



## **SAFEGUARDING & CHILD PROTECTION POLICY:** **St. Margaret Clitherow Academy**



## Contents Page

Trust Mission Statement	Page 4
Safeguarding Statement	Page 4
Key personnel	Page 5
Terminology	Page 5
Policy Statement	Page 6
1. Introduction	Page 6
2. Policy Principles	Page 6-7
3. Policy Aims	Page 7
4. Values supporting children	Page 7-8
5. Prevention/Protection	Page 8
6. Safe School, Safe Staff	Page 9
7. Roles and Responsibilities	Page 9-11
8. The Head teacher will ensure that	Page 11-12
9. Designated Safeguarding Lead (DSL)	Page 12-13
10. All School Staff	Page 13
11. Confidentiality & Information Sharing	Page 13-14
12. Child Protection Procedures	Page 14-15
13. If Staff are concerned about a Child's Welfare	Page 15
14. If a pupil discloses to a member of Staff	Page 15-16
15. Notifying Parents	Page 16
16. Making a Referral	Page 16-17
17. Is this Child in Need?	Page 17
18. Is this a Child Protection Matter?	Page 17-18
19. Staff Well-being	Page 18
20. Children who are particularly vulnerable	Page 18-19
21. Recognising signs of Child Abuse	Page 19-21



22. Recognising Emotional Abuse	Page 21
23. Recognising signs of Sexual Abuse	Page 21-22
24. Recognising Neglect	Page 22
25. Racist Incidents	Page 22
26. Adverse Childhood Experiences (ACEs)	Page 22-23
27. Disguised Compliance	Page 23
28. Protecting yourself against allegations of Abuse	Page 23-24
29. Allegations against Staff	Page 24
30. Whistleblowing	Page 24-25
31. Recruitment, Supervision and Training for Staff	Page 25
32. Physical Intervention	Page 25
33. Mobile phones and Cameras in school	Page 25
34. Transporting Pupils Guidance	Page 26
35. Educational Trips	Page 26
36. Policy Links	Page 27
37. Key Documents	Page 27
Appendix A: Aspects of Safeguarding	Page 28-46
Appendix B: Flow chart for raising Safeguarding concerns	Page 47
Appendix C: Websites for Further Advice	Page 48-49
Appendix D: Changes to Keeping Children Safe In Education	Page 450



## Our Lady of Lourdes Catholic Multi Academy Trust Mission Statement

We are a partnership of Catholic schools and our aim is to provide the very best Catholic education for all in our community and so improve life chances through spiritual, academic and social development.

We will achieve this by:

Placing the life and teachings of Jesus Christ at the centre of all that we do.

Following the example of Our Lady of Lourdes by nurturing everyone so that we can all make the most of our God given talents.

Working together so that we can all achieve our full potential, deepen our faith and know that God loves us.

Being an example of healing, compassion and support for the most vulnerable in our society.

***Joshua 1:9-10 "Have I not commanded you? Be strong and courageous. Do not be afraid; do not be discouraged, for the Lord your God will be with you wherever you go."***

### Child Protection and Safeguarding Policy 2019-20

<b>Date Issued</b>	October 2019
<b>Governors' Committee Responsible:</b>	OLoL Trust Standards Committee/Executive Board
<b>School Safeguarding Governor Lead:</b>	Jacinta Fru
<b>Nominated Lead Member of Staff:</b>	Christine Reilly
<b>Status &amp; Review Cycle:</b>	Statutory Annual
<b>Next Review Date:</b>	October 2020
<b>Author</b>	Moira Dales

### Safeguarding Statement

Our Lady of Lourdes Catholic Multi Academy Trust Executive Board recognise their moral and statutory responsibility to safeguard and promote the welfare of all pupils together with the St. Margaret Clitherow Local Governing Body. The Executive Trust Board and Local Governing Body will endeavour to provide a safe and welcoming environment where all children and adults are respected and valued. They will make sure that all children and young people have the same protection regardless of age, disability, gender reassignment, race, religion or belief, sex, or sexual orientation. The Executive Trust Board and Local Governing Body are alert to the signs of abuse and neglect. They follow procedures to ensure that children and adults receive effective support, protection and justice and recognise the additional needs of children from minority ethnic groups and disabled children and the barriers they may face, especially around communication. Child protection forms part of the school's safeguarding responsibilities. The school Safeguarding and Child Protection policy is available on the school website: [www.st-margaretclitherow.nottingham.sch.uk](http://www.st-margaretclitherow.nottingham.sch.uk)



## Key Personnel

**The Designated Safeguarding Lead (DSL) is:** Christine Reilly

Contact details: email: [headteacher@st-margaretcatherow.nottingham.sch.uk](mailto:headteacher@st-margaretcatherow.nottingham.sch.uk) Telephone: 0115 9150296

**The deputy DSLs are:**

Sarah Sweeney

Contact details: email: [sarah.sweeney@st-margaretcatherow.nottingham.sch.uk](mailto:sarah.sweeney@st-margaretcatherow.nottingham.sch.uk) Telephone: 0115 9150296

Sarah McQuaid

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**The nominated child protection governor is:** Jacinta Fru

Contact details: email: [Jacinta.fru@st-margaretcatherow.nottingham.sch.uk](mailto:Jacinta.fru@st-margaretcatherow.nottingham.sch.uk) Telephone: 0115 9150296

**The Headteacher is:** Christine Reilly

Contact details: email: [headteacher@st-margaretcatherow.nottingham.sch.uk](mailto:headteacher@st-margaretcatherow.nottingham.sch.uk) Telephone: 0115 9150296

**The Chair of Governors is:** Jacinta Fru

Contact details: email: [Jacinta.fru@st-margaretcatherow.nottingham.sch.uk](mailto:Jacinta.fru@st-margaretcatherow.nottingham.sch.uk) Telephone: 0115 9150296

**Nottingham City Education Safeguarding Officer:** Karen Shead

Contact details: email: [Karen.shead@nottinghamcity.gov.uk](mailto:Karen.shead@nottinghamcity.gov.uk) Telephone: 0115 8764725

**Nottingham City Designated Officer (LADO):** Tina Wright

Contact details: email: [Tina.wright@nottinghamcity.gov.uk](mailto:Tina.wright@nottinghamcity.gov.uk) Telephone: 0115 8765501

## Terminology

**Safeguarding** and promoting the welfare of children is defined as:

- protecting children from maltreatment;
- preventing impairment of children's health or development;
- ensuring that children grow up in circumstances consistent with the provision of safe and effective care;
- and
- taking action to enable all children to have the best outcomes.

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

**Staff** refers to all those working for or on behalf of the school, full or part time, temporary or permanent, in either a paid or voluntary capacity.

**Child** includes everyone under the age of 18.

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



## Policy Statement

**Safeguarding determines the actions that we take to keep children safe and protect them from harm in all aspects of their school life. As a school we are committed to safeguarding and promoting the welfare of all of our pupils and staff<sup>1</sup>.**

**The actions that we take to prevent harm; to promote wellbeing; to create safe environments; to educate on rights, respect and responsibilities; to respond to specific issues and vulnerabilities all form part of the safeguarding responsibilities of the school. As such, this overarching policy will link to other policies which will provide more information and greater detail.**

### 1. Introduction

In England, people working with children are expected to report concerns about a child's welfare to the relevant agencies.

- The key guidance for child protection is 'Working together to Safeguard Children' (Department for Education, updated Oct 2019)<sup>2</sup>. This states: everyone who works with children has a responsibility for keeping them safe everyone who comes into contact with children and families has a role to play in sharing information and identifying concerns. In addition, section 11 of the Children Act 2004<sup>3</sup> places a statutory duty on certain agencies to co-operate to safeguard and promote the welfare of children. **This includes:**
  - local authorities,
  - NHS services and trusts,
  - police,
  - probation services
  - young offenders institutions.People who work in these agencies and who do not report suspected cases of abuse or neglect may be subject to disciplinary proceedings but do not currently face criminal penalties.
- **Mandatory reporting:** It is mandatory for all regulated health and social care professionals and teachers in England to report 'known cases' of Female Genital Mutilation (FGM) in under 18s to the police (Home Office, 2016).
  - The guidance also reflects, both 'Keeping Children Safe in Education' Oct 2019<sup>4</sup>, and Nottingham City Safeguarding Children Partnership (NCSCP)<sup>5</sup>
  - The Governing body takes seriously its responsibility under section 175 of the Education Act 2002 to safeguard and promote the welfare of children; and to work together with other agencies to ensure adequate arrangements within the school to identify, assess, and support those children who are suffering harm.
  - This policy applies to all members of staff and governors in the school.

### 2. Policy Principles

- The welfare of the child is paramount
- All children regardless of age, gender, culture, language, race, ability, sexual identity or religion have equal rights to protection, safeguarding and opportunities.

<sup>1</sup> Wherever the word "staff" is used, it covers ALL staff on site, including ancillary supply and self-employed staff, contractors, volunteers working with children etc, and governors.

<sup>2</sup> <https://www.gov.uk/government/publications/working-together-to-safeguard-children--2>

<sup>3</sup> [http://www.legislation.gov.uk/ukpga/2004/31/pdfs/ukpga\\_20040031\\_en.pdf](http://www.legislation.gov.uk/ukpga/2004/31/pdfs/ukpga_20040031_en.pdf)

<sup>4</sup> <https://www.gov.uk/government/publications/keeping-children-safe-in-education--2>

<sup>5</sup> [www.nottinghamcity.gov.uk/information-for-residents/children-and-families/nottingham-city-safeguarding-children-board/](http://www.nottinghamcity.gov.uk/information-for-residents/children-and-families/nottingham-city-safeguarding-children-board/)



- We recognise that all adults, including temporary staff, volunteers and governors, have a full and active part to play in protecting our pupils from harm and have an equal responsibility to act on any suspicion or disclosure that may suggest a child is at risk of harm;
- All staff believe that our school should provide a caring, positive, safe and stimulating environment that promotes the social, physical and moral development of the individual child.
- Pupils and staff involved in child protection issues will receive appropriate support.

### **3. Policy Aims**

- To demonstrate the school's commitment with regard to safeguarding and child protection to pupils, parents and other partners.
- To support the child's development in ways that will foster security, confidence and independence.
- To provide an environment in which children and young people feel safe, secure, valued and respected, and feel confident to, and know how to approach adults if they are in difficulties, believing they will be effectively listened to.
- To raise the 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.
- To provide a systematic means of monitoring children known or thought to be at risk of harm, and ensure we, the school, contribute to assessments of need and support packages for those children.
- To emphasise the need for good levels of communication between all members of staff.
- To develop a structured procedure within the school which will be followed by all members of the school community in cases of suspected abuse.
- To develop and promote effective working relationships with other agencies, especially the Police and Social Care.
- To ensure that all staff working within our school who have substantial access to children have been checked as to their suitability, including verification of their identity, qualifications, and a satisfactory DBS check (according to guidance)<sup>6</sup>, and a single central record is kept for audit.
- To support staff in their roles and to ensure that all staff are aware of the Whistleblowing policy of the Trust.

### **4. Values Supporting Children**

- We recognise that a child who is abused or witness's violence may feel helpless and humiliated, may blame themselves, and find it difficult to develop and maintain a sense of self-worth.
- We recognise that the school may provide the only stability in the lives of children who have been abused or who are at risk of harm.

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<sup>6</sup> Guidance regarding DBS checks found in the Protection of Freedoms Act 2012



- We accept that research shows that the behaviour of a child in these circumstances may range from that which is perceived to be normal to aggressive or withdrawn.
- Our school will support all children by:
  - Encouraging self-esteem and self-assertiveness, through the curriculum as well as our relationships, whilst not condoning aggression or bullying.
  - Promoting a caring, safe and positive environment within the school.
  - Responding sympathetically to any requests for time out to deal with distress and anxiety.
  - Offering details of helplines, counselling or other avenues of external support.
  - Liaising and working together with all other support services and those agencies involved in the safeguarding of children.
  - Notifying Social Care as soon as there is a significant concern.
  - Providing continuing support to a child about whom there have been concerns who leaves the school by ensuring that appropriate information is copied under confidential cover to the child's new setting and ensuring the school medical records are forwarded as a matter of priority.
  - Children are taught to understand and manage risk through our person, social, health and economic (PHSE) education and Relationship and Sex Education and through all aspects of school life. This includes online safety.

## **5. Prevention / Protection**

- We recognise that the school plays a significant part in the prevention of harm to our children by providing children with good lines of communication with trusted adults, supportive friends and an ethos of protection
- The school community will therefore:
  - Work to establish and maintain an ethos where children feel secure, are encouraged to talk and are always listened to.
  - Include regular consultation with children e.g. through safety questionnaires, participation in anti-bullying week, asking children to report whether they have had happy/sad lunchtimes/playtimes
  - Ensure that all children know there is an adult in the school whom they can approach if they are worried or in difficulty.
  - Include safeguarding across the curriculum, including PSE, opportunities which equip children with the skills they need to stay safe from harm and to know to whom they should turn for help. In particular this will include anti-bullying work, online-safety and road safety. Also focussed work in Year 6 to prepare for transition to Secondary school and more personal safety/independent travel.
  - Ensure all staff are aware of school guidance for their use of mobile technology and have discussed safeguarding issues around the use of mobile technologies and their associated risks.

## **6. Safe School, Safe Staff:**

- We will ensure that;





- All staff receive information about the school's safeguarding arrangements, the school's safeguarding statement, staff behaviour policy (code of conduct), child protection policy, the role and names of the Designated Safeguarding Lead and their deputy(ies), and Keeping Children Safe in Education (Oct 2019) part 1 and annex A on induction
- All staff receive safeguarding and child protection training at induction in line with advice from Nottingham City Safeguarding Children Partnership (NCSCP) which is regularly updated and receive safeguarding and child protection updates (for example, via email, e-bulletins and staff meetings), as required, but at least annually;
- All members of staff are trained in and receive regular updates in online safety and reporting concerns;
- All staff, Trust Executive and Local Governing body members, undertake the yearly 'Hays online training' and sign up to receive '**Andrew Halls Monday Briefing**<sup>7</sup>' for regular child protection awareness information, updated by the DSL as appropriate, to maintain their understanding of the signs and indicators of abuse;
- The safeguarding policy is made available via the school website or other means and that parents/carers are made aware of this policy and their entitlement to have a copy via the school handbook/newsletter/website. All parents/carers are made aware of the responsibilities of staff members with regard to child protection procedures through the publication of the Safeguarding Policy and reference to it in the school's handbook.
- The school provides a coordinated offer of Early Help when additional needs of children are identified and contributes to early help arrangements and inter-agency working and plans;
- Our lettings policy will seek to ensure the suitability of adults working with children on school sites at any time;
- Community users organising activities for children are aware of the school's Safeguarding Policy, guidelines and procedures which covers child protection;
- The name of the designated members of staff for child protection, the Designated Safeguarding Lead and deputies, are clearly advertised in the school entrance with a statement explaining the school's role in referring and monitoring cases of suspected abuse;
- On an annual basis, all staff will be given a copy of Part 1 and Annex A of Keeping Children Safe in Education (Oct 2019) and will sign to say they have read and understood it. This applies to the Governing Body in relation to part 2 of the same guidance.

## **7. Roles and Responsibilities; Responsibilities of Governing bodies, proprietors and management committees KCSIE Oct 2019 Part two)**

- All members of Our Lady of Lourdes Catholic Multi Academy Trust Executive Board and the Local Governing Body understand and fulfil their responsibilities, namely to ensure that;
  - There is a Safeguarding policy together with a staff behaviour policy (code of conduct).
  - Child protection, safeguarding, recruitment and managing allegations policies and procedures, including the staff behaviour policy (code of conduct), are consistent with Nottingham City Safeguarding Children

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<sup>7</sup> <https://www.safeguardingschools.co.uk/andrew-hall/>



Partnership (NCSCP) Safeguarding Children Partnership and statutory requirements, are reviewed annually and that the Safeguarding policy is publically available on the school website or by other means;

- Ensures that all staff including temporary staff and volunteers are provided with the school's safeguarding policy and staff behaviour policy;
- All staff have read Keeping Children Safe in Education (Oct 2019) part 1 and Annex A and those mechanisms are in place to assist staff in understanding and discharging their roles and responsibilities as set out in the guidance.
- The school operates a safer recruitment procedure that includes statutory checks on staff suitability to work with children and disqualification by association regulations and by ensuring that there is at least one person on every recruitment panel who has completed safer recruitment training;
- The school has procedures for dealing with allegations of abuse against staff (including the headteacher), volunteers and against other children and that a referral is made to the DBS if a person in regulated activity has been dismissed or removed due to safeguarding concerns, or would have had they not resigned; ***Our Lady of Lourdes Whistle Blowing Policy March 2019***<sup>8</sup>
- A member of the Governing Body, usually the Chair, is nominated to liaise with the Local Authority on Child Protection issues and in the event of an allegation of abuse made against the Headteacher.
- A member of the senior leadership team has been appointed as the Designated Safeguarding Lead (DSL) by the Governing Body who will take lead responsibility for safeguarding and child protection and that the role is explicit in the role holder's job description;
- On appointment, the DSL and deputies undertake interagency training and also undertake DSL 'New to Role' and attend DSL update training throughout the year;
- All other staff have safeguarding and Child Protection training, including online safety, at induction. Training should be regularly updated.
- At least one member of the governing body i.e. Chair and one other is to complete Safer Recruitment CPD through Hays Online Training Platform; CPD to be repeated annually.
- Children are taught about safeguarding (including online safety) as part of a broad and balanced curriculum covering relevant issues through personal social health and economic education (PSHE) and/or for maintained schools through relationship and sex education (RSE);
- Appropriate safeguarding responses are in place for children who go missing from education, particularly on repeat occasions, to help identify the risk of abuse and neglect including sexual abuse or exploitation and to help prevent the risks of their going missing in future;
- The appropriate filters and monitoring systems are in place to protect learners; KCSIE Oct 2019 Annex C. Further guidance has been published by the UK Safer Internet Centre <sup>9</sup>
- Enhanced DBS checks (without barred list checks, unless the governor is also a volunteer at the school) are in place for all Governors;
- Any weaknesses in Child Protection are remedied immediately.

<sup>8</sup> <http://www.ololcatholicmat.co.uk/wp-content/uploads/2019/04/OLoL-Whistleblowing-Policy-final-March-2019-1.pdf>

<sup>9</sup> <https://www.saferinternet.org.uk/>



- will ensure the school/college keeps an up to date single central record of pre-employment checks, specifying when the check was made and when it will be renewed.
- Monitors the adequacy of resources committed to child safeguarding, and the staff and governor training profile

#### 8. The Headteacher will ensure that;

- The Safeguarding Policy and procedures are implemented by Our Lady of Lourdes Catholic Multi Academy Trust and followed by all staff;
- Sufficient time, training, support, resources, including cover arrangements where necessary, is allocated to the DSL and deputies DSL(s) to carry out their roles effectively, including the assessment of pupils and attendance at strategy discussions and other necessary meetings;
- Where there is a safeguarding concern that the child's wishes and feelings are taken into account when determining what action to take and what services to provide;
- Systems are in place for children to express their views and give feedback which operate with the best interest of the child at heart;
- All staff feel able to raise concerns about poor or unsafe practice and that such concerns are handled sensitively and in accordance with the whistle-blowing procedures;
- A single central database of all staff and volunteers, and their safeguarding training dates is maintained and that this list confirms that all staff and those volunteers who meet the specified criteria have had a DBS check, when this check was made and when it will be renewed;
- That pupils are provided with opportunities throughout the curriculum to learn about safeguarding, including keeping themselves safe online;
- They liaise with the Local Authority Designated Officer (LADO)<sup>10</sup>, before taking any action and on an ongoing basis, where an allegation is made against a member of staff or volunteer;
- Anyone who has harmed or may pose a risk to a child s referred to the Disclosure and Barring Service.
- All school staff are provided with safeguarding training and are updated on any changes to safeguarding legislation and publications as they occur.

DSLs in school attend regular DSL updates and training as they are made available by Nottingham City Safeguarding Children Partnership (NCSCP).

- A visitor's policy is in place that puts the safeguarding of pupils at the centre and is applied to all visitors irrespective of their status and the following checks are made as visitors arrive at the school:
  - all visitors to the school will be asked to bring formal identification with them at the time of their visit unless they are named as approved visitors/contractors; **access via the Estates Portal.**
  - once on site, all visitors must report to reception first; no visitor is permitted to enter the school via any other entrance under any circumstances.

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<sup>10</sup> Nottinghamshire: [Eva Callaghan 0115 8041272](mailto:Eva.Callaghan@nottinghamcity.gov.uk) Nottingham City: 0115 8765501  
[Tina.wright@nottinghamcity.gov.uk](mailto:Tina.wright@nottinghamcity.gov.uk) Derby and Derbyshire: 01629 533190



- at reception, all visitors must state the purpose of their visit and who has invited them. They should be ready to produce formal identification upon request.
- all visitors will be asked to sign the Visitors Record Book which is kept in reception at all times making note of their name, organisation, who they are visiting and car registration.
- all visitors will be required to wear an identification badge – the badge must remain visible throughout their visit.
- visitors will then be escorted to their point of contact OR their point of contact will be asked to come to reception to receive the visitor. The contact will then be responsible for them while they are on site. The visitor must not be allowed to move about the site unaccompanied unless they are registered on the Approved Visitor List (to be on this list, the person must have a current clear DBS check and children's barred check with a copy of this registered on the schools' central record. They must then follow the procedures above e.g. sign into the visitors' book and enter the premises via reception).

## 9. The Designated Safeguarding Lead; (KCSIE Oct 2019 Annex B pg. 92)

The Designated Safeguarding Lead (DSL) should take lead responsibility for safeguarding and child protection (including online safety). This should be explicit in the role holders job description. The person should have appropriate status and authority within the school to carry out the duties of the post. They should be given time, funding, training, resources and support to provide advice and support to other staff on child welfare and child protection matters, to take strategic discussions and inter-agency meetings, and/or support other staff to do so and to contribute to the assessment of children.

Any Deputy DSLs should be trained to the same standard as the designated safeguarding lead and the role should be explicit in their job description. Whilst activities of the designated safeguarding lead can be delegated to appropriately trained deputies, the ultimate **lead responsibility** for child protection, as set out above, remains with the designated safeguarding lead, this **lead responsibility** should not be delegated.

### Manage Referrals - the DSL is expected to:

- Refer cases of suspected abuse to the local authority children's social care as required;
- Support staff who make referrals to local authority children's social care;
- Refer cases to the Channel programme where there is a radicalisation concern as required;
- Support staff who make referrals to the Channel programme;
- Refer cases where a person is dismissed or left due to risk/harm to the Disclosure and Barring Service as required; and
- Refer cases where a crime may have been committed to the Police as required.

### Work with others - the DSL is expected to:

- Act as point of contact with 3 safeguarding partners;
- Liaise with the head teacher or principal to inform him or her of issues – especially ongoing enquiries under section 47 of the Children Act 1989 and police investigations
- As required liaise with the 'case manager' (Part 4 KCSIE Oct 2019) and the designated officer(s) at the Local Authority for child protection concerns in cases which concern a member of staff;
- Liaise with staff (especially pastoral support staff, school nurses, IT Technicians and SENCOs) on matters of safety and safeguarding (including online and digital safety) and when deciding whether to make a referral by liaising with relevant agencies; and
- Act as a source of support, advice and expertise for all staff.

***For Training/Raising Awareness/Child Protection File/Availability refer to KCSIE Oct 2019 Annex B pg. 93-95***



## 10. All School Staff

- Understand that it is everyone's responsibility to safeguard and promote the welfare of children and that they have a role to play in identifying concerns, putting concerns in writing using the online CPOMs system, sharing information with the DSL and taking prompt action.
- Only use the CPOMs system from a personal login to a computer, ensuring that any files downloaded from CPOMs are protected by the personal login to that computer. Staff should ensure that all devices lock when not in use and are never left unattended. Staff must also be diligent in removing copies of files from the 'Downloads' location.
- Consider, at all times, what is in the best interests of the child;
- Know how to respond to a pupil who discloses abuse through delivery of 'Working together to Safeguard Children', and 'What to do if you suspect a Child is being Abused' (2015)<sup>11</sup>;
- Will refer any safeguarding or child protection concerns to the DSL or if necessary where the child is at immediate risk to the police or Children's Social Care;
- Are aware of the Early Help<sup>12</sup> process and understand their role within it including identifying emerging problems for children who may benefit from an offer of Early Help, liaising with the DSL in the first instance and supporting other agencies and professionals in an early help assessment through information sharing. In some cases staff may act as the Lead Professional in Early Help Cases.
- Will provide a safe environment in which children can learn.

## 11. Confidentiality and Information Sharing

- St Margaret Clitherow Academy recognises that in order to effectively meet a child's needs, safeguard their welfare and protect them from harm the school must contribute to inter-agency working in line with 'Working Together to Safeguard Children' and share information between professionals and agencies where there are concerns.
- All staff must be aware that they have a professional responsibility to share information with other agencies in order to safeguard children and that the Data Protection Act 2018 is not a barrier to sharing information where the failure to do so would place a child at risk of harm; ***see DfE advice "Information Sharing July 2018"<sup>13</sup>; The General Data Protection Regulation (GDPR) and Data Protection Action 2018 pg 5*** ***"Fears about sharing information should not be allowed to stand in the way of the need to promote the welfare and protect the safety of the child."*** ***KCSIE Oct 2019 pg.12***
- All staff must be aware that they cannot promise a child to keep secrets which might compromise the child's safety or wellbeing.
- However, we also recognise that all matters relating to child protection are personal to children and families. Therefore, in this respect they are confidential and the Head teacher or DSLs will only disclose information about a child to other members of staff on a need to know basis.

<sup>11</sup> <https://www.gov.uk/government/publications/what-to-do-if-youre-worried-a-child-is-being-abused--2>

<sup>12</sup> Nottingham City Family Support Pathways: <http://www.nottinghamchildrenspartnership.co.uk/family-support-pathway/>  
Nottinghamshire County:

<https://www.nottshelpyourself.org.uk/kb5/nottinghamshire/directory/service.page?id=c8jgiR4VJI4>

Derby and Derbyshire: [https://derbyshirescbs.proceduresonline.com/p\\_prov\\_early\\_help.html](https://derbyshirescbs.proceduresonline.com/p_prov_early_help.html)

<sup>13</sup> <https://www.gov.uk/government/publications/safeguarding-practitioners-information-sharing-advice>



- We will always undertake to share our intention to refer a child to Social Care with their parents /carers unless to do so could put the child at greater risk of harm or impede a criminal investigation. If in doubt, we will consult with an Assistant Team Manager at the Children's Services Area Team on this point.

## 12. Child Protection Procedures

- Abuse and neglect are forms of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Children may be abused in the family or in an institutional or community setting by those known to them or, more rarely, by others (e.g. via the internet). They may be abused by an adult or adults or by another child or children.
- Further information about the four categories of abuse; physical, emotional, sexual and neglect, and indicators that a child may be being abused can be found in Appendices A.
- Any child in any family in any school could become a victim of abuse. Staff should always maintain an attitude of "It could happen here".
- There are also a number of specific safeguarding concerns that we recognise our pupils may experience (go to Annex A pg. 28);
  - bullying including cyberbullying
  - child missing from education
  - child missing from home or care
  - child sexual exploitation
  - Children with family members in prison
  - 'County Lines'
  - Criminal Exploitation of children
  - domestic abuse
  - drugs and substance misuse
  - On Line safety
  - fabricated or induced illness
  - faith abuse
  - female genital mutilation (FGM)
  - forced marriage
  - gangs and youth violence
  - gender-based violence/violence against women and girls (VAWG)
  - Harassment and discrimination
  - Homelessness
  - Peer-on-peer abuse
  - private fostering
  - providing first aid
  - Racist abuse (see 'Racist Incidents' pg. 22)
  - Preventing radicalisation
  - Self-harm
  - Sexual violence and sexual harassment between children
  - youth produced sexual imagery (sexting)
  - teenage relationship abuse
  - trafficking
- Staff are aware that behaviours linked to drug taking, alcohol abuse, truanting and sexting put children in danger and that safeguarding issues can manifest themselves via peer on peer abuse.



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

### **13. If staff are concerned about a child's welfare**

- If staff notice any indicators of abuse/neglect or signs that a child may be experiencing a safeguarding issue they should record these concerns on CPOMS which will alert the DSL. Staff may also discuss their concerns in person with the DSL but the details of the concern should be recorded in writing as soon as possible on CPOMS. CPOMS will send an alert to the DSL who will follow up the concern immediately; in addition to this the member of staff logging the concern must alert the DSL verbally that they have logged a concern as soon as they have done so.
- There will be occasions when staff may suspect that a pupil may be at risk, but have no 'real' evidence. The pupil's behaviour may have changed, their artwork could be bizarre, they may write stories or poetry that reveal confusion or distress, or physical or inconclusive signs may have been noticed.
- St Margaret Clitherow Academy recognise that the signs may be due to a variety of factors, for example, a parent has moved out, a pet has died, a grandparent is very ill or an accident has occurred. However, they may also indicate a child is being abused or is in need of safeguarding.
- In these circumstances staff will try to give the child the opportunity to talk and immediately follow up by entering the concern onto CPOMS and alerting the DSL.
- If the pupil does begin to reveal that they are being harmed, staff should follow the advice below regarding a pupil making a disclosure.

### **14. If a pupil discloses to a member of staff**

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

During their conversation with the pupil staff will;

- Listen to what the child has to say and allow them to speak freely
- Remain calm and not overreact or act shocked or disgusted – the pupil may stop talking if they feel they are upsetting the listener
- Reassure the child that it is not their fault and that they have done the right thing in telling someone
- Not be afraid of silences – staff must remember how difficult it is for the pupil and allow them time to talk
- Take what the child is disclosing seriously
- Ask open questions and avoid asking leading questions
- Avoid jumping to conclusions, speculation or make accusations





- Not automatically offer any physical touch as comfort. It may be anything but comforting to a child who is being abused.
- Avoid admonishing the child for not disclosing sooner. Saying things such as 'I do wish you had told me about it when it started' may be the staff member's way of being supportive but may be interpreted by the child to mean they have done something wrong.
- Tell the child what will happen next. If a pupil talks to any member of staff about any risks to their safety or wellbeing the staff member will let the child know that they will have to pass the information on – staff are not allowed to keep secrets.

***The member of staff should write up their conversation as soon as possible on CPOMs in the child's own words. Staff should make this a matter of priority. The record should also detail where the disclosure was made and who else was present. The record should be handed to the DSL.***

## **15. Notifying Parents**

- The School will normally seek to discuss any concerns about a pupil with their parents. This must be handled sensitively and the DSL will make contact with the parent in the event of a concern, suspicion or disclosure.
- However, if the school believes that notifying parents could increase the risk to the child or exacerbate the problem, advice will first be sought from children's social care.
- Where there are concerns about forced marriage, honour based violence or FGM parents should not be informed a referral is being made as to do so may place the child at a significantly increased risk.

***The school aims to help parents understand that the school, like all others, has a duty to safeguard and promote the welfare of all pupils. The school may need to share information and work in partnership with other agencies when there are concerns about a pupil's welfare.***

## **16. Making a referral**

- Concerns about a child or a disclosure should be discussed with the DSL who will help decide whether a referral to children's social care, early help or other support is appropriate in accordance with Local Authority guidance.
- If a referral is needed, then the DSL should make it initially by telephone then followed up by completing a MARF/MASH (dependent on L.A) form and sending it immediately following the initial phone call via email to social care contact. However, anyone can make a referral and if for any reason a staff member thinks a referral is appropriate and one hasn't been made they can and should consider making a referral themselves.
- The child (subject to their age and understanding) and the parents will be told that a referral is being made, unless to do so would increase the risk to the child.
- If after a referral the child's situation does not appear to be improving the designated safeguarding lead (or the person that made the referral) should press for re-consideration to ensure their concerns have been addressed, and most importantly the child's situation improves. This should initially be followed up with the social care worker leading the referral or Local Authority Designated Safeguarding Officer<sup>14</sup>

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<sup>14</sup> Nottinghamshire: [Eva Callaghan 0115 8041272](mailto:Eva.Callaghan@nottinghamcity.gov.uk) Nottingham City: 0115 8765501  
[Tina.wright@nottinghamcity.gov.uk](mailto:Tina.wright@nottinghamcity.gov.uk) Derby and Derbyshire: 01629 533190





- If a child is in immediate danger or is at risk of harm a referral should be made to children's social care and/or the police immediately. Anybody can make a referral.
- Where referrals are not made by the DSL, the DSL should be informed as soon as possible.

**17. Is this Child in Need?** S17 of the Children Act 1989 says

- they are unlikely to achieve or maintain, or to have opportunity to achieve or maintain a reasonable standard of health or development, without the provision of services by a local authority;
- their health or development is likely to be impaired, or further impaired without the provision of such services
- does the young person have a disability?

**18. Is this a Child Protection matter?** S47 of the Children Act 1989 says

- children at risk or who are suffering significant harm
- children suffering the effects of significant harm
- serious health problems
- If this is a child in need, discuss the issues with the Designated Safeguarding Lead and parents. Obtain their consent for referral to Social Care.
- If this is a child protection matter, this should be discussed with the Designated Safeguarding Lead and will need to be referred to Social Care by the school as soon as possible.
- It is the 'significant harm' threshold that justifies statutory intervention into family life. A professional making a child protection referral under S.47 must therefore provide information which clearly outlines that a child is suffering or likely to suffer significant harm.
- It is not possible to rely on one absolute criterion when judging what constitutes significant harm. Consideration of the severity of ill-treatment may include the extent of the harm suffered, the context within which it occurred and its duration.
- Significant harm may also arise from a combination of significant events which are both acute and long standing and which may impair the child's physical, psychological and social development.
- In order to both understand and establish significant harm, it is necessary to consider the family context, together with the child's development within their wider social and cultural environment. It is also necessary to consider any special needs, e.g. medical condition, communication difficulties or disability that may affect the child's development and care within the family. The nature of harm, in terms of ill-treatment or failure to provide adequate care also needs consideration alongside the impact on the child's health and development and the adequacy of care provided.

***Definition of Significant Harm***

The Children Act 1989 introduced the concept of Significant Harm as the threshold that justifies compulsory intervention in family life in the best interests of children.

There are no absolute criteria on which to rely when judging what constitutes Significant Harm but consideration should be given to the following:



- The severity of ill-treatment which may include the degree and extent of physical harm including, for example, impairment suffered from seeing or hearing the ill-treatment of another;
- The duration and frequency of abuse and neglect;
- The extent of premeditation

## 19. Staff Well-being

- We recognise that staff working in the school who have become involved with a child who has suffered harm, or appears to be likely to suffer harm may find the situation stressful and upsetting.
- We will support such staff by providing an opportunity to talk through their anxieties with the DSLs and to seek further support as appropriate.
- Staff can also seek support through the Employee Assistance Programme, organised through Sodexo. This offers a free, confidential counselling service on a wide range of issues. Staff can contact Care first 24/7 on the Freephone telephone number – 0808 168 2143 and access online counselling on the Lifestyle website<sup>15</sup>.

## 20. Children who are particularly vulnerable

St Margaret Clitherow Academy recognises that some children are more vulnerable to abuse and neglect and those additional barriers exist when recognising abuse for some children.

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

In some cases possible indicators of abuse such as a child's mood, behaviour or injury might be assumed to relate to the child's impairment or disability rather than giving a cause for concern. Or a focus may be on the child's disability, special educational needs or situation without consideration of the full picture. In other cases, such as bullying, the child may be disproportionately impacted by the behaviour without outwardly showing any signs that they are experiencing it.

Some children may also find it harder to disclose abuse due to communication barriers, lack of access to a trusted adult or not being aware that what they are experiencing is abuse.

To ensure that all of our pupils receive equal protection we will give special consideration to children who are;

- Disabled or have special educational needs
- Young carers
- Affected by parental substance misuse, domestic abuse or parental mental health needs
- Asylum seekers
- Living away from home
- Vulnerable to being bullied or engaged in bullying
- Already viewed as a 'problem'
- Living in temporary accommodation
- Live transient lifestyles
- Living in chaotic and unsupportive home situations
- Vulnerable to discrimination on the grounds of race, ethnicity, religion, disability or sexuality
- At risk of sexual exploitation
- Do not have English as a first language

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<sup>15</sup> [www.carefirst-lifestyle.co.uk](http://www.carefirst-lifestyle.co.uk)



- At risk of female genital mutilation risk of forced marriage
- At risk of being drawn into extremism.

## **21. Recognising signs of child abuse**

### **A. Categories of Abuse:**

- Physical Abuse
- Emotional Abuse (including Domestic Abuse)
- Sexual Abuse (including child sexual exploitation)
- Neglect
- Signs of Abuse in Children:
  - The following non-specific signs may indicate something is wrong:
  - Significant change in behaviour
  - Extreme anger or sadness
  - Aggressive and attention-seeking behaviour
  - Suspicious bruises with unsatisfactory explanations
  - Lack of self-esteem
  - Self-injury
  - Depression
  - Age inappropriate sexual behaviour
  - Child Sexual Exploitation.

### **B. 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 an abusive relationship the child may:

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

The parent or carer may:

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

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

### **C. 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

#### **D. 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

#### **E. 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.

#### **F. Burns and Scalds**

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

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

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

#### **G. Fractures**

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

Non-mobile children rarely sustain fractures.

There are grounds for concern if:



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

## **H. Scars**

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

## **22. Recognising Emotional Abuse**

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

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

The following may be indicators of emotional abuse:

- Developmental delay
- Abnormal attachment between a child and parent/carer e.g. anxious, indiscriminate or not attachment
- Indiscriminate attachment or failure to attach
- Aggressive behaviour towards others
- 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

## **23. 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

## **24. 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

## **25. Racist Incidents**

- Our policy on racist incidents is set out separately, and acknowledges that repeated racist incidents or a single serious incident may lead to consideration under child protection procedures. We keep a record of racist incidents.

## **26. Adverse Childhood Experiences (ACEs)**

Adverse Childhood Experiences (ACEs) are stressful events occurring in childhood including

- domestic violence
- parental abandonment through separation or divorce
- a parent with a mental health condition
- being the victim of abuse (physical, sexual and/or emotional)
- being the victim of neglect (physical and emotional)
- a member of the household being in prison
- growing up in a household in which there are adults experiencing alcohol and drug use problems.

The term was originally developed in the US for the Adverse Childhood Experiences survey which found that as the number of ACEs increased in the population studied, so did the risk of experiencing a range of health conditions in adulthood. There have been numerous other studies which have found similar findings including in Wales and England.

Preventing ACEs should be seen within the wider context of tackling societal inequalities. While ACEs are found across the population, there is more risk of experiencing ACEs in areas of higher deprivation.

ACEs have been found to have lifelong impacts on health and behaviour and they are relevant to all sectors and involve all of us in society. We all have a part to play in preventing adversity and raising awareness of ACEs. Resilient communities have an important role in action on ACEs.

An ACE survey with adults in Wales found that compared to people with no ACEs, those with 4 or more ACEs are more likely to:

- have been in prison
- develop heart disease
- frequently visit the GP
- develop type 2 diabetes
- have committed violence in the last 12 months
- have health-harming behaviours (high-risk drinking, smoking, drug use).



When children are exposed to adverse and stressful experiences, it can have a long-lasting impact on their ability to think, interact with others and on their learning.

ACEs should not be seen as someone's destiny. There is much that can be done to offer hope and build resilience in children, young people and adults who have experienced adversity in early life.

## 27. Disguised Compliance

There can be a tendency in safeguarding and child protection work to use jargon and shorthand to explain quite complex ideas. One of the challenges of multi-agency working is to ensure that there is a common language. In this article, specialist safeguarding consultant, Andrew Hall, explores five phrases that often crop up in child protection reports and meetings.

“‘Disguised compliance’ involves a parent or carer giving the appearance of co-operating with child welfare agencies to avoid raising suspicions, to allay professional concerns and ultimately to diffuse professional intervention.” NSPCC Fact Sheet ‘Disguised Compliance’ (March 2010)<sup>16</sup>

- Examples of Disguised Compliance include:
  - no effective change despite significant input by professionals
  - parents who agree to changes, but put little effort into implementing them
  - parents who only partially carry out any agreed plans
  - the child's view is different to the parents'
  - cleaning the home before a planned visit by social workers
  - attending appointments more regularly than in the past
  - school attendance improving markedly
- Risks of Disguised Compliance
  - cases can lack focus and drift over time
  - risks are not reduced, and may even worsen
  - significant issues may be missed
  - cases may be closed prematurely
  - the child is not safe

## 28. Protecting Yourself against Allegations of Abuse

You should seek to keep your personal contact with children under review and seek to minimise the risk of any situation arising in which misunderstandings can occur. The following sensible precautions can be taken when working alone with children

- work in a room where there is a glass panel in the door or leave the door open
- make sure that other adults visit the room occasionally
- avoid working in isolation with children unless thought has been given to safeguards
- must not give out personal mobile phone numbers or private e-mail addresses
- must not give pupils lifts home in your cars
- must not arrange to meet them outside of school hours
- must not chat to pupils on the social websites
- Under the Sexual Offences Act 2003 it is a criminal offence for anyone working in an education setting to have a sexual relationship with a pupil even when the pupil is over the age of consent.
- Any use of physical force or restraint against pupils will be carried out and documented in accordance with the relevant physical restraint policy. If it is necessary to use physical action to prevent a child from injury to themselves or others parents will be informed.
- Children will not be punished by any form of hitting, slapping, shaking or other degrading treatment.

## 29. Allegations against staff (KCSIE Oct 2019: Part Four)

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<sup>16</sup> <http://lrsb.org.uk/uploads/nspcc-fact-sheet-disguised-compliance.pdf>



- All school staff should take care not to place themselves in a vulnerable position with a child. It is always advisable for interviews or work with individual children or parents to be conducted in view of other adults.
- All Staff should be aware of the school's own Behaviour Management policy.
- Guidance about conduct and safe practice, including safe use of mobile phones by staff and volunteers will be given at induction.
- We understand that a pupil may make an allegation against a member of staff or staff may have concerns about another staff member.
- If such an allegation is made, or information is received which suggests that a person may be unsuitable to work with children, the member of staff receiving the allegation or aware of the information, will immediately inform the Head teacher<sup>i</sup>.
- The Head teacher on all such occasions will discuss the content of the allegation initially with the Chair of Governors then if necessary with the Local Authority Designated Officer (LADO see footnote pg. 17)) at the earliest opportunity and before taking any further action.
- If the allegation made to a member of staff concerns the Headteacher, the person receiving the allegation will immediately inform the Chair of Governors/Chair of the Academy Trust (Mr Ken Daly) who will consult the LADO as above, without notifying the Headteacher first.
- The school will follow the Nottingham City Safeguarding Children Partnership (NCSCP) procedures for managing allegations against staff, procedures set out in Keeping Children Safe in Education and the school's Whistleblowing policy and procedures.
- Suspension of the member of staff, excluding the Headteacher, against whom an allegation has been made, needs careful consideration, and the Headteacher will seek the advice of the LADO and an HR Consultant in making this decision.
- In the event of an allegation against the Headteacher, the decision to suspend will be made by the Chair of Governors with advice as above.
- Staff, parents and governors are reminded that publication of material that may lead to the identification of a teacher who is the subject of an allegation is prohibited by law. Publication includes verbal conversations or writing including content placed on social media sites.

### 30. Whistle-blowing

- We recognise that children cannot be expected to raise concerns in an environment where staff fail to do so.
- All staff should be aware of their duty to raise concerns, where they exist, about the management of child protection, which may include the attitude or actions of colleagues, poor or unsafe practice and potential failures in the school's safeguarding arrangements. If it becomes necessary to consult outside the school, they should speak in the first instance, to the Area Education Officer/LADO following the OLoL Trust Whistleblowing Policy.<sup>17</sup>
- The NSPCC whistleblowing helpline is available for staff who do not feel able to raise concerns regarding child protection failures internally. Staff can call: 0800 028 0285 – line is available from 8:00 AM to 8:00 PM, Monday to Friday and Email: [help@nspcc.org.uk](mailto:help@nspcc.org.uk).
- Whistle-blowing re the Headteacher should be made to the Chair of the Governing Body Our Lady of Lourdes Catholic Multi Academy Trust whose contact details are readily available to staff.

### 31. Recruitment, Supervision and Training for Staff

- When recruiting new members of staff the school follows the guidance given in the Safeguarding Children: Safer Recruitment in Education, and the Nottingham City Safeguarding Children Partnership (NCSCP) Children Partnership guidelines. The school ensures that DBS checks are undertaken in line with the Academy Trust's HR policy and that references are taken up and obtained and that qualifications are verified.

<sup>17</sup> <http://www.ololcatholicmat.co.uk/wp-content/uploads/2019/04/OLoL-Whistleblowing-Policy-final-March-2019-1.pdf>





- Newly appointed staff will have initial training in Safeguarding as part of their induction programme as well as Hays on-line training. They should be aware of the Nottingham City Safeguarding Children Partnership (NCSCP) procedures as part of that induction programme, and be sign posted to a copy of the schools Safeguarding Policy.
- The initial Child Protection training given to each member of the service will be updated by the DSL.
- The Trust DSL networks will be the initial form of 'supervision' for Lead DSLs during academic year 2019-20; after this period the process by which DSLs receive 'supervision', will be reviewed.

### **32. Physical Intervention**

- We acknowledge that staff must only ever use physical intervention as a last resort, when a child is endangering him/herself or others, and that at all times it must be the minimal force necessary to prevent injury to another person.
- Such events should be recorded and signed by a witness.
- Staff who are likely to need to use physical intervention will be appropriately trained in the Positive Handling techniques.
- We understand that physical intervention of a nature which causes injury or distress to a child may be considered under child protection or disciplinary procedures.
- We recognise that touch is appropriate in the context of working with children, and all staff have been signposted to 'Use of Reasonable Force in Schools<sup>18</sup>' guidance to ensure they are clear about their professional boundary.

### **33. Mobile Phones and Cameras in school**

- Practitioner's phones must be kept out of the reach of children and parents, in a secure area accessible only to staff. All staff are made aware of their duty to follow this procedure which is set out in the Code of Conduct.
- Visitors to the setting (including parents) are requested not to use their mobile phones on the premises and that they should not take photographs on the school site.
- Photographs validate children's experiences and achievements and are a valuable way of recording milestones in a child's life. Parental permission for the different ways in which we use photographs is gained as part of the initial registration at St Margaret Clitherow Academy.
- A mixture of photos that reflect the school environment; sometimes this will be when children are engrossed in an activity either on their own or with their peers. Children are encouraged to use the camera/iPad to take photos of their peers. In order to safeguard children and adults, and to maintain privacy, cameras are not to be taken into the toilets by adults or children. All adults whether teachers/practitioners or volunteers at St Margaret Clitherow Academy understand the difference between appropriate and inappropriate sharing of images. All images are kept securely in compliance with the Data Protection Act.

### **34. Transporting Pupils Guidance<sup>19</sup>:**

- In certain situations staff or volunteers may be required or offer to transport pupils as part of their work. As for any other activity undertaken at work, the employer has a duty to carry out a risk assessment covering the health and safety of their staff and to manage any known risks.
- Staff should not offer lifts to pupils unless the need for this has been agreed by a manager.
- A designated member of staff should be appointed to plan and provide oversight of all transport arrangements and respond to any concerns that may arise.
- Wherever possible and practicable it is advisable that transport is undertaken other than in private vehicles and with at least one adult additional to the driver acting as an escort.

<sup>18</sup> <https://www.gov.uk/government/publications/use-of-reasonable-force-in-schools>

<sup>19</sup> <http://www.safeguardingschools.co.uk/wp-content/uploads/2015/10/Guidance-for-Safer-Working-Practices-2015-final1.pdf>



- It is a legal requirement that all passengers wear seatbelts and the driver should ensure that they do so. They should also be aware of and adhere to current legislation regarding the use of car seats for younger children.
- Staff should ensure that their behaviour is safe and that the transport arrangements and the vehicle meet all legal requirements. They should ensure that the vehicle is roadworthy and appropriately insured and that the maximum carrying capacity is not exceeded.
- Staff should never offer to transport pupils outside of their normal working duties, other than in an emergency or where not doing so would mean the child may be at risk. In these circumstances the matter should be recorded and reported to both their manager and the child's parent(s).
- The school's health and safety policy and/or educational visits policy should set out the arrangements under which staff may use private vehicles to transport pupils.
- Any private vehicles used to transport pupils should be insured for 'Business' use and registered through Our Lady of Lourdes Estates Manager

### 35. Educational Visits:

- Our Lady of Lourdes CMAT together with St Margaret Clitherow Academy Governing Body are responsible for the provision and implementation of health and safety procedures, guidance and specific advice. All Trust schools must operate to guidance, standards and approval requirements issued by the Outdoor Education Advisor. Under the Health and Safety at Work Act 1974, employers are responsible for the provision and implementation of health and safety procedures, guidance and specific advice.
- With regard to school visits all Trust Schools use EVOLVE and SOLAR to manage risk and approve Educational Visits - **Sport, Outdoor Learning, Life Skills, Adventure and Risk Management (SOLAR)**  
[www.nottinghamcityvisits.org.uk](http://www.nottinghamcityvisits.org.uk)
- EV advice can be sought via the Outdoor Activities Services Manager [Andrew.Smith@collegest.org.uk](mailto:Andrew.Smith@collegest.org.uk) / T: 0115 947 6202 (Ext 238). Approval is delegated to HT's except residential/ overnight where SOLAR must approve.

#### The Outdoor Education Advisor is responsible for:

- guidance to schools and other services working with children and young people on the safe management of school visits and off site learning (based on good practice and legal requirement)
  - production of generic risk assessments
  - training in the management of schools visits and off site learning
  - provision of a web based storage and approval system - \*Solar
  - provision of a telephone/email advisory service
  - formally approving all higher risk activities as in compliance with Local Authority Standards
  - monitoring of system use, school procedures and external visits.
- Mini Buses:
    - The Trust schools follow guidance within the Driving School Minibuses – Advice for Schools and Local Authorities (Sept 2013)<sup>20</sup> see also Trust Mini Bus Policy.
  - See Keeping Children Safe in Education Oct 2019 Annex E: Host families - homestay during exchange visits

### 36. This policy also links to our policies on:

- Administration of medicines
- Allegations against staff,
- Anti-bullying,
- Attendance,
- Behaviour,
- Curriculum
- Drug Education

<sup>20</sup> <https://www.gov.uk/government/publications/driving-school-minibuses-advice-for-schools-and-local-authorities>



- E-Safety, including staff use of mobile phones
- First Aid policy
- Health & Safety Policy
- Intimate Care Plans
- Trust Mini Bus Policy
- Parental Complaints,
- Peer on Peer Abuse Guidance and Policy (**Nottinghamshire County Council**)
- Recruitment and Selection
- Risk Assessments
- Sex and Relationships Education
- Staff Behaviour Policy / Code of Conduct
- Trust Whistleblowing,

### **37. Key Documents to be Read by All Staff Working with Children**

- Keeping Children Safe in Education (October 2019)
- Working Together to Safeguard Children (2018)
- Inspecting Safeguarding in Early Years, education and skills (DfE Sept 2019)
- Code of Conduct Policy (Previous Hub policy)
- Anti Bullying Policy (School Policy)
- Whistleblowing Policy (OLoL Trust policy)
- Social Media Code of Conduct (Previous Hub policy)
- Safeguarding Policy (OLoL Trust policy)

<b>Appendix A: Aspects of Safeguarding</b>		<b>Page</b>
Anti-bullying/Cyberbullying		29
Breast Ironing		29
Children in the Court system		29
Children Missing from Education		28
Children with Family members in Prison		29
Child Criminal Exploitation (CCE): Including Sexual Exploitation/County Lines/Gangs/Youth Violence/Trafficking		29



Contextual Safeguarding	31
Domestic Violence/Abuse	31
Drugs and Substance misuse	32
Fabricated or induced illness	32
Female Genital Mutilation (FGM)	33
Forced Marriage	34
Gender based violence/violence against women and girls (VAWG) including so-called: Honour-Based Violence	34
Homelessness	35
Looked After Children (LAC)	35
Mental Health & Well-being	36
Online Safety	37
Peer on Peer abuse.	37
Private Fostering	38
Providing first aid	39
Preventing Radicalisation	39
Sexual Violence and Sexual Harassment between children in schools	41
Youth produced sexual imagery (sexting)	42
Teenage relationship abuse	43
Up-skirting	44

- **Anti-Bullying/Cyberbullying**

- Our school policy on anti-bullying is set out in a separate document and acknowledges that to allow or condone bullying may lead to consideration under child protection procedures. This includes all forms e.g. cyberbullying, racist, homophobic and gender related bullying. We keep a record of known bullying incidents which is shared with and analysed by the governing body. All staff are aware that children with SEND and / or differences/perceived differences are more susceptible to being bullied / victims of child abuse.
- If the bullying is particularly serious, or the anti-bullying procedures are seen to be ineffective, the headteacher and the DSL will consider implementing child protection procedures.
- The subject of bullying is addressed at regular intervals in PHSE education.



- Cyberbullying is covered in our Trust IT policy which links to C4S<sup>21</sup>
- **Breast Ironing<sup>22</sup>**
  - Breast Ironing is practiced in some African countries, notably Cameroon. Girls aged between 9 and 15 have hot pestles, stones or other implements rubbed on their developing breast to stop them growing further. In the vast majority of cases breast ironing is carried out by mothers or grandmothers and the men in the family are unaware. Estimates range between 25% and 50% of girls in Cameroon are affected by breast ironing, affecting up to 3.8 million women across Africa.
  - The practice of breast ironing is seen as a protection to girls by making them seem 'child-like' for longer and reduce the likelihood of pregnancy. Once girls' breasts have developed, they are at risk of sexual harassment, rape, forced marriage and kidnapping; consequently, breast ironing is more prevalent in cities. Cameroon has one of the highest rates of literacy in Africa and ensuring that girls remain in education is seen as an important outcome of breast ironing.
  - Breast ironing is a form of physical abuse that has been condemned by the United Nations and identified as Gender-based Violence. Although, countries where breast ironing is prevalent have ratified the African Charter on Human Rights to prevent harmful traditional practices, it is not against the law.
  - Breast ironing does not stop the breasts from growing, but development can be slowed down. Damage caused by the 'ironing' can leave women with malformed breasts, difficulty breastfeeding or producing milk, severe chest pains, infections and abscesses. In some cases, it may be related to the onset of breast cancer.
- **Children and the court system (KCSIE Oct 2019)**
  - Children are sometimes required to give evidence in criminal courts, either for crimes committed against them or for crimes they have witnessed. There are two age appropriate guides to support children 5-11-year olds and 12-17 year olds.
  - The guides explain each step of the process 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.
- **Children 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's or college's unauthorised absence and children missing from education procedures. **(KCSIE Oct 2019)**
  - Attendance, absence and exclusions are closely monitored. A child going missing from education is a potential indicator of abuse and neglect, including sexual abuse and sexual exploitation.
  - The DSL will monitor unauthorised absences and take appropriate action including notifying the local authority particularly where children go missing on repeat occasions and/or are missing for periods during the school day in conjunction with 'Children Missing Education: Statutory Guidance for Local Authorities'<sup>23</sup>
  - Staff must be alert to signs of children at risk of travelling to conflict zones, female genital mutilation and forced marriage.

<sup>21</sup> <https://www.cyber4schools.net/>

<sup>22</sup> <http://safeguarding.pro/wp-content/uploads/2016/12/Breast-Ironing.pdf>

<sup>23</sup>

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/550416/Children\\_Missing\\_Education\\_-\\_statutory\\_guidance.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/550416/Children_Missing_Education_-_statutory_guidance.pdf)



- **Children with family members in prison (KCSIE Oct 2019)**
  - Approximately 200,000 children 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 provides information designed to support professionals working with offenders and their children, to help mitigate negative consequences for those children
- **Child Criminal Exploitation (CCE): Including Sexual Exploitation/County Lines/Gangs/Youth Violence/Trafficking**
  - Child sexual exploitation is a form of sexual abuse where children are sexually exploited for money, power or status.
  - CSE can happen online and offline and all staff should be aware of the link between online safety and vulnerability to CSE.
  - can affect any child or young person (male or female) under the age of 18 years, including 16 and 17 year olds who can legally consent to have sex;
  - can still be abuse even if the sexual activity appears consensual;
  - can include both contact (penetrative and non-penetrative acts) and non-contact sexual activity;
  - can take place in person or via technology, or a combination of both;
  - can involve force and/or enticement-based methods of compliance and may, or may not, be accompanied by violence or threats of violence;
  - may occur without the child or young person's immediate knowledge (through others copying videos or images they have created and posting on social media, for example);
  - can be perpetrated by individuals or groups, males or females, and children or adults. The abuse can be a one-off occurrence or a series of incidents over time, and range from opportunistic to complex organised abuse; and
  - is typified by some form of power imbalance in favour of those perpetrating the abuse. Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including gender, sexual identity, cognitive ability, physical strength, status, and access to economic or other resources.
  - Any concerns that a child is being or is at risk of being sexually exploited should be passed without delay to the DSL. St Margaret Clitherow is aware there is a clear link between regular school absence/truancy and CSE. Staff should consider a child to be at potential CSE risk in the case of regular school absence/truancy and make reasonable enquiries with the child and parents to assess this risk.
  - In all cases if the tool identified any level of concern (green, amber or red) the DSL should contact their local Referral, Intervention and Assessment team and email the completed CSE Screening Tool along with a Multi-Agency Referral Form (MARF). If a child is in immediate danger the police should be called on 999.
- Criminal exploitation of children is a geographically widespread form of harm that is a typical feature of county lines criminal activity: drug networks or gangs groom and exploit children and young people to carry drugs and money from urban areas to suburban and rural areas, market and seaside towns. Key to identifying potential involvement in county lines are missing episodes, when the victim may have been trafficked for the purpose of transporting drugs and a referral to the National Referral Mechanism<sup>24</sup> should be considered.
- Trafficking is where children and young people tricked, forced or persuaded to leave their homes and are moved or transported and then exploited, forced to work or sold. Children are trafficked for:
  - sexual exploitation
  - benefit fraud
  - forced marriage
  - domestic slavery like cleaning, cooking and childcare
  - forced labour in factories or agriculture
  - committing crimes, like begging, theft, working on cannabis farms or moving drugs

<sup>24</sup> Only staff at designated First Responders Organisations can refer cases to the NRM.

Forms should be sent to the SCA by email to [nationalreferralmechanism@homeoffice.gov.uk](mailto:nationalreferralmechanism@homeoffice.gov.uk)



Trafficked children experience many types of abuse and neglect. Traffickers use physical, sexual and emotional abuse as a form of control. Children and young people are also likely to be physically and emotionally neglected and may be sexually exploited.

- St Margaret Clitherow Academy is aware that a child often is not able to recognise the coercive nature of the abuse and does not see themselves as a victim. As a consequence the child may resent what they perceive as interference by staff. However, staff must act on their concerns as they would for any other type of abuse.
- St Margaret Clitherow Academy includes the risks of sexual exploitation in the PHSE and SRE curriculum. Pupils will be informed of the grooming process and how to protect themselves from people who may potentially be intent on causing harm. They will be supported in terms of recognising and assessing risk in relation to CSE, including online, and knowing how and where to get help.
- The following list of indicators is not exhaustive or definitive but it does highlight common signs which can assist professionals in identifying children or young people who may be victims of sexual exploitation.

**Signs include:**

- going missing from home or school
- regular school absence/truancy
- underage sexual activity
- inappropriate sexual or sexualised behaviour
- sexually risky behaviour, 'swapping' sex
- repeat sexually transmitted infections
- in girls, repeat pregnancy, abortions, miscarriage
- receiving unexplained gifts or gifts from unknown sources
- having multiple mobile phones and worrying about losing contact via mobile
- online safety concerns such as youth produced sexual imagery or being coerced into sharing explicit images.
- having unaffordable new things (clothes, mobile) or expensive habits (alcohol, drugs)
- changes in the way they dress
- going to hotels or other unusual locations to meet friends
- seen at known places of concern
- moving around the country, appearing in new towns or cities, not knowing where they are
- getting in/out of different cars driven by unknown adults
- having older boyfriends or girlfriends
- contact with known perpetrators
- involved in abusive relationships, intimidated and fearful of certain people or situations
- hanging out with groups of older people, or anti-social groups, or with other vulnerable peers
- associating with other young people involved in sexual exploitation recruiting other young people to exploitative situations
- truancy, exclusion, disengagement with school, opting out of education altogether
- unexplained changes in behaviour or personality (chaotic, aggressive, sexual)
- mood swings, volatile behaviour, emotional distress
- self-harming, suicidal thoughts, suicide attempts, overdosing, eating disorders
- drug or alcohol misuse
- getting involved in crime
- police involvement, police records
- involved in gangs, gang fights, gang membership
- injuries from physical assault, physical restraint, sexual assault.

- **Contextual Safeguarding:**

- For the first time, Working Together to Safeguard Children (2018) and Keeping Children Safe in Education (2018) refer to Contextual Safeguarding. This is a conceptual framework for understanding, assessing, and reducing the risk of harm from outside the family home.





- Contextual Safeguarding is based on research and extensive trials in multi-agency safeguarding hubs, led by Dr Carlene Firmin, Principal Research Fellow, University of Bedfordshire<sup>25</sup>. Information about the research and its practical application can be found at the Contextual Safeguarding network ([www.contextualsafeguarding.org.uk](http://www.contextualsafeguarding.org.uk)). Membership of the network is free and allows access to a wealth of resources.
  - Contextual Safeguarding is an approach to understanding, and responding to, young people's experiences of significant harm beyond their families. It recognises that the different relationships that young people form in their neighbourhoods, schools and online can feature violence and abuse. Parents and carers have little influence over these contexts, and young people's experiences of extra-familial abuse can undermine parent-child relationships. Therefore children's social care practitioners need to engage with individuals and sectors who do have influence over/within extra-familial contexts, and recognise that assessment of, and intervention with, these spaces are a critical part of safeguarding practices. Contextual Safeguarding, therefore, expands the objectives of child protection systems in recognition that young people are vulnerable to abuse in a range of social contexts.
  - Contextual Safeguarding has been developed at the University of Bedfordshire over the past six years to inform policy and practice approaches to safeguarding adolescents. Initially emerging from a three-year review of operational responses to peer-on-peer abuse. Contextual Safeguarding provides a framework to advance child protection and safeguarding responses to a range of extra-familial risks that compromise the safety and welfare of young people.
- **Domestic Violence/Abuse**
    - Domestic abuse represents one quarter of all violent crime. It is actual or threatened physical, emotional, psychological, sexual and financial abuse. It involves the use of power and control by one person over another. It occurs regardless of race, ethnicity, gender, class, sexuality, age, religion, mental or physical ability. Domestic abuse can also involve other types of abuse.
    - We use the term domestic abuse to reflect that a number of abusive and controlling behaviours are involved beyond violence.
    - Slapping, punching, kicking, bruising, rape, ridicule, constant criticism, threats, manipulation, sleep deprivation, social isolation, and other controlling behaviours all count as abuse.
    - Living in a home where domestic abuse takes place is harmful to children and can have a serious impact on their behaviour, wellbeing and understanding of healthy, positive relationships. Children who witness domestic abuse are at risk of significant harm and staff are alert to the signs and symptoms of a child suffering or witnessing domestic abuse.
    - Advice on identifying children who are affected by domestic abuse and how they can be helped is available<sup>26</sup>.

- ***How does it affect children?***

Children can be traumatised by seeing and hearing violence and abuse. They may also be directly targeted by the abuser or take on a protective role and get caught in the middle. In the long term this can lead to mental health issues such as depression, self harm and anxiety.

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

Children affected by domestic abuse reflect their distress in a variety of ways. They may change their usual behaviour and become withdrawn, tired, start to wet the bed and have behavioural difficulties. They may not want to leave their

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<sup>25</sup> <https://www.contextualsafeguarding.org.uk/en/about/what-is-contextual-safeguarding>

<sup>26</sup> <https://www.nspcc.org.uk/what-is-child-abuse/types-of-abuse/domestic-abuse/>  
<https://www.refuge.org.uk/get-help-now/support-for-women/what-about-my-children/>  
<http://safelives.org.uk/sites/default/files/resources/Safe%20Young%20Lives%20web.pdf>





house or may become reluctant to return. Others will excel, using their time in your care as a way to escape from their home life. None of these signs are exclusive to domestic abuse so when you are considering changes in behaviours and concerns about a child, think about whether domestic abuse may be a factor.

- ***What should I do if I suspect a family is affected by domestic abuse?***

To talk through your concerns discuss with the DSL who can then call the Nottingham City Safeguarding Children Partnership (NCSCP).

**Drug and Substance Misuse:**

- Most parents and carers who drink alcohol or use drugs do so in moderation and don't present an increased risk of harm to their children.
- However, parents and carers who misuse substances often have chaotic, unpredictable lifestyles and may struggle to provide their children with safe care and clear boundaries.
- **Alcohol misuse is harmful drinking and alcohol dependence:**
  - o Harmful drinking is a pattern of alcohol use which causes alcohol-related health problems, including psychological problems such as depression, physical illnesses or alcohol-related accidents.
  - o Alcohol dependence is characterised by craving alcohol and continued drinking in spite of harmful consequences. It's associated with increased criminal activity, domestic abuse and an increased rate of significant mental and physical health problems (NICE, 2011).
- **Drug misuse**
  - o Drug misuse is a dependence on, or regular excessive consumption of, psychoactive substances leading to social, psychological, physical or legal problems.
  - o Drug misuse is more prevalent in socially deprived areas. In England and Wales the most commonly used psychoactive substance is cannabis, followed by cocaine and ecstasy. Opioids such as heroin are used less commonly but present the most significant health problems (NICE, 2012).
- **Fabricated or induced illness:**

Fabricated or induced illness (FII) is a rare form of child abuse. It occurs when a parent or carer, usually the child's biological mother, exaggerates or deliberately causes symptoms of illness in the child.
- FII is also known as "Munchausen's syndrome by proxy" (not to be confused with Munchausen's syndrome, where a person pretends to be ill or causes illness or injury to themselves).
- **Signs of fabricated or induced illness**
  - o FII covers a wide range of symptoms and behaviours involving parents seeking healthcare for a child. This ranges from extreme neglect (failing to seek medical care) to induced illness.
  - o Behaviours in FII include a mother or other carer who:
    - persuades healthcare professionals that their child is ill when they're perfectly healthy
    - exaggerates or lies about their child's symptoms
    - manipulates test results to suggest the presence of illness – for example, by putting glucose in urine samples to suggest the child has diabetes
    - deliberately induces symptoms of illness – for example, by poisoning her child with unnecessary medication or other substances.
- For further information<sup>27</sup>
- **Female Genital Mutilation (FGM)**
- Female Genital Mutilation (FGM)<sup>28</sup> is illegal in England and Wales under the FGM Act (2003)<sup>29</sup>. It is a form of child abuse and violence against women. A mandatory reporting duty requires teachers to report 'known' cases of FGM in under 18s, which are identified in the course of their professional work, to the police<sup>ii</sup>.

<sup>27</sup> <https://www.nhs.uk/conditions/fabricated-or-induced-illness/>

<sup>28</sup> <https://www.gov.uk/government/collections/female-genital-mutilation>

<sup>29</sup> <http://www.legislation.gov.uk/ukpga/2003/31/contents>



- The duty applies to all persons in St Margaret Clitherow Academy who is employed or engaged to carry out 'teaching work' in the school, whether or not they have qualified teacher status. The duty applies to the individual who becomes aware of the case to make a report. It should not be transferred to the Designated Safeguarding Lead, however the DSL should be informed.
- If a teacher is informed by a girl under 18 that an act of FGM has been carried out on her, or a teacher observes physical signs which appear to show that an act of FGM has been carried out on a girl under 18 and they have no reason to believe the act was necessary for the girl's physical or mental health or for purposes connected with labour or birth, the teacher should personally make a report to the police force in which the girl resides by calling 101. The report should be made by the close of the next working day.
- Concerns about FGM outside of the mandatory reporting duty should be reported as per St Margaret Clitherow Academy child protection procedures. Staff should be particularly alert to suspicions or concerns expressed by female pupils about going on a long holiday during the summer vacation period. There should also be consideration of potential risk to other girls in the family and practicing community.
- Where there is a risk to life or likelihood of serious immediate harm the teacher should report the case immediately to the police, including dialling 999 if appropriate.
- There are no circumstances in which a teacher or other member of staff should examine a girl.

#### ***What is FGM?***

- It involves procedures that intentionally alter/injure the female genital organs for non-medical reasons.
- 4 types of procedure:
  - o Type 1 Clitoridectomy – partial/total removal of clitoris
  - o Type 2 Excision – partial/total removal of clitoris and labia minora
  - o Type 3 Infibulation entrance to vagina is narrowed by repositioning the inner/outer labia
  - o Type 4 all other procedures that may include: pricking, piercing, incising, cauterising and scraping the genital area.

#### ***Why is it carried out?***

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

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

- o Child talking about getting ready for a special ceremony
- o Family taking a long trip abroad
- o Child's family being from one of the 'at risk' communities for FGM (Kenya, Somalia, Sudan, Sierra Leone, Egypt, Nigeria, Eritrea as well as non-African communities including Yemeni, Afghani, Kurdistan, Indonesia and Pakistan)
- o Knowledge that the child's sibling has undergone FGM
- o Child talks about going abroad to be 'cut' or to prepare for marriage
- o Signs that may indicate a child has undergone FGM:
  - o Prolonged absence from school and other activities
  - o Behaviour change on return from a holiday abroad, such as being withdrawn and appearing subdued
  - o Bladder or menstrual problems
  - o Finding it difficult to sit still and looking uncomfortable
  - o Complaining about pain between the legs
  - o Mentioning something somebody did to them that they are not allowed to talk about
  - o Secretive behaviour, including isolating themselves from the group
  - o Reluctance to take part in physical activity
  - o Repeated urinal tract infection



- Disclosure

### ***The 'One Chance' rule***

As with Forced Marriage there is the 'One Chance' rule. It is essential that settings /schools/colleges take action without delay and make a referral to children's services.

- All staff are aware of the 'One Chance' Rule' in relation to forced marriage, FGM and HBV. Staff recognise they may only have one chance' to speak to a pupil who is a potential victim and have just one chance to save a life.
- St Margaret Clitherow Academy are aware that if the victim is not offered support following disclosure that the 'One Chance' opportunity may be lost. Therefore, all staff are aware of their responsibilities and obligations when they become aware of potential forced marriage, FGM and HBV cases.
- **Forced Marriage**
  - A forced marriage is a marriage in which one or both people do not (or in cases of people with learning disabilities cannot) consent to the marriage but are coerced into it. Coercion may include physical, psychological, financial, sexual and emotional pressure. It may also involve physical or sexual violence and abuse.
  - Forced marriage is an appalling and indefensible practice and is recognised in the UK as a form of violence against women and men, domestic/child abuse and a serious abuse of human rights. Since June 2014 forcing someone to marry has become a criminal offence in England and Wales under the Anti-Social Behaviour, Crime and Policing Act 2014<sup>30</sup>.
  - A forced marriage is not the same as an arranged marriage which is common in several cultures. The families of both spouses take a leading role in arranging the marriage but the choice of whether or not to accept the arrangement remains with the prospective spouses.
  - School staff should never attempt to intervene directly as a school or through a third party. Contact should be made with the contact centre or the Forced Marriage Unit 200 7008 0151.
  - Honour-based Violence
  - Honour based violence (HBV) can be described as a collection of practices, which are used to control behaviour within families or other social groups to protect perceived cultural and religious beliefs and/or honour. Such violence can occur when perpetrators perceive that a relative has shamed the family and/or community by breaking their honour code.
  - Honour based violence might be committed against people who;
    - become involved with a boyfriend or girlfriend from a different culture or religion;
    - want to get out of an arranged marriage;
    - want to get out of a forced marriage;
    - wear clothes or take part in activities that might not be considered traditional within a particular culture.
  - It is a violation of human rights and may be a form of domestic and/or sexual abuse. There is no, and cannot be, honour or justification for abusing the human rights of others.
- **Gender based violence/violence against women and girls (VAWG) including so-called: Honour-Based Violence**
  - Honour based violence is a violent crime or incident which may have been committed to protect or defend the honour of the family or community.
  - It is often linked to family members or acquaintances who mistakenly believe someone has brought shame to their family or community by doing something that is not in keeping with the traditional beliefs of their culture. For example, honour based violence might be committed against people who:
    - become involved with a boyfriend or girlfriend from a different culture or religion
    - want to get out of an arranged marriage
    - want to get out of a forced marriage
    - wear clothes or take part in activities that might not be considered traditional within a particular culture
  - ***What types of honour based crime are there?***

<sup>30</sup> <http://www.legislation.gov.uk/ukpga/2014/12/contents/enacted>



- The term 'honour based crime' covers any criminal offence that is driven by a mistaken desire to protect the cultural or traditional beliefs of a family or community. It may or may not involve violence. It can include:
- personal attacks of any kind, including physical and sexual violence
  - o forced marriage
  - o forced repatriation (sending someone back to a country from which they originate without their consent)
  - o written or verbal threats or insults
  - o threatening or abusive phone calls, emails and instant messages
  - o Forced Marriage will soon be made a criminal offence
- **Homelessness (KCSIE Oct 2019)**
  - 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, and in accordance with local procedures, this does not, and should not, replace a referral into children's social care where a child has been harmed or is at risk of harm.
  - The Homelessness Reduction Act 2017 places a new legal duty on English councils so that everyone who is homeless or at risk of homelessness will have access to meaningful help including an assessment of their needs and circumstances, the development of a personalised housing plan, and work to help them retain their accommodation or find a new place to live. The following factsheets usefully summarise the new duties: Homeless Reduction Act Factsheets<sup>31</sup>. 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.
- **Looked After Children (LAC)**
  - The most common reason for children becoming looked after is as a result of abuse and neglect. St Margaret Clitherow Academy ensures that staff have the necessary skills and understanding to keep looked after children safe. Appropriate staff have information about a child's looked after legal status and care arrangements, including the level of authority delegated to the carer by the authority looking after the child and contact arrangements with birth parents or those with parental responsibility.
  - The designated teacher for looked after children and the DSL have details of the child's social worker and the name and contact details of the Nottingham City Safeguarding Children Partnership (NCSCP) virtual school head for children in care.
  - The designated teacher for looked after child works with the virtual school head to discuss how Pupil Premium Plus funding can be best used to support the progress of looked after children in the school and meet the needs in the child's personal education plan.
- **Mental Health and Well Being:**
  - At Our Lady of Lourdes CMAT there is a focus on the mental health and well-being of pupils. One member of staff is currently training as a Mental Health First Aider with a plan to have a further staff trained and there to be one Mental Health First Aider in situ at all Trust schools by the end of the academic year 2020.
  - Further support is available on the NSPCC website regarding Mental health and suicidal thoughts<sup>32</sup>: *"Mental illness and suicidal thoughts can affect anyone, of any age, of any background, at any time. Like with physical illnesses, people don't choose to have a mental health problem. And they need the appropriate care to get better. Mental illness and suicidal thoughts are common issues for young people. It can be difficult to know if a child is suffering as they often keep it to themselves. But we're here to help you spot the signs and know how to support them."*
- **Online Safety:**

<sup>31</sup> <https://www.gov.uk/government/publications/homelessness-reduction-bill-policy-factsheets>

<sup>32</sup> <https://www.nspcc.org.uk/preventing-abuse/keeping-children-safe/mental-health-suicidal-thoughts-children/>



**Our pupils increasingly use electronic equipment on a daily basis to access the internet and share content and images via social media sites such as facebook, twitter, instagram, snapchat and oovoo.**

- Unfortunately, some adults and other children use these technologies to harm children. The harm might range from sending hurtful or abusive texts or emails, to grooming and enticing children to engage in sexual behaviour such as webcam photography or face-to-face meetings. Pupils may also be distressed or harmed by accessing inappropriate material such as pornographic websites or those which promote extremist behaviour, criminal activity, suicide or eating disorders.
- St Margaret Clitherow Academy has an Online Safety and Acceptable Use policy, both of which explain how we try to keep pupils safe in school and how we respond to online safety incidents.
- Pupils are taught about online safety throughout the curriculum and all staff receive online safety training which is regularly updated. The school online safety co-ordinators is: Attiya Butt
- The government has published a new guidance document 'Teaching Online Safety in School' (DfE, June 2019<sup>33</sup>). It outlines to schools the importance of helping children and young people not only use the internet safely, but also give them opportunities to learn how to behave online. Throughout, the guidance emphasises the importance of teaching that is always age and developmentally appropriate. The guidance is non-statutory and applies to all local authority maintained schools, academies and free schools.
- Teaching online safety in school says that there are many areas in the curriculum where the topics could be taught, not least in the new compulsory Relationships (Sex Education) and Health Education in place from September 2020. In these curriculum areas, pupils will be taught what positive, healthy and respectful online relationships look like.

The guidance includes the following underpinning knowledge and behaviours:

- How to evaluate what they see online
- How to recognise techniques used for persuasion
- Online behaviour
- How to identify online risks
- How and when to seek support

Potential harms covered in the guidance include:

- Age restrictions
- Content: How it can be used and shared
- Disinformation, misinformation and hoaxes
- Fake websites and scam emails
- Fraud (online)
- Password phishing
- Personal data
- Persuasive design which keeps 'users online for longer than they might have planned or desired'
- Privacy settings
- Targeting of online content
- Abuse (online)
- Challenges [to do something and post about it]
- Content which incites...hate, violence
- Fake profiles
- Grooming
- Live streaming
- Pornography
- Unsafe communication
- Impact on confidence (including body confidence)
- Impact on quality of life, physical and mental health and relationships
- Online vs. offline behaviours
- Reputational damage
- Suicide, self-harm and eating disorders

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<sup>33</sup> <https://www.gov.uk/government/publications/teaching-online-safety-in-schools>



- In an important section, the Teaching online safety in school guidance, reminds schools that when teaching about these safeguarding topics (and others), staff should be mindful that there may be a child or young person in the lesson who is or has been affected by these harms. During or after a lesson, a pupil may be prompted to disclose about something that may have happened online.
- The guidance says that it is good practice to consult the Designated safeguarding Lead 'when considering and planning any safeguarding related lessons or activities (including online) as they will be best placed to reflect and advise on any known safeguarding cases, and how to support any pupils who may be especially impacted by a lesson'.
- 'Teaching Online Safety in School' should be read in conjunction with 'Education for a Connected World' Framework<sup>34</sup> (UKCIS, 2018) which offers 'age specific advice about the online knowledge and skills that pupils should have the opportunity to develop at different stages of their lives.'

- **Peer on Peer Abuse**

- In most instances, the conduct of pupils towards each other will be covered by our behaviour policy. However, some allegations may be of such a serious nature that they may raise safeguarding concerns. St Margaret Clitherow Academy recognise that children are capable of abusing their peers. It will not be passed off as 'banter' or 'part of growing up'. The forms of 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 further information follow NSPCC 'Healthy Sexual Behaviour'**<sup>35</sup>.
- 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. Therefore, our response will cut across these definitions and capture the complex web of their experiences.
- There are also different gender issues that can be prevalent when dealing with peer on peer abuse (i.e. girls being sexually touched/assaulted or boys being subjected to initiation/hazing type violence; **see Sexual Violence and Harassment**).

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

<sup>34</sup> <https://www.gov.uk/government/publications/education-for-a-connected-world>

<sup>35</sup> <https://www.nspcc.org.uk/preventing-abuse/keeping-children-safe/healthy-sexual-behaviour-children-young-people/>





- Any concerns, disclosures or allegations of peer on peer abuse in any form should be referred to the DSL using St Margaret Clitherow Academy child protection procedures as set out in this policy. Where a concern regarding peer on peer abuse has been disclosed to the DSL(s), advice and guidance will be sought from Children Social Care and where it is clear a crime has been committed or there is a risk of crime being committed the Police will be contacted.
- Working with external agencies the school will respond to the unacceptable behaviour. If a pupil's behaviour negatively impacts on the safety and welfare of other pupils then safeguards will be put in place to promote the well-being of the pupils affected and the victim and perpetrator will be provided with support.
- **Private Fostering Arrangements**
  - A private fostering arrangement occurs when someone other than a parent or close relative cares for a child for a period of 28 days or more, with the agreement of the child's parents. It applies to children under the age of 16 or 18 if the child is disabled. Children looked after by the local authority or who are placed in residential schools, children's homes or hospitals are not considered to be privately fostered.
  - Private fostering occurs in all cultures, including British culture and children may be privately fostered at any age.
  - St Margaret Clitherow Academy recognise that most privately fostered children remain safe and well but are aware that safeguarding concerns have been raised in some cases. Therefore, all staff are alert to possible safeguarding issues, including the possibility that the child has been trafficked into the country.
  - By law, a parent, private foster carer or other persons involved in making a private fostering arrangement must notify children's services as soon as possible. However, where a member of staff becomes aware that a pupil may be in a private fostering arrangement they will raise this with the DSL and the DSL will notify **Nottingham City Safeguarding Children Partnership (NCSCP)**.
  - A private fostering arrangement is one that is made privately (without the involvement of a local authority) for the care of a child under the age of 16 years (under 18, if disabled) by someone other than a parent or close relative, in their own home, with the intention that it should last for 28 days or more. (\*Close family relative is defined as a 'grandparent, brother, sister, uncle or aunt' and includes half-siblings and step-parents; it does not include great-aunts or uncles, great grandparents or cousins.)

**Most frequently, young people are in private foster care for the following reasons:**

- children from other countries sent to live in the UK with extended family
- host families for language schools
- parental ill-health
- where parents who have moved away, but the child stays behind (eg. to stay at the same school to finish exams)
- teenagers estranged from their families
- children brought from outside the UK with a view to adoption
- children at independent boarding schools who do not return home for holidays and are placed with host families
- trafficked children

**Signs that a child may be privately fostered:**

- The child is new to school
- The child has disappeared from school for no reason
- The child is overseas without their parents
- Documents such as admission forms, previous school records show this
- The child discloses that they are no longer living at home
- People other than parents attend school events



*There is no duty for schools to be given information about a child who is privately fostered by the family, carer or the local authority. There is however a mandatory duty on schools to inform children's services where they become aware of such an arrangement.*

- **Providing First Aid**

**Employers' legal duties:**

- The Health and Safety (First-Aid) Regulations 1981<sup>36</sup> require employers to provide adequate and appropriate equipment, facilities and personnel to ensure their employees receive immediate attention if they are injured or taken ill at work. These Regulations apply to all workplaces including those with less than five employees and to the self-employed.
- Assessment of first-aid needs: Employers are required to carry out an assessment of first-aid needs. This involves consideration of workplace hazards and risks, the size of the organisation and other relevant factors, to determine what first-aid equipment, facilities and personnel should be provided.

**Early Years:**

- At least one person who has a current paediatric first aid (PFA) certificate must be on the premises and available at all times when children are present, and must accompany children on outings. The certificate must be for a full course consistent with the criteria set out in Annex A. Childminders, and any assistant who might be in sole charge of the children for any period of time, must hold a full current PFA certificate. PFA training<sup>30</sup> must be renewed every three years and be relevant for workers caring for young children and where relevant, babies. Providers should take into account the number of children, staff and layout of premises to ensure that a paediatric first aider is able to respond to emergencies quickly. All newly qualified<sup>31</sup> entrants to the early years workforce who have completed a level 2 and/or level 3 qualification on or after 30 June 2016, must also have either a full PFA or an emergency PFA certificate within three months of starting work<sup>32</sup> in order to be included in the required staff:child ratios at level 2 or level 3 in an early years setting<sup>33</sup>. Providers should display (or make available to parents) staff PFA certificates or a list of staff who have a current PFA certificate.<sup>37</sup>

- **Radicalisation and Extremism**

- The Prevent Duty for England and Wales<sup>38</sup> (2015) under section 26 of the Counter-Terrorism and Security Act 2015 places a duty on education and other children's services to have due regard to the need to prevent people from being drawn into terrorism.
- Extremism is defined as 'as 'vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs'. We also include in our definition of extremism calls for the death of members of our armed forces, whether in this country or overseas.
- Some children are at risk of being radicalised; adopting beliefs and engaging in activities which are harmful, criminal or dangerous.
- St Margaret Clitherow Academy is clear that exploitation of vulnerable children and radicalisation should be viewed as a safeguarding concern and follows the Department for Education guidance for schools and childcare providers on preventing children and young people from being drawn into terrorism<sup>39</sup>.
- St Margaret Clitherow Academy seeks to protect children and young people against the messages of all violent extremism including, but not restricted to, those linked to Islamist ideology, or to Far Right / Neo Nazi / White

<sup>36</sup> <http://www.hse.gov.uk/firstaid/legislation.htm>

<sup>37</sup>

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/596629/EYFS\\_STATUTORY\\_FRAMEWORK\\_2017.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/596629/EYFS_STATUTORY_FRAMEWORK_2017.pdf)

<sup>38</sup> <https://www.gov.uk/government/publications/prevent-duty-guidance>





Supremacist ideology, Irish Nationalist and Loyalist paramilitary groups, and extremist Animal Rights movements.

- School staff receive training to help identify early signs of radicalisation and extremism. Indicators of vulnerability to radicalisation are in detailed in Appendix 6.
- Opportunities are provided in the curriculum to enable pupils to discuss issues of religion, ethnicity and culture and the school follows the DfE advice Promoting Fundamental British Values as part of SMSC (spiritual, moral, social and cultural education) in Schools (2014)<sup>40</sup>.
- The school governors, the Head Teacher and the Designated Safeguarding Lead (DSL) will assess the level of risk within the school and put actions in place to reduce that risk. Risk assessment may include, the use of school premises by external agencies, anti-bullying policy and other issues specific to the school's profile, community and philosophy.
- When any member of staff has concerns that a pupil may be at risk of radicalisation or involvement in terrorism, they should speak with the DSL. They should then follow normal safeguarding procedures. If the matter is urgent then the Police must be contacted by dialling 999. In non-urgent cases where police advice is sought then dial 101.
- The Department for Education has also set up a dedicated telephone helpline for staff and governors to raise concerns around Prevent (020 7340 7264).

Radicalisation refers to the process by which a person comes to support terrorism and forms of extremism leading to terrorism.

**Extremism is defined by the Crown Prosecution Service as:**

The demonstration of unacceptable behaviour by using any means or medium to express views which:

- Encourage, justify or glorify terrorist violence in furtherance of particular beliefs;
  - Seek to provoke others to terrorist acts;
  - Encourage other serious criminal activity or seek to provoke others to serious criminal acts; or
  - Foster hatred which might lead to inter-community violence in the UK.
- There is no such thing as a "typical extremist": those who become involved in extremist actions come from a range of backgrounds and experiences, and most individuals, even those who hold radical views, do not become involved in violent extremist activity.
  - Pupils may become susceptible to radicalisation through a range of social, personal and environmental factors - it is known that violent extremists exploit vulnerabilities in individuals to drive a wedge between them and their families and communities. It is vital that school staff are able to recognise those vulnerabilities.

**Indicators of vulnerability include:**

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



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

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

More critical risk factors could include:

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

The Department of Education guidance [The Prevent Duty](#) can be accessed via this link.

- **Sexual Violence and Harassment:**

- Sexual Violence and Sexual Harassment' is government guidance, first published in December 2017, updated in May 2018, and later incorporated into Keeping Children Safe in Education (**Oct 2019; Part Five Child on Child Sexual Violence and Harassment<sup>41</sup>**).

**The guidance covers:**

- what sexual violence and sexual harassment is
- what schools' and colleges' legal responsibilities are
- creating a whole school or college approach to safeguarding and child protection; and
- how to respond to reports of sexual violence and sexual harassment

**Sexual Violence refers to criminal acts: rape, assault by penetration and sexual assault, as defined by the Sexual Offences Act 2003<sup>42</sup>. Sexual harassment is described as 'unwanted conduct of a sexual nature'. Importantly, the definition of consent is stated and will help pupils begin to understand it more clearly.**

- **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.
- **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.

**It is important to know that: -**

- A child under the age of 13 can never consent to any sexual activity;
- The age of consent is 16;
- Sexual intercourse without consent is rape.

<sup>41</sup> <https://www.gov.uk/government/publications/keeping-children-safe-in-education--2>

<sup>42</sup> <http://www.legislation.gov.uk/ukpga/2003/42/contents>



**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.

- It is also important to differentiate between consensual sexual activity between children of a similar age and that which involves any power imbalance, coercion or exploitation. Due to their additional training, the designated safeguarding lead (or deputy) should be involved and leading the school or college response. If in any doubt, they should seek expert advice.
- It is important that schools and colleges consider sexual harassment in broad terms. Sexual harassment (as set out above) creates an atmosphere that, if not challenged, can normalise inappropriate behaviours and provide an environment that may lead to sexual violence.

### **Harmful Sexual Behaviour (HSB)**

- Children's sexual behaviour exists on a wide continuum, from normal and developmentally expected to inappropriate, problematic, abusive and violent. Problematic, abusive and violent sexual behaviour is developmentally inappropriate and may cause developmental damage. A useful umbrella term is "harmful sexual behaviour". The term has been widely adopted in child protection and is used in this advice. Harmful sexual behaviour can occur online and/or offline and can also occur simultaneously between the two. Harmful sexual behaviour should be considered in a child protection context.
- Useful guidance can be found in: -
- NSPCC's and Research in Practice's Harmful Sexual Behaviour Framework<sup>43</sup>:
- The Brook Sexual Behaviours Traffic Light Tool<sup>44</sup> can also be very helpful in identifying sexual behaviours by children.

### **Hazing/Initiation**

- The practice of rituals, challenges, and other activities involving harassment, abuse or humiliation used as a way of initiating a person into a group.
- At St Margaret Clitherow Academy sexual violence and sexual harassment and sexual misconduct is seen as unacceptable, and not 'banter' or an inevitable part of growing up. It should be recognised that these issues are likely to occur, and St Margaret Clitherow Academy has procedures in place to deal with them.
- Groups at particular risk include girls, students who identify as LGBT+, or are perceived by peers to be LGBT+, and pupils with SEND.
- The guidance is clear that victims and alleged perpetrators can be kept apart in classrooms and other shared spaces, and that consideration should be given about travel to and from school. The emphasis should be on ensuring that the victim can continue their normal routines. Schools can consider the conduct of the alleged perpetrator as part of their behaviour policy on the 'balance of probabilities' and apply appropriate and proportional consequences.
- St Margaret Clitherow Academy records incidents across the whole spectrum of sexual violence and sexual harassment, so that we can understand the scale of the problem in our school and make appropriate plans to reduce it.
- 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.
- **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

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<sup>43</sup> [www.nspcc.org.uk/globalassets/documents/publications/harmful-sexual-behaviour-framework.pdf](http://www.nspcc.org.uk/globalassets/documents/publications/harmful-sexual-behaviour-framework.pdf)

<sup>44</sup> [www.brook.org.uk/our-work/the-sexual-behaviours-traffic-light-tool](http://www.brook.org.uk/our-work/the-sexual-behaviours-traffic-light-tool)



behavioural relationships with each other. Such sexual activity is essentially information gathering and experience testing. It is characterised by mutuality and of the seeking of consent.

- **Inappropriate Sexual Behaviour** can be inappropriate socially, inappropriate to development, or both. In considering whether behaviour fits into this category, it is important to consider what negative effects it has on any of the parties involved and what concerns it raises about a child or young person. It should be recognised that some actions may be motivated by information seeking, but still cause significant upset, confusion, worry, physical damage, etc. It may also be that the behaviour is “acting out” which may derive from other sexual situations to which the child or young person has been exposed. If an act appears to have been inappropriate, there may still be a need for some form of behaviour management or intervention. For some children, educative inputs may be enough to address the behaviour.
- Abusive sexual activity included any behaviour involving coercion, threats, aggression together with secrecy, or where one participant relies on an unequal power base. In order to more fully determine the nature of the incident the following factors should be given consideration. The presence of exploitation in terms of:
  - o **Equality** – consider differentials of physical, cognitive and emotional development, power and control and authority, passive and assertive tendencies

In evaluating sexual behaviour of children and young people, the above information should be used only as a guide.

- **Youth produced sexual imagery (sexting)**

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

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

- o A person under the age of 18 creates and shares sexual imagery of themselves with a peer under the age of 18.
  - o A person under the age of 18 shares sexual imagery created by another person under the age of 18 with a peer under the age of 18 or an adult.
  - o A person under the age of 18 is in possession of sexual imagery created by another person under the age of 18.
- All incidents of this nature should be treated as a safeguarding concern and in line with the UKCCIS guidance<sup>45</sup> ‘Sexting in schools and colleges: responding to incidents and safeguarding young people’<sup>46</sup>.
  - Cases where sexual imagery of people under 18 has been shared by adults and where sexual imagery of a person of any age has been shared by an adult to a child is child sexual abuse and should be responded to accordingly.
  - If a member of staff becomes aware of an incident involving youth produced sexual imagery they should follow the child protection procedures and refer to the DSL as soon as possible. The member of staff should confiscate the device involved and set it to flight mode or, if this is not possible, turn it off. Staff should not view, copy or print the youth produced sexual imagery.
  - The DSL should hold an initial review meeting with appropriate school staff and subsequent interviews with the children involved (if appropriate). Parents should be informed at an early stage and involved in the process unless there is reason to believe that involving parents would put the child at risk of harm. At any point in the

<sup>45</sup> <https://www.gov.uk/government/groups/uk-council-for-child-internet-safety-ukccis>

<sup>46</sup> <https://www.gov.uk/government/publications/sexting-in-schools-and-colleges>



process if there is concern a young person has been harmed or is at risk of harm a referral should be made to Children's Social Care or the Police as appropriate.

Immediate referral at the initial review stage should be made to Children's Social Care/Police if;

- The incident involves an adult;
- There is good reason to believe that a young person has been coerced, blackmailed or groomed or if there are concerns about their capacity to consent (for example, owing to special education needs);
- What you know about the imagery suggests the content depicts sexual acts which are unusual for the child's development stage or are violent;
- The imagery involves sexual acts;
- The imagery involves a child under the age of 13;
- There is reason to believe a child is at immediate risk of harm owing to the sharing of the imagery, for example the child is presenting as suicidal or self-harming.

If none of the above apply then the DSL will use their professional judgement to assess the risk to pupils involved and may decide, with input from the Headteacher, to respond to the incident without escalation to Children's Social Care or the police.

In applying judgement, the DSL will consider if;

- there is a significant age difference between the sender/receiver;
- there is any coercion or encouragement beyond the sender/receiver;
- the imagery was shared and received with the knowledge of the child in the imagery;
- the child is more vulnerable than usual i.e. at risk;
- there is a significant impact on the children involved;
- the image is of a severe or extreme nature;
- the child involved understands consent;
- the situation is isolated or if the image been more widely distributed;
- there other circumstances relating to either the sender or recipient that may add cause for concern i.e. difficult home circumstances;
- the children have been involved in incidents relating to youth produced imagery before.

If any of these circumstances are present the situation will be escalated according to our child protection procedures, including reporting to the police or children's social care. Otherwise, the situation will be managed within the school.

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

- **Teenage Relationship Abuse:**

- The British Crime Survey 2009/10 found that the 16-19 year age group were most likely to suffer abuse from a partner. This led to a recognition of the seriousness and prevalence of the issues. In March 2013, the definition of domestic violence was revised to include young people between 16 and 18:
- "Any incident or pattern of incidents of controlling, coercive or threatening behaviour, violence or abuse between those aged 16 or over who are or have been intimate partners or family members regardless of gender or sexuality. This can encompass but is not limited to the following types of abuse:
  - psychological
  - physical
  - sexual
  - financial
  - emotional
- Controlling behaviour is: a range of acts designed to make a person subordinate and/or dependent by isolating them from sources of support, exploiting their resources and capacities for personal gain, depriving them of the means needed for independence, resistance and escape and regulating their everyday behaviour.



- Coercive behaviour is: an act or a pattern of acts of assault, threats, humiliation and intimidation or other abuse that is used to harm, punish, or frighten their victim.”

*This definition, which is not a legal definition, includes so called ‘honour’ based violence, female genital mutilation (FGM) and forced marriage, and is clear that victims are not confined to one gender or ethnic group.*

**See Domestic Violence for further information**

### **Prevention in the Curriculum**

- The school recognises the importance of developing pupils’ awareness of behaviour that is unacceptable towards them and others, and how they can help keep themselves and others safe.
- The PSHE programme in each key stage provides personal development opportunities for pupils to learn about keeping safe and who to ask for help if their safety is threatened. As part of developing a healthy, safer lifestyle, pupils are taught to:
  - safely explore their own and others’ attitudes
  - recognise and manage risks in different situations and how to behave responsibly
  - judge what kind of physical contact is acceptable and unacceptable
  - recognise when pressure from others (including people they know) threatens their:
    - personal safety and well-being and develop effective ways of resisting pressure;
    - including knowing when and where to get help
  - use assertiveness techniques to resist unhelpful pressure.
  - Internet Safety

### **Protection is Prevention**

- pupils will be encouraged to discuss openly their use of technology and anything which makes them feel uncomfortable. (If this results in child protection concerns the schools Designated Safeguarding Lead should be informed immediately)
- Pupils should not give out their personal details, phone numbers, schools, home address, computer passwords etc
- Pupils should adhere to the school policy on mobile phones and use of social media.
- The police will be involved if there is any criminal element to misuse of the internet, phones or any other form of electronic media.

- **Upskirting:**

Changes have been made to the Voyeurism (Offences) Act 2019<sup>47</sup> which criminalise the act of ‘upskirting’.

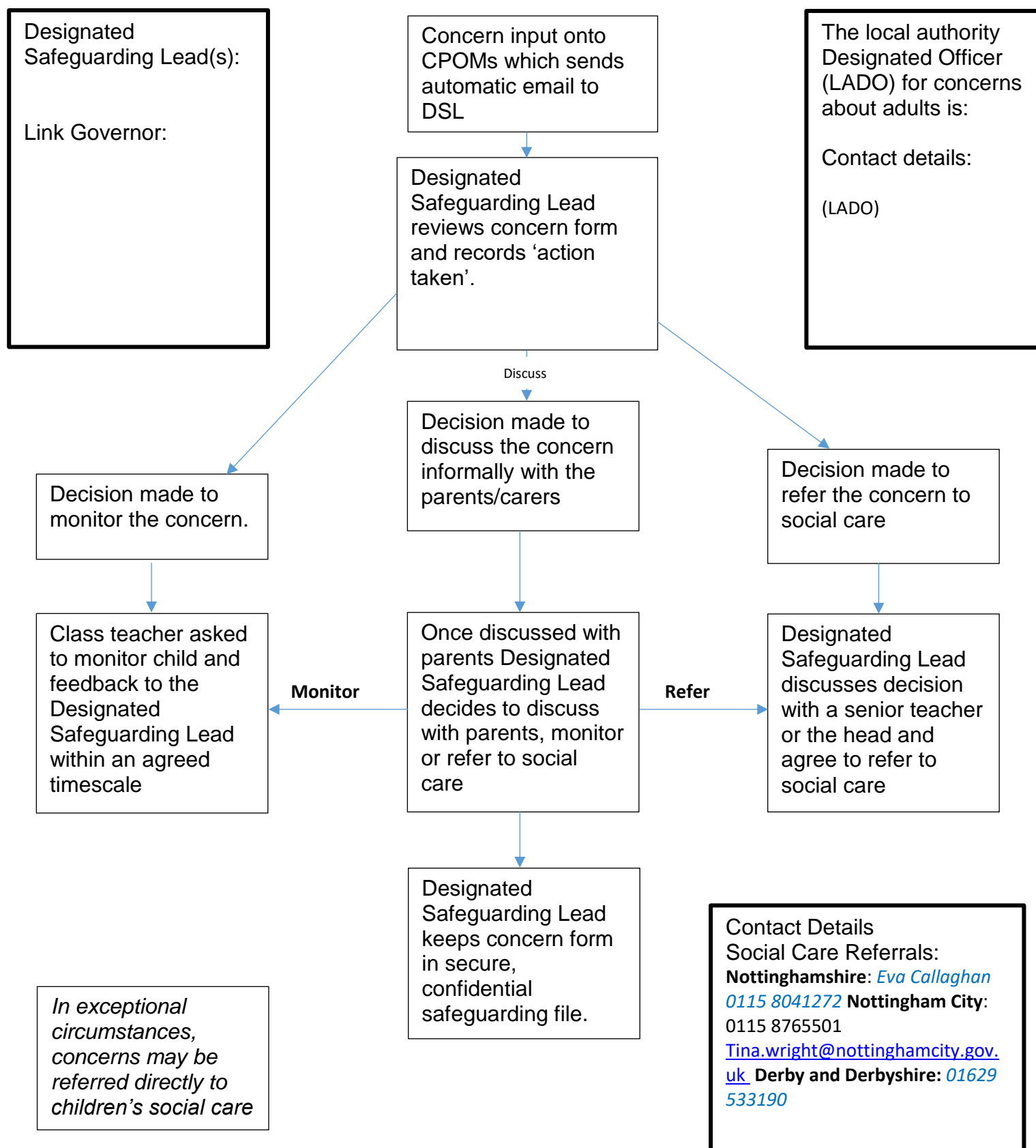
The Crown Prosecution Service (CPS) defines ‘up skirting’ as a colloquial term referring to the action of placing equipment such as a camera or mobile phone beneath a person’s clothing to take a voyeuristic photograph without their permission. It is not only confined to victims wearing skirts or dresses and equally applies when men or women are wearing kilts, cassocks shorts or trousers. It is often performed in crowded public places, for example on public transport or at music festivals, which can make it difficult to notice offenders.”

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<sup>47</sup> <https://www.gov.uk/government/publications/implementation-of-the-voyeurism-offences-act-2019>



## Appendix B: FLOW CHART FOR RAISING SAFEGUARDING CONCERNS ABOUT A CHILD







**Appendix C: Further advice on child protection is available from:**

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

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

CEOPSThinkuknow: <https://www.thinkuknow.co.uk/>

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

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

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

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

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

**Additional Information for Online safety:**

[www.gov.uk/government/publications/teaching-online-safety-in-schools](http://www.gov.uk/government/publications/teaching-online-safety-in-schools)

DfE guidance on teaching online safety in schools (2019)

[www.learning.nspcc.org.uk/research-resources/2016/i-wasn-t-sure-it-was-normal-to-watch-it/](http://www.learning.nspcc.org.uk/research-resources/2016/i-wasn-t-sure-it-was-normal-to-watch-it/)

NSPCC research on impact of pornography on children's values attitudes and behaviours

[www.nspcc.org.uk/report-abuse/dedicated-helplines/protecting-children-from-radicalisation](http://www.nspcc.org.uk/report-abuse/dedicated-helplines/protecting-children-from-radicalisation)

Advice from the NSPCC on protecting children from radicalisation

[www.iwf.org.uk/news/iwf-research-on-child-sex-abuse-live-streaming-reveals-98-of-victims-are-13-or-under](http://www.iwf.org.uk/news/iwf-research-on-child-sex-abuse-live-streaming-reveals-98-of-victims-are-13-or-under)

Internet Watch Foundation Research on 'Live Streaming'

[www.thinkuknow.co.uk/parents/articles/live-streaming-responding-to-the-risks/](http://www.thinkuknow.co.uk/parents/articles/live-streaming-responding-to-the-risks/)

additional information on 'Live Streaming'

[www.thinkuknow.co.uk/professionals/guidance/ukccis-framework-education-for-a-connected-world/](http://www.thinkuknow.co.uk/professionals/guidance/ukccis-framework-education-for-a-connected-world/)

UKCIS has developed a framework for incorporating online safety across the curriculum

[www.pshe-association.org.uk](http://www.pshe-association.org.uk)

PSHE association publishes advice on developing the PSHE curriculum

[www.gov.uk/government/organisations/uk-council-for-internet-safety](http://www.gov.uk/government/organisations/uk-council-for-internet-safety)

UK Council for Internet Safety here you will find a range of guidance/ advice including approaches to online safety in Early Years and Guidance on Sexting for schools and colleges

**National Guidance on What to do If You're Worried About a Child**





[https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/419604/What to do if you are worried a child is being abused.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/419604/What_to_do_if_you_are_worried_a_child_is_being_abused.pdf)

### **Statutory Guidance on Keeping Children Safe in Education**

<https://www.gov.uk/government/publications/keeping-children-safe-in-education--2>

### **Working together to safeguard children:**

<https://www.gov.uk/government/publications/working-together-to-safeguard-children--2>

21 February 2019 Updated 'Working Together to Safeguard Children 2018' to reflect how local authorities should notify the Child Safeguarding Panel.

### **NSPCC Keeping Children Safe Guidance**

<https://www.nspcc.org.uk/preventing-abuse/safeguarding/>

### **Underwear Rule - guide for Parents**

<https://www.nspcc.org.uk/globalassets/documents/advice-and-info/the-underwear-rule---guide-for-parents-new-brand.pdf>

### **Keeping Children Safe from Sexual Exploitation**

<http://paceuk.info/about-cse/keep-them-safe/>

### **Online Safety**

<https://www.ceop.police.uk/safety-centre/Parents/> nspcc share aware

<https://www.thinkuknow.co.uk/parents/>

<https://www.thinkuknow.co.uk/Teachers/Nude-Selfies/>

<https://www.internetmatters.org/advice/social-networking/?gclid=CKTp4ZaP-80CFVXNGwod0AEBmw>

[http://www.parentsprotect.co.uk/files/learning\\_disabilities\\_autism\\_internet\\_safety\\_parent\\_guide.pdf](http://www.parentsprotect.co.uk/files/learning_disabilities_autism_internet_safety_parent_guide.pdf)

<http://www.familylives.org.uk/advice/your-family/online-safety/parent-s-guide-to-facebook/>

### **Drugs and Alcohol**

[http://www.nhs.uk/scot.nhs.uk/files/Parents\\_guide\\_to\\_alcohol\\_and\\_drugs.pdf](http://www.nhs.uk/scot.nhs.uk/files/Parents_guide_to_alcohol_and_drugs.pdf)

### **Radicalisation and Extremism**

<http://parentinfo.org/article/preventing-violent-extremism-what-parents-can-do>

### **Child Mental Health Advice, Including self harm**

<http://www.rcpsych.ac.uk/healthadvice/parentsandyouthinfo/parentscarers/self-harm.aspx>

### **Children who may have been trafficked**

<https://www.gov.uk/government/publications/safeguarding-children-who-may-have-been-trafficked-practice-guidance>

### **Gang and Knife Crime DCSF – 00064-2010**

[https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/288804/Safeguarding children Gang activity.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/288804/Safeguarding_children_Gang_activity.pdf)

### **Homophobic, Transphobic Bullying**

<https://www.gov.uk/government/news/homophobic-bullying-in-schools-project-gets->

Guidance is also available on the Nottingham City Safeguarding Children Board Website for Children with 'Looked After' Status and Children Missing from Home and Care



## Appendix D: Changes to Keeping Children Safe in Education – 2018

### Keeping Children Safe in Education for October 2019.

The government published an update to the statutory guidance, Keeping Children Safe in Education, in September 2019 and this was subsequently updated in October 2019. This update is simply to ensure that the guidance is consistent with other areas of government policy. There are no core changes or new expectations.

#### September 2019 update:

The changes are to be found on pages 108 and 109, and include:

- reference to the Safeguarding Partnerships that should be in place from September 2019 and will replace LSCBs
- references to the new curriculum for Relationships Education, and Relationships and Sex Education, and Health Education
- reference to the new Ofsted framework
- reference to the new guidance 'Teaching online safety in school'
- Ensure that staff are aware of the changes to the Voyeurism (Offences) Act 2019 which criminalise the act of 'up skirting'. The Criminal Prosecution Service (CPS) defines 'up skirting' as a colloquial term referring to the action of placing equipment such as a camera or mobile phone beneath a person's clothing to take a voyeuristic photograph without their permission.

#### October 2019 update:

Changes to parag: 164 & 165 –

*164. The DBS will consider whether to bar the person. Detailed guidance on when to refer to the DBS, and what information must be provided, can be found on GOV.UK.*

*165. Referrals should be made as soon as possible, and ordinarily on conclusion of an investigation, when an individual is removed from regulated activity. This could include when an individual is suspended, redeployed to work that is not regulated activity, dismissed or when they have resigned. When an allegation is made, an investigation should be carried out to gather enough evidence to establish if it has foundation, and employers should ensure they have sufficient information to meet the referral duty criteria explained in the DBS referral guidance, which can be found on GOV.UK*

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