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# SAWSTON VILLAGE COLLEGE

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## SAFEGUARDING AND CHILD PROTECTION POLICY

THIS POLICY WAS APPROVED:	20 <sup>TH</sup> SEPTEMBER 2022
THIS POLICY WILL BE REVIEWED:	AUTUMN 2023
MEMBER OF STAFF WITH RESPONSIBILITY FOR REVIEW:	MARTHA GREGG

## INTRODUCTION

Sawston Village College fully recognises the responsibility it has under section 157 (academies) of the Education Act 2002 (as amended), and the Apprenticeships, Skills, Children and Learning Act 2009 (as amended) to have arrangements in place to safeguard and promote the welfare of children.

This responsibility is more fully explained in the statutory guidance for schools and colleges 'Keeping Children Safe in Education' (September 2022). **All staff** must be made aware of their duties and responsibilities under Part One of this document, which are set out below.

Staff should read the above document together with 'Annex B' of 'Keeping Children Safe in Education', 2022 and 'What to do if you're worried a child is being abused: Advice for practitioners' (March 2015) if they are working directly with children. For those staff who do not work directly with children or where English is a second language, Annex A may be issued instead.

Sawston Village College fully recognises the responsibility it has under the Equality Act 2010 to provide protection from direct/indirect discrimination or harassment for people with a protected characteristic that relates to:

- Age
- Disability
- Gender reassignment
- Pregnancy and maternity
- Race
- Religious belief or non-belief
- Sex
- Sexual Orientation

Through their day-to-day contact with pupils and direct work with families all staff in school have a responsibility to:

- Identify concerns early to prevent them from escalating;
- Provide a safe environment in which children can learn;
- Identify children who may benefit from early help;
- Know what to do if a child tells them he/she is being abused or neglected;
- Follow the referral process if they have a concern.

(see Keeping Children Safe in Education, 2022)

This policy sets out how the College's governing body and Anglian Learning Trust discharges its statutory responsibilities relating to safeguarding and promoting the welfare of children who are pupils at the College. Our policy applies to **all** staff, paid and unpaid, working in the College including governors. Teaching assistants, mid-day supervisors, administrative and support staff, as well as teachers can be the first point of disclosure for a child. Concerned parents/carers may also contact the College and its governors.

It is consistent with the Safeguarding Children Partnership Board procedures.

**There are four main elements to our policy:**

- 1. PREVENTION** through the teaching and pastoral support offered to pupils and the creation and maintenance of a whole school protective ethos;
- 2. PROCEDURES** for identifying and reporting cases, or suspected cases, of abuse. The definitions of the four categories of abuse are attached (see Appendix A);
- 3. SUPPORTING CHILDREN** particularly those who may have been abused or witnessed violence towards others;
- 4. PREVENTING UNSUITABLE PEOPLE WORKING WITH CHILDREN** - processes are followed to ensure that those who are unsuitable to work with children are not employed.

This policy is available to parents on request and is on the College website.

## 1. PREVENTION

We recognise that high self-esteem, confidence, supportive friends and good lines of communication with a trusted adult help to protect children.

The College will therefore:

- Establish and maintain an environment where children feel safe, including in a digital context, and are encouraged to talk about their concerns and problems, and are listened to.
- Ensure children know that there are adults in the College whom they can approach if they are worried or in difficulty and their concerns will be taken seriously and acted upon as appropriate.
- Tailor our curriculum to be age and stage appropriate so that it meets the specific needs and vulnerabilities of individual children, including those who have experienced abuse, and children with special educational needs or disabilities.
- Incorporate into the curriculum, activities and opportunities that enable children to develop their understanding of stereotyping, prejudice and equality.
- Ensure that College staff challenge instances of prejudice related behavior, including but not limited to, instances of sexism, misogyny/misandry, homophobia, bi-phobic and sexual violence/harassment. Any prejudice related incidents will be responded to in accordance with our 'Responding to Prejudice-Related Incidents Policy'.
- Incorporate into the curriculum, activities and opportunities which equip children with the skills they need to stay safer from abuse in all contexts, including:
  - How to determine whether other children, adults or sources of information are trustworthy and judge when a family, friend, intimate or other relationship is unsafe (and to recognise this in others' relationships); and, how to seek help or advice, including reporting concerns about others, if needed
  - The characteristics of positive and healthy friendships
  - That some types of behaviour within relationships are criminal, including violent behaviour and coercive control
  - What constitutes sexual harassment and sexual violence and why these are always unacceptable
  - About online risks, including that any material someone provides has the potential to be shared online and the difficulty of removing potentially compromising material placed online
  - What to do and where to get support to report material or manage issues online
  - The impact of viewing harmful content
  - That specifically explicit material e.g. pornography presents a distorted picture of sexual behaviours, can damage the way people see themselves in relation to others and negatively affect how they behave towards sexual partners.
  - That sharing and viewing indecent images of children (including those created by children) is a criminal offence which carries severe penalties including jail
  - The concepts of, and laws relating to, sexual consent, sexual exploitation, abuse, grooming, coercion, control, harassment, rape, domestic abuse, forced marriage, honour-based abuse and FGM and how they can affect current and future relationships.

- How people can actively communicate and recognise consent from others, including sexual consent and how and when that can be withdrawn (in all contexts including online).

## 2. PROCEDURES

We will follow the procedures set out in the Cambridgeshire and Peterborough Safeguarding Children Partnership Board 'Inter-Agency Procedures'. A copy of these procedures can be found on their website: <http://www.safeguardingcambspeterborough.org.uk/children-board/>

The Designated Safeguarding Lead is:

Miss Martha Gregg – Director of Safeguarding, Welfare and Pastoral Support.

The Deputy Designated Safeguarding Leads are:

Mr David Hunt – Director of Inclusion and Alternative Provision  
Miss Vicky Linzell – Inclusion Manager

The following members of staff have also received the Designated Safeguarding Lead training:

Mr Jonathan Russell – Principal  
Miss Susan Gelder – Deputy Principal  
Mrs Cheryl Wombwell – Year 10 Lead and Head of Mandela House  
Mrs Jodie Fink – Year 7 Lead and Head of Turing House

The nominated governor for Safeguarding and Child Protection is:

Ms Samantha Abbs

The Governing body will:

- Appoint a senior member of staff, from the leadership team, to the role of Designated Safeguarding Lead (DSL). The DSL will take lead responsibility for safeguarding and child protection. Whilst the activities of the DSL can be delegated to appropriately trained deputies, (Deputy Designated Safeguarding Lead, DDSL), the lead responsibility for safeguarding and child protection remains with the DSL and cannot be delegated.
- Ensure that the role of DSL and DDSL is explicit in the role holder's job description.
- Ensure that the DSL has the appropriate status and authority within the College to carry out the duties of the post. Give the DSL the time, funding, training, resources and support to provide advice and support to other staff on child welfare and child protection matters. (See 'Keeping Children Safe in Education, 2022, Annex C). Ensure that the DSL and deputies have undertaken the two day training provided by the Education Safeguarding Team and that this training is updated **at least every two years**.
- Ensure that in addition to the formal training set out above, the DSL and DDSLs refresh their knowledge and skills e.g. via bulletins, meetings or further reading **at least annually**.

- Ensure that every member of staff, paid and unpaid, and the governing body, knows who the Designated Safeguarding Lead and Deputies are and the procedures for passing on concerns from the **point of induction**.

Staff members are required to log all safeguarding concerns on My Concern ([www.myconcern.com](http://www.myconcern.com)). Where a young person may be at risk of significant harm, staff should speak directly to a DSL/DDSL immediately as well as logging the concern on My Concern. Visitors should complete a blue 'log of concern' form and pass this to the DSL/DDSL immediately.

- Ensure that the DSL or DDSL are always available (during school hours, during term-time) to discuss any safeguarding concerns and that all staff are clear upon the course of action they must take if in exceptional circumstances the DSL and DDSL are not available, which would be to speak with a member of the Senior Leadership Team.

If a DSL/DDSL is not available, staff members should speak to a member of the Senior Leadership Team in the first instance. If they are unable to do so, they should contact Cambridgeshire Children's Social Care directly on 0345 045 5203.

- Liaise with the three safeguarding partners (Local Authority, Integrated Care Board and Police) as appropriate and work with other agencies in line with Working Together to Safeguard Children, 2018.
- Ensure the nominated governor for safeguarding and child protection (Samantha Abbs) has undertaken appropriate training.
- Ensure every member of staff and every governor knows:
  - the name of the Designated Safeguarding Lead/Deputies and their role;
  - how to identify the signs of abuse and neglect;
  - that children may not feel ready or know how to tell someone that they are being abused, exploited or neglected and/or they may not recognize their experiences as harmful;
  - how to pass on and record concerns about a pupil/student;
  - that they have an individual responsibility to be alert to the signs and indicators of abuse; and for referring safeguarding concerns to the DSL/DDSL;
  - what is meant by, and the importance of, showing professional curiosity;
  - that they have a responsibility to provide a safe environment in which children can learn;
  - where to find the Inter-Agency Procedures on the Safeguarding Children Partnership Board website; <https://www.safeguardingcambspeterborough.org.uk/children-board/>
  - their role in the early help process;
  - the process for making referrals to children's social care;
  - the safeguarding response to children who go missing in education.
- Ensure that all staff and governors recognise the need to ensure that those with protected characteristics are treated fairly and that they are protected from all forms of discrimination and harassment.

- Ensure all staff members undergo safeguarding and child protection training at induction. Ensure that staff training is regularly updated and that in addition to this training all staff members receive regular safeguarding and child protection updates as required **but at least annually**.
- Ensure that **all** staff, paid and unpaid, recognise their duty and feel able to raise concerns about poor or unsafe practice in regard to children and that such concerns are addressed sensitively and effectively in a timely manner in accordance with agreed whistle-blowing policies.
- Ensure that parents are informed of the responsibility placed on the College and staff in relation to child protection by setting out these duties on the College website.
- Ensure that this policy is available publicly either via the College website or by other means.
- Help promote educational outcomes by sharing the information about the welfare, safeguarding and child protection issues that children who have or have had a social worker are experiencing with teachers and school leadership staff.

Where pupils are educated off site or in alternative provision, the College and the provider will have clear procedures about managing safeguarding concerns between the two agencies. Written confirmation that the alternative provider has carried out appropriate safeguarding checks on individuals working at the establishment will be sought by the College. The College will conduct regular visits and phone calls to providers as part of our quality assurance process; this will include ensuring that safeguarding procedures are being followed as stated in the provider's safeguarding policy. The College will insist on provider's giving a daily attendance update on any pupils in attendance

### **Liaison with Other Agencies**

The College will:

- Work to develop effective links with relevant services to promote the safety and welfare of all pupils/students.
- Co-operate as required, in line with 'Working Together to Safeguard Children,' (July 2018), with key agencies in their enquiries regarding child protection matters including attendance and providing written reports at child protection conferences and core groups.
- Notify the relevant Social Care Team immediately if:
  - it should have to exclude a pupil who is subject to a Child Protection Plan (whether fixed term or permanently);
  - there is an unexplained absence of a pupil who is subject to a Child Protection Plan;
  - there is any change in circumstances to a pupil who is subject to a Child Protection Plan.
- When a pupil who is subject to a child protection plan leaves, information will be transferred to the new school immediately. The Child Protection Chair and Social Work Team will also be informed.

## **Record Keeping**

The College will:

- Keep clear, detailed, accurate, written records of concerns about children (noting the date, event and action taken), even where there is no need to refer the matter to Social Care immediately.
- Record, in writing, in a separate safeguarding file for each child all concerns, discussions and decisions made, and the reasons for those decisions.

Records should include:

- a clear and comprehensive summary of the concern;
- the child's wishes and feelings;
- details of how the concern was followed up and resolved;
- a note of any action taken, decisions reached and the outcome;
- a record of any discussion communication with parents, other agencies etc.

Electronic records are stored on an identified, purpose-built, secure platform, 'MyConcern'.

- Ensure all relevant safeguarding records are sent to the receiving school or establishment when a pupil moves schools, within five days, in accordance with 'Keeping Children Safe in Education, 2022, (page 163) and the Education Safeguarding Team's Guidance on Keeping and Managing Child Safeguarding Records.
- Consider whether it would be appropriate to share information with the new school/college in advance of a child leaving.
- Make parents aware that such records exist except where to do so would place the child at risk of harm.
- Ensure all actions and decisions are led by what is considered to be in the best interests of the child.

## **Confidentiality and information sharing**

The Data Protection Act 2018 does not prevent school staff from sharing information with relevant agencies, where that information may help to protect a child. Information about children and their families is defined as 'special category data', i.e. information that identifies a living individual. Collection, storage and sharing of personal data is governed by the UK General Data Protection Regulations (UK GDPR) and the Data Protection Act 2018.

The College will:

- Ensure staff and volunteers adhere to confidentiality protocols and that information is shared appropriately.



- Ensure staff are aware that they have a professional responsibility to share information with other agencies in order to safeguard children, (as set out in 'Information sharing; Advice for practitioners providing safeguarding services to children, young people, parents and carers,' DfE, July 2018).
- Ensure that if a member of staff receives a Subject Access Request (under the Data Protection Act 2018) from a pupil or parent they will refer the request to the DSL or Headteacher.
- Ensure staff are clear with children that they cannot promise to keep secrets.

The Designated Safeguarding Lead/Deputies will:

- Disclose information about a pupil to other members of staff on a 'need to know' basis. Parental consent may be required.
- Aim to gain consent to share information and be mindful of situations where to do so would place a child at increased risk of harm. Information may be shared without consent if a person believes that there is good reason to do so, and that the sharing of information will enhance the safeguarding of a child in a timely manner.
- Record when decisions are made to share or withhold information, who information has been shared with and why. (See 'Working Together to Safeguard Children,' July 2018)
- In cases where the 'serious harm test' is met, schools must withhold providing the data in compliance with schools' obligations under the Data Protection Act 2018 and the UK GDPR. Where in doubt schools should seek independent legal advice.
- Seek advice about confidentiality from outside agencies if required. (See 'Information sharing; Advice for practitioners providing safeguarding services to children, young people, parents and carers,' DfE, July 2018).
- Ensure that all pupils' files are requested on admission to the College, either from Primary settings or as a mid-year transfer. Paper files will be collected by a DSL/DDSL where possible, or will be requested to be sent via recorded and signed for delivery.

### **Communication with Parents/Carers**

The College will:

- Ensure that parents/carers are informed of the responsibility placed on the College and staff in relation to child protection by setting out its duties on the College website.
- Undertake appropriate discussion with parents/carers prior to involvement of another agency unless the circumstances preclude this action.
- Discuss with Children's Social Care if the College believes that notifying parents could place the child or another person at immediate risk of harm or prejudice the prevention or detection of crime. (Further guidance on this can be found in the Effective Support for Children and Families in Cambridgeshire and Peterborough).

- Record what discussions have taken place with parents or if a decision has been made not to discuss it with parents, the rationale must be recorded. Records may subsequently be disclosable to relevant partner agencies if Child Protection proceedings commence.

Particular circumstances where parents **may not** be informed include any disclosure of sexual abuse or physical abuse where the child has an injury, where it would place the child at immediate risk of harm, or where it may lead to the loss of evidence or prejudice the prevention or detection of crime. Rationales for these decisions must be recorded.

## Child on Child Abuse

We recognise that child on child abuse can manifest itself in many ways. 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 part of the Voyeurism (Offences) Act, April 2019 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 forms of child on child abuse are unacceptable and will be taken seriously.

The College will therefore:

- Create a whole school protective ethos in which child on child abuse, including sexual violence and sexual harassment will not be tolerated.
- Provide training for staff about recognising and responding to child on child abuse, including raising awareness of the gendered nature of peer abuse, with girls more likely to be victims and boys perpetrators.
- Ensure that staff do not dismiss instances of child on child abuse, including sexual violence and sexual harassment as an inevitable part of growing up.
- Include within the curriculum, information and materials that support children in keeping themselves safe from abuse, including abuse from their peers and online.
- Provide high quality Relationship and Sex Education (RSE) and/or enrichment programmes including teaching about consent.
- Ensure that staff members follow the procedures outlined in this policy and those in the Sexual Harassment and Sexual Violence addendum 2021, Appendix E when they become aware of child on child abuse, referring any concerns of child on child abuse to the Designated Safeguarding Lead (or deputy) in line with safeguarding reporting procedures.
- Be aware that some groups are potentially more at risk. Evidence shows girls, children with special educational needs and disabilities (SEND) and LGBT children are at greater risk. School will ensure that these children have a trusted adult in school to talk to.

- Recognise the risk of intra familial harms and provide support to siblings following incidents when necessary.

The Designated Safeguarding Lead will refer to the Safeguarding Children Partnership Board's Child Sexual Abuse Assessment Tool if there is a concern that a young person may be displaying sexually harmful behaviours, may have experienced sexual violence or sexual harassment or other forms of sexual abuse.

In the case of an allegation, staff are to refer to the Sexual Harassment and Sexual Violence addendum 2021, Appendix E, for details on prevention and procedure.

### **Dealing with Sexual Violence and Sexual Harassment between children**

Sexual violence and sexual harassment can occur between two children of any age and sex from primary to secondary stage and into colleges. It can also occur wholly online, concurrently online and offline, or technology may be used to facilitate offline abuse. It can also occur through a group of children sexually assaulting or sexually harassing a single child or group of children.

Children who are victims of sexual violence and sexual harassment will likely find the experience stressful and distressing. This will, in all likelihood, adversely affect their educational attainment and will be exacerbated if the alleged perpetrator(s) attends the same school or college. Sexual violence and sexual harassment exist on a continuum and may overlap, they can occur online and face to face (both physically and verbally) and are never acceptable.

The College will:

- Be clear that there is a zero-tolerance approach to sexual violence and sexual harassment, that it is never acceptable, and it will not be tolerated.
- Provide training for staff on how to manage a report of sexual violence or sexual harassment.
- Make decisions on a case-by-case basis.
- Reassure victims that they are being taken seriously, offer appropriate support and take the wishes of the victim into account when decision making.
- Implement measures to keep the victim, alleged perpetrator and if necessary other children and staff members, safe. Record any risk assessments and keep them under review.
- Give consideration to the welfare of both the victim(s) and perpetrator(s) in these situations.
- Liaise closely with external agencies, including police and social care, when required.
- Refer to Sexual Harassment and Sexual Violence addendum 2021, Appendix E, and to 'Keeping Children Safe in Education - Part Five', 2022, 'Sexual violence and sexual harassment between children in schools and colleges,' (DfE, September, 2022) for full details of procedures to be followed in such cases. Also see 'Sharing nudes and semi-nudes: advice for education settings working with children and young people' (UKCIS, December 2020), Appendix F.

### 3. SUPPORTING CHILDREN

The College recognises that any child may be subject to abuse and that mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation and as such will support all children by:

- Providing curricular opportunities to encourage self-esteem and self-motivation.
- Creating an ethos that actively promotes a positive, supportive and safe environment and values the whole community.
- Applying the College's behaviour policy effectively. All staff will agree on a consistent approach, which focuses on the behaviour of the child but does not damage the pupil's sense of self-worth. The College will ensure that the pupil knows that some behaviour is unacceptable but s/he is valued and not to be blamed for any abuse which has occurred.
- Liaising with the senior mental health lead where safeguarding concerns are linked to mental health in the College for advice on case management.
- Liaising with other agencies which support the pupil such as Social Care, Child and Adolescent Mental Health Services, Cambridgeshire Sexual Behaviour Service or Early Help Teams.
- Promoting supportive engagement with parents and/or carers in safeguarding and promoting the welfare of children, including where families may be facing challenging circumstances

The College recognises that whilst any child may benefit from early help, staff are encouraged to consider the wider environmental factors present in a child's life which could pose a threat to their welfare or safety, (contextual safeguarding). Staff are required to be particularly alert to the potential need for early help for children in particular circumstances. Please see page 9 of Keeping Children Safe in Education, 2022 for the complete list. The list includes:

#### **Children with Disabilities, Additional Needs or Special Educational Needs**

We recognise that, statistically, children with additional needs, special educational needs, emotional and behavioural difficulties and disabilities are most vulnerable to abuse. School staff who deal with children with complex and multiple disabilities and/or emotional and behavioural problems should be particularly sensitive to indicators of abuse.

The College has pupils with emotional and behavioural difficulties and/or challenging behaviours. The College will support staff to decide appropriate strategies that will reduce anxiety for the individual child and raise self-esteem as part of an overall behaviour support plan agreed with parents/carers.

As part of the PSHE curriculum staff will teach children personal safety skills commensurate with their age, ability and needs. Children will be taught personal safety skills such as: how to recognise if they are feeling unsafe including within family relationships and friendships; how to ask for help; the difference between safe and unsafe secrets; the difference between safe and unsafe physical contact; and how recognise and manage risk including in a digital context. The content of lessons will be shared with parents/carers so that these skills can be supported at home.

The College has pupils who may have communication difficulties and we are aware that they are vulnerable to abuse because they are unable to express themselves to others. Instead, such children will often exhibit changes in behaviours or signs and indicators of abuse recognised by staff with a good knowledge of the child.

Where necessary, the College will provide additional training to staff in the use of Makaton, PECS or other communication systems. Supervision by senior leaders will be vigilant to create a protective ethos around the child.

We promote high standards of practice, including ensuring that disabled children know how to raise concerns, and have access to a range of adults with whom they can communicate.

### **Young Carers**

The College recognises that children who are living in a home environment which requires them to act as a young carer for a family member or a friend, who is ill, disabled or misuses drugs or alcohol can increase their vulnerability and that they may need additional support and protection.

School will: seek to identify young carers; offer additional support internally; signpost to external agencies; be particularly vigilant to the welfare of young carers and follow the procedures outlined in this policy, referring to Early Help or Social Care as required if concerns arise.

### **Children at Risk of Criminal Exploitation**

Criminal exploitation of children is a form of harm that is a typical feature of county lines activity. Drug networks or gangs exploit children and young people to carry drugs and money from urban areas to suburban and rural areas. Exploitation can occur even if activity appears to be consensual.

All staff will consider whether children are at risk of abuse or exploitation in situations outside their families. School will address indicators of child criminal exploitation with staff through training. Staff will follow the procedures outlined in this policy if concerns of criminal exploitation arise.

The Designated Safeguarding Lead will complete Safeguarding Children Partnership Board's Exploitation Risk Assessment and Management Tool and refer to Social Care if there is a concern that a young person may be at risk of criminal exploitation.

The College recognises that young people who go missing can be at increased risk of child criminal exploitation, modern slavery and/or trafficking and has procedures in place to ensure appropriate response to children and young people who go missing, particularly on repeat occasions.

### **Children Frequently Missing Education**

School recognises that children going missing, particularly repeatedly, can act as a warning sign of a range of safeguarding possibilities including abuse, neglect, child sexual exploitation and child criminal exploitation, modern slavery, mental health problems, risk of substance abuse, risk of travelling to conflict zones, and risk of FGM or forced marriage.

The College monitors attendance of individual pupils closely, as outlined in the Attendance Policy, and analyses patterns of absence to aid early identification of concerning patterns of absence.

The College endeavors to hold more than one emergency contact for each pupil to provide additional options to make contact with a responsible adult when a child missing education is identified as a welfare and/or safeguarding concern.

When a child is missing from education, the College follows the procedure as set out in Cambridgeshire's Children Missing Education guidance. The College will inform Social Care if a missing child is subject to a Child Protection Plan or there have been ongoing concerns.

### **Children Misusing Drugs or Alcohol**

The discovery that a young person is misusing legal or illegal substances or reported evidence of their substance misuse is not necessarily sufficient in itself to initiate child protection proceedings but the College will consider such action in the following situations:

- When there is evidence or reasonable cause to believe the young person's substance misuse may cause him or her to be vulnerable to other abuse such as sexual abuse;
- Where there is evidence or reasonable cause to believe the pupil's substance related behaviour is a result of abuse or because of pressure or incentives from others, particularly adults;
- Where the misuse is suspected of being linked to parent/carer substance misuse.
- Where the misuse indicates an urgent health or safeguarding concern
- Where the child is perceived to be at risk of harm through any substance associated criminality

### **Children at Risk of Child Sexual Exploitation**

Child sexual exploitation (CSE) is a form of child sexual abuse. It occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or young person under the age of 18 into sexual activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial advantage or increased status of the perpetrator or facilitator. The victim may have been sexually exploited even if the sexual activity appears consensual. Child sexual exploitation does not always involve physical contact; it can also occur through the use of technology.

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.

Potential indicators of sexual exploitation will be addressed within staff training, including raising awareness with staff that some young people who are being sexually exploited do not show any external signs of abuse and may not recognise it as abuse. Staff will follow the procedures outlined in this policy if concerns of child sexual exploitation arise.

The Designated Safeguarding Lead will complete the Safeguarding Children Partnership Board's Exploitation Risk Assessment and Management Tool and refer to Social Care if there is a concern that a young person may be at risk of CSE.

The College recognises that young people who go missing can be at increased risk of sexual exploitation and has procedures in place to ensure appropriate response to children and young people who go missing, particularly on repeat occasions.

At Sawston Village College we are working in partnership with Cambridgeshire Police and Cambridgeshire County Council to identify and provide appropriate support to pupils who have gone missing through the Operation Encompass scheme. Cambridgeshire's Education Safeguarding Team will share police information of missing child episodes with the Designated Safeguarding Lead(s). On receipt of any information, the DSL will decide on the appropriate support the child may require. The Operation Encompass information is stored in line with all other confidential and child protection information.

### **Children Living with Substance Misusing Parents/Carers**

Misuse of drugs and/or alcohol is strongly associated with Significant Harm to children, especially when combined with other features such as domestic violence.

When the College receives information about drug and alcohol abuse by a child's parents/carers they will follow appropriate procedures.

This is particularly important if the following factors are present:

- Use of the family resources to finance the parent's dependency, characterised by inadequate food, heat and clothing for the children
- Children exposed to unsuitable caregivers or visitors, e.g. customers or dealers
- The effects of alcohol leading to an inappropriate display of sexual and/or aggressive behaviour
- Chaotic drug and alcohol use leading to emotional unavailability, irrational behaviour and reduced parental vigilance
- Disturbed moods as a result of withdrawal symptoms or dependency
- Unsafe storage of drugs and/or alcohol or injecting equipment
- Drugs and/or alcohol having an adverse impact on the growth and development of the unborn child

### **Children Living with Domestic Abuse**

The Domestic Abuse Act 2021 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.

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 child on child 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).

Domestic Abuse is defined as any incident or pattern of incidents of controlling, coercive or threatening behaviour, violence or abuse between those aged 16 or over who are 'personally connected' regardless of

gender or sexuality. This can encompass but is not limited to the following types of abuse: psychological, physical, sexual, financial and emotional, coercive or controlling behaviour.

The College recognises that where there is Domestic Abuse in a family, the children/young people will always be affected; the longer the violence continues, the greater the risk of significant and enduring harm, which they may carry with them into their adult life and relationships. Domestic Abuse can also affect children in their personal relationships as well as in the context of home life.

Staff will follow the procedures outlined in this policy if concerns of Domestic Abuse arise. The College will vigilantly monitor the welfare of children living in domestic abuse households, offer support to them and contribute to any Multi-Agency Risk Assessment Conference (MARAC) safety plan as required.

At Sawston Village College we are working in partnership with Cambridgeshire Police and Cambridgeshire County Council to identify and provide appropriate support to pupils who have experienced domestic abuse in their home; this scheme is called Operation Encompass.

In order to achieve this, Cambridgeshire's Education Safeguarding Team will share police information of all domestic incidents to which police have been called, where one of our pupils has been present, with the Designated Safeguarding Lead(s) (DSL)/Domestic Abuse (DA) Lead.

On receipt of any information, the DSL/DA Lead will decide on the appropriate support the child may require. The Operation Encompass information is stored in line with all other confidential safeguarding and child protection information. All information sharing and resulting actions will be undertaken in accordance with the 'Cambridgeshire and Peterborough Joint Agency Protocol for Domestic Abuse – Notifications to Schools, Colleges and Early Years settings'.

### **Children at risk of 'Honour- Based' Abuse including Female Genital Mutilation**

So called 'honour-based' abuse (HBA) encompasses incidents which have been committed to protect or defend the honour of the family and/or community, including breast ironing, female genital mutilation (FGM) and forced marriage. The College takes these concerns seriously and staff are made aware of the possible signs and indicators that may alert them to the possibility of HBA through training. Staff are required to treat all forms of HBA as abuse and follow the procedures outlined in this policy.

FGM is a procedure involving the partial or total removal of the external female genitalia or other injury to the female genital organs. FGM is illegal in the UK. Any indication that a child is at risk of FGM, where FGM is suspected, or where the woman is under 18, will be dealt with under the child protection procedures outlined in this policy. Staff will report concerns to the DSL, who will make appropriate and timely referrals to social care. In these cases, parents will not be informed before seeking advice and the case will still be referred to social care even if it is against the pupil's wishes.

In accordance with the Female Genital Mutilation Act, it is a statutory duty for teachers in England and Wales to report 'known' cases of FGM in under-18s which they identify in the course of their professional work to the police. Teachers should still consider and discuss any such case with the DSL and involve social care as appropriate, but the teacher will personally report to the police that an act of FGM appears to have been carried out.



## **Children who have returned home to their family from care**

The College recognises that a previously looked after child potentially remains vulnerable. School will vigilantly monitor the welfare of previously looked after children, keep records and notify Social Care as soon as there is a recurrence of a concern in accordance with the Cambridgeshire and Peterborough Safeguarding Children Partnership Board 'Inter - Agency Procedures.'

## **Children showing signs of Abuse and/or Neglect**

School recognises that experiencing abuse or neglect may have an adverse impact on those children which may last into adulthood without appropriate intervention and support. School may be the only stable, secure and predictable element in the lives of children at risk. Children who have experienced abuse or neglect may display this through their own behaviour, which may be challenging and defiant or passive and withdrawn. We recognise that children may develop abusive behaviours and that these children may need to be referred on for appropriate support and intervention.

All staff should be aware that safeguarding incidents and/or behaviours can be associated with factors outside the College and/or can occur between children outside of these environments. All staff, but especially the designated safeguarding lead (and deputies) should consider whether children are at risk of abuse or exploitation in situations outside their families. Extra-familial harms take a variety of different forms and children can be vulnerable to multiple harms including (but not limited to) sexual exploitation, criminal exploitation, and serious youth violence.

School will provide training for staff to ensure that they have the skills to identify and report cases, or suspected cases, of abuse in accordance with the procedures outlined in this policy.

## **Children at Risk of Radicalisation**

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

The governing body will ensure that the DSL has undertaken Prevent awareness training and that all staff receive training about the Prevent Duty.

Staff are required to be alert to changes in children's behavior which could indicate they need help or protection. Concerns that a child is at risk of radicalisation are referred to the DSL in the usual way. The college's designated safeguarding lead (and any deputies) should be aware of local procedures for making a Prevent referral.

See also 'The Prevent Duty, Departmental advice for schools and childcare providers', DfE (June 2015), and 'Revised Prevent Duty Guidance: for England and Wales,' HM Government, (April 2021).

## **Privately Fostered Children**

Private fostering is when a child under the age of 16, (under 18 if disabled) is provided with care and accommodation by a person who is not a parent, person with parental responsibility for them or relative in their own home for 28 days or more.

The College will follow the mandatory duty to inform the local authority of any 'Private Fostering' arrangements and refer to the Specialist Fostering Team.

### **Children who have Family Members in Prison**

The College is committed to supporting children and young people who have a parent or close relative in prison and will work with the family to find the best ways of supporting the child.

The College recognises that children with family members in prison are at risk of poor outcomes including: poverty, stigma, isolation, poor mental health and poor attendance.

The College will treat information shared by the family in confidence and it will be shared on a 'need to know' basis.

The College will work with the family and the child to minimise the risk of the child not achieving their full potential.

## **4. PREVENTING UNSUITABLE PEOPLE FROM WORKING WITH CHILDREN**

The College will operate safer recruitment practices including ensuring appropriate DBS and reference checks are undertaken according to Part Three of 'Keeping Children Safe in Education', 2022. This section should be read in conjunction with The College's Safer Recruitment Policy.

The governing body will ensure that at least one of the persons who conducts an interview has completed safer recruitment training.

The following members of staff have undertaken Safer Recruitment training

Susan Gelder – Deputy Principal

Alan Sutton – Assistant Principal

David Hunt – Director for Inclusion and Alternative Provision

The following Governors have undertaken Safer Recruitment training:

Polly Stanton, Sam Abbs, Eleanor Clapp, Rachel Kerr.

### **Allegations that may meet the harms threshold (Part Four, Section One)**

Any allegation of abuse made against a member of staff (including supply staff, contractors and volunteers) that meets the harms threshold as set out in Keeping Children Safe in Education, 2021, Part Four, Section One, will be reported straight away to the Principal. Where an allegation is against a member of the Central Trust team, this will be reported to the CEO.

In cases where the Principal is the subject of an allegation, it will be reported to Trust CEO and the Chair of Governors, in line with the Allegations Flowchart, Appendix D. The College will follow the procedures set out in Part Four of 'Keeping Children Safe in Education', 2022.

The College will consult with the Trust CEO and the Local Authority Designated Officer (LADO) in the event of an allegation being made against a member of staff, volunteer or agency/supply staff and adhere to the relevant procedures set out in 'Keeping Children Safe in Education', 2022 and the College's HR Policies, and seek advice from their HR provider.

The Principal or Chair of Governors will ensure that all allegations are reported to the LADO within one working day. The LADO will advise on all further action to be taken.

Before contacting the LADO, schools and colleges should conduct basic enquiries in line with local procedures to establish the facts to help them determine whether there is any foundation to the allegation, being careful not to jeopardise any future police investigation.

Where the College identifies a child has been harmed they should contact children's social care and, as appropriate, the police immediately.

The College will consider:

- **Looking after the welfare of the child** - the designated safeguarding lead is responsible for ensuring that the child is not at risk and referring cases of suspected abuse to the local authority children's social care.
- **Investigating and supporting the person subject to the allegation** - the case manager should discuss with the LADO, the nature, content and context of the allegation, and agree a course of action.

The College will ensure that any disciplinary proceedings against staff, supply staff or volunteers relating to child protection matters are concluded in full even when the member of staff, supply staff or volunteer is no longer employed at the College and that notification of any concerns is made to the relevant authorities and professional bodies and included in references where applicable.

Staff (including supply staff and volunteers) who are the subject of an allegation have the right to have their case dealt with fairly, quickly, and consistently and to be kept informed of its progress. Suspension should not be an automatic response when an allegation is reported. However, in some cases, staff may be suspended where this is deemed to be the best way to ensure that children are protected.

### **Concerns that do not meet the harms threshold (Part Four, Section Two)**

Low level concerns that do not meet the harms threshold should be reported to the Principal. NB: The term low level does not mean that it is insignificant, it means that the behaviour towards a child does not meet the harms test.

In cases where the Principal is the subject of an allegation, it will be reported to the Chair of Governors. The College will follow the procedures set out in Part Four of 'Keeping Children Safe in Education', 2022.

The College will deal with any such concern, no matter how small, where an adult working in or on behalf of the College may have acted in a way that:

- is inconsistent with the staff code of conduct, including inappropriate conduct outside of work; and

- does not meet the allegations threshold or is otherwise not considered serious enough to consider a referral to the LADO.

All low-level concerns should be recorded in writing. The record should include details of the concern, the context in which the concern arose, and action taken. The name of the individual sharing their concerns should also be noted, if the individual wishes to remain anonymous then that should be respected as far as reasonably possible.

Schools and colleges can decide where these records are kept, but they must be kept confidential, held securely and comply with the Data Protection Act 2018 and the UK General Data Protection Regulation (UK GDPR). At Sawston Village College, hard copies of these records are kept securely in the Principal's PA's Office and electronically in the Principal's confidential folder.

The College will promote an open and transparent culture in which all concerns about all adults working in or on behalf of the College (including supply teachers, volunteers and contractors) are dealt with promptly and appropriately. This will enable the College to identify concerning, problematic or inappropriate behaviour early; minimise the risk of abuse; and ensure that adults working in or on behalf of the College are clear about professional boundaries and act within these boundaries, and in accordance with the ethos and values of the institution.

The College should ensure that **all** staff, paid and unpaid, are aware of the need for maintaining appropriate and professional boundaries in their relationships with pupils and parents/carers as advised within the Local Authority's Code of Conduct: 'Guidance for Safer Working Practice for Adults who work with Children and Young People in Education Settings' (February 2022). As part of the Induction process, all staff, paid and unpaid, will receive guidance about how to create appropriate professional boundaries (in both the real and virtual world) with all children, especially those with a disability or who are vulnerable.

All staff have signed to confirm that they have read the Anglian Learning Staff Code of Conduct and 'Guidance for Safer Working Practice for Adults who work with Children and Young People in Education Settings' (February 2022).

The College will ensure that staff, supply staff and volunteers are aware that sexual relationships with pupils aged under 18 are unlawful and could result in legal proceedings taken against them under the Sexual Offences Act 2003 (Abuse of Position of Trust).

## **5. OTHER RELATED POLICIES AND PROCEDURES**

**This policy links to our:**

- Anti-bullying policy
- Attendance policy (including Children Missing Education)
- Behaviour policy
- Complaints policy
- Critical Incident plan
- Equality policy
- First Aid policy
- Health and Safety policy

- Intimate Care policy
- Lone Working policy
- Online Safety and Acceptable Use policy
- Physical Intervention and/or Use of Reasonable Force policy
- Protocol for children not collected from school at the end of the school day/activity
- Recruitment and Selection policy
- Staff Code of Conduct/Safer Working Practice
- Staff Discipline and Grievance procedures
- Supporting Pupils with Medical Conditions policy
- Whistleblowing policy

## **6. GOVERNING BODY SAFEGUARDING RESPONSIBILITIES**

Governing bodies should ensure they facilitate a whole school approach to safeguarding. This means ensuring safeguarding and child protection are at the forefront and underpin all relevant aspects of process and policy development. Ultimately, all systems, processes and policies should operate with the best interests of the child at their heart.

The governing body and the Anglian Learning Trust fully recognises its responsibilities with regards to safeguarding and promoting the welfare of children. It aims to ensure that the policies, procedures and training in the College are effective and comply with the law and government guidance at all times.

It will:

- Designate a governor for safeguarding who will take leadership responsibility for the College's safeguarding arrangements and practice and champion safeguarding issues, undertaking monitoring as required in the LGB handbook and other trust guidance.
- Ensure that all governors and trustees receive appropriate safeguarding and child protection (including online) training at induction. This training will equip them with the knowledge to provide strategic challenge to test and assure themselves that the safeguarding policies and procedures in place in schools and colleges are effective and support the delivery of a robust whole school approach to safeguarding. This training will be regularly updated.
- Ensure governors and trustees are aware of their obligations under the Human Rights Act 1998, the Equality Act 2010, the Public Sector Equality Duty and the local multi-agency safeguarding arrangements.
- Monitor the College's compliance with statutory requirements
- Ensure an annual safeguarding report is made to the full governing body and copied to the Education Safeguarding Team. Any weaknesses will be rectified without delay.
- Ensure that this Safeguarding and Child Protection policy is annually reviewed, ratified, updated and understood and followed by all staff.
- It will be published on the College website.
- Ensure that children's exposure to potential risks while using the internet is limited by having in place age appropriate filtering and monitoring systems.
- Ensure children's wishes and feelings are taken into account where there are safeguarding concerns.

### **Use of the College premises for non-school activities**

If the governing body provides extended school facilities or before or after school activities directly under the supervision or management of school staff, the College's arrangements for safeguarding as written in this policy shall apply.

Where services or activities are provided separately by another organisation or individual, either on or off school site, the governing body will seek assurance that they have appropriate policies and procedures in place to keep children safe and there are arrangements to liaise with the College on these matters where appropriate.

## Categories of abuse

### Abuse

A form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Harm can include ill treatment that is not physical as well as the impact of witnessing ill treatment of others. This can be particularly relevant, for example, in relation to the impact on children of all forms of domestic abuse. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Children may be abused by an adult or adults or by another child or children.

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

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

It may occur during pregnancy as a result of maternal substance misuse.

It may involve the neglect of or lack of responsiveness to a child's basic emotional needs.

It also includes parents or carers failing to:

- Provide adequate food, clothing and shelter including exclusion from home or abandonment
- Protect a child from physical and emotional harm or danger
- Ensure adequate supervision including the use of inadequate care-givers
- Ensure access to appropriate medical care or treatment

**Emotional Abuse** - Is the persistent emotional maltreatment so as to cause severe and adverse effects on a child's emotional development.

It may involve conveying to a child that they are:

- Worthless
- Unloved
- Inadequate
- Valued only insofar as they meet another person's needs

It may include:

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

It may also feature age or developmentally inappropriate expectations being imposed on children including:

- interactions that are beyond the child's developmental capability
- overprotection and limitation of exploration and learning
- preventing participation in normal social interaction.

It may involve:

- Seeing or hearing the ill-treatment of another
- Serious bullying (including cyberbullying) causing children frequently to feel frightened or in danger
- The exploitation or corruption of children

Some level of emotional abuse is involved in all types of maltreatment although it may occur alone.

**Sexual Abuse** – involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening.

This may involve:

- physical contact including assault by penetration (e.g. rape or oral sex)
- non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing
- non-contact activities involving:
  - children in looking at, or in the production of, sexual images,
  - children in watching sexual activities
  - or encouraging children to behave in sexually inappropriate ways
  - 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.



**Useful Contacts - Cambridgeshire and Peterborough**

Cambridgeshire and Peterborough Safeguarding Children Partnership Board – Safeguarding Inter-Agency Procedures <http://www.safeguardingcambspeterborough.org.uk/children-board/>

Education Safeguarding Team [ECPS.General@cambridgeshire.gov.uk](mailto:ECPS.General@cambridgeshire.gov.uk)

Police Child Abuse Investigation Unit Tel: 101

**Useful Contacts - Cambridgeshire**

Education Safeguarding Manager – Sara Rogers [sara.rogers@cambridgeshire.gov.uk](mailto:sara.rogers@cambridgeshire.gov.uk)

Early Help Hub (EHH) Tel: 01480 376666

Customer Service Centre – social care referrals Tel: 0345 045 5203

Emergency Duty Team (out of hours) Tel: 01733 234724

Local Authority Designated Officer (LADO)  
[LADO@cambridgeshire.gov.uk](mailto:LADO@cambridgeshire.gov.uk) Tel: 01223 727967

Senior Education Adviser – Phil Nash Tel: 01223 699448

**Relevant Documents**

“Keeping Children Safe in Education: Statutory guidance for schools and colleges” (September 2022)

“Guidance for Safer Working Practice for those working with children and young people in education settings” (February 2022)

“Information sharing: Advice for practitioners providing safeguarding services to children, young people, parents and carers” (July 2018)

“The Prevent Duty, Departmental advice for schools and childcare providers” (June 2015)

“Revised Prevent Duty Guidance: for England and Wales” (April 2021)

“Sexual violence and sexual harassment between children in schools and colleges” (September, 2021)

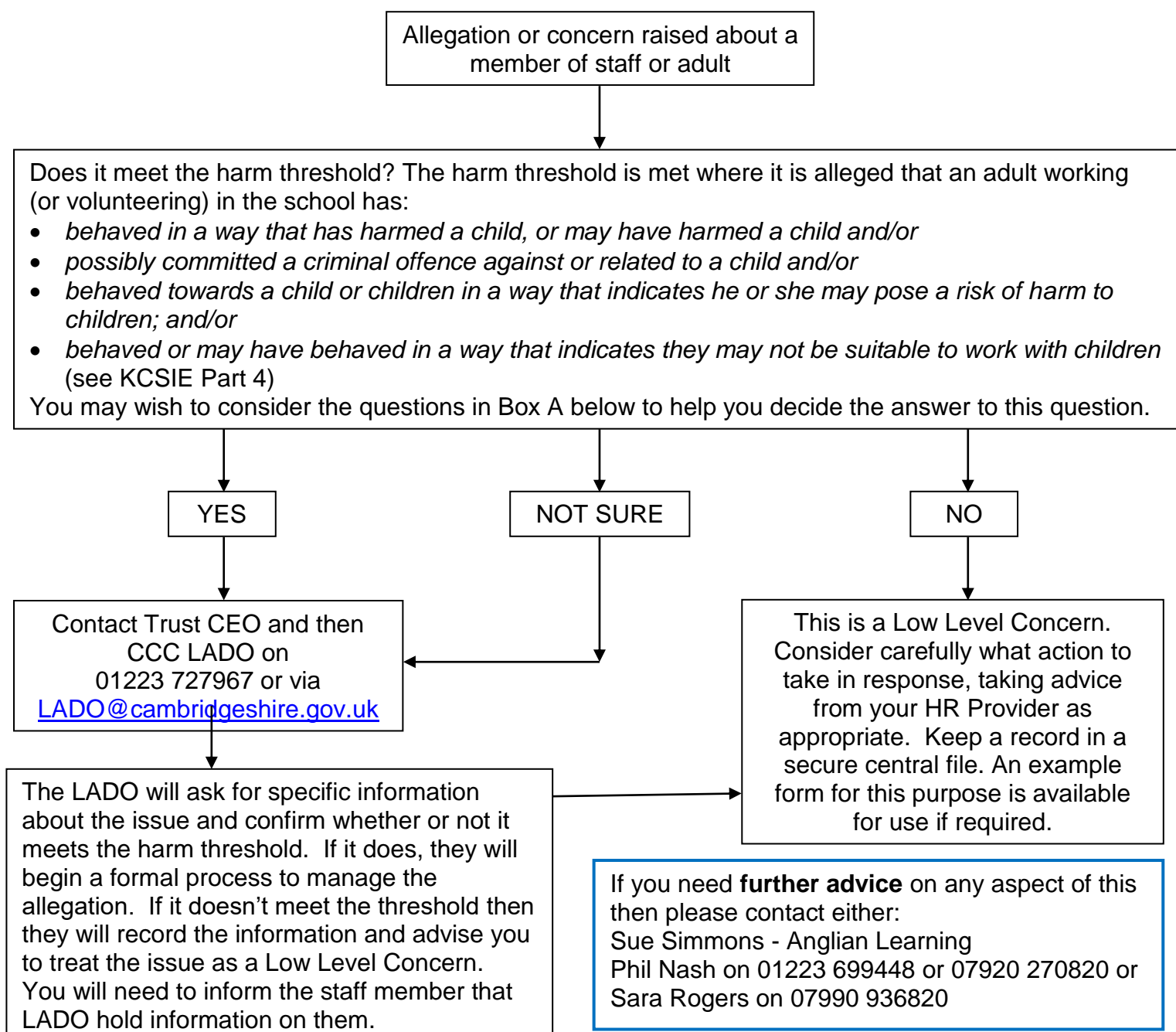
Sharing nudes and semi-nudes: advice for education settings working with children and young people (UKCIS, December 2020)

“What to do if you’re worried a child is being abused: Advice for practitioners” (March, 2015)

“When to Call the Police: guidance for schools and colleges” (National Police Chief Council)

“Working Together to Safeguard Children: A guide to inter-agency working to safeguard and promote the welfare of children” (July 2018)

## Dealing with Allegations or Concerns about an Adult Working with Children

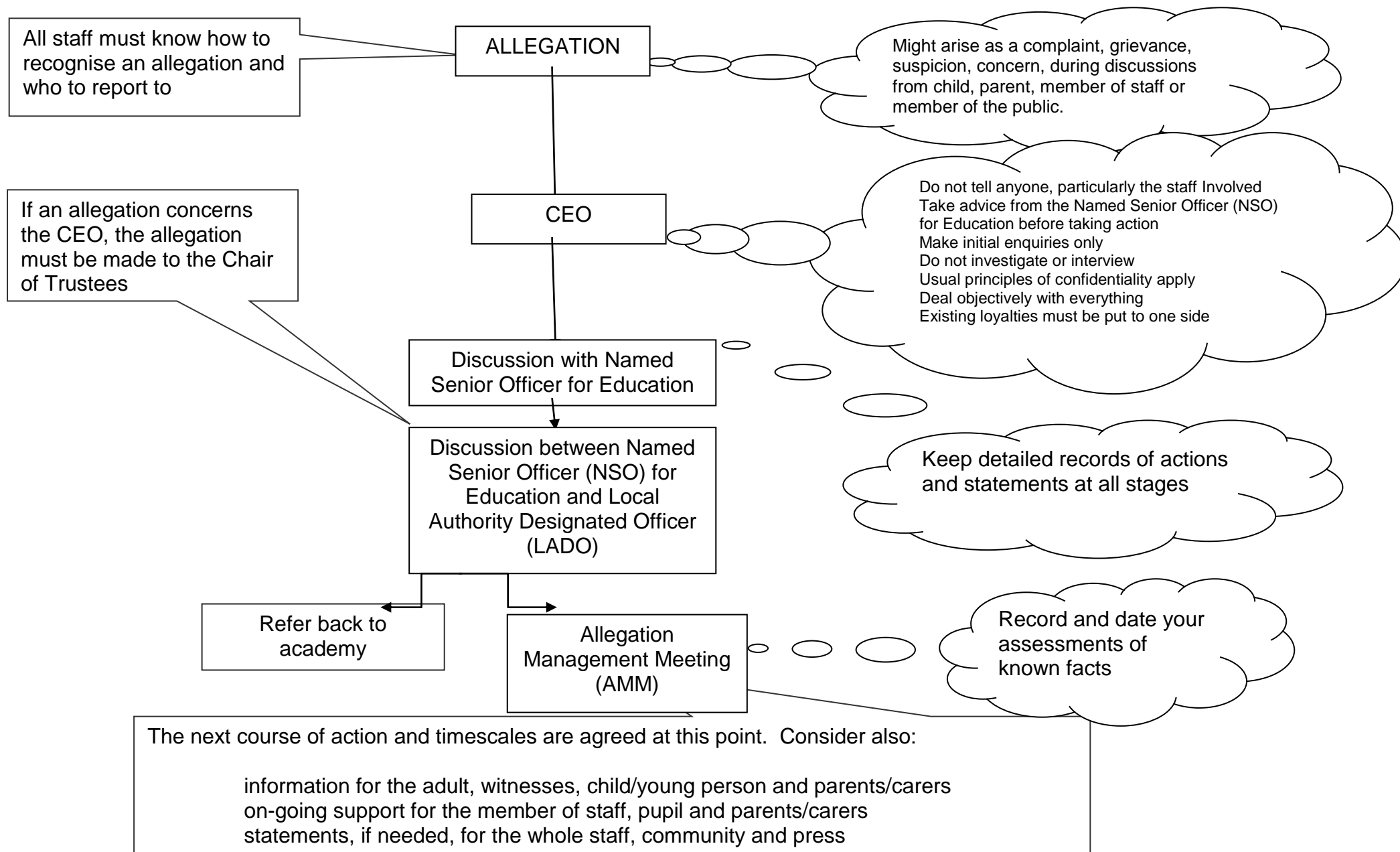


### Box A:

- How long has the adult or member of staff worked for you?
- Have there been any previous concerns raised?
- Is this a one-off or part of a pattern of behaviour?
- Has the member of staff previously been given advice in this area?
- Would an associated pattern of behaviour (if it exists) be seen by others? (How closely do they work with other colleagues?)
- Might this have been a planned action or event?
- Could this behaviour be inadvertent? What is the likelihood of this?
- Could this be the precursor to more concerning behaviour?
- Did it occur in a 'public' or 'private' place? Was this in school or out of school?
- If electronic devices are involved, have any relevant files been deleted and is there any evidence of this?
- If this relates to inappropriate language, what is the precise nature of the language used? How inappropriate is it? What was the context – where was this, and who were the listeners? Could this be seen as 'banter' or might it have more serious undertones?

## Managing an Allegation against a Member of Staff in your Establishment

## Appendix D



**Addendum: Child on Child Abuse and Sexual Violence and Harassment 2021****Aims**

All Anglian Learning academies will adopt a whole academy or college approach to safeguarding and child protection and will promote the principle within all settings that child on child abuse, sexual harassment and sexual violence is not acceptable and will not be tolerated.

This will involve everyone in the Trust, academy or college, including Trustees, the governing body and all staff, children and young people and their parents or carers. All parties will understand that child on child abuse, sexual violence or sexual harassment will not be passed off as 'banter', 'part of growing up' or 'having a laugh' and staff will be expected and supported to challenge and report all incidents of concern, however minor they may seem.

Safeguarding procedures with regard to child on child abuse, sexual violence and sexual harassment will be transparent, clear and easy to understand for staff, pupils, parents and carers. Academy websites and information sharing will make clear to pupils and their families the procedures they can follow if they have concerns or wish to make a disclosure follow.

All allegations and disclosures will be taken seriously and managed without judgement.

All academy leaders, when faced with a report of child on child abuse, sexual violence and/or sexual harassment will give immediate consideration as to how best to support and protect the victim and the alleged perpetrator through in-school provision whilst simultaneously engaging and working with external agencies.

The Relationships Education curriculum in primary academies and the Sex and Relationships curriculum in secondary academies must build a coherent understanding of the nature of healthy relationships and support all pupils to manage their relationships well. Pupils will be taught how to respond to inappropriate and unhealthy attitudes expressed towards them and will learn the sources of support they can access when any associated problems arise.

**Action following a report of child on child abuse or sexual violence and/or sexual harassment.**

All academy schools and colleges will carefully consider any report of child on child abuse, sexual violence and/or sexual harassment. The designated safeguarding lead (or deputy) is likely to have a complete safeguarding picture and be the most appropriate person to advise on the academy's or college's initial response. Where there are concerns that need support, advice or review beyond academy level the DSL should contact a peer DSL or the relevant Trust Director.

**Important considerations must include:**

- the ages of the children / young people involved
- the developmental stages of the children involved ([Child Sexual Behaviour Tool](#))
- the nature of the alleged incident(s), including whether a crime may have been committed and consideration of harmful sexual behaviour

- the wishes of the victim in terms of how they want to proceed. This is especially important in the context of sexual violence and sexual harassment. Victims should be given as much control as is reasonably possible over decisions regarding how any investigation will be progressed and any support that they will be offered
- any power imbalance between those involved. For example, is the alleged perpetrator significantly older, more mature or more confident
- whether the victim has a disability or learning difficulty
- if the alleged incident is a one-off or constitutes a sustained pattern of behaviour
- if there are ongoing risks to the victim, other children, adult students or school or college staff
- what support the parents, carers and families of alleged victims and perpetrators may need and are entitled to
- any other related issues and wider context

### **Responses to disclosures of child on child abuse, sexual violence and sexual harassment:**

Disclosures of child on child abuse, sexual violence and sexual harassment are likely to be complex and require difficult professional decisions to be made, often quickly and under pressure. Trust academies and colleges will prepare for potential disclosures by implementing approaches that include:

- staff and governor training ensuring their academy's approach to managing child on child abuse or sexual harassment and sexual violence is fully understood as is the difference between them
- pupils learning appropriate attitudes and behaviours through staff modelling, through the RSE curriculum and throughout various aspects of the broader curriculum
- the academy making clear to pupils and parents the contacts and process for reporting any concerns
- all staff being trained to manage reports of child on child abuse or sexual violence and harassment in accordance with each academy's safeguarding policies and procedures. This training evidenced and recorded
- effective links between this policy guidance and any other policies that establish the foundation for a calm, considered and appropriate response to any reports of sexual harassment or sexual violence. Including the academy's behaviour, RSE and anti-bullying policies
- ensuring that allegations will be reported to and overseen by the designated safeguarding lead (or deputy). Appropriate members of the senior leadership team being made aware of how they can best support the DSL and safeguarding team in the event of an investigation of this nature

### **Response to any report from a child or young person will ensure:**

- victims are reassured that they are being taken seriously and that they will be supported and kept safe with immediate effect
- victims will never be given the impression that they are creating a problem by reporting child on child abuse or sexual violence or sexual harassment
- victims will never be made to feel ashamed for making a report
- victims will be informed of all decisions about the next steps and any potential agency involvement
- alleged perpetrators of sexual harassment and/ or sexual violence are kept separate from the victim and are not judged
- parents and carers of victims and perpetrators are contacted and informed of any allegations in accordance with statutory guidance
- where a crime of potential crime is disclosed, it is reported to the Police and/or other relevant body as required by law or DfE guidance

### **Responsibilities - all academy staff must:**

- understand they cannot promise confidentiality at any stage of the management process, especially in the initial stage. (It is very likely a concern will have to be shared further (for example, with the designated safeguarding lead or children's social care representative) to discuss the next steps to be taken.)
- ensure that the victim understands what the next steps will be and who the information shared will be passed to
- set clear boundaries, recognising that a child or young person is likely to disclose to someone they trust. This could be any member of the school or college staff. Staff will always listen carefully, be supportive and respectful of the child or young person whether they are the victim of the alleged perpetrator
- not ask leading questions and only prompt the child where necessary with open questions – *where, when, what*, etc.
- devote their full attention to the child, recognising that it may be appropriate to make notes during the disclosure/discussion without appearing distracted. (especially if a second member of staff is present)
- only share the information and report with those people who are necessary in order to progress it

### **Recording disclosures**

Staff will only record the facts as the child or young person presents them. Any records must not reflect the personal opinion of the note taker. All academy designated safeguarding leads (and deputies) must be aware that notes of such reports could become part of a statutory assessment by children's social care and/or part of a criminal investigation and should only be factual, concise and without bias. All interview

notes should be signed by all those present to ensure that they are agreed as an accurate representation of the meeting.

Staff must consider the best way to make a record of the disclosure. In immediate instances, best practice is to wait until the end of a discussion and immediately write up a thorough summary and upload to My Concern or write directly onto the pupil profile on My Concern (this should include both victim and perpetrator).

Staff must ensure that if procedures require that they formally interview a child that this is only done with another member of staff present (ideally one person will be the note taker and the other the interviewer). These two colleagues should meet before the interview to pre-plan questions to ensure that they are not leading and are sensitive. Children and young people should have the option for a parent/carer to be present.

### **Managing reports**

Designated safeguarding leads and deputies in addition to Governing bodies and proprietors will be aware that they can access detailed definitions on what constitutes sexual violence and harassment and advice to support their schools and colleges in the Department of Education [advice on sexual violence and harassment between children in schools and colleges](#). Annex A of this document should be signposted to staff offering links to further support and guidance.

### **Online sexual harassment and/or sexual violence:**

Where the disclosure and/or reporting includes an online element, all leaders will follow their individual academy policies of searching, screening and confiscation. They will, as necessary, consult [searching, screening and confiscation at school](#) and follow the advice of [UKCCIS sexting](#) advice for schools and colleges. Staff must not view or forward illegal images of a child.

In reporting disclosures of online sexual harassment staff must:

- wherever possible manage reports with two members of staff present, (preferably one of them being the designated safeguarding lead or a deputy with one taking notes of the meeting)
- inform the designated safeguarding lead (or deputy), as soon as practically possible, if the designated safeguarding lead (or deputy) is not involved in the initial report

The above will allow for all academies to make decisions on a case-by-case basis, with the designated safeguarding lead (or deputy) taking a leading role and using their professional judgement, supported by wider agencies, such as children's social care and the police as required.

### **Risk assessments**

When there has been a report of sexual violence, the designated safeguarding lead (or a deputy) will make an immediate risk and needs assessment [EST RA for primary schools](#) and [EST RA for secondary schools](#). Where there has been a report of sexual harassment, the need for a risk assessment should be considered on a case-by-case basis. The risk assessment is not intended to replace any detailed assessments of expert professionals. Any such professional assessments should be used to inform the school's or college's approach to supporting and protecting their pupils and students and updating their own risk assessment.

Risk assessments must be recorded using MyConcern. They must be added to the victim's and alleged perpetrator's files and should be kept under review. All updates will be uploaded to the individual's files. At all times, the school or college should be actively considering the risks posed to all their pupils and students and ensure adequate measures are in place to protect them and keep them safe.

#### **The risk and needs assessment must consider**

- the victim, especially their protection, support and wishes
- the alleged perpetrator and their protection and support
- all other children and young people (and, if appropriate, adult students and staff) at the school or college, especially any actions that are appropriate to protect them.
- if the alleged perpetrator attends any outside clubs where they could be perceived to be a risk. DSLs should share information on a need-to-know basis with safeguarding representatives of such clubs/teams etc.

Where the victim and alleged perpetrator are in the same year group elements in the risk assessment may include:

- moving the alleged perpetrator to different classes
- informing staff without disclosing details that the children/young people are to be kept separate
- sharing with staff relevant aspects of the risk assessment that will support keeping the victim and perpetrator safe
- ensure the victim and perpetrator know who their 'go to person' in school is
- allocate a safe space for the victim and the perpetrator to use as necessary
- allow time and allocate a discreet place for other agencies to visit the victim and the perpetrator in school
- consider transitions in corridors
- consider changing facilities
- consider unstructured times such as breaks and lunchtimes
- consider times of arriving at and leaving academy or college sites (are the victim and alleged perpetrator on the same bus, using the same cycle/pedestrian route?)
- consider the potential 'ripple effect' across the year and peer groups and any potential risk in this. For example- the victim's or alleged perpetrator's peers taking actions against either the alleged victim and/or perpetrator.

These considerations are in the best interests of both the victim and alleged perpetrator.

They are not an assumption of guilt by the academy.



The designated safeguarding lead (or a deputy) must ensure they are engaging with children's social care and specialist services as required. Where there has been a report of sexual violence, it is likely that professional risk assessments by social workers and / or sexual violence specialists will be required.

## Sharing nudes and semi-nudes: how to respond to an incident

An overview for all staff working in education settings in England

UK Council for  
Internet Safety

This document provides a brief overview for frontline staff of how to respond to incidents where nudes and semi-nudes have been shared.

**All** such incidents should be immediately reported to the Designated Safeguarding Lead (DSL) or equivalent and managed in line with your setting's child protection policies.

The appropriate safeguarding lead person should be familiar with the full 2020 guidance from the UK Council for Internet Safety (UKCIS), *Sharing nudes and semi-nudes: advice for education settings working with children and young people* and should **not** refer to this document instead of the full guidance.

### What do we mean by sharing nudes and semi-nudes?

In the latest advice for schools and colleges (UKCIS, 2020), this is defined as the sending or posting of nude or semi-nude images, videos or live streams online by young people under the age of 18. This could be via social media, gaming platforms, chat apps or forums. It could also involve sharing between devices via services like Apple's AirDrop which works offline. Alternative terms used by children and young people may include 'dick pics' or 'pics'.

The motivations for taking and sharing nude and semi-nude images, videos and live streams are not always sexually or criminally motivated.

This advice does not apply to adults sharing nudes or semi-nudes of under 18-year olds. This is a form of child sexual abuse and must be referred to the police as a matter of urgency.

### What to do if an incident comes to your attention

**Report it to your Designated Safeguarding Lead (DSL) or equivalent immediately. Your setting's child protection policy should outline codes of practice to be followed.**

- **Never** view, copy, print, share, store or save the imagery yourself, or ask a child to share or download – **this is illegal**.<sup>1</sup>
- If you have already viewed the imagery by accident (e.g. if a young person has showed it to you before you could ask them not to), report this to the DSL (or equivalent) and seek support.
- **Do not** delete the imagery or ask the young person to delete it.
- **Do not** ask the child/children or young person(s) who are involved in the incident to disclose information regarding the imagery. This is the responsibility of the DSL (or equivalent).
- **Do not** share information about the incident with other members of staff, the young person(s) it involves or their, or other, parents and/or carers.
- **Do not** say or do anything to blame or shame any young people involved.
- **Do** explain to them that you need to report it and reassure them that they will receive support and help from the DSL (or equivalent).

### For further information

Download the full guidance, *Sharing nudes and semi-nudes: advice for education settings working with children and young people* (UKCIS, 2020) at [www.gov.uk/government/publications/sharing-nudes-and-semi-nudes-advice-for-education-settings-working-with-children-and-young-people](https://www.gov.uk/government/publications/sharing-nudes-and-semi-nudes-advice-for-education-settings-working-with-children-and-young-people).

<sup>1</sup> In exceptional circumstances, it may be necessary for the DSL (or equivalent) only to view the image in order to safeguard the child or young person. That decision should be based on the professional judgement of the DSL (or equivalent).