessness will have access to meaningful help including an assessment of their needs and circumstances, the development of a personalised housing plan, and work to help them retain their accommodation or find a new place to live. The following factsheets usefully summarise the new duties: Homeless Reduction Act Factsheets. The new duties shift focus to early intervention and encourage those at risk to seek support as soon as possible, before they are facing a homelessness crisis.

In most cases school and college staff will be considering homelessness in the context of children who live with their families, and intervention will be on that basis. However, it should also be recognised that in some cases 16 and 17 year olds could be living independently from their parents or guardians, for example through their exclusion from the family home, and will require a different level of intervention and support. Children's social care will be the lead agency for these children and the Designated Safeguarding Lead (or a deputy) should ensure appropriate referrals are made based on the child's circumstances. The Department and the Ministry of Housing, Communities and Local Government have published joint statutory guidance on the provision of accommodation for 16 and 17 year olds who may be homeless and/or require accommodation: [here](#).

**So-called 'honour'-based abuse** (inc Female Genital Mutilation and Forced Marriage)  
So-called 'honour'-based abuse (HBA) encompasses incidents or crimes which have been committed to protect or defend the honour of the family and/or the community, including female genital mutilation (FGM), forced marriage, and practices such as breast ironing. Abuse committed in the context of preserving 'honour' often involves a wider network of family or community pressure and can include multiple perpetrators. It is important to be aware of this dynamic and additional risk factors when deciding what form of safeguarding action to take. All forms of HBA are abuse (regardless of the motivation) and should be handled and escalated as such. Professionals in all agencies, and individuals and groups in relevant communities, need to be alert to the possibility of a child being at risk of HBA, or already having suffered HBA.

### Actions:

If staff have a concern regarding a child who might be at risk of HBA or who has suffered from HBA, they should speak to the Designated Safeguarding Lead (or deputy). As appropriate, the Designated Safeguarding Lead (or deputy) will activate local safeguarding procedures, using existing national and local protocols for multi-agency liaison with police and children's social care. Where FGM has taken place, since 31 October 2015 there has been a mandatory reporting duty placed on teachers<sup>128</sup> that requires a different approach (see following section).

## **FGM**

FGM comprises all procedures involving partial or total removal of the external female genitalia or other injury to the female genital organs. It is illegal in the UK and a form of child abuse with long-lasting harmful consequences.

### **FGM mandatory reporting duty for teachers**

Section 5B of the Female Genital Mutilation Act 2003 (as inserted by section 74 of the Serious Crime Act 2015) places a statutory duty upon teachers, along with regulated health and social care professionals in England and Wales, to report to the police where they discover (either through disclosure by the victim or visual evidence) that FGM appears to have been carried out on a girl under 18. Those failing to report such cases may face disciplinary sanctions. It will be rare for teachers to see visual evidence, and they should not be examining pupils or students, but the same definition of what is meant by “to discover that an act of FGM appears to have been carried out” is used for all professionals to whom this mandatory reporting duty applies. Information on when and how to make a report can be found at: [Mandatory reporting of female genital mutilation procedural information](#).

Under Section 5B(11)(a) of the Female Genital Mutilation Act 2003, “teacher” means, in relation to England, a person within section 141A(1) of the Education Act 2002 (persons employed or engaged to carry out teaching work at schools and other institutions in England).

Teachers must personally report to the police cases where they discover that an act of FGM appears to have been carried out. Section 5B(6) of the Female Genital Mutilation Act 2003 states teachers need not report a case to the police if they have reason to believe that another teacher has already reported the case.

Unless the teacher has good reason not to, they should still consider and discuss any such case with the school’s or college’s Designated Safeguarding Lead (or deputy) and involve children’s social care as appropriate. The duty does not apply in relation to at risk or suspected cases (i.e. where the teacher does not discover that an act of FGM appears to have been carried out, either through disclosure by the victim or visual evidence) or in cases where the woman is 18 or over. In these cases, teachers should follow local safeguarding procedures. The following is a useful summary of the FGM mandatory reporting duty: FGM Fact Sheet. Further information can be found in the Multi-agency statutory guidance on female genital mutilation and the FGM resource pack particularly section 13.

### **Forced marriage**

Forcing a person into a marriage is a crime in England and Wales. A forced marriage is one entered into without the full and free consent of one or both parties and where violence, threats or any other form of coercion is used to cause a person to enter into a marriage. Threats can be physical or emotional and psychological. A lack of full and free consent can be where a person does not consent or where they cannot consent if they have learning disabilities, for example). Nevertheless, some perpetrators use perceived cultural practices as a way to coerce a person into marriage. Schools and colleges can play an important role in safeguarding children from forced marriage.

The Forced Marriage Unit (FMU) has created: Multi-agency practice guidelines: handling cases of forced marriage (pages 32-36 of which focus on the role of schools and colleges)

and, Multi-agency statutory guidance for dealing with forced marriage, which can both be found at <https://www.gov.uk/guidance/forced-marriage>. School and college staff can contact the Forced Marriage Unit if they need advice or information: Contact: 020 7008 0151 or email [fm@fcdo.gov.uk](mailto:fm@fcdo.gov.uk).

## **Preventing radicalisation**

Children are vulnerable to extremist ideology and radicalisation. Similar to protecting children from other forms of harms and abuse, protecting children from this risk should be a part of a schools' or colleges' safeguarding approach.

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

There is no single way of identifying whether a child is likely to be susceptible to an extremist ideology. Background factors combined with specific influences such as family and friends may contribute to a child's vulnerability. Similarly, radicalisation can occur through many different methods (such as social media or the internet) and settings (such as within the home).

However, it is possible to protect vulnerable people from extremist ideology and intervene to prevent those at risk of radicalisation being radicalised. As with other safeguarding risks, staff should be alert to changes in children's behaviour, which could indicate that they may be in need of help or protection. Staff should use their judgement in identifying children who might be at risk of radicalisation and act proportionately which may include the Designated Safeguarding Lead (or deputy) making a Prevent referral.

The school's or college's Designated Safeguarding Lead (and any deputies) are aware of [local procedures for making a Prevent referral](#).

## **The Prevent duty**

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

As defined in the Government's Counter Extremism Strategy

<https://www.gov.uk/government/publications/counter-extremism-strategy>.

As defined in the Revised Prevent Duty Guidance for England and Wales.

<https://www.gov.uk/government/publications/prevent-duty-guidance/revised-prevent-duty-guidance-for-england-and-wales>



As defined in the Terrorism Act 2000 (TACT 2000)

<http://www.legislation.gov.uk/ukpga/2000/11/contents>

The Prevent duty should be seen as part of schools' and colleges' wider safeguarding obligations. Designated Safeguarding Leads and other senior leaders in schools should familiarise themselves with the revised Prevent duty guidance: for England and Wales, especially paragraphs 57-76, which are specifically concerned with schools (and also covers childcare). Designated Safeguarding Leads and other senior leaders in colleges should familiarise themselves with the Prevent duty guidance: for further education institutions in England and Wales. The guidance is set out in terms of four general themes: risk assessment, working in partnership, staff training, and IT policies.

### **Channel**

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

The Designated Safeguarding Lead should consider if it would be appropriate to share any information with the new school or college in advance of a child leaving. For example, information that would allow the new school or college to continue supporting victims of abuse or those who are currently receiving support through the 'Channel' programme, and have that support in place for when the child arrives. Statutory guidance on Channel is available at: Channel guidance.

### **Additional support**

The Department has published further advice for schools on the Prevent duty. The advice is intended to complement the Prevent guidance and signposts to other sources of advice and support. According to the Prevent duty guidance 'having due regard' means that the authorities should place an appropriate amount of weight on the need to prevent people being drawn into terrorism when they consider all the other factors relevant to how they carry out their usual functions.

The Home Office has developed three e-learning modules:

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

Educate Against Hate, is a government website designed to support school teachers and leaders to help them safeguard their students from radicalisation and extremism. The platform provides free information and resources to help school staff identify and address the risks, as well as build resilience to radicalisation.

For advice specific to further education, the Education and Training Foundation (ETF) hosts the Prevent for FE and Training. This hosts a range of free, sector specific resources to support further education settings to comply with the Prevent duty. This includes the Prevent Awareness e-learning, which offers an introduction to the duty, and the Prevent Referral e-learning, which is designed to support staff to make robust, informed and proportionate referrals.

The ETF Online Learning environment provides online training modules for practitioners, leaders and managers, support staff and governors/Board members outlining their roles and responsibilities under the duty.

### **Child on child abuse**

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

### **Sexual violence and sexual harassment between children in schools and colleges**

Sexual violence and sexual harassment can occur between two children of any age and sex from primary to secondary stage and into colleges. It can also occur online. It can also occur through a group of children sexually assaulting or sexually harassing a single child or group of children.

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 or college. Sexual violence and sexual harassment exist on a continuum and may overlap, they can occur online and face to face (both physically and verbally) and are never acceptable.

It is essential that all victims are reassured that they are being taken seriously and that they will be supported and kept safe. A victim should never be given the impression that they are creating a problem by reporting sexual violence or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report. Staff should be aware that some groups are potentially more at risk. Evidence shows girls, children with special educational needs and disabilities (SEND) and LGBT children are at greater risk.

Staff 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
- not tolerating or dismissing sexual violence or sexual harassment as “banter”, “part of growing up”, “just having a laugh” or “boys being boys” and

- challenging 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.

## **What is sexual violence and sexual harassment?**

### **Sexual violence**

It is important that school and college staff are aware of sexual violence and the fact children can, and sometimes do, abuse their peers in this way and that it can happen both inside and outside of school/college. When referring to sexual violence we are referring to sexual violence offences under the Sexual Offences Act 2003<sup>135</sup> as described below:

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

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

**Sexual Assault:** A person (A) commits an offence of sexual assault if s/he intentionally touches another person (B), the touching is sexual, B does not consent to the touching and A does not reasonably believe that B consents. (Schools should be aware that sexual assault covers a very wide range of behaviour so a single act of kissing someone without consent, or touching someone's bottom/breasts/genitalia without consent, can still constitute sexual assault.)

**Causing someone to engage in sexual activity without consent:** A person (A) commits an offence if: s/he intentionally causes another person (B) to engage in an activity, the activity is sexual, B does not consent to engaging in the activity, and A does not reasonably believe that B consents. (This could include forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party.)

### **What is consent?**

Consent is about having the freedom and capacity to choose. Consent to sexual activity may be given to one sort of sexual activity but not another, e.g. to vaginal but not anal sex or penetration with conditions, such as wearing a condom. Consent can be withdrawn at any time during sexual activity and each time activity occurs. Someone consents to vaginal, anal or oral penetration only if s/he agrees by choice to that penetration and has the freedom and capacity to make that choice.<sup>137</sup> Further information about consent can be found here: [Rape Crisis England & Wales](#)

### **Sexual consent**

- a child under the age of 13 can never consent to any sexual activity
- the age of consent is 16
- sexual intercourse without consent is rape

It is important school and college staff (and especially Designated Safeguarding Leads and their deputies) understand consent. This will be especially important if a child is reporting they have been raped or sexually assaulted in any way.

PSHE Teaching about consent from the PSHE association provides advice and lesson plans to teach consent at Key stage 3 and 4.

## **Sexual harassment**

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

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

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

As set out in UKCIS Sharing nudes and semi-nudes: advice for education settings working with children and young people (which provides detailed advice for schools and colleges) taking and sharing nude photographs of U18s is a criminal offence;

It is important to differentiate between consensual sexual activity between children of a similar age and that, which involves any power imbalance, coercion or exploitation. Due to their additional training, the Designated Safeguarding Lead (or deputy) should be involved and generally speaking leading the school or college response. If in any doubt, they should seek expert advice.

Project deSHAME from Childnet provides useful research, advice and resources regarding online sexual harassment.

Consensual image sharing, especially between older children of the same age, may require a different response. It might not be abusive - but children still need to know it is illegal- whilst non-consensual is illegal and abusive.

## **Upskirting**

The Voyeurism (Offences) Act 2019, which is commonly known as the Upskirting Act, came into force on 12 April 2019. ‘Upskirting’ is where someone takes a picture under a person’s clothing (not necessarily a skirt) without their permission and or knowledge, with the

intention of viewing their genitals or buttocks (with or without underwear) to obtain sexual gratification, or cause the victim humiliation, distress or alarm. It is a criminal offence. Anyone of any sex, can be a victim. The Voyeurism (Offences) Act 2019, which amends the Sexual Offences Act 2003 to make upskirting a specific offence of voyeurism. The Act came into force on 12 April 2019.

### **The response to a report of sexual violence or sexual harassment**

The initial response to a report from a child is incredibly important. How the school or college responds to a report can encourage or undermine the confidence of future victims of sexual violence and sexual harassment to report or come forward. Schools and colleges not recognising, acknowledging or understanding the scale of harassment and abuse and/or downplaying of some behaviours can actually lead to a culture of unacceptable behaviour. It is essential that all victims are reassured that they are being taken seriously and that they will be supported and kept safe. A victim should never be given the impression that they are creating a problem by reporting sexual violence or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report.

If staff have a concern about a child or a child makes a report to them, they should follow the referral process as set out in Section 4 of this policy. As is always the case, if staff are in any doubt as to what to do they should speak to the Designated Safeguarding Lead (or a deputy).

### **Annex D: Online Safety**

There is a wealth of information available to support schools, colleges and parents/carers to keep children safe online. The following list is not exhaustive but should provide a useful starting point:

#### **Advice for governing bodies/proprietors and senior leaders**

- Childnet provide guidance for schools on cyberbullying
- Educateagainsthate provides practical advice and support on protecting children from extremism and radicalisation
- London Grid for Learning provides advice on all aspects of a school or college's online safety arrangements
- NSPCC provides advice on all aspects of a school or college's online safety arrangements
- Safer recruitment consortium "guidance for safe working practice", which may help ensure staff behaviour policies are robust and effective
- Searching screening and confiscation is departmental advice for schools on searching children and confiscating items such as mobile phones
- South West Grid for Learning provides advice on all aspects of a school or college's online safety arrangements
- Use of social media for online radicalisation - A briefing note for schools on how social media is used to encourage travel to Syria and Iraq
- UK Council for Internet Safety have provided advice on, and an Online Safety Audit Tool to help mentors of trainee teachers and newly qualified teachers induct mentees and provide ongoing support, development and monitoring
- Department for Digital, Culture, Media & Sport (DCMS) Online safety guidance if you own or manage an online platform provides practical steps on how companies can embed safety into the design of their online platforms. It

offers information on common platform features and functions (such as private messaging) and their risks, as well as steps that can be taken to manage that risk.

- Department for Digital, Culture, Media & Sport (DCMS) A business guide for protecting children on your online platform provides guidance to businesses on how to protect children on their online platform. It outlines existing regulatory requirements and provides best practice advice on how to protect children's personal data, ensure content is appropriate for the age of users, ensure positive user-to-user interactions and address child sexual exploitation and abuse.
- Remote education, virtual lessons and live streaming
- Case studies on remote education practice are available for schools to learn from each other
- Departmental guidance on safeguarding and remote education including planning remote education strategies and teaching remotely
- London Grid for Learning guidance, including platform specific advice
- National Cyber Security Centre guidance on choosing, configuring and deploying video conferencing
- National Cyber Security Centre guidance on how to set up and use video conferencing
- UK Safer Internet Centre guidance on safe remote learning
- There is new advice from the government on [Harmful online challenges and online hoaxes](#) - this includes advice on preparing for any online challenges and hoaxes, sharing information with parents and carers and where to get help and support.

### Support for children

- Childline for free and confidential advice
- UK Safer Internet Centre to report and remove harmful online content
- CEOP for advice on making a report about online abuse

### Parental support

- Childnet offers a toolkit to support parents and carers of children of any age to start discussions about their online life, to set boundaries around online behaviour and technology use, and to find out where to get more help and support
- Commonsensemedia provide independent reviews, age ratings, & other information about all types of media for children and their parents
- Government advice about protecting children from specific online harms such as child sexual abuse, sexting, and cyberbullying
- Government advice about security and privacy settings, blocking unsuitable content, and parental controls
- Internet Matters provide age-specific online safety checklists, guides on how to set parental controls on a range of devices, and a host of practical tips to help children get the most out of their digital world

- Let's Talk About It provides advice for parents and carers to keep children safe from online radicalisation
- London Grid for Learning provides support for parents and carers to keep their children safe online, including tips to keep primary aged children safe online
- Stopitnow resource from The Lucy Faithfull Foundation can be used by parents and carers who are concerned about someone's behaviour, including children who may be displaying concerning sexual behaviour (not just about online)
- National Crime Agency/CEOP Thinkuknow provides support for parents and carers to keep their children safe online
- Net-aware provides support for parents and carers from the NSPCC and O2, including a guide to social networks, apps and games
- Parentzone provides help for parents and carers on how to keep their children safe online
- Parent info from Parentzone and the National Crime Agency provides support and guidance for parents from leading experts and organisations
- UK Safer Internet Centre provide tips, advice, guides and other resources to help keep children safe online

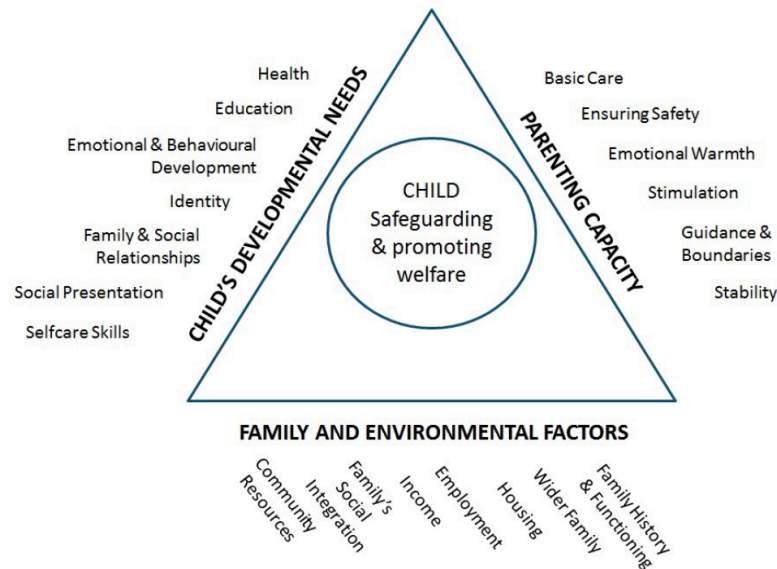
#### **Appendix 4: Contextual Safeguarding**

Contextual Safeguarding is an approach to understanding, and responding to, children's experiences of significant harm beyond their families. It recognises that the different relationships that children form in their neighbourhoods, schools and online can feature violence and abuse. Parents and carers may have little influence over these contexts, and children's experiences of extra-familial abuse can undermine parent/carers children relationships.

At AHS we recognise that safeguarding incidents and/or behaviours can be associated with factors outside the school and/or can occur between children outside of these environments and we will respond to such concerns, reporting to the appropriate agencies in order to support and protect the pupil. All staff, and especially the DSLs, should consider whether children are at risk of abuse or exploitation in situations outside their families. Extra-familial harms take a variety of different forms and children can be vulnerable to multiple harms including (but not limited to) sexual exploitation, criminal exploitation, and serious youth violence. Children who may be alleged perpetrators will also be supported to understand the impact of contextual issues on their safety and welfare. In such cases the individual needs and vulnerabilities of each child will be considered. Further guidance can be found at: <https://contextualsafeguarding.org.uk/>

## Assessment Framework

(from Working Together to Safeguard Children, July 2018)



Every assessment should draw together relevant information gathered from the child and their family and from relevant practitioners including teachers and school staff, early years workers, health practitioners, the police and adult social care.

Every assessment of a child should reflect the unique characteristics of the child within their family and community context.

Each child whose referral has been accepted by children's social care should have their individual needs assessed, including an analysis of the parental capacity to meet those needs, whether they arise from issues within the family or the wider community.

Frequently, more than one child from the same family is referred and siblings within the family should always be considered.

## Appendix 5: Safer Recruitment

AHS follows the guidance as set out in the KCSIE and uses [this checklist](#) to ensure that all the appropriate checks have been carried out on new staff and volunteers.

The recruitment steps outlined below are based on part 3 of Keeping Children Safe in Education.

To make sure we recruit suitable people, we will ensure that those involved in the recruitment and employment of staff to work with children have received appropriate safer recruitment training.

We have put the following steps in place during our recruitment and selection process to ensure we are committed to safeguarding and promoting the welfare of children.



## **Advertising**

When advertising roles, we will make clear:

- Our school's commitment to safeguarding and promoting the welfare of children
- That safeguarding checks will be undertaken
- The safeguarding requirements and responsibilities of the role, such as the extent to which the role will involve contact with children
- Whether or not the role is exempt from the Rehabilitation of Offenders Act 1974 and the amendments to the Exceptions Order 1975, 2013 and 2020. If the role is exempt, certain spent convictions and cautions are 'protected', so they do not need to be disclosed, and if they are disclosed, we cannot take them into account

## **Application forms**

Our application forms will:

- Include a statement saying that it is an offence to apply for the role if an applicant is barred from engaging in regulated activity relevant to children (where the role involves this type of regulated activity)
- Include a copy of, or link to, our child protection and safeguarding policy and our policy on the employment of ex-offenders

## **Shortlisting**

Our shortlisting process will involve at least 2 people and will:

- Consider any inconsistencies and look for gaps in employment and reasons given for them
- Explore all potential concerns
- Carry out an online search as part of their due diligence on the shortlisted candidates. This may help identify any incidents or issues that have happened, and are publicly available online, which the school might want to explore with the applicant at interview. Shortlisted candidates must be told that this search will be carried out.

## **Once we have shortlisted candidates, we will ask shortlisted candidates to:**

Complete a self-declaration of their criminal record or any information that would make them unsuitable to work with children, so that they have the opportunity to share relevant information and discuss it at interview stage. The information we will ask for includes:

- If they have a criminal history
- Whether they are included on the barred list
- Whether they are prohibited from teaching
- Information about any criminal offences committed in any country in line with the law as applicable in England and Wales
- Any relevant overseas information
- Sign a declaration confirming the information they have provided is true
- Seeking references and checking employment history
- We will obtain references before interview. Any concerns raised will be explored further with referees and taken up with the candidate at interview.

#### **When seeking references we will:**

- Not accept open references
- Liaise directly with referees and verify any information contained within references with the referees. Ensure any references are from the candidate's current employer and completed by a senior person. Where the referee is school based, we will ask for the reference to be confirmed by the Headteacher/principal as accurate in respect to disciplinary investigations
- Obtain verification of the candidate's most recent relevant period of employment if they are not currently employed
- Secure a reference from the relevant employer from the last time the candidate worked with children if they are not currently working with children
- Compare the information on the application form with that in the reference and take up any inconsistencies with the candidate
- Resolve any concerns before any appointment is confirmed

#### **Interview and selection**

##### **When interviewing candidates, we will:**

- Probe any gaps in employment, or where the candidate has changed employment or location frequently, and ask candidates to explain this
- Explore any potential areas of concern to determine the candidate's suitability to work with children
- Record all information considered and decisions made

#### **Pre-appointment vetting checks**

We will record all information on the checks carried out in the school's single central record (SCR). Copies of these checks, where appropriate, will be held in individuals' personnel files. We follow **requirements and best practice in retaining copies of these checks, as set out below.**

##### **New staff**

All offers of appointment will be conditional until satisfactory completion of the necessary pre-employment checks. When appointing new staff, we will:

- Verify their identity
- Obtain (via the applicant) an enhanced DBS certificate, including barred list information for those who will be engaging in regulated activity (see definition below). We will obtain the certificate before, or as soon as practicable after, appointment, including when using the DBS update service. We will not keep a copy of the certificate for longer than 6 months, but when the copy is destroyed we may still keep a record of the fact that vetting took place, the result of the check and recruitment decision taken
- Obtain a separate barred list check if they will start work in regulated activity before the DBS certificate is available
- Verify their mental and physical fitness to carry out their work responsibilities

- Verify their right to work in the UK. We will keep a copy of this verification for the duration of the member of staff's employment and for 2 years afterwards
- Verify their professional qualifications, as appropriate
- Ensure they are not subject to a prohibition order if they are employed to be a teacher
- Carry out further additional checks, as appropriate, on candidates who have lived or worked outside of the UK. Where available, these will include:
  - For all staff, including teaching positions: criminal records checks for overseas applicants
  - For teaching positions: obtaining a letter of professional standing from the professional regulating authority in the country where the applicant has worked
- Check that candidates taking up a management position\* are not subject to a prohibition from management (section 128) direction made by the secretary of state.  
 \* Management positions are most likely to include, but are not limited to, Headteachers, principals and Deputy/Assistant Headteachers.

#### **Regulated activity means a person who will be:**

- Responsible, on a regular basis in a school or college, for teaching, training, instructing, caring for or supervising children; or
- Carrying out paid, or unsupervised unpaid, work regularly in a school or college where that work provides an opportunity for contact with children; or
- Engaging in intimate or personal care or overnight activity, even if this happens only once and regardless of whether they are supervised or not

#### **Existing staff**

In certain circumstances, we will carry out all the relevant checks on existing staff as if the individual was a new member of staff. These circumstances are when:

- There are concerns about an existing member of staff's suitability to work with children; or
- An individual moves from a post that is not regulated activity to one that is; or
- There has been a break in service of 12 weeks or more

We will refer to the DBS anyone who has harmed, or poses a risk of harm, to a child or vulnerable adult where:

- We believe the individual has engaged in [relevant conduct](#); or
- We believe the individual has received a caution or conviction for a relevant (automatic barring either with or without the right to make representations) offence, under the [Safeguarding Vulnerable Groups Act 2006 \(Prescribed Criteria and Miscellaneous Provisions\) Regulations 2009](#); or
- We believe the 'harm test' is satisfied in respect of the individual (i.e. they may harm a child or vulnerable adult or put them at risk of harm); and

- The individual has been removed from working in regulated activity (paid or unpaid) or would have been removed if they had not left

### **Agency and third-party staff**

We will obtain written notification from any agency or third-party organisation that it has carried out the necessary safer recruitment checks that we would otherwise perform. We will also check that the person presenting themselves for work is the same person on whom the checks have been made.

### **Contractors**

We will ensure that any contractor, or any employee of the contractor, who is to work at the school has had the appropriate level of DBS check (this includes contractors who are provided through a PFI or similar contract). This will be:

- An enhanced DBS check with barred list information for contractors engaging in regulated activity
- An enhanced DBS check, not including barred list information, for all other contractors who are not in regulated activity but whose work provides them with an opportunity for regular contact with children

We will obtain the DBS check for self-employed contractors.

We will not keep copies of such checks for longer than 6 months.

Contractors who have not had any checks will not be allowed to work unsupervised or engage in regulated activity under any circumstances.

We will check the identity of all contractors and their staff on arrival at the school.

### **Trainee/student teachers**

Where applicants for initial teacher training are salaried by us, we will ensure that all necessary checks are carried out.

Where trainee teachers are fee-funded, we will obtain written confirmation from the training provider that necessary checks have been carried out and that the trainee has been judged by the provider to be suitable to work with children.

### **Volunteers**

We will:

- Never leave an unchecked volunteer unsupervised or allow them to work in regulated activity
- Obtain an enhanced DBS check with barred list information for all volunteers who are new to working in regulated activity
- Carry out a risk assessment when deciding whether to seek an enhanced DBS check without barred list information for any volunteers not engaging in regulated activity. We will retain a record of this risk assessment

### **Governors**

All governors and trustees will have an enhanced DBS check without barred list information.

They will have an enhanced DBS check with barred list information if working in regulated activity.

The chair of the board will have their DBS check countersigned by the Secretary of State.

**All proprietors, trustees, local governors and members will also have the following checks:**

- A section 128 check (to check prohibition on participation in management under [section 128 of the Education and Skills Act 2008](#)). [Section 128 checks are only required for local governors if they have retained or been delegated any management responsibilities.]
- Identity
- Right to work in the UK
- Other checks deemed necessary if they have lived or worked outside the UK

### **Alternative provision settings**

When a child is accessing an alternative provision, the school will ensure that the provision has secure and robust safeguarding arrangements in place. A member of staff, from school, will regularly visit the provision and meet with the child to hear their voice.

### **Adults who supervise pupils on work experience**

When organising work experience, we will ensure that policies and procedures are in place to protect children from harm.

We will also consider whether it is necessary for barred list checks to be carried out on the individuals who supervise a pupil under 16 on work experience. This will depend on the specific circumstances of the work experience, including the nature of the supervision, the frequency of the activity being supervised, and whether the work is regulated activity.

### **Pupils staying with host families**

Where the school makes arrangements for pupils to be provided with care and accommodation by a host family to which they are not related (for example, during a foreign exchange visit), we will request enhanced DBS checks with barred list information on those people.

Where the school is organising such hosting arrangements overseas and host families cannot be checked in the same way, we will work with our partner schools abroad to ensure that similar assurances are undertaken prior to the visit.