

HURTWOOD HOUSE

Child Protection and Safeguarding Policy

The names and contact details of relevant personnel are in Section 3 (page 5) of this document.

Details of what to do if a student makes a disclosure to you, or you become aware of a concern in any other way are in Section 8 (page 8) of this document.

Contact details of the relevant agencies are in Section 13 (page 14) of this document.

Reviewed	By	Last reviewed	Last modified
Annually	SMT CE	August 2021	August 2021

1 Policy statement

- 1.1 This policy has regard to statutory guidance *Keeping children safe in education September 2021*, *Working Together to Safeguard Children July 2018*, section 29 of the *Counter Terrorism & Security Act 2015*, paragraphs 57-76 (“the Prevent Guidance”), and is in accordance with locally agreed inter-agency procedures set out by Surrey Safeguarding Children’s Partnership.
- 1.2 This policy has been developed in accordance with the principles established by the Children Acts 1989 and 2004; the Education Act 2002, the Education and Inspections Act 2006, the Education Act 2011, The Equality Act 2010 and:
- 1.2.1 has been authorised by the Partners and the Senior Management Team;
- 1.2.2 is addressed to all members of staff, contractors, peripatetic staff, supply staff and volunteers;
- 1.2.3 is available in hard copy to parents on request and is published on the School website;
- 1.2.4 can be made available in large print or other accessible format if required;
- 1.2.5 and its procedures apply wherever staff or supply staff or volunteers are working with students even where this is away from the School, for example at an activity centre or on an educational visit.
- 1.3 Every student should feel safe and protected from any form of abuse which, in this policy, means any kind of neglect, non-accidental physical injury, sexual exploitation or emotional ill-treatment.
- 1.4 The Designated Safeguarding Lead will be a member of the Senior Management Team.

1.5 **Key messages: Any suspicion or complaints of abuse must be reported to the Designated Safeguarding Lead or a Deputy Designated Safeguarding Lead, or if the complaint involves a member of staff, supply staff or volunteer, to the Headmaster. If the complaint involves the Headmaster or a Partner you must immediately inform the designated officer at the local authority before further action is taken and within one working day without informing the Headmaster.**

1.6 **DO NOT investigate the matter, as this could prejudice the investigations of outside agencies. If, at any point, there is a risk of immediate serious harm to a child, a referral should be made to children’s social care immediately. Anybody can make a referral. If the child’s situation does not appear to be improving the staff member with concerns should press for re-consideration. Concerns should always lead to help for the child at some point.**

2 School Duties

- 2.1 Hurtwood House (School) is committed to safeguarding and promoting the welfare of children and young people and expects all staff and volunteers to share this commitment. In addition, the School has an attitude of 'it could happen here'.

The School will take all reasonable measures to:

- ensure that we practise safer recruitment in checking the suitability of staff and volunteers (including staff employed by another organisation) to work with children and young people in accordance with the statutory guidance given in “*Keeping children safe in education September 2021*”, the Education (Independent School

Standards) (England) Regulations 2014 (as amended) and the National Minimum Standards for Boarding Schools 2015 (refer to the School's 'Recruitment, Selection and Disclosure Policy' for details);

- ensure that we carry out all necessary checks on the suitability of people who serve in the School in accordance with the above regulations and statutory guidance given in "*Keeping children safe in education September 2021*" and the National Minimum Standards for Boarding Schools;
- ensure that we carry out the appropriate DBS check, in accordance with the Protection of Freedoms Act 2012 and that a central record of recruitment checks is kept for audit;
- raise awareness of all teaching and non-teaching staff of the need to safeguard children and of their responsibilities in identifying and reporting possible cases of abuse;
- ensure that where staff from another organisation are working with our students on another site, we have received assurances that appropriate child protection checks and procedures apply to those staff;
- emphasise the need for good levels of communication between all members of staff;
- ensure that all staff receive the "Code of Conduct" as part of their ongoing training or for new staff, at induction and that an individual declaration is recorded annually;
- develop and promote effective working relationships with other agencies, especially the Police and Social Care;
- follow the local inter-agency procedures of the Surrey Safeguarding Children Partnership (SSCP);
- protect each student from any form of abuse, whether from an adult or another student;
- include opportunities in the PSHEE curriculum (Enigma) for students to develop the skills they need to recognise and stay safe from abuse;
- be alert to signs of abuse both in the School and from outside;
- deal appropriately with every suspicion or complaint of abuse;
- listen to students and provide early help where appropriate;
- design and operate procedures which promote this policy which will be followed by all members of the school community in cases of suspected abuse;
- design and operate procedures which, so far as possible, ensure that teachers and others who are innocent are not prejudiced by false allegations;
- support children who have been abused in accordance with his / her agreed child protection plan;
- be alert to the medical needs of children with medical conditions;
- operate robust and sensible health & safety procedures;
- take all practicable steps to ensure that School premises are as secure as circumstances permit;
- operate clear and supportive policies on drugs, alcohol and substance misuse;
- consider and develop procedures to deal with any other safeguarding issues which may be specific to individual children in our School or in our local area; and

- have regard to guidance issued by the Department for Education (**DfE**) in accordance with section 157 of the Education Act 2002 and associated regulations.

2.2 *Keeping children safe in education September 2021* provides that the inspection of independent schools will ensure that the Independent School Standard which concerns the welfare, health and safety of children is met.

3 The Designated Safeguarding Lead

3.1 The School's Partners have appointed a member of the Senior Management Team (**Designated Safeguarding Lead**) to take lead responsibility for matters relating to child protection and welfare. Parents are welcome to approach the Designated Safeguarding Lead if they have any concerns about the welfare of any student in the School, whether these concerns relate to their own child or any other. If preferred, parents may discuss concerns in private with the student's Housemaster/Housemistress or the Headmaster who will notify the Designated Safeguarding Lead in accordance with these procedures.

3.2 The Designated Safeguarding Lead shall be given the time, funding, training, resources and support to enable him/her to support other staff on child welfare and child protection matters, to take part in strategy discussions and inter-agency meetings, and/or support other staff to do so, and to contribute to the assessment of children.

3.3 The main responsibilities of the Designated Safeguarding Lead are:

- to be the first point of contact for parents, students, teaching and non-teaching staff and external agencies in all matters of child protection and to provide support, advice and expertise on all matters concerning safeguarding;
- to co-ordinate the child protection procedures in the School and to review and update regularly the procedures and implementation of the procedures, working with the Partners as necessary;
- to ensure that all members of staff, supply staff and volunteers receive the appropriate training on child protection and safer recruitment procedure and to keep and maintain records of this training;
- to link with the Surrey Safeguarding Children Partnership (SSCP) to make sure staff are aware of training opportunities and the latest local policies on safeguarding;
- to advise and act upon all suspicion, belief and evidence of abuse reported to him;
- keep the Headmaster informed of all actions unless the Headmaster is the subject of a complaint (see Appendix 2 for the procedures for dealing with allegations against staff)
- to ensure that an induction programme is in place for all new employees, supply staff and volunteers (see also 7.3);
- to monitor the keeping, confidentiality and storage of records in relation to child protection and where a child leaves, ensure his / her child protection file is copied for the new school as soon as possible and transfer it separately from the main student file. The Designated Safeguarding Lead will ensure secure transit and obtain confirmation of receipt;
- to 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 and have that support in place for when the child arrives.
- to liaise with the designated officer at the local authority, children's social care and other external agencies on behalf of the School, including the police and the Disclosure and Barring Service;

- to keep parents informed of action to be taken under these procedures in relation to their son/daughter in accordance with paragraph 8.12;
 - to monitor records of students in the School who are subject to a child protection plan to ensure that this is maintained and updated as notification is received;
 - to liaise with other professionals to ensure that children who are subject to child protection plans are monitored; and
 - where appropriate, to take part in child protection conferences or reviews.
- 3.4 The Designated Safeguarding Lead for the School is **Dave Fonseca, Deputy Head - Students**, who may be contacted on 01483 279 116.
- 3.5 If the Designated Safeguarding Lead is unavailable his duties will be carried out by the **Deputy Designated Safeguarding Lead**, who has received appropriate training. The Deputy Designated Safeguarding Leads are **James Baker (Deputy Head - Personnel) and Abi Hoyle (Deputy Head - Curriculum)** who may be contacted on 01483 279 106 and 01483 279 143 respectively.
- 3.6 The Partners have nominated one of them to manage child protection incidents on behalf of the Partners and to liaise with external agencies where this is required. The nominated Partner is **Cosmo Jackson**. He can be contacted on 01483 279103.
- 3.7 In this policy, reference to the Designated Safeguarding Lead includes the Deputy Designated Safeguarding Leads where the Designated Safeguarding Lead is unavailable.
- 3.8 The Designated Safeguarding Lead and the Deputy Designated Safeguarding Leads have undertaken child protection training and training in inter-agency working protocols and will attend refresher training at two yearly intervals (including training in the SSCP approach to Prevent duties). The Designated Safeguarding Lead and the Deputy Safeguarding Leads have undertaken Prevent Awareness training in relation to the risks of radicalisation to be able to identify young people at risk and to provide advice and support to other staff. In addition to formal training, the knowledge and skills of the DSL and Deputy DSLs will be refreshed at regular intervals, as required, but at least annually, to allow them to understand and keep up with any developments relevant to their role.

During term time the Designated Safeguarding Lead (or one of the deputies) will always be available during school hours for staff in the School to discuss any safeguarding concerns. Available in this case may mean in person, via the telephone and/or Skype or other such means. For out of hours/out of term activities, such as school trips, the Designated Safeguarding Lead (or one of the deputies) is available and their details are on the school's Emergency Procedures and trip risk assessments.

4 Definitions of Safeguarding and Types and Signs of Abuse

- 4.1 Safeguarding and promoting the welfare of children is defined as protecting children from maltreatment; 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; and taking action to enable all children to have the best outcomes.
- 4.2 Abuse is a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others (e.g. via the internet). Abuse can take place wholly online, or technology may be used to facilitate offline abuse. They may be abused by an adult or adults or by another child or children.

All school staff should be aware that abuse, neglect and safeguarding issues are rarely standalone events that can be covered by one definition or label. In most cases multiple issues will overlap with one another.

Abuse can be:

- physical abuse, for example beating or punching;
- emotional abuse, for example rejection and denial of affection;
- sexual abuse and exploitation, for example sexual assault or encouraging a child to view pornographic material;
- neglect, for example failure to provide appropriate care including warmth or medical attention.

(For further details refer to Appendices 3 and 4)

5 Signs of abuse

- 5.1 Possible signs of abuse (consistent with the Surrey Safeguarding Children Partnership SSCP) include (but are not limited to):
- the student says s/he has been abused or asks a question or makes a comment which gives rise to that inference;
 - there is no reasonable or consistent explanation for a student's injury; the injury is unusual in kind or location; there have been a number of injuries; there is a pattern to the injuries;
 - the student's behaviour stands out from the group as either being extreme model behaviour or extremely challenging behaviour; or there is a sudden change in the student's behaviour;
 - the student asks to drop subjects with a particular teacher and seems reluctant to discuss the reasons;
 - the student's development is delayed;
 - the student loses or gains weight or there is a deterioration in the student's general wellbeing;
 - the student appears neglected, e.g. dirty, hungry, inadequately clothed;
 - the student is reluctant to go home, or has been openly rejected by his / her parents or carers.

(For further details refer to Appendices 3 and 4)

6 Extremism and Radicalisation

- 6.1 Hurtwood House views freedom of speech and the expression of beliefs / ideology as fundamental rights underpinning our society's values. Both students and staff have the right to speak freely and voice their opinions. However, freedom comes with responsibility and free speech that is designed to manipulate the vulnerable or that leads to violence and harm of others goes against the moral principles in which freedom of speech is valued. Free speech is not an unqualified privilege; it is subject to laws and policies governing equality, human rights, community safety and community cohesion.
- 6.2 The current threat from terrorism in the United Kingdom may include the exploitation of vulnerable people, to involve them in terrorism or in activity in support of terrorism. The normalisation of extreme views may also make young people vulnerable to future manipulation and exploitation. The School is clear that this exploitation and radicalisation should be viewed as a safeguarding concern.
- 6.3 The Headmaster, SMT and the Designated Safeguarding Lead (DSL) will assess the level of risk within the school and put actions in place to reduce that risk.

7 Duty of employees, partners, volunteers, peripatetic staff and contractors

- 7.1 Every employee and partner of the School as well as every volunteer, peripatetic staff and contractor who assists the School is under a general legal duty:
- to protect children from abuse;
 - to be aware of the School's child protection procedures and to follow them;
 - to know how to access and implement the procedures, independently if necessary;
 - to keep a sufficient record of any significant complaint, conversation or event in accordance with this policy;
 - to report any matters of concern to the Designated Safeguarding Lead immediately
 - to make an immediate referral to children's social care if there is a risk of immediate serious harm to a child and
 - to identify children who may be in need of extra help, to raise concerns with the Designated Safeguarding Lead and then to take appropriate action accordingly, working with other agencies as needed and to monitor.
- 7.2 The Partners ensure that the School's safeguarding arrangements take into account the procedures and practice of the Surrey Safeguarding Children Partnership. The Partners have nominated one of them to manage child protection incidents on behalf of the Partners and to liaise with external agencies where this is required. The nominated Partner is Cosmo Jackson. He can be contacted on 01483 279103.
- 7.3 **Training:** All staff, including temporary staff and volunteers, will be provided with induction training that includes:
- 7.3.1 this policy;
 - 7.3.2 the staff Code of Conduct;
 - 7.3.3 Behaviour and Discipline policy
 - 7.3.4 the identity of the Designated Safeguarding Lead and his Deputies;
 - 7.3.5 a copy of Part 1 and Annexe A of *Keeping children safe in education, September 2021*; and
 - 7.3.6 the Whistle Blowing policy

All staff including the Headmaster will receive a copy of this policy and Part 1 and Annexe A of *Keeping children safe in education, September 2021* (and any updates issued by the DfE), and will be required to confirm that they have read these.

The Headmaster, all staff and other adults who work in regulated activity with children and the nominated Partner will undertake appropriate child protection training, including online safety, which will be updated regularly in accordance with the requirements of Surrey Safeguarding Children Partnership (SSCP) both in content and frequency. This training will cover the risks of radicalisation and how to identify young people at risk of radicalisation.

In addition, all staff members will receive regular safeguarding and child protection updates (eg via email, bulletins and staff meetings), as required, but at least annually, to provide staff with the relevant skills and knowledge to safeguard children effectively.

8 Procedures

8.1 Complaints of abuse:

8.1.1 Staff should not assume that somebody else will take action and share information that might be critical in keeping children safe.

8.1.2 Every complaint or suspicion of abuse from within or outside the School will be taken seriously and action taken in accordance with this policy.

8.1.3 The child protection training provided to staff considers the types and signs of abuse staff should be aware of. Further details are set out in Appendices 3 and 4.

8.1.4 If a member of staff is concerned that a student may be suffering harm, the matter should be referred to the Designated Safeguarding Lead as soon as possible. If a member of staff suspects or hears a complaint of abuse, the procedures set out below must be followed. If at any point there is a risk of immediate serious harm a referral should be made to children's social care immediately.

8.1.5 If a member of staff has concerns that a student may benefit from early help, the matter should be referred to the Designated Safeguarding Lead. Early help means providing support as soon as a problem emerges at any point in a child's life, from the foundation years through to the teenage years. The Designated Safeguarding Lead will follow the procedure below for an early help assessment, if required.

8.2 Action staff must take: A member of staff suspecting or hearing a complaint of abuse or a concern:

- must listen carefully to the student and keep an open mind. Staff should not take a decision as to whether or not abuse has taken place;
- must not ask leading questions, that is, a question which suggests its own answer (such as "did x do x to you?");
- must reassure the student but not give a guarantee of absolute confidentiality. The member of staff should explain that they need to pass the information to the Designated Safeguarding Lead who will ensure that the correct action is taken;
- must keep a sufficient written record of the conversation. The record should include the date, time and place of the conversation and the essence of what was said and done by whom and in whose presence. The record should be signed by the person making it and should use names, not initials. The record must be kept securely and handed to the Designated Safeguarding Lead as soon as possible;
- must always act in the best interests of the student.

- 8.3 **Preserving evidence:** All evidence, (for example, scribbled notes, mobile phones containing text messages, clothing, computers), must be safeguarded and preserved and passed to the Designated Safeguarding Lead.
- 8.4 **Reporting:** All suspicions, concerns or complaints of abuse must be reported to the Designated Safeguarding Lead immediately, unless it is an allegation against a member of staff in which case the procedures set out in Appendix 2 should be followed. If there is a risk of immediate serious harm to a child and it is not possible to report to the Designated Safeguarding Lead or one of the Deputy Designated Safeguarding Leads, a referral should be made to children's social care immediately.

Members of staff must, as soon as reasonably practicable after making a report, complete the Reporting Form which can be found in Appendix 1, on the school staff intranet and they should inform the Designated Safeguarding Lead immediately. All concerns, discussions and decisions (together with reasons) made under these procedures should be recorded in writing. The local authority should make a decision within one working day or a referral being made about what course of action they are taking and should let the referrer know the outcome. Staff should follow up on a referral should that information not be forthcoming.

- 8.5 **Action by the Designated Safeguarding Lead:** On being notified of a complaint, concern or suspicion of abuse, the action to be taken by the Designated Safeguarding Lead will take into account:
- the local inter-agency procedures of the Surrey Safeguarding Children Partnership (SSCP);
 - the nature and seriousness of the suspicion or complaint. A complaint involving a serious criminal offence will always be referred to the Police and children's social care;
 - the child's wishes or feelings;
 - duties of confidentiality, so far as applicable.

The Designated Safeguarding Lead will consider if early help can be offered to support and prevent the young person's needs escalating or to make a referral to children's social care.

If a concern appears to be a borderline case as to whether a referral should be made, the Designated Safeguarding Lead will consult with children's social care (C-SPA) on a no names basis without identifying the family. However, as soon as sufficient concern exists that a student may be at risk of **significant harm**, there will be a referral within 24 hours to children's social care who has statutory responsibility to make enquiries under Section 47 of the Children Act 1989.

If the initial referral is made by telephone, the Designated Safeguarding Lead will confirm the referral in writing to children's social care within 24 hours, using the Multi Agency Referral Form (MARF). If no response or acknowledgment is received within three working days, the Designated Safeguarding Lead will contact children's social care again.

It may be advised that an early help assessment is more appropriate than a referral to children's social care. This early intervention may prevent the student's needs escalating to a point where a referral to children's social care is needed. Where a student and family would benefit from additional support from more than one agency (for example education, health, housing, police) there should be an inter-agency assessment to identify what coordinated support the family require (Section 17 of the Children Act 1989). This may involve use of the Common Assessment Framework (CAF) and Team Around The Child (TAC) approaches. The school will liaise with the external agencies as required.

The Designated Safeguarding Lead will support staff in liaising with external agencies and professionals in an inter-agency assessment, as appropriate. If early help is appropriate,

the matter will be kept under review and consideration given to a referral to children's social care if the student's situation does not appear to be improving.

- 8.6 **Dealing with allegations against staff (including supply staff) and volunteers:** The School has procedures for dealing with allegations against staff (and supply staff and volunteers who work with children) which aim to strike a balance between the need to protect children from abuse and the need to protect staff and volunteers from false or unfounded allegations. These procedures are set out fully in Appendix 2 which can be found on the school staff intranet and follow the statutory guidance in Part 4 of "*Keeping children safe in education September 2021*".

The designated officer at the local authority will be informed immediately and in any event within one working day of all allegations against staff and volunteers that come to the School's attention and appear to meet the criteria set out in paragraph 1 of Appendix 2.

Detailed guidance is given to staff to ensure that their behaviour and actions do not place students or themselves at risk of harm or of allegations of harm to a student. This guidance is contained in the Staff Handbook and Code of Conduct.

- 8.7 **Dealing with allegations against students:** All staff are alert to student relationships and the potential for peer abuse. Although there is no school rule preventing relationships amongst students, there are clear inter-gender guidelines laid out for each of the boarding houses in the School's Co-Educational Boarding Policy, which boarding staff are aware of.

In most instances, the conduct of students towards each other will be covered by our behaviour and discipline policy. However, some allegations may be of such a serious nature that they may raise safeguarding concerns. The School recognises that children are capable of abusing their peers. There is a zero-tolerance approach to peer on peer abuse. It will not be passed off as 'banter' or 'part of growing up'. The forms of peer on peer abuse are outlined below:

- **Domestic abuse** – an incident or pattern of actual or threatened acts of physical, sexual, financial and/or emotional abuse, perpetrated by an adolescent against a current or former dating partner regardless of gender or sexuality.
- **Child Sexual Exploitation** – children under the age of 18 may be sexually abused in the context of exploitative relationships, contexts and situations by peers who are also under 18.
- **Harmful Sexual Behaviour** – Children and young people presenting with sexual behaviours that are outside of developmentally 'normative' parameters and harmful to themselves and others (For more information, please see Appendix 3).
- **Serious Youth Violence** – Any offence of most serious violence or weapon enabled crime, where the victim is aged 1-19 i.e. murder, manslaughter, rape, wounding with intent and causing grievous bodily harm. 'Youth violence' is defined in the same way, but also includes assault with injury offences.

The term peer on peer abuse can refer to all of these definitions and a child may experience one or multiple facets of abuse at any one time.

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

The School aims to reduce the likelihood of peer on peer abuse through;

- the established ethos of respect, friendship, courtesy and kindness;
- high expectations of behaviour;
- clear consequences for unacceptable behaviour;
- providing a developmentally appropriate PSHE curriculum which develops students' understanding of healthy relationships, acceptable behaviour, consent and keeping themselves safe;

- systems for any student to raise concerns with staff, knowing that they will be listened to, valued and believed;
- robust risk assessments and providing targeted work for students identified as being a potential risk to other students and those identified as being at risk.

Research indicates that young people rarely disclose peer on peer abuse and that if they do, it is likely to be to their friends. Therefore, the School will also educate students in how to support their friends if they are concerned about them, that they should talk to a trusted adult in the school and what services they can contact for further advice.

The 'sharing nudes and semi-nudes', meaning the sending or posting of nude or semi-nude images, videos or live streams by young people under the age of 18 online, will be dealt with under this policy. Consensual image sharing, especially between older children of the same age, may not be abusive – but children still need to know it is illegal- whilst non-consensual is illegal and abusive.

When a member of staff first becomes aware of an incident, they must notify the school's Designated Safeguarding Lead (DSL) who will follow the school's procedures.

Members of staff are permitted to search student devices with or without the student's consent if they have reasonable grounds to suspect that student is in possession of indecent material. The member of staff should confiscate the device involved and set it to flight mode or, if this is not possible, turn it off. Staff should not view, copy or print the youth produced sexual imagery. The School's policy on Searching and Confiscation will be followed by all staff.

All peer on peer abuse will be managed in accordance with this policy and a bullying incident will be treated as a child protection concern where there is reasonable cause to suspect that a child is suffering, or is likely to suffer, significant harm.

Where peer abuse is suspected, staff will report to the Designated Safeguarding Lead.

A student against whom an allegation of abuse has been made may be suspended from the School during the investigation and the School's policy on behaviour, discipline and sanctions will apply. The School will take advice from children's social care on the investigation of such allegations and will take all appropriate action to ensure the safety and welfare of all students involved including the student or students accused of abuse. If there is a risk of significant harm, the abuse will be reported to children's social care.

If it is necessary for a student to be interviewed by the Police in relation to allegations of abuse, the School will ensure that, subject to the advice of children's social care, the student's parents are informed as soon as possible and that the student is supported during the interview by an appropriate adult. In the case of students whose parents are abroad, the student's Education Guardian, if applicable, will be requested to provide support to the student and to accommodate him/her if it is necessary to suspend him/her during the investigation.

Victims and perpetrators of peer on peer abuse will be offered pastoral support by the School, as appropriate.

8.8 Missing student procedures: All staff are informed of the separate procedure to be used for searching for, and if necessary, reporting, any student missing from school. The procedure includes the requirement to record any incident, the action taken and the reasons given by the student for being missing. Please see the School's separate Missing Student Procedure for further details.

8.9 Radicalisation and Extremism: When any member of staff has concerns that a student may be at risk of radicalisation or involvement in terrorism, they should speak with the Headmaster and/ or to the DSL immediately. They should then follow normal safeguarding procedures. If the matter is urgent then Surrey Police must be contacted by dialling 999. In

non urgent cases where police advice is sought then dial 101. The Department of Education has also set up a dedicated telephone helpline for staff to raise concerns around Prevent (020 7340 7264). Definitions of radicalisation and extremism, and indicators of vulnerability to radicalisation are detailed in Appendix 4.

- 8.10 **Close One-to-One teaching:** Specialist performing arts provision often includes one-to-one teaching and support. All staff are asked to complete the Safeguarding Children and Young People: Staff Code of Conduct. This details how staff should conduct themselves in a one-to-one teaching situation. If staff have any concerns, they should follow the normal safeguarding procedures.
- 8.11 **Whistleblowing Policy:** Whistleblowing is the reporting, by those working for or on behalf of the School, of suspected wrongdoing on the part of employees, management or the partners.

Hurtwood House is committed to achieving the highest possible standards of honesty, openness and accountability and relies on its employees to help maintain these standards. In pursuit of these aims, the School encourages all individuals to raise concerns which they may have about the conduct or practices of others.

Any member of staff may make a referral to an external agency and no one should hesitate to take action to report concerns because of fear or possible repercussions. Staff who have any concerns of a safeguarding nature should consult the DSL immediately.

The following are other whistleblowing channels available to staff:

- General guidance can be found at <https://www.gov.uk/whistleblowing>.
- The NPSPCC whistleblowing helpline - 0800 028 0285 – lines are open Monday to Friday 8:00 am to 8:00 pm. Email: help@nspcc.org.uk

- 8.12 **Informing parents:** Parents will normally be kept informed as appropriate of any action to be taken under these procedures. However, there may be circumstances when the Designated Safeguarding Lead will need to consult the Headmaster, the designated officer at the local authority, children's social care and / or the Police before discussing details with parents. See also section 3 of Appendix 2 for details about the disclosure of information where an allegation has been made against a member of staff, supply staff, volunteer or the Headmaster at the School.

For the avoidance of doubt, referrals to children's social care do not require parental consent. Staff must act in the best interests of the student, even if this means making a referral against the parents' wishes.

9 Secure school premises

- 9.1 **School premises:** The School will take all practicable steps to ensure that School premises are as secure as circumstances permit.
- 9.2 **Visitors Book:** The School keeps a Visitors Book at Reception. All visitors must sign in on arrival and sign out on departure and are escorted whilst on School premises by a member of staff or appropriately vetted volunteer. All visitors will be given a name badge with the title 'Visitor' which must be clearly displayed and worn at all times whilst on the School premises.

The School has clear procedures for ensuring that any visiting speakers, whether invited by staff or by students, are suitable and appropriately supervised. All visiting speakers will be subject to the School's *Visitors to the School* policy. This will include signing in and out, the wearing of visitor badges at all times and being escorted by a fully vetted member of staff.

- 9.3 **Boarding Houses:** All visitors to the Boarding Houses must report to the Duty member of staff immediately on arrival, and must observe the necessity to be kept under sufficient staff supervision during their visit.

10 Confidentiality and information sharing

- 10.1 **Confidentiality and information sharing:** The School will keep all child protection records confidential, allowing disclosure only to those who need the information in order to safeguard and promote the welfare of children. The School will co-operate with Police and children's social care to ensure that all relevant information is shared for the purposes of child protection investigations under section 47 of the Children Act 1989 in accordance with the requirements of *Working Together to Safeguard Children* (July 2018). If in any doubt, staff should speak to the DSL or a deputy. Fears about information sharing **must not** be allowed to stand in the way of the need to promote the welfare, and protect the safety, of children.
- 10.2 **Allegations against staff:** Where allegations have been made against staff, the School will consult with the designated officer at the local authority and, where appropriate, the police and children's social care to agree the information that should be disclosed and to whom.

11 How the school aims to support students who are in need

- 11.1 The school recognises that students who are abused or witness violence may find it difficult to develop a sense of self-worth. They may feel helplessness, humiliation and some sense of blame. The school may be the only stable, secure and predictable element in the lives of children at risk. When at school their behaviour may be challenging and defiant or they may be withdrawn.
- 11.2 The school's approach to supporting students who are victims of abuse or are in need, includes:
- The content of the curriculum
 - The school's Mission Statement and Aims which promote a positive, supportive and secure environment and give students a sense of being valued
 - The school's Behaviour and Discipline Policy and Anti-Bullying Policy which aim to support vulnerable students in the school. The school will ensure that the student knows that some behaviour is unacceptable but they are valued and not to be blamed for any abuse which has occurred.
 - Liaison with other agencies that support the student such as the Surrey County Council Children's Services Department, Child and Adult Mental Health Service (CAMHS), the Education Welfare Service and the Educational Psychology Services
 - Ensuring that, where a student subject to a child protection plan leaves, their information is transferred to the new school immediately and that the child's social worker is informed.

12 Monitoring

- 12.1 Any child protection incidents at the School will be followed by a review of the safeguarding procedures within the School and a prompt report to the Partners. Where an incident

involves a member of staff, the designated officer at the local authority will assist in this review to determine whether any improvements can be made to the School's procedures.

- 12.2 In addition, the Designated Safeguarding Lead will ensure that this policy is reviewed annually and its procedures and implementation are updated and reviewed regularly, working with the Partners as necessary.
- 12.3 The Partners will undertake an annual review of this policy and its procedures including good cooperation with local agencies and of the efficiency with which the relevant duties have been discharged.
- 12.4 The Partners will ensure that any deficiencies or weaknesses in regard to child protection arrangements at any time are remedied without delay.

13 Contact numbers

- 13.1 The telephone numbers of the Surrey County Council Social Services Departments are as follows:

C-SPA (Children's Single Point of Access
Mon – Fri, 9am – 5pm

0300 470 9100
cspa@surreycc.gov.uk

Emergency Duty Team
(for urgent out of hours referrals)

01483 517898

Local Authority Designated Officer
Mon – Fri, 9am – 5pm

0300 123 1650 (Option 3 LADO)
LADO@surreycc.gov.uk

Prevent referrals

preventreferrals@surrey.pnn.police.uk

- 13.2 The following telephone numbers may also be useful:

Prevent Supervisor, Surrey Police

101
01483 632982

Honour based crimes, Surrey Police
(FGM, forced marriage, honour based abuse)

01483 639673
diversitycrimesunit@surrey.pnn.police.uk

Childline

0800 1111

NSPCC

0808 800 5000
88858 (text)
help@nspcc.org.uk

Children's Commissioner

0800 528 0731

Non-emergency Police

101

Department for Education dedicated helpline for
non-emergency advice

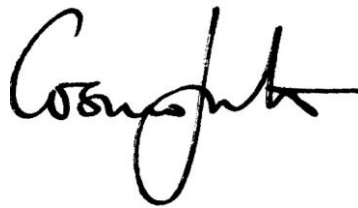
020 7340 7264
Counter-extremism@education.gsi.gov.uk

South West Surrey Domestic Abuse Outreach
Service

01483 898884

Authorised by

Resolution of the Partners



Date

22nd June 2021

Effective date of the policy 1st September 2021

Circulation

Partners / all staff / supply staff / volunteers automatically
Parents on request
Published on the School's website

Status

Complies with paragraph 7 of Schedule 1 to the Education (Independent School Standards) (England) Regulations 2014, the National Minimum Standards for Boarding Schools 2015 and the guidance "*Keeping children safe in education September 2021*".

Appendix 1 Child protection expression of concern form

1 Introduction

- 1.1 This form comprises part of the School's child protection suite of documents and should be read in conjunction with the Safeguarding and Child Protection Policy, which is available on the School's website and from Dave Fonseca, Designated Safeguarding Lead.

This form is designed to be completed by any member of staff who receives information raising child protection concerns either through observation or direct disclosure, from a student or from another source. The purpose of this form is to ensure that an adequate amount of information is recorded at the outset. This form must be completed as soon as possible after the information is received even where this happens away from the School, for example on an educational visit.

Do not allow the completion of the form to delay notification of the concerns to the School's Designated Safeguarding Lead but pass the completed form to the Designated Safeguarding Lead, the Partners as appropriate, as a matter of urgency.

- 1.2 The School's **Designated Safeguarding Lead** for child protection is Dave Fonseca (Deputy Head - Students).
- 1.3 The designated officer at the local authority can be contacted on 0300 200 1006.



Child Protection Expression of Concern Form

This form should be completed when there is cause for concern and given to **Dave Fonseca**, the Designated Safeguarding Lead, as soon as possible.

Details of Student:

Child's Name:

Child's Date of Birth:

Details of the person reporting concerns:

Full Name:

Post:

Do these concerns relate to a specific incident/disclosure? If **YES** complete Section A; If **NO**, omit section A and move straight to Section B

Section A:

Date and time of incident/disclosure:

Location of incident/disclosure:

Date this form was completed:

Other persons present:

Section B:

Details of concern/disclosure/incident:

(What was said, observed, reported)

Action taken:

(What did you do following the incident/disclosure/concern?)

Any other relevant information:

Signed:

Date:

For completion by the Designated Safeguarding Lead (DSL):

DSL Response:
Action taken by DSL:
Rationale for decision making/actions taken:
Outcome of action taken by DSL:
Follow up action by DSL:
Feedback given to person reporting the concerns:

Signed by DSL: Full Name:	Date:
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Checklist for DSL:

- Concern described in sufficient detail?
- Distinguished between fact, opinion and hearsay?
- Child's own words used? (Swear words, insults or intimate vocabulary should be written down verbatim)
- Jargon free?
- Free from discrimination/stereotyping or assumptions?
- Concern recorded and passed to DSL in a timely manner?

Appendix 2 Allegations against staff

1 The School's Procedures

- 1.1 The School has procedures for dealing with allegations against staff (and supply staff and volunteers who work with children) that aim to strike a balance between the need to protect children from abuse and the need to protect staff, supply staff and volunteers for false or unfounded allegations. These procedures will be used where the member of staff, supply staff or volunteer has:
- 1.1.1 behaved in a way that has harmed a child, or may have harmed a child;
 - 1.1.2 possibly committed a criminal offence against or related to a child; or
 - 1.1.3 behaved towards a child or children in a way that indicates he or she may pose a risk of harm to children; or
 - 1.1.4 behaved or may have behaved in a way that indicates they may not be suitable to work with children.
- 1.2 This procedure relates to members of staff who are currently working in school regardless of whether the school is where the alleged abuse took place. Allegations against a member of staff who is no longer working at the school should be referred to the police. Historical allegations of abuse should also be referred to the police.
- 1.3 Any allegations not meeting this criteria will be dealt with in accordance with the Surrey Safeguarding Children Partnership (SSCP) procedures. Advice from the designated officer at the local authority will be sought in borderline cases.
- 1.4 All such allegations must be dealt with as a priority so as to avoid any delay.

2 Reporting an allegation against staff, supply staff or volunteers

- 2.1 Where an allegation or complaint is made against any member of staff, supply staff or volunteer, the matter should be reported immediately to the Headmaster or in his absence to a Partner. Where appropriate, the Headmaster will consult with the Designated Safeguarding Lead or one of the Deputy Designated Safeguarding Leads and the allegation will be discussed with the designated officer at the local authority before further action is taken and within one working day.
- 2.2 Where the concern or allegation is made against the Designated Safeguarding Lead, or the Deputy Designated Safeguarding Lead, you must immediately inform the Headmaster.
- 2.3 If it is not possible to report to the Headmaster or a Partner in the circumstances set out above, a report should be made immediately to the Designated Safeguarding Lead or, if he is unavailable, one of the Deputy Designated Safeguarding Leads, where appropriate. The Designated Safeguarding Lead will take action in accordance with these procedures and will as soon as possible inform the Headmaster or, where appropriate, a Partner.
- 2.4 The person taking action in accordance with the procedures in this Appendix is known as the "case manager".
- 2.5 The case manager should immediately discuss the allegation with the designated officer at the local authority and consider the nature, content and context of the allegation and agree a course of action including any involvement of the Police. (Where the case manager deems there to be an immediate risk to children or there is evidence of a possible criminal offence, the case manager may involve the Police immediately.) All discussions should be recorded in writing, and any communication with both the individual and the parents of the child(ren) agreed. The designated officer should be informed within one working day of all allegations that come to the School's attention and appear to meet the criteria or that are made directly to the Police and/or children's social care.

- 2.6 **Allegations against individuals who are not directly employed by the School (Supply staff/agency staff).** Under no circumstances should the School cease to use a supply teacher due to safeguarding concerns without finding out the facts and liaising with the Local Authority Designated Officer (LADO) to determine a suitable outcome. The partners should discuss with the agency whether it is appropriate to suspend the supply teacher, or redeploy them to another part of the school, whilst the investigation is being carried out.
- 2.7 Agencies should be fully involved and cooperate in any enquiries from the LADO, police and/or children's social services. Supply teachers, whilst not employed by the School, are under the supervision, direction and control of the proprietors when working in the School. They should be advised to contact their trade union or a colleague for support. When using an agency, the School should inform the agency of the process for managing allegations.
- 2.8 **Allegations against the Headmaster or a Partner:** Where an allegation or complaint is made against the Headmaster or a Partner, the person receiving the allegation should immediately inform the designated officer at the local authority before further action is taken and within one working day, without informing the Headmaster. Staff may consider discussing any concerns with the Designated Safeguarding Lead and make any referral via them.

3 Disclosure of information

- 3.1 The case manager will inform the accused person of the allegation as soon as possible after the designated officer at the local authority has been consulted.
- 3.2 The Parents or carers of the child[ren] involved will be informed of the allegation as soon as possible if they do not already know of it. They will also be kept informed of the progress of the case, including the outcome of any disciplinary process.
- 3.3 Where the designated officer at the local authority advises that a strategy discussion is needed, in accordance with *Working Together to Safeguard Children* (July 2018), or the police or children's social care need to be involved, the case manager will not inform the accused or the parents or carers until these agencies have been consulted and it has been agreed what information can be disclosed.
- 3.4 The reporting restrictions preventing the identification of a teacher who is the subject of such an allegation in certain circumstances will be observed.

4 Action to be taken against the accused

- 4.1 A school has a duty of care towards its employees and as such, it must ensure that effective support is provided for anyone facing an allegation. Individuals should be informed of concerns or allegations as soon as possible and given an explanation of the likely course of action, unless external agencies object to this. A representative will be appointed to keep him or her informed of the progress of the case and to consider what other support is available for the individual, as appropriate.
- 4.2 Where an investigation by the police or children's social care is unnecessary, the designated officer at the local authority will discuss the steps to be taken with the case manager. The appropriate action will depend on the nature and circumstances of the allegation and will range from taking no further action to dismissal or a decision not to use the person's services in the future.
- 4.3 It may be necessary to undertake further enquiries to determine the appropriate action. If so, the designated officer at the local authority will discuss with the case manager how and by whom the investigation will be undertaken. The appropriate person will usually be a senior member of staff, but in some instances it may be appropriate to appoint an independent investigator as advised by the Surrey Safeguarding Children Partnership (SSCP).

4.4 Suspension

- 4.4.1 Suspension will not be an automatic response to an allegation and should only be considered in a case where:
- (a) there is cause to suspect a child or other children at the School is or are at risk of significant harm; or
 - (b) the allegation is so serious that it might be grounds for dismissal.
- 4.4.2. Suspension will not be automatic and consideration will be given to whether the result that would be achieved by suspension could be obtained by alternative arrangements. In many cases an investigation can be resolved quickly and without the need for suspension. If the designated officer at the local authority, police and children's social care services have no objections to the member of staff continuing to work during the investigation, the case manager should be as inventive as possible to avoid suspension. Based on assessment of risk, the following alternatives should be considered by the case manager before suspending a member of staff:
- (a) redeployment within the school or college so that the individual does not have direct contact with the child or children concerned;
 - (b) providing an assistant to be present when the individual has contact with children;
 - (c) redeploying to alternative work in the school or college so the individual does not have unsupervised access to children;
 - (d) moving the child or children to classes where they will not come into contact with the member of staff, making it clear that this is not a punishment and parents have been consulted; or
 - (e) temporarily redeploying the member of staff to another role in a different location, for example to an alternative school or college or work for the local authority or academy trust.
- 4.4.3. These alternatives allow time for an informed decision regarding the suspension and possibly reduce the initial impact of the allegation. This will, however, depend upon the nature of the allegation. The case manager should consider the potential permanent professional reputational damage to employees that can result from suspension where an allegation is later found to be unsubstantiated or maliciously intended.
- 4.4.4 A member of staff will only be suspended if there is no reasonable alternative. If suspension is deemed appropriate, the reasons and justification will be recorded and the member of staff notified of those reasons in writing within one working day. Appropriate support will be provided for the suspended individual. They will be informed of their named contact within the school and contact details provided.
- 4.4.5 If a member of boarding staff is suspended pending an investigation of a child protection nature, arrangements will be made for alternative accommodation away from children.
- 4.4.6 If the case manager is concerned about the welfare of other children in the community or the teacher's family, those concerns should be reported to the designated officer at the local authority, children's social care or the police as required. But suspension is highly unlikely to be justified on the basis of such concerns alone.
- 4.4.7 In cases where the school is made aware that the Secretary of State has made an interim prohibition order in respect of an individual who works at the school, immediate action should be taken to ensure the individual does not carry out work

in contravention of the order, i.e. pending the findings of the TRA investigation, the individual must not carry out teaching work.

4.5 Criminal proceedings

4.5.1 The School will consult with the designated officer at the local authority following the conclusion of a criminal investigation or prosecution as to whether any further action, including disciplinary action, is appropriate and if so, how to proceed. The options will depend on the circumstances of the case, including the result of the police investigation or trial and the standards of proof applicable.

4.5.2 If the allegation is substantiated and the person is dismissed or the School ceases to use the person's services, or the person resigns or otherwise ceases to provide his or her services, the designated officer at the local authority will discuss with the case manager whether the School will decide to make a referral to the Disclosure and Barring Service for consideration of whether inclusion on the barred lists is required and in the case of a member of teaching staff, whether to refer the matter to the Teaching Regulation Agency (TRA) to consider prohibiting the individual from teaching.

4.5.3 There is a legal requirement for the School to make a referral to the DBS where the school believes that an individual has engaged in conduct that harmed (or is likely to harm) a child; or if a person otherwise poses a risk of harm to a child.

4.6 Return to work

4.6.1 If it is decided that the person who has been suspended should return to work, the School will consider how best to facilitate this, for example, a phased return may be appropriate and / or the provision of a mentor to provide assistance in the short term. The School should also consider how to manage the contact with the child[ren] who made the allegation.

5 Ceasing to use staff

5.1 If the School ceases to use the services of a member of staff (or a partner or supply staff volunteer) because they are unsuitable to work with children, a settlement/compromise agreement will not be used. The designated officer at the local authority will discuss with the case manager whether the School will decide to make a referral to the Disclosure and Barring Service for consideration of whether inclusion on the barred lists is required. If a decision is made to make a referral because the criteria have been met, it will be made as soon as possible.

5.2 If a member of staff (or supply staff or volunteer) tenders his or her resignation, or ceases to provide his or her services, any child protection allegations will still be followed up by the School in accordance with this policy. The designated officer at the local authority will discuss with the case manager whether the School will decide to make a referral to the Disclosure and Barring Service for consideration of whether inclusion on the barred lists is required. If a decision is made to make a referral because the criteria have been met, it will be made as soon as possible.

5.3 Where a teacher has been dismissed, or would have been dismissed had he / she not resigned, separate consideration will be given as to whether a referral to the National College for Teaching and Leadership should be made to consider prohibiting the individual from teaching. The reasons such a referral would be considered are 'unacceptable professional conduct', 'conduct that may bring the profession into disrepute' or a 'conviction, at any time, for a relevant offence'.

6 Timescales

6.1 All allegations must be dealt with as a priority so as to avoid any delay. Where it is clear immediately that the allegation is unsubstantiated or malicious, the case should be resolved within one week. It is expected that most cases of allegations of abuse against staff will be resolved within one month with exceptional cases being completed within 12 months. If the nature of the allegation does not require formal disciplinary action, the

Headmaster should instigate appropriate action within three working days. If a disciplinary hearing is required and can be held without further investigation, it should be held within 15 working days.

7 Unsubstantiated or malicious allegations

- 7.1 Where an allegation by a student is shown to have been deliberately invented or malicious, the Headmaster will consider whether to take disciplinary action in accordance with the School's behaviour and discipline policy.
- 7.2 Where a parent has made a deliberately invented or malicious allegation the Headmaster will consider whether to require that parent to withdraw their child or children from the school on the basis that they have treated the school or a member of staff unreasonably.
- 7.3 Whether or not the person making the allegation is a student or a parent (or other member of the public), the school reserves the right to contact the police to determine whether any action might be appropriate.

8 Record keeping

- 8.1 Details of allegations found to be malicious will be removed from personnel records.
- 8.2 For all other allegations, a clear and comprehensive summary of the allegation, details of how the allegation was followed up and resolved, and a note of any action and decisions reached, is kept on the confidential personnel file of the person accused and a copy provided to the person concerned. The record will be retained at least until the individual has reached the normal pension age or for a period of ten years from the date of the allegation, if this is longer.
- 8.3 An allegation proven to be false, unsubstantiated, unfounded or malicious will not be referred to in employer references. A history of repeated concerns or allegations which have all been found to be false, unsubstantiated or malicious will also not be included in any reference.

9 Learning Lessons

- 9.1 Any child protection incidents involving a member of staff will be followed by a review of the safeguarding procedures within the School and a prompt report to the Partners. The designated officer at the local authority will assist in this review to determine whether any improvements can be made to the School's procedures.
 - 9.2 At the conclusion of a case in which an allegation is substantiated, the review should include issues arising from the decision to suspend the member of staff, the duration of the suspension and whether or not suspension was justified.
- 10** Lessons should also be learnt from the use of suspension when an individual is subsequently reinstated. The designated officer and case manager should consider how future investigations of a similar nature could be carried out without suspending the individual.

Appendix 3 Types of Abuse and Neglect

See also 'What to do if you're worried a child is being abused. Advice for practitioners', March 2015, DfE

Categories of Abuse and Neglect

Abuse is a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm, or by failing to act to prevent harm. They may be abused in a family, outside a family or in an institutional or community setting by those known to them or, more rarely, by others (eg. Via the internet). They may be abused by an adult or adults or another child or children. *What to do if you're worried a child is being abused* defines the following types of abuse.

- **Physical Abuse:** deliberately physically hurting a child. It might take a variety of different forms including hitting, pinching, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm to a child. Physical abuse can happen in any family, but children may be more at risk if their parents have problems with drugs, alcohol and mental health or if they live in a home where domestic abuse happens. Babies and disabled children also have a higher risk of suffering physical abuse. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child. Physical abuse can also occur outside the family environment.
- **Emotional Abuse:** the persistent emotional maltreatment of a child. It is also sometimes called psychological abuse and it can have severe and persistent adverse effects on a child's emotional development. Although the effects of emotional abuse might take a long time to be recognisable, practitioners will be in a position to observe it, for example, in the way a parent interacts with their child. Emotional abuse may involve deliberately telling a child that they are worthless or unloved and inadequate. It may include not giving a child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may involve serious bullying - including online bullying through social networks, online games or mobile phones – by a child's peers.
- **Sexual Abuse:** any sexual activity with a child. You should be aware that many children and young people who are victims of sexual abuse do not recognise themselves as such. A child may not understand what is happening and may not even understand that it is wrong. Sexual abuse can have a long term impact on mental health. Sexual abuse 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. It may also include non-contact activities, such as involving children in the production of, forcing children to look at sexual images or watch sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (including via the internet). Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.
- **Sexual exploitation:** a form of sexual abuse where children are sexually exploited for money, power or status. It can involve violent, humiliating and degrading sexual assaults. In some cases, young people are persuaded or forced into exchanging sexual activity for money, drugs, gifts, affection or status. Consent cannot be given, even where a child may believe they are voluntarily engaging in sexual activity with the person who is exploiting them. Child sexual exploitation doesn't always involve physical contact and can happen online. A significant number of children who are victims of sexual exploitation go missing from home, care and education at some point.
- **Neglect:** a pattern of failing to provide for a child's basic needs, whether it be adequate food, clothing, hygiene, supervision or shelter. It is likely to result in the serious impairment of the child's health or development. Children who are neglected also suffer from other types of abuse. It is important that practitioners remain alert and do not miss opportunities to take timely action. However, while you may be concerned about a child, neglect is not always straightforward to identify. Neglect may occur if a parent becomes physically or mentally unable to care for a child. A parent may also have an addiction to alcohol or drugs, which

could impair their ability to keep a child safe or result in them prioritising buying drugs, or alcohol, over food, clothing or warmth for the child. Neglect may occur during pregnancy as a result of maternal drug or alcohol abuse.

Signs of Abuse or neglect in Children

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

- Children whose behaviour changes – they may become aggressive, challenging, disruptive, withdrawn or clingy, or they might have difficulty sleeping or start wetting the bed;
- Children with clothes which are ill-fitting and/or dirty;
- Children with consistently poor hygiene;
- Children who make strong efforts to avoid specific family members or friends, without an obvious reason;
- Children who don't want to change clothes in front of others or participate in physical activities;
- Children who are having problems at school, for example, a sudden lack of concentration and learning or they appear to be tired and hungry;
- Children who talk about being left home alone, with inappropriate carers or with strangers;
- Children who reach developmental milestones, such as learning to speak or walk, late, with no medical reason;
- Children who are regularly missing from school or education;
- Children who are reluctant to go home after school;
- Children with poor school attendance and punctuality, or who are consistently late being picked up;
- Parents who are dismissive and non-responsive to practitioners' concerns;
- Parents who collect their children from school when drunk, or under the influence of drugs;
- Children who drink alcohol regularly from an early age;
- Children who are concerned for younger siblings without explaining why;
- Children who talk about running away; and
- Children who shy away from being touched or flinch at sudden movements.

Risk Indicators

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

- Must be regarded as indicators of the possibility of significant harm
- Justifies the need for careful assessment and discussion with designated/named lead person, manager, (or in the absence of all those individuals, an experienced colleague)
- May require consultation with and/or referral to Children's Services

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

In the abusive relationship the child may:

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

The parent or carer may:

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

- Be involved in domestic abuse

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

Recognising Physical Abuse

The following are often regarded as indicators of concern:

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

Bruising

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

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

Bite Marks

Bite marks can leave clear impressions of the teeth. Human bite marks are oval or crescent shaped. Those over 3 cm in diameter are more likely to have been caused by an adult or older child.

A medical opinion should be sought where there is any doubt over the origin of the bite.

Burns or Scalds

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

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

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

Fractures

Fractures may cause pain, swelling and discolouration over a bone or joint.

Non-mobile children rarely sustain fractures.

There are grounds for concern if:

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

Scars

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

Recognising Emotional Abuse

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

The indicators of emotional abuse are often also associated with other forms of abuse.

The following may be indicators of emotional abuse:

- Developmental delay
- Abnormal attachment between a child and parent/carer e.g. anxious
- Indiscriminate attachment or failure to attach
- Aggressive behaviour towards others
- Scape-goated within the family
- Frozen watchfulness, particularly in pre-school children
- Low self-esteem and lack of confidence
- Withdrawn or seen as a “loner” – difficulty relating to others

Recognising signs of Sexual Abuse

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

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

Some behavioural indicators associated with this form of abuse are:

- Inappropriate sexualised conduct
- Sexually explicit behaviour, play or conversation, inappropriate to the child's age
- Continual and inappropriate or excessive masturbation
- Self-harm (including eating disorder), self-mutilation and suicide attempts
- Involvement in prostitution or indiscriminate choice of sexual partners
- An anxious unwillingness to remove clothes e.g. for sports events (but this may be related to cultural norms or physical difficulties)

Some physical indicators associated with this form of abuse are:

- Pain or itching of genital area

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

Sexual Abuse by Young People

The boundary between what is abusive and what is part of normal childhood or youthful experimentation can be blurred. The determination of whether behaviour is developmental, inappropriate or abusive will hinge around the related concepts of true consent, power imbalance and exploitation. This may include children and young people who exhibit a range of sexually problematic behaviour such as indecent exposure, obscene telephone calls, fetishism, bestiality and sexual abuse against adults, peers or children.

Abuse is abuse and should never be tolerated or passed off as ‘banter’ or ‘part of growing up’.

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

Inappropriate Sexual Behaviour can be inappropriate socially, inappropriate to development, or both. In considering whether behaviour fits into this category, it is important to consider what negative effects it has on any of the parties involved and what concerns it raises about a child or young person. It should be recognised that some actions may be motivated by information seeking, but still cause significant upset, confusion, worry, physical damage, etc. It may also be that the behaviour is “acting out” which may derive from other sexual situations to which the child or young person has been exposed.

If an act appears to have been inappropriate, there may still be a need for some form of behaviour management or intervention. For some children, educative inputs may be enough to address the behaviour.

Abusive sexual activity includes any behaviour involving coercion, threats, aggression together with secrecy, or where one participant relies on an unequal power base.

Assessment

In order to more fully determine the nature of the incident the following factors should be given consideration. The presence of exploitation in terms of:

- **Equality** – consider differentials of physical, cognitive and emotional development, power and control and authority, passive and assertive tendencies
- **Consent** – agreement including all the following:
 - Understanding that is proposed based on age, maturity, development level, functioning and experience
 - Knowledge of society’s standards for what is being proposed
 - Awareness of potential consequences and alternatives
 - Assumption that agreements or disagreements will be respected equally
 - Voluntary decision
 - Mental competence
- **Coercion** – the young perpetrator who abuses may use techniques like bribing, manipulation and emotional threats of secondary gains and losses that is loss of love, friendship, etc. Some may use physical force, brutality or the threat of these regardless of victim resistance.

In evaluating sexual behaviour of children and young people, the above information should be used as a guide. Further information and advice to assist in identifying and responding appropriately to sexual behaviour is available from the Brook Sexual Behaviours Traffic Light Tool (<https://www.brook.org.uk/our-work/category/sexual-behaviours-traffic-light-tool>). Assessment, Consultation and Therapy (ACT) team can assist professionals in identifying sexual behaviour of concern in children and adolescents. They can be contacted via email at act@surreycc.gov.uk or by calling 01483 519606.

Where an incident comes to light which includes sexual violence and sexual harassment, the guidance '**Sexual violence and sexual harassment between children in schools and colleges**' DfE Dec 2017 should be followed. If a child has been harmed, is in immediate danger, or is at risk of harm a referral should be made to the Children's Single Point of Access C-SPA (social care) or the police. The DSL will need to undertake a risk and needs assessment considering the victim, the alleged perpetrator, and other children or staff at the school or college, and take action accordingly.

Contextual Safeguarding

Safeguarding incidents and/or behaviours can be associated with factors outside the school and/or can occur between children outside of these environments. All staff, but especially the designated safeguarding lead (or deputy) should be considering the context within which such incidents and/or behaviours occur. This is known as contextual safeguarding, which simply means assessments of children should consider whether wider environmental factors are present in a child's life that are a threat to their safety and/or welfare. Children's social care assessments should consider such factors so it is important that schools provide as much information as possible as part of the referral process. This will allow any assessment to consider all the available evidence and the full context of any abuse. Additional information regarding contextual safeguarding is available at <https://contextualsafeguarding.org.uk/about/what-is-contextual-safeguarding>.

Children with special educational needs and disabilities

Children with special educational needs (SEN) and disabilities can face additional safeguarding challenges. Governing bodies and proprietors should ensure their child protection policy reflects the fact that additional barriers can exist when recognising abuse and neglect in this group of children. This can include:

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

Recognising Neglect

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

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

Appendix 4 Specific Safeguarding Issues

All staff should have an awareness of safeguarding issues that can put children at risk of harm. Behaviours linked to issues such as drug taking and or alcohol misuse, deliberately missing education and consensual and non-consensual sharing of nudes and semi-nudes images and/or videos can be signs that children are at risk.

Expert and professional organisations are best placed to provide up-to-date guidance and practical support on specific safeguarding issues. For example information for schools and colleges can be found on the TES website (www.tes.co.uk), Mind Ed (www.minded.org.uk) and NSPCC website (www.nspcc.org.uk). Schools staff can also access government guidance on the issues listed below via the GOV.UK website:

Abuse or Safeguarding issue	Link to Guidance/Advice	Source
Abuse	What to do if you're worried a child is being abused https://www.gov.uk/government/publications/what-to-do-if-youre-worried-a-child-is-being-abused--2	DfE advice
	Domestic abuse: Various Information/Guidance https://www.gov.uk/domestic-violence-and-abuse	Home Office
	Faith based abuse: National Action Plan https://www.gov.uk/government/publications/national-action-plan-to-tackle-child-abuse-linked-to-faith-or-belief	DfE advice
	Relationship abuse: disrespect nobody https://www.disrespectnobody.co.uk/relationship-abuse/what-is-relationship-abuse/	Home Office website
Bullying	Preventing and tackling bullying https://www.gov.uk/government/publications/preventing-and-tackling-bullying	DfE advice
	Cyber Bullying: advice for headteachers and school staff https://www.gov.uk/government/publications/preventing-and-tackling-bullying	
Children and the courts	Advice for 12-17 year old witnesses in criminal courts https://www.gov.uk/government/publications/young-witness-booklet-for-12-to-17-year-olds	MoJ advice
Children missing from education, home or care	Children missing education https://www.gov.uk/government/publications/children-missing-education	DfE statutory guidance
	Child missing from home or care https://www.gov.uk/government/publications/children-who-run-away-or-go-missing-from-home-or-care	DfE statutory guidance
	Children and adults missing strategy https://www.gov.uk/government/publications/missing-children-and-adults-strategy	Home Office strategy
Children with family members in prison	National Information Centre on Children of Offenders https://www.nicco.org.uk/	Barnardo's in partnership with Her Majesty's Prison and Probation Service (HMPPS) advice
Child Criminal Exploitation	County Lines: criminal exploitation of children and vulnerable adults https://www.gov.uk/government/publications/criminal-exploitation-of-children-and-vulnerable-adults-county-lines	Home Office guidance
	Child sexual exploitation: guide for practitioners https://www.gov.uk/government/publications/child-sexual-exploitation-definition-and-guide-for-practitioners	DfE
	Trafficking: safeguarding children https://www.gov.uk/government/publications/safeguarding-	DfE and HO guidance

	children-who-may-have-been-trafficked-practice-guidance	
Drugs	Drugs: advice for schools https://www.gov.uk/government/publications/drugs-advice-for-schools	DfE and ACPO advice
	Drug strategy 2017 https://www.gov.uk/government/publications/drug-strategy-2017	Home Office strategy
	Information and advice on drugs http://www.talktofrank.com/	Talk to Frank website
	ADEPIS platform sharing information and resources for schools: covering drug (& alcohol) prevention http://mentor-adepis.org/	Website developed by Mentor UK
“Honour Based Abuse” (so called)	Female genital mutilation: information and resources https://www.gov.uk/government/collections/female-genital-mutilation	Home Office
	Female genital mutilation: multi agency statutory guidance https://www.gov.uk/government/publications/multi-agency-statutory-guidance-on-female-genital-mutilation	DfE, DH, and HO statutory guidance
	Forced marriage: information and practice guidelines https://www.gov.uk/forced-marriage	Foreign Commonwealth Office and Home Office
Health and Well-being	Fabricated or induced illness: safeguarding children https://www.gov.uk/government/publications/safeguarding-children-in-whom-illness-is-fabricated-or-induced	DfE, Department for Health and Home Office
	Rise Above: Free PSHE resources on health, wellbeing and resilience https://www.pshe-association.org.uk/curriculum-and-resources/resources/rise-above-schools-teaching-resources	Public Health England resources
	Medical conditions: supporting pupils at school https://www.gov.uk/government/publications/supporting-pupils-at-school-with-medical-conditions--3	DfE statutory guidance
	Mental health and behaviour https://www.gov.uk/government/publications/mental-health-and-behaviour-in-schools--2	DfE advice
Homelessness	Homelessness: How local authorities should exercise their functions https://www.gov.uk/guidance/homelessness-code-of-guidance-for-local-authorities	HCLG
Online	Sharing nudes and semi nudes: How to respond to an incident https://www.gov.uk/government/publications/sharing-nudes-and-semi-nudes-advice-for-education-settings-working-with-children-and-young-people/sharing-nudes-and-semi-nudes-how-to-respond-to-an-incident-overview	UK Council for Child Internet Safety
Private fostering	Private fostering: local authorities https://www.gov.uk/government/publications/children-act-1989-private-fostering	DfE - statutory guidance
Radicalisation	Prevent duty guidance https://www.gov.uk/government/publications/prevent-duty-guidance	Home Office guidance
	Prevent duty advice for schools https://www.gov.uk/government/publications/protecting-children-from-radicalisation-the-prevent-duty	DfE advice
	Educate Against Hate Website http://educateagainsthate.com	DfE and Home Office
	Prevent for FE and Training https://preventforfeandtraining.org.uk/	Education and Training Foundation (ETF)

Upskirting	Upskirting Know Your Rights https://www.gov.uk/government/news/upskirting-know-your-rights	
Violence	Gangs and youth violence: for schools and colleges https://www.gov.uk/government/publications/advice-to-schools-and-colleges-on-gangs-and-youth-violence	Home Office advice
	Ending violence against women and girls 2016-2020 strategy https://www.gov.uk/government/publications/strategy-to-end-violence-against-women-and-girls-2016-to-2020	Home Office strategy
	Violence against women and girls: national statement of expectations for victims https://www.gov.uk/government/publications/violence-against-women-and-girls-national-statement-of-expectations	Home Office guidance
	Sexual violence and sexual harassment between children in schools and colleges https://www.gov.uk/government/publications/sexual-violence-and-sexual-harassment-between-children-in-schools-and-colleges	DfE advice
	Serious violence strategy https://www.gov.uk/government/publications/serious-violence-strategy	Home Office Strategy

Children and the court system

Children are sometime required to give evidence in criminal courts, either for crimes committed against them or for crimes they have witnessed. There is an age appropriate guide to support children 12-17 year olds (<https://www.gov.uk/government/publications/young-witness-booklet-for-12-to-17-year-olds>) .

It explains each step of the process and 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.

Child Missing from Education

All staff should be aware that children going missing, 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 child criminal exploitation. It may indicate mental health problems, risk of substance abuse, risk of travelling to conflict zones, risk of female genital mutilation 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 their school or college's unauthorised absence and children missing from education procedures.

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. NICCO (<https://www.nicco.org.uk/>) 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)

Both CSE and CCE are forms of abuse that occur where an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a child into taking part in sexual or criminal activity, in exchange for something the victim needs or wants, and/or for the financial advantage or increased status of the perpetrator or facilitator and/or through violence or the threat of violence. CSE and CCE can affect children, both male and female and can include children who have been moved (commonly referred to as trafficking) for the purpose of exploitation.

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 can be found at https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/591903/CSE_Guidance_Core_Document_13.02.2017.pdf

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.

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 be commenced over the coming months

Operation Encompass

Operation Encompass operates in the majority of 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 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.

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 <https://www.nspcc.org.uk/preventing-abuse/child-abuse-and-neglect/domestic-abuse/signs-symptoms-effects/>
- Refuge what is domestic violence/effects of domestic violence on children <http://www.refuge.org.uk/get-help-now/support-for-women/what-about-my-children/>
- Safelives: young people and domestic abuse <http://www.safelives.org.uk/knowledge-hub/spotlights/spotlight-3-young-people-and-domestic-abuse>

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 in to the Local Housing Authority so they can raise/progress concerns at the earliest opportunity. Indicators that a family may be at risk of homelessness include household debt, rent arrears, domestic abuse and anti-social behaviour, as well as the family being asked to leave a property. Whilst referrals and or discussion with the Local Housing Authority should be progressed as appropriate, this does not, and should not, replace a referral into children's social care where a child has been harmed or is at risk of harm.

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 <https://www.gov.uk/government/publications/homelessness-reduction-bill-policy-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 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 services will be the lead agency for these young people 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: <https://www.gov.uk/government/publications/homelessness-reduction-bill-policy-factsheets>.

So-called ‘honour based’ abuse (including 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 that might be at risk of HBA or who has suffered from HBA, they should speak to the designated safeguarding lead (or deputy). As appropriate, they will activate local safeguarding procedures, using existing national and local protocols for multiagency 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** 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

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 will face disciplinary sanctions. It will be rare for teachers to see visual evidence, and they should not be examining 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- <https://www.gov.uk/government/publications/mandatory-reporting-of-female-genital-mutilation-procedural-information>

Teachers **must** personally report to the police cases where they discover that an act of FGM appears to have been carried out.⁷⁴ Unless the teacher has a good reason not to, they should also still consider and discuss any such case with the school or college’s designated safeguarding lead 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 - https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/496415/6_1639_HO_SP_FGM_mandatory_reporting_Fact_sheet_Web.pdf

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 communities use religion and culture 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 has published Multi-agency guidelines, - <https://www.gov.uk/forced-marriage> with pages 32-36 focusing on the role of schools and colleges. School and college staff can contact the Forced Marriage Unit if they need advice or information. Contact: 020 7008 0151 or email: fmufco.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 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 designated safeguarding lead (and any deputies) should be 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".¹⁰⁴ This duty is known as the Prevent duty.

The Prevent duty should be seen as part of schools' and colleges' wider safeguarding obligations. Designated safeguarding leads and other senior leaders should familiarise themselves with the Revised Prevent duty guidance: for England and Wales - especially paragraphs 57-76 which are specifically concerned with schools (and also covers childcare). The guidance is set out in terms of four general themes: Risk assessment, working in partnership, staff training, and IT policies. <https://www.gov.uk/government/publications/prevent-duty-guidance>

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.

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

Additional support

The department has published advice for schools on the Prevent duty <https://www.gov.uk/government/publications/protecting-children-from-radicalisation-the-prevent-duty> - The advice is intended to complement the Prevent guidance and signposts other sources of advice and support.

The Home Office has developed three e-learning modules:

- Prevent awareness e-learning offers an introduction to the Prevent duty: <https://www.elearning.prevent.homeoffice.gov.uk/la2/screen1.html>
- Prevent referrals e-learning supports staff to make Prevent referrals that are robust, informed and with good intention; https://www.elearning.prevent.homeoffice.gov.uk/prevent_referrals/01-welcome.html
- Channel awareness e-learning is aimed at staff who may be asked to contribute to or sit on a multi-agency Channel panel: http://course.ncalt.com/Channel_General_Awareness/01/index.html.

Educate Against Hate - <https://educateagainsthate.com/>, 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](https://preventforfeandtraining.org.uk/) <https://preventforfeandtraining.org.uk/> This hosts a range of free, sector specific resources to support further education settings 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.

Peer on peer abuse

It is important that **all** staff recognise the indicators and signs of peer on peer 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 nudes and semi-nudes 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.

All staff should understand, that even if there are no reports in School it does not mean it is not happening, it may be the case that it is just not being reported. As such it is important if staff have any concerns regarding peer on peer abuse they should speak to DSL (or dDSL).

It is essential that **all** staff understand the importance of challenging inappropriate behaviours between peers, many of which are listed below, that are actually abusive in nature. Downplaying certain behaviours, for example dismissing sexual harassment as “just banter”, “just having a laugh”, “part of growing up” or “boys being boys” can lead to a culture of unacceptable behaviours, an unsafe environment for children and in worst case scenarios a culture that normalises abuse leading to children accepting it as normal and not coming forward to report it.

Sexual violence and sexual harassment between children in schools and colleges

Context

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

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

Staff should be aware of the importance of:

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

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. When referring to sexual violence we are referring to sexual offences under the Sexual Offences Act 2003 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.

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.

Sexual harassment

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

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:
 - non-consensual sharing of sexual images and videos;
 - sexualised online bullying;
 - unwanted sexual comments and messages, including, on social media;
 - sexual exploitation; coercion and threats; and
 - Upskirting.

Upskirting

The Voyeurism (Offences) Act, 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 gender, can be a victim.

The response to a report of sexual violence or sexual harassment

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

If staff have a concern about a child or a child makes a report to them, they should follow the referral process. 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).

Serious Youth Violence

All staff should be aware of the indicators, which may signal 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 a significant change in wellbeing, or signs of assault or unexplained injuries. 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 and may be at risk of criminal exploitation

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, <https://nationalcrimeagency.gov.uk/what-we-do/crime-threats/cyber-crime/cyberchoices>

'NPCC- When to call the Police'

<https://www.npcc.police.uk/documents/Children%20and%20Young%20people/When%20to%20call%20the%20police%20guidance%20for%20schools%20and%20colleges.pdf>

and National Cyber Security Centre - NCSC.GOV.UK <https://www.ncsc.gov.uk/>

Further advice on child protection is available from:

NSPCC: www.nspcc.org.uk

Childline: www.childline.org.uk

CEOPSThinkuknow: www.thinkuknow.co.uk

Anti-Bullying Alliance: www.anti-bullyingalliance.org.uk

Extremism: The Department for Education has dedicated a telephone helpline (020 7340 7264) to enable staff and governors to raise concerns relating to extremism directly. Concerns can also be raised by email to counter.extremism@education.gsi.gov.uk.

TES: www.tes.co.uk