

# Safeguarding children policy & child protection procedure

Bramcote College



September 2023 (review September 2024)

**Faye Parker Dennis**

Reviewed Sept 23 - Pending Governor Approval

Designated Safeguarding Lead

## Who this document applies to:

This document applies to all children/young people under 18 at the setting.

Anyone coming into contact with our students or visiting our site must abide by this policy.

Everyone working at the setting as a member of staff or volunteer has a duty to safeguard and promote the welfare of children/young people. They must read this policy as well as Keeping Children Safe in Education Part 1 (or Annex A as appropriate) and Annex B, and sign to say they understand them and agree to work to them.

Visitors to the setting including contractors must read our safeguarding statement:

### keeping children/young people safe is our **top concern**.

If on your visit you have any worries at all, please raise them with a member of staff or ask to speak to the Designated Safeguarding Lead or Head Teacher.

- Speak to Faye Parker Dennis the Designated Safeguarding Lead
- Speak to Heidi Gale, the Head teacher
- Concerns can also be reported via [safeguarding@bramcote.college](mailto:safeguarding@bramcote.college)

If you are still worried or do not feel able to share your concern with us, you can:

- Contact Nottinghamshire MASH 03005008090 (Out of hours number – 03004564546)

"Safeguarding and the welfare of a child is everyone's responsibility. Every student has the right to live free from fear of abuse and for the adults in their lives, at home, in the community and at our setting, to watch over them, listen to their views and take action if they are concerned. This safeguarding policy sets out how parents, staff and setting leaders will respond if they are worried about a child. Remember – it could happen here"

## Our Child Protection Policy

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

- Providing a safe environment in which children can learn and develop.
- Ensuring we practice safer recruitment in checking the suitability of staff and volunteers to work with children.
- Developing and then implementing procedures for identifying and reporting cases, or suspected cases of abuse.
- Supporting pupils who have been abused or harmed in accordance with his/her child protection plan.
- Raising awareness of safeguarding children, child protection processes and equipping children with the skills needed to keep them safe.
- Working in partnership with agencies and safeguarding partners in the 'best interest of the child'.

We recognise that because of the day to day contact with children, Bramcote College staff are well placed to observe the outward signs of abuse.

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## Who's Who

**Faye Parker Dennis** is the Designated Safeguarding Lead. This means he has lead responsibility for the wellbeing and protection of all students at the setting, ensuring staff are recruited and trained safely, and monitoring the progress of any student needing additional care or protection. Faye can be contacted on 01159168900 ext. 340, [faye.parkerdennis@whptrust.org](mailto:faye.parkerdennis@whptrust.org)

**Janine Harrison** is the Deputy Safeguarding Lead. She works closely alongside Faye to be fully aware of the needs of students across the setting and is able to take any necessary action in his absence.

Faye Parker Dennis can be contacted on 01159168900 ext. 303, [Janine.harrison@whptrust.org](mailto:Janine.harrison@whptrust.org)

**Heidi Gale** is the Head Teacher and has overall responsibility for the setting, staff and students.

**Mary Kirby** is our SENCO, responsible for the provision of those with additional needs vulnerabilities in school.

**Kate Wood** is the Designated Teacher who coordinates, supports and oversees the educational outcomes for our Looked After Children.

## When we review this policy

This policy is reviewed annually and updated if required. This is so we can keep up to date with safeguarding issues as they emerge and evolve, and include lessons learnt from reviews of serious cases of abuse or neglect. It is available on our website. We have incorporated key changes to the government guidance, Keeping Children Safe in Education. A summary of the changes is available [here](#).

## Hire or rent of setting premises

When we hire or rent the premises or facilities to other organisations, our governance body checks and ensures that appropriate safeguarding arrangements are in place and the organisation meets our requirements, relevant legal requirements and statutory guidance. This will be a requirement of any agreement between the setting and the other organisation.

## Complaints

As well as talking to or emailing the staff names above, children/young people or parents can make a complaint about something they have seen at the setting. Please see our complaints procedure [on our website](#) for more details.

## Our mission

**At Bramcote College we strive to ensure our children spend their day learning together for a better future. We see our children as developing into responsible citizens and our school as a world of possibilities.**

**Our curriculum gives our children breadth of learning with experiences which embrace their physical, spiritual, and emotional development. They have time to think, play and thrive as an individual and as part of a community in a supportive, caring and challenging environment.**

**To achieve this, we work to clear principles that guide our work and response to any concerns.**

## Principles

1. We **always** act in the best interests of each student/student and promote their welfare.
2. We **listen** to any communication from students, parents or carers and always take concerns seriously.
3. We acknowledge there are **risks** to the students in our care. Without proper care and vigilance abuse or neglect of students could happen at the setting. We talk about these risks with students, staff and parents/carers and together will plan carefully to keep them safe.
4. People **must** act if they are worried about a student and keep acting until they believe the student is safe.
5. We are **open** in our decisions and let parents and local authorities know about concerns.
6. We make it easy to raise a concern, and **anyone** raising concerns will be kept safe.

## Valuing diversity

Difference is central to our strength as a group of people. We promote inclusive behaviours that empower students to make choices right for them. Discrimination can also be a safeguarding issue, and we will work with other agencies to consider how hurtful behaviour or comments affect students and act accordingly. If staff or volunteers behave in a way that discriminates against particular groups, we will take action to rectify things and consider whether this is a breach of our Code of Conduct.

## Mental Health

It is widely recognised that a child/young person's emotional health and wellbeing influences their cognitive development and learning, as well as their physical and social health and their mental wellbeing in adulthood. It is part of the role of our staff to promote the welfare of students, mental as well as physical.

Our school/college will provide a safe environment which nurtures and encourages children/young people's sense of self-worth and self-efficacy, reduces the threat of bullying and violence, and promotes positive behaviours.

All staff foster an ethos that promotes mutual respect, learning and successful relationships among students and staff. We strive to create a culture of inclusiveness and communication that ensures all children/young people's concerns can be expressed and addressed. Staff undertake training that reflects the needs of students. We have staff who are trained in both Mental Health First and Bereavement in order to support our students accordingly.

The school/college will work in partnership with parents, carers and other family members to promote children/young people's social and emotional wellbeing. All students have access to pastoral care and support so that emotional, social and behavioural problems can be dealt with as soon as they occur. When issues arise that need more support than the school/college community can offer, parents and students are referred for additional help e.g. from our local early help services and/or child and adolescent mental health services.

## What to do if you're worried about a student at the setting

### parents & visitors

If the child/young person is in **imminent danger**, take action to keep them safe. Tell our staff or if necessary, call the Police on 999 or children's services on 03005008090



If you are concerned about **staff behaviour** **contact** Heidi Gale as the **Head Teacher** on 01159168900 ext 335



For other concerns  
**speak to your class teacher**



**We will contact you** by the next school day (sooner if required) to tell you that action has been taken



**If you do not hear**, or you remain concerned, please speak to the Head Teacher or DSL

### staff & volunteers

The DSL should be spoken to about any immediate concerns. Staff should record concerns on the CPOMS system under 'Safeguarding Referral' which will alert the Designated Safeguarding Leads



The DSL will assess the level of risk using the Multi-Agency Safeguarding Thresholds Guidance and may contact the Early Help Hub for advice. For Level 1 & 2 needs, talk to the parents, and provide support, including possible referral to other services.



For Level 3 & 4 needs, the DSL will contact parents (unless this would increase the risk) to talk about involving other agencies, as explained the threshold of needs guide. The DSL may contact Children's Services for advice and clarification on level of need.



If we have consent, the DSL will refer to children's social care on 03005008090. If we do not have consent and we have a child protection concern, the DSL **must** still refer.

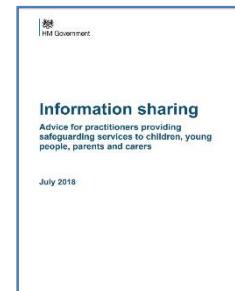
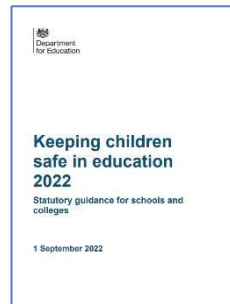
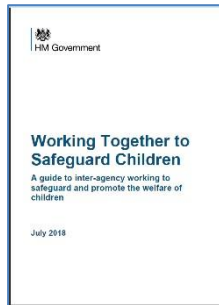


### Monitor progress for the student

Unless it will increase the risk to the child/young person contact the referrer, parent and any staff who need to know to let them know what is happening and what to do.

# All staff, volunteers & visitors have a duty to act to protect children and promote their welfare

If you still have a concern after following these procedures please speak to Heidi Gale, Headteacher or follow [Whistleblowing Guidance](#)



## The law

It's important every agency knows what to do if worried about a child/young person. We follow the above national guidance so we are clear what to expect and can explain this to students and families.

Where there are specific risks we will access other specific guidance – please see a full list in Appendix B.

**'Safeguarding & promoting welfare'** of children is defined as:

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

### Keeping Children Safe in Education

**'Child protection'** are the systems and processes all agencies follow if there is reasonable cause to suspect a child is suffering, or at risk of suffering, significant harm (s47, Children Act 1989).

## Safeguarding in Nottinghamshire

We work within the [Nottinghamshire Child Protection Procedures](#) and our local safeguarding children partnership. This policy should be read in conjunction with [Nottinghamshire Safeguarding Children Guidance for Education Settings on Child Protection Procedures](#) and [Nottinghamshire SCP LADO Procedures](#)

Where there is a welfare or child protection concern about a child/young person at the setting we will contact Nottinghamshire Multi Agency Safeguarding Hub (MASH) by phone on 03005008090 (**Out of hours – 03004564546**)

this will be followed up by a written referral where required.

The FGM mandatory reporting duty (Appendix A, specific issues (h)) is a legal duty requiring teachers in England and Wales to make a report to the **police** where, in the course of their professional duties, they either:

- are informed by a girl under 18 that an act of FGM has been carried out on her; or
- observe physical signs which appear to show that an act of FGM has been carried out on a girl under 18 and they have no reason to believe that the act was necessary for the girl's physical or mental health or for purposes connected with labour or birth.



## Teaching about safeguarding

We work to facilitate a whole setting approach to safeguarding to listen to and empower students to keep themselves safe both on and offline. How we do this varies through the setting depending on the age and understanding of the student, worries and issues we come across and the views and values of the families and communities with whom we work.

Citizenship is about belonging in a community, looking after one another, respecting one another's rights and understanding one's own rights. Students are taught about their right to an education that helps them fulfil their potential, to protection from violence, abuse or neglect and to express their opinions and be listened to. This can occur in the classroom, or through modelling effective ways to resolve issues between students.

Students are taught what to do if they are worried about something for themselves or another student. They are encouraged to identify safe and important people in their immediate and surrounding family and friends, in the staff team here at the setting and about ChildLine and other organisations that are there to help children/young people in trouble. There are posters and other information about this in the setting.

**Preventative education is most effective in the context of a whole-school or college approach that prepares students for life in modern Britain and creates a culture of zero tolerance for sexism, misogyny/misandry, homophobia, biphobic and sexual violence/harassment. These are underpinned by our school's behaviour policy and pastoral support system, as well as by a planned programme of evidence-based RSHE delivered in regularly timetabled lessons and reinforced throughout the whole curriculum.**

## Relationships Education

The setting follows the [statutory guidance](#) in teaching about relationships. We talk about healthy relationships, choices, our rights over our bodies, keeping safe and what to do when you are worried – there is more information in our [relationships education policy](#). Where teaching may affect an individual student (such as where there has been a significant life event) there will be discussions between the parent, the Designated Safeguarding Lead and the relevant teacher to ensure the teaching is most supportive of the student.



## Online safety

The online world is very present in our students lives and in line with [government guidance](#) we teach about the benefits (and risks) of technology and the internet, this includes how to evaluate what students see online, recognising techniques used for persuasion (from advertising, bullying and online hoaxes), acceptable and unacceptable online behaviour, identifying online risks and how and when to seek support. **Early help**

Providing early help is more effective in promoting the welfare of children/young people than reacting later. Early help means providing support as soon as a problem emerges, at any point in a child/young person's life, from the foundation years through to the teenage years.

Any child/young person may benefit from early help assessments; however, staff should be particularly alert to a child/young person who:

- has special educational needs, is disabled or has certain health conditions
- has a mental health need
- is a young carer
- risks being drawn into gang involvement, anti-social or criminal behaviour
- is frequently missing/goes missing from education, home or care
- is at risk of modern slavery, trafficking, sexual or criminal exploitation
- is at risk of being radicalised or exploited
- has a family member in prison, or is affected by parental offending
- is in family circumstances such as drug/alcohol misuse, adult mental health issues and domestic abuse, and/or is misusing drugs or alcohol themselves
- has returned home to their family from care;
- is at risk of 'honour'-based abuse such as Female Genital Mutilation or Forced Marriage • is privately fostered

Staff should discuss their concerns with the Designated Safeguarding Lead or deputy who will consider the need for an Early Help Assessment and will work with the family to identify their needs and the services best placed to address those needs.

## Identifying abuse & neglect

Abuse or neglect of a child/young person can happen by someone inflicting harm or failing to act to prevent harm. Children/young people may be abused in a family, 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 another child/young person or children/young people. Sometimes they tell us about abuse. More often they don't.

**Harm can include ill treatment that is not physical as well as the impact of witnessing ill treatment of others. This can be particularly relevant, for example, in relation to the impact on children of all forms of domestic abuse. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others.**

In our local area children/young people face risks of substance misuse, domestic violence, radicalisation and county lines, gangs and serious violence, and violence against women and girls every day. Within [Nottinghamshire several contextual pathways](#) exist to support our local context, including Child Sexual Exploitation, Harmful Sexual Behaviour, Child Criminal Exploitation, Serious Youth Violence, Radicalisation and Human Trafficking and Modern Slavery. We focus on several of these areas within staff training and where appropriate college life and our curriculum, we take action where we have concerns, and we work so that children/young people over time develop skills themselves in recognising risks and keeping themselves and others safe. We also have a proactive safer recruitment policy, physical contact policy and safeguarding training for all staff. We also work with children/young people to ensure they develop positive, enjoyable, and respectful relationships as they grow up, including relationships education, choices, and health. Where there are serious concerns, we always involve others such as parents, carers health staff, police or social workers.

In our setting, we recognise that children/young people may abuse other children/young people including within our setting, and that even if there are no reported cases of such abuse, it may still be taking place and not being reported. It is acknowledged that it is more likely that girls will be victims and boys' perpetrators in many forms of child on child/Child-on-child abuse, but that all such abuse (see Appendix A, (e) Child on Child abuse for details), is unacceptable and will be taken seriously. We take a zero-tolerance approach to child on child/Child on Child abuse, and never pass it off as "banter", "just having a laugh", "part of growing up" or "boys being boys" as this could lead to a culture of unacceptable behaviours and an unsafe environment for our students. We understand that such behaviours are harmful to the children/young people who are harming as well as to the children/young people being harmed and ensure that appropriate support is given to all involved. We take a [whole-setting preventative approach](#) together with a well promoted, easily understood, easily accessible reporting process to enable students to confidently report abuse, knowing their concerns will be treated seriously, and knowing they can safely express their views and feedback.

There are four categories of abuse defined in Working Together and accompanying indicators which, if observed should trigger you to carefully consider whether what you are seeing could be as a result of abuse. That something is or is not on the list does not mean that you can instantly rule in or rule out abuse as a possibility and if there is something that is causing you concern you should act on those concerns.

<b>Physical abuse</b>	<b>Sexual abuse</b>	<b>Emotional abuse</b>	<b>Neglect</b>
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Staff must be familiar with each form of abuse and what to look for. These are listed in [Appendix A](#).

Children/young people are abused or neglected in a range of situations. There is specific guidance about the following situations , also in Appendix A;

Domestic violence and abuse  
Physical intervention and restraint  
Bullying  
Children/young people with sexually harmful behaviour  
Child on Child abuse  
Racist & other hate incidents  
Forced Marriages & Honour Based Abuse  
Child Criminal Exploitation  
Anti-social & gang related activity

Serious Violence & Knife crime  
Children court  
Family in Prison  
Homelessness & poverty  
Child Sexual Exploitation  
Substance Misuse  
County Lines  
Trafficking  
Radicalisation & Extremism  
Online or internet use  
Photography & images  
Private Fostering  
Body Image and Confidence  
Young carers  
Children going missing  
Modern slavery  
Children who previously had a social worker

The setting is clear that expectations about behaviour online are the same as expectations about behaviour offline. We provide advice and guidance around online content, contact and conduct to staff, students, and their parents, together with how to keep safe and sources of support.

We personalise our expectations and practices for our more vulnerable students, victims of abuse and students with special educational needs or disabilities.

### Human Rights Act

**The Human Rights Act 1998 (HRA) sets out the fundamental rights and freedoms that everyone in the UK is entitled to and contains the Articles and protocols of the European Convention on Human Rights (ECHR) (the Convention) that are deemed to apply in the UK. It compels public organisations to respect and protect an individual's human rights when they make individual decisions about them. Under the HRA, it is unlawful for schools and colleges to act in a way that is incompatible with the Convention.**

**The specific Convention rights applying to schools and colleges are:**

- **Article 3: the right to freedom from inhuman and degrading treatment (an absolute right)**
- **Article 8: the right to respect for private and family life (a qualified right) includes a duty to protect individuals' physical and psychological integrity**
- **Article 14: requires that all of the rights and freedoms set out in the Act must be protected and applied without discrimination, and**
- **Protocol 1, Article 2: protects the right to education.**

**Being subjected to harassment, violence and or abuse, including that of a sexual nature, may breach any or all of these rights, depending on the nature of the conduct and the circumstances. Further information (including on absolute and qualified rights) can be found at Human Rights. [Human Rights | Equality and Human Rights Commission \(equalityhumanrights.com\)](https://equalityhumanrights.com)**

## Equality Act 2010

Schools and colleges have obligations under the Equality Act 2010 (the Equality Act). According to the Equality Act, schools and colleges must not unlawfully discriminate against pupils because of their sex, race, disability, religion or belief, gender reassignment, pregnancy and maternity, or sexual orientation (protected characteristics).

Whilst all of the above protections are important in the context of safeguarding, this guidance and the legal duties placed on schools and colleges, in relation to safeguarding and promoting the welfare of children, governing bodies and proprietors should carefully consider how they are supporting their pupils and students with regard to particular protected characteristics - including disability, sex, sexual orientation, gender reassignment and race.

Provisions within the Equality Act allow schools and colleges to take positive action, where it can be shown that it is proportionate, to deal with particular disadvantages affecting pupils or students with a particular protected characteristic in order to meet their specific need. This includes a duty to make reasonable adjustments for disabled children and young people, including those with long term conditions. A school or college, could, for example, consider taking positive action to support girls if there was evidence they were being disproportionately subjected to sexual violence or sexual harassment.

Guidance to help schools understand how the Equality Act affects them and how to fulfil their duties under the act can be found at

Equality Act 2010: advice for schools - [Equality Act 2010: advice for schools - GOV.UK \(www.gov.uk\)](https://www.gov.uk/equality-act-2010-advice-for-schools) it may also be useful for colleges. For further information Equality Act guidance | [Equality Act guidance | Equality and Human Rights Commission \(equalityhumanrights.com\)](https://equalityhumanrights.com)

## If children/young people raise a concern...

Always take children/young people seriously, listen carefully and report this to the safeguarding team.

### Do...

Listen and accept, trying not to interrupt  
Reassure them it was the right thing to tell you  
Explain what you are going to do next  
Make accurate notes using all the child/young person's words as soon as possible  
Inform the safeguarding team

### Don't...

Promise confidentiality  
Investigate  
Use leading questions  
Ask the child/young person to repeat the disclosure  
Judge or make assumptions

Staff should never attempt to carry out an investigation of suspected child abuse by interviewing the child or any others involved especially if a criminal act is thought to have occurred. The only people who should investigate child abuse and harm are Social Care, Police or the NSPCC.

**All staff should be aware that children may not feel ready or know how to tell someone that they are being abused, exploited, or neglected, and/or they may not recognise their experiences as harmful. For example, children may feel embarrassed, humiliated, or are being threatened. This could be due to their vulnerability, disability and/or sexual orientation or language barriers. This should not prevent staff from having a professional curiosity and speaking to the designated safeguarding lead (DSL) have concerns about a child. It is also important that staff determine how best to build trusted relationships with children and young people which facilitate communication.**

## How should I respond?

### Parents & children/young people:

If you have a concern about a student at Bramcote College please contact our Designated Safeguarding Lead. We will listen to your concerns, take these seriously and ensure you receive a response.

You can contact Faye Parker Dennis 01159168900 ext 352

faye.parkerdennis@whptrust.org

If you are still not satisfied you can contact:

- the Head Teacher, Heidi Gale on 01159168900 ext 335, [Heidi.gale@whptrust.org](mailto:Heidi.gale@whptrust.org)
- Cathy Peacock (Chair of Governors), [Cathy.peacock@whptrust.org](mailto:Cathy.peacock@whptrust.org)
- local children's services duty team (0115 876 4800) - or if necessary, Ofsted (0300 123 4666).

### Setting staff & volunteers

Every member of staff has a duty to act to keep children/young people safe and promote their welfare. Failure to act on a concern could lead to disciplinary action.

Concerns about and/or serious disclosures made by students should be reported to Faye Parker Dennis,



Designated Safeguarding Lead. They will ensure the concern is explored and must let you know what happens as far as is possible. In his absence, please speak to Faye Parker Dennis, and/ or any available member of the senior leadership team.

Safeguarding referrals should be made and recorded within the schools online reporting system CPOMS. Further information can be found in the Appendix F.

Those who do not have access to this system, such as agency and local authority staff are required to use either email, a written referral or report the concern in person directly to the DSL.

Concerns about the behaviour of staff must be taken directly to the Head Teacher. If the concern is about the Head Teacher the Chair of Governors should be contacted, or the Local Authority Designated Officer (LADO).

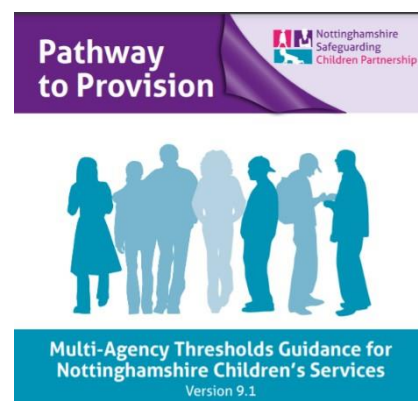
If you are still concerned after taking a concern to the DSL/Head Teacher, you must follow the escalation process until you are not worried anymore. This may include reporting directly to children's social care yourself.

## How do I tell if a child/young person is at risk of abuse or neglect?

It's difficult to be certain, but if you have a reason to worry then that's enough to talk more with the safeguarding team about the risk or to involve other agencies. Use the definitions of abuse or neglect in this document and the [Nottinghamshire Pathway to Provision guide](#). Some of the key issues affecting our children/young people are set out in [Appendix](#)

[A](#). More detailed guidance on specific issues is available in the [Nottinghamshire SCP Child Protection Procedures](#).

Where there are concerns for the wellbeing of a child/young person that do not meet the threshold for abuse or neglect, the setting will use the [Early Help Assessment form](#) to record and track such concerns. The [Nottinghamshire Neglect Toolkit](#) will be used to assist in the identification of neglect and abuse and referrals will be made accordingly.



### **Children/young people with special educational needs and disabilities**

There are additional safeguarding challenges for children/young people with special educational needs (SEN) and/or disabilities, including:

- that behaviour, mood and injury may relate to possible abuse and not just a SEN or a disability
- higher risk of peer/ social group isolation
- disproportionate impact of bullying
- difficulties with communication

Sometimes, a student's SEN or disability needs are seen first, and the potential for abuse second. If students are behaving in particular ways or they're looking distressed or their behaviour or demeanour is different from in the past, staff should think about that being a sign of the potential for abuse, and not simply see it as part of their disability or their special educational needs. Students with SEN and/or disabilities also have a higher risk of being left out, of being isolated from their peer/ social groups, and they are disproportionately affected by bullying.

[We have put measures in place](#) to address these additional challenges including extra pastoral support and attention, and appropriate support for communication as needed.

Our setting's [Behaviour policy](#) provides detail around the '**use of reasonable force**' and how this is only used as a last resort for managing incidents of very challenging behaviour. This is in line with national guidelines and takes into account individual student needs and risk management /care plans and in particular with regard to SEND.

Remember, every piece of information shared may be important:



Good Information > Better Decisions > Best Outcomes



**Fears about sharing information cannot be allowed to stand in the way of the need to safeguard and promote the welfare of children at risk of abuse or neglect.**

Information sharing advice for practitioners

### **Sharing information internally:**

Legally, we must share information within the setting on a 'need to know basis', so that everyone who needs to know information to keep children/young people safe and help them develop does know.

When we are worried about a child/young person it is essential we record the concern and inform the designated safeguarding lead promptly.

Some information within the setting will be further restricted, for example:

- Where there is an allegation about a member of staff the Head Teacher will decide who will lead on the concern and contact other agencies.
- Where the detail of information is particularly sensitive this can be restricted further, for example the details of sexual abuse or a young person sharing worries about their mental health or sexuality. Staff involved in their direct care may need to know in general terms the nature of the concern.



## Sharing information with other agencies:

Where a significant issue arises the Designated Safeguarding Lead will ensure the parent is contacted within 24 hours, or immediately if required (unless doing so will put a child or adult at risk of harm).

We follow the 7 Golden Rules from [Information sharing advice for practitioners](#):

1. The General Data Protection Regulation (GDPR), Data Protection Act 2018 and human rights law are not barriers to justified information sharing, but provide a framework to ensure that personal information about living individuals is shared appropriately.
2. We will be open and honest with individuals (and/or family where appropriate) from the outset about why, what, how and with whom information will, or could be shared, and seek their agreement, unless it is unsafe or inappropriate to do so.
3. We will seek advice from other practitioners (e.g. MASH), or our information governance lead, if in any doubt about sharing the information concerned, without disclosing the identity of the individual where possible.
4. We share information with informed consent where appropriate and, if possible, respect the wishes of those who do not consent to share confidential information. We still share information without consent if, in our judgement, there is a lawful basis to do so, e.g. where safety may be at risk. We base judgements on the facts of the case. We are clear why we share or request personal information from someone. We remain mindful that individuals might not expect information to be shared, even with consent.
5. We consider safety and well-being and base our information sharing decisions on considerations of the safety and well-being of the individual and others who may be affected by their actions.
6. Necessary, proportionate, relevant, adequate, accurate, timely and secure: We ensure information we share is necessary for the purpose for which we are sharing it, is shared only with individuals who need to have it, is accurate and up-to-date, is shared in a timely fashion, and is shared securely.
7. We keep records of our decision to share (or not to share) and the reasons for it. We record what we have shared, with whom and for what purpose.

## Children's social care

We ask parents to let us know if their child has ever had a social worker and this information is also shared routinely with us by local authorities. This allows us to put in extra support to give them the best chances of success and to take earlier action if we are worried about a student's progress, behaviour or if they go missing.

## Contacting the Police

We share information with the Police if we suspect abuse or neglect in line with the Nottinghamshire SCP Child Protection procedures. We will consider contacting the Police if we suspect a crime has been committed in line with the [National Police Chiefs Council Guidance](#).

## An Appropriate Adult

At times it may be necessary for the police to attend school to speak with children regarding matters that have occurred either inside or outside of the school. Although school cannot intervene with a police investigation, school will be in position to support the young person and act as an appropriate adult as and when necessary. An appropriate adult is usually a parent, guardian or social worker but if none are available the designated safeguarding leads or suitably qualified adult will support where necessary.

How the Police conduct themselves when a person is detained and / or questioned is covered by the Police and Criminal Evidence Act 1984 (PACE) Code C. In paragraph 1.7 the PACE guidance advises that "The role of the appropriate adult is to safeguard the rights, entitlements and welfare of juveniles and vulnerable persons", with there being further elaboration that the appropriate adult (AA) is expected to observe that the police are acting properly and fairly in relation to a vulnerable detained persons rights and entitlements, as well as helping the detained person understand their rights.

As a school we will endeavour to contact home in advance of the police speaking with children and where this is not possible, we will be pupil lead, in terms of having a person of their choice in the room.

## What to do if you are still worried...

The setting has an internal escalation process, and links with the [Nottinghamshire Child Protection Escalation Procedures](#)

**Anyone worried about a child/young person must continue to raise the concern until they have a reason not to be worried about the child/young person anymore.**

**Concern action is not being taken to protect a child:**

Discuss with the Designated Safeguarding Lead and with the person making the decision

**If you are still worried:**

Raise the issue with the Head Teacher

**If you are still worried:**

Follow the Nottinghamshire [Child Protection Procedures Conflict Resolution policy](#). You also have access to the NSPCC Whistleblowing helpline on 0800 028 0285

7 days  
or less

Every member of staff must follow this process. There will be no reprisals for honestly raising a concern. Where an immediate decision is needed, and a particular person is unavailable you may move to the next stage. The timescale for the process relates to the urgency of the decision, but in any event should not extend beyond one week.

We **always** listen to concerns raised by children/young people, families, staff, visitors, or other organisations. The whistleblowing process should only be used if there are no clear safeguarding procedures, you are concerned your concern won't be dealt with properly or will be covered up, your concern has not been acted upon or you are worried about being treated unfairly. The prescribed organisation for safeguarding children whistleblowing is the NSPCC: **0800 028 0285** or [help@nspcc.org.uk](mailto:help@nspcc.org.uk).

## Safer Recruitment

We do our best to ensure we employ 'safe staff' by following the guidance given by the [Nottinghamshire SCP Child Protection Procedure on Safer Recruitment and](#) our individual procedures. Those involved in recruitment and employment of staff have received safer recruitment training in line with DfE guidance, [Keeping Children Safe in Education](#).

Safer recruitment means that all applicants will:

- a) understand their duties to safeguard children/young people from the outset through the advertisement and in their job description
- b) complete and sign an application form which includes a full education, qualification and employment history (with explanations for any gaps)
- c) provide business contact details for two verified, formal referee statements following our own format, including at least one who can comment on the applicant's suitability to work with children/young people (the last childcare employer if they have one) and one who is a senior person with appropriate authority in their current employment.
- d) provide evidence of identity and qualifications (including birth certificate, where available).
- e) be checked in accordance with the Disclosure and Barring Service (DBS) regulations as appropriate to their role, including s128 checks
- f) have their mental and physical fitness to carry out their work responsibilities verified
- g) provide evidence of their right to work in the UK
- h) be shortlisted by a panel who have completed safer recruitment and interviewed by at least two people testing skills and abilities with value-based questions against the job description. Members of the panel will have completed safer recruitment training.
- i) **As part of the shortlisting process, our school will carry out an online search as part of our due diligence on the shortlisted candidates. This may help identify any incidents or issues that have happened, and are publicly available online, which we may wish to explore with the applicant at interview.**

We also ensure that recruitment documentation will state its commitment to safeguard children/young people. All new members of staff will undergo face to face induction training within 2 weeks which includes familiarisation with our safeguarding policies and procedures and support to identify their child protection training needs. All staff will sign to confirm that they have read and **understood** the safeguarding policies and procedures and will attend relevant training.

## Agency

If ever used, we would obtain written confirmation from supply agencies that agency staff have been appropriately checked, and their suitability to work with children/young people at the setting will be assessed based on the children/young people's needs.

We maintain records of recruitment checks undertaken and the appointing manager signs to evidence they have checked this documentation and the overall record is signed by the Designated Safeguarding Lead and Safeguarding Governor termly.

## Supporting staff at the setting

### Code of conduct

We have published a code of conduct which sets out expectations of staff around appropriate boundaries and staff keeping themselves safe – staff sign to say they have read and understood this document.

### Emotional support

Having to deal with a situation where a young person has experienced harm can be stressful and upsetting. We will support staff in a variety of ways, including a debrief with their line manager and/or the Designated Safeguarding Lead as appropriate. Where necessary confidential counselling services and additional resources will be sought.

### Supervision

Staff involved in working directly with children/young people, or supervising staff who do, will receive regular supervision. This supervision will be half-termly and will provide a space for the staff member to

- reflect on any safeguarding issues that the staff member has been involved in (directly or indirectly) and allow for agreement on any further action required;
- talk about issues which they are facing in the work environment, including thoughts that they have in terms of developing the service that is provided to the children/young people; and
- discuss the emotional impact of the role as well as any other issues that they consider relevant.



## Covid 19 arrangements

Our priority is to deliver face-to-face, high-quality education to all students. The evidence is clear that being out of education causes significant harm to educational attainment, life chances, mental and physical health.

Despite Covid-19, the setting's child protection policy is fundamentally the same; children and young people always come first, and staff should respond robustly to safeguarding concerns and contact the DSL in line with our established safeguarding procedures. In the unusual circumstance that, due to Covid-19, no DSL or deputies are on site, the DSL or Deputy will be contactable and the Headteacher or a member of the Senior Leadership Team will email all staff by 9am to advise they are acting in an on-site safeguarding role together with contact details for the DSL or Deputy DSL.

### Our School's Response

The setting will create 'outbreak plans' to cover the possibility that in some local areas it may become necessary to reintroduce 'bubbles' for a temporary period, to reduce mixing between groups. Given the impact the pandemic has had on education, any measures taken would be a last resort and kept to the shortest period possible. Attendance is still vital and mandatory for all students of compulsory school age, and it is a priority to ensure that our students do attend the setting regularly. Where there is a need for remote education, we will endeavour to provide high quality education and support for all students and will ensure effective safeguards are in place for remote learning in line with [UK Safer Internet Centre](#) and [safer working practice](#) guidance. Staff will be aware of the signs and indicators of [cyberbullying](#) and [other risks online](#) and will implement the [20 safeguarding considerations for livestreaming](#) where necessary. Parents and carers will receive information about keeping their children safe online. We will set out the setting's approach, including the sites students will be asked to access and who from

the setting (if anyone) their child is going to be interacting with online. Students accessing remote learning will receive guidance on keeping safe online and how to raise concerns with the setting, [Childline](#), the [UK Safer Internet Centre](#) and [CEOP](#). Our governance body will [review arrangements](#) to ensure they remain appropriate.

**Identifying vulnerability:** We acknowledge that the pressures on children/young people, their families and staff if an outbreak occurs are significant. There will be heightened awareness of family pressures particularly if parents/carers are also working from home. Staff will be mindful of the mental health of both [children/young people](#) and their [parents and carers](#), involving the DSL about any concerns. We recognise the additional potential for [Child-on-child abuse](#) during setting closures.

We have put into place specific arrangements for the following groups, should an outbreak occur

**High priority:** Looked after and previously looked after children, children/young people subject to a child protection plan, children/young people who have, or have previously had a social worker, and children/young people with an EHCP - We will expect these children/young people will continue to attend during any time when other children/young people are learning remotely. Where this is not possible an individual plan will be drawn up taking into account the specific risks for each child/young person.

**Medium priority:** Children/young people on the edge of social care involvement or pending allocation of a social worker – A plan will be drawn up for each of these children/young people with an individual member of staff identified to consider their vulnerability. This plan will be shared with other involved agencies. These children/young people may attend virtually or may attend on site with the agreement of the head teacher.

**Other children/young people:** The class teacher or tutor will consider the vulnerability of each child/young person and may make a recommendation to the head teacher that they are given medium or high priority.



## Concerns and allegations about staff, volunteers and contractors

Staff, Volunteers and Contractors should take care not to place themselves in a vulnerable position with a child/young person. While staff are friendly with children/young people, they do not become friends. No staff member will share their personal details with children/young people, have on-going contact or relationships with children/young people outside of the setting (including social networking) and accept or give significant gifts. Staff must adhere to the risk assessment for lone working policy. Any person who is unsure should seek advice from their Line Manager/the Designated Safeguarding lead. All staff understand that a child/young person may make an allegation against an adult working in or for the setting. Any such concern will be reported directly to the head teacher, unless it is about the head teacher, in which case it will be reported directly to the chair of the governing body/ management committee or the proprietor.

Members of staff etc. must advise the head teacher **immediately** if it is alleged current staff (including volunteers) or contractors may have:

- behaved in a way that has harmed a child, or may have harmed a child;
- possibly committed a criminal offence against or related to a child;
- behaved towards a child or children in a way that indicates he or she would pose a risk of harm to children;
- behaved or may have behaved in a way that indicates they may not be suitable to work with children.

If the allegation concerns the head teacher staff etc. will immediately inform the Chair of Governors without notifying the head teacher first. The Head Teacher (or a designate) will follow [the Managing Allegations & Safeguarding Concerns policy](#) and where appropriate discuss the content of the allegation with Nottinghamshire's LADO (designated officer for the management and oversight of allegations) Eva Callaghan on 0115 8041272 and follow their procedures for managing allegations and safeguarding concerns about staff etc. We will [make a barring referral to the DBS](#) should an allegation made against a member of staff be upheld. Allegations about prior members of staff or historic allegations will be referred to the police.

### Low level concerns

Staff etc. will report to the Head Teacher any concern about other adults working with children/young people, no matter how small they seem. The term low level concern does not mean it is insignificant, it means that the behaviour towards a child/young person does not meet the allegations threshold of harm or is not serious enough to consider a referral to the LADO. It could amount to inappropriate behaviour such as being over friendly with children/young people, having favourites, taking photographs of children/young people on their mobile phone, engaging with a child/young person on a one-to-one basis behind a closed door or secluded area or using sexualised, intimidating or offensive language and/ or humiliating a child. Staff etc. are clear about what appropriate behaviour looks like and staff are trained to help to identify any weakness in the setting's safeguarding system.

The protocol for managing, dealing with and recording low-level concerns is set out in the staff code of conduct.

The Head Teacher will consider whether a low-level concern is in fact an allegation. If there is doubt the LADO should be advised **immediately**.



## Whistleblowing

We promote good practice and professional conduct through the organisation. Staff must be committed to providing a high standard of service and understand that children/young people cannot be expected to raise concerns in an environment where staff fail to do so. All staff are 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. Staff will follow our [whistlelow level-blowing](#) policy. As necessary, they should speak to the Designated Safeguarding Lead, Senior Leadership Team or the Nottinghamshire local authority designated officer.

If a member of staff notices anything that gives them cause for concern it is vital that this is raised. Acting upon staff concerns is fundamental in order to ensure good practice and support for staff. Resolving issues must be viewed by all staff as a positive action and not a breach of trust between colleagues or an attack on the organisation. We value an atmosphere of openness and honesty and welcome suggestions, complaints and criticisms. Whistleblowing includes raising and passing on concerns about any of the following:

- a) Poor standards of service
- b) Issues of bad practice
- c) The conduct of colleagues or managers
- d) Anything which is not in the best interest of the young person or the organisation
- e) Anything which is illegal or unacceptable behaviour.

If you think that your concern won't be dealt with properly or will be covered up, your concern has not been acted upon or you are worried about being treated unfairly, then the prescribed organisation for safeguarding children whistleblowing is the NSPCC: **0800 028 0285** or [help@nspcc.org.uk](mailto:help@nspcc.org.uk).

## Staff training

This strategy has been devised drawing on requirements in DfE guidance, Keeping Children Safe in Education

### Principles

The **Designated Safeguarding Lead** will ensure all staff and volunteers have safeguarding children training relevant to their role. We see safeguarding training as an on-going process and the Safeguarding Team will ensure there are safeguarding and child protection updates and reminders at least once a term.

### Job Roles at the setting

We have aligned all job roles at the setting depending on role and contact with our students. Each role has specific training requirements.

Requirements for staff undertaking supervision, interview panels and other particular roles are also taken into account.

### New staff

The **human resources lead** will send the appointment letter to new staff with links to Part I or Annex A (as appropriate), and Annex B of the current [Keeping Children Safe in Education](#) with a requirement this is read and understood before they start work. On the first day of work the **Designated Safeguarding Lead** will:

- talk with them about Keeping Children Safe in Education with opportunity for questions,
- introduce them to the setting's Safeguarding and Child Protection Policy and pathways for raising concern and
- ensure they know what to do if worried about a child/young person.

At the probationary review new staff will be explicitly asked about any concerns they have for children/young people at the setting and any other safeguarding issues they have identified.

### **Agency staff**

**Agency staff** working at the setting for a month or more will be required to meet the same standards as permanent staff.

**Agency staff** working for less than one month must read Part I or Annex A (as appropriate) of the current [Keeping Children Safe in Education](#). Their agency must provide written assurance the member of staff has safeguarding children training to the appropriate level for the role in the relevant time period.

## **Elective Home Education**

Where a parent/carers has expressed their intention to remove a child from our setting with a view to educating at home, we will coordinate meeting with them, the relevant Local Authority officers and other key professionals where possible, and ideally before a final decision has been made, to ensure the parents/carers can fully consider what is in the best interests of their child. This is particularly important where a child has special educational needs and/or disabilities (SEND), is vulnerable, and/or has a social worker.

We do this because, whilst many home educated children have a positive learning experience, this is not the case for all, and home education can mean some children are less visible to the services that are there to keep them safe and supported in line with their needs. We will never put families under pressure to remove a child to home education because of issues such as behaviour, attendance or academic/SEND concerns.

We understand and support the roles and responsibilities in relation to elective home education as set out in the [DfE guidance for local authorities and parents](#).

## **Looked After Children – The Role of Designated Teacher and the Designated Safeguarding Lead**

A teacher is appointed who has responsibility for promoting the educational achievement of children who are looked after. They have the appropriate training. The Designated Teacher will work with the Virtual School to ensure that the progress of the child is supported.

The Designated Safeguarding Lead will also have details of the child's social worker and the name of the Assistant Head of the Virtual School. The Designated Safeguarding Lead will work closely with the Designated Teacher, as we recognise that children may have been abused or neglected before becoming looked after. We will ensure their ongoing safety and wellbeing as well as supporting their education, through linking with their social worker, carers and parents where appropriate.

We also recognise those children who were previously Looked After potentially remain vulnerable and all staff will be informed of the importance of maintaining support for them through our school's pastoral system. As a school, we will continue to recognise the importance of working with agencies and take prompt actions where necessary to safeguard these children, who may remain vulnerable.

## Care Leavers

We recognise those children and young people who cease to be Looked After and become 'care leavers', should remain supported and our Designated Teacher and school staff will work with the Personal Advisor appointed for them, where one is appointed, to help develop a pathway plan with them and the young person.

## Alternative Academy Placements/Arrangements

Where pupils regularly attend another institution or alternative education provider for all or some of their provision, we will ensure that effective procedures for safeguarding are in place. A copy of this policy will be shared with the provider as there is an expectation that it will be following our Academy's processes in respect of any safeguarding issues related to children who are on roll at our Academy.

## 'Extended College' and off site arrangements

Where extended College activities are provided by and managed by the College, our own safeguarding policy and procedures apply. If other organisations provide services or activities on our site we will check that they have appropriate procedures in place, including safer recruitment checks and procedures. When our children attend offsite activities, we will check that effective child protection arrangements are in place.

## Appendix A – definitions of abuse, neglect and specific situations

### Physical abuse

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

### Emotional abuse

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

### Sexual abuse

Involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example, rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include non-contact activities, such as involving students in looking at, or in the production of, sexual images, watching sexual activities, encouraging students to behave in sexually inappropriate ways, or grooming a child in preparation for abuse. Sexual abuse can take place online, and technology can be used to facilitate offline abuse. Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children. The sexual abuse of children by other children is a specific safeguarding issue (also known as Child-on-child abuse) in education and all staff will follow these child protection procedures. **Neglect**

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

- provide adequate food, clothing and shelter (including exclusion from home or abandonment);
- protect a child from physical and emotional harm or danger;

- ensure adequate supervision (including the use of inadequate care-givers); or ensure access to appropriate medical care or treatment.

## Indicators of abuse

Physical signs define some type of abuse, for example, bruising, bleeding, or broken bones resulting from physical or sexual abuse, or injuries sustained while a child/young person has been inadequately supervised. The definition of physical signs is complicated, as children/young people may go to great lengths to hide injuries, often because they are ashamed or embarrassed, or their abuser has threatened further violence or trauma if they 'tell'. It is also quite difficult for anyone to categorise injuries into accidental or deliberate with any degree of certainty. For these reasons it is vital that staff are also aware of the behavioural indicators of abuse and report any concerns to the Safeguarding Team.

It is the responsibility of staff to report their concerns. It is not their responsibility to investigate or decide whether a child/young person has been abused.

A child/young person who has been abused or neglected may:

- a) Have bruises, bleeding, burns, fractures or other injuries
- b) Show signs of pain or discomfort
- c) Keep arms or legs covered, even in warm weather
- d) Be concerned about changing for PE, swimming or in the residential areas for bathing/ bed
- e) Look unkempt and uncared for –

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

- present as smelly
- f) Change their eating habits
- g) Have difficulty in making or sustaining friendships
- h) Appear fearful
- i) Be reckless with regard to their own or others safety
- j) Self-harm
- k) Frequently absent or arrive late
- l) Show signs of not wanting to go home
- m) Display a change in behaviour – from quiet to aggressive, or happy go lucky to withdrawn
- n) Challenge authority
- o) Become disinterested in lessons
- p) Be constantly tired or preoccupied
- q) Be wary of physical contact
- r) Be involved in, or particularly knowledgeable about drugs or alcohol
- s) Display sexual knowledge or behaviour beyond that normally expected for their age.

Individual indicators will rarely, in isolation, provide conclusive evidence of abuse. They should be viewed as part of a jigsaw, and each small piece of information will help the Safeguarding Team and other agencies to decide how to proceed.

## Specific issues

Staff must respond if they identify any of the following:

### a) **Domestic Violence and Abuse**

We recognise that Domestic Abuse has a significant impact on a child/young person's development and emotional wellbeing and should always lead to a child protection referral. Domestic abuse is very widespread and where staff have concerns for other staff members they should talk to their supervisor. The Domestic Abuse Act 2021 recognises children/young people as victims in their own right if they see, hear or experience the effects of abuse.

Domestic abuse is defined as any incident or pattern of incidents of physical emotional, economic or sexual abuse, controlling, coercive, or violent 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. Abuse can be direct or indirect (e.g. through a child).

**Domestic abuse can be psychological, physical, sexual, financial or emotional. Children can be victims of domestic abuse. They may see, hear or experience the effects of abuse at home and/or suffer domestic abuse in their own intimate relationships (teenage relationship abuse). All of which can have a detrimental and long-term impact on their health, well-being, development, and ability to learn.**

We work with the Nottinghamshire Police Service under Operation Encompass. The Police notify the setting about any domestic abuse incident where the child or young person has been present, to allow the setting to take appropriate steps to support their student during what could be an emotionally difficult day.

The setting will talk to parents, children/young people and other agencies about such issues where required.

### b) **Physical Intervention and restraint**

Staff must read the [behaviour policy](#) and code of conduct and understand how to work with children/young people in a person-centred way and learn to analyse the child/young person's behaviour and respond in a proactive and caring way to reduce the stress displayed.

Our procedure on physical intervention and restraint is set out separately and acknowledges that staff must only ever use physical restraint as a last resort when a student/student is endangering themselves or others, and that at all times it must be the minimum force necessary to prevent injury and applied for the shortest possible time.

All staff understand that physical intervention or restraint of a nature which causes injury or distress to a student/student and is unreasonable under the circumstances may be considered a disciplinary matter.

### c) **Bullying**

Bullying between children/young people is a very serious issue that can cause considerable anxiety and distress. At its most serious level, bullying can have a disastrous effect on a student/student's wellbeing and in very rare cases has been a feature in the suicide of some children/young people.

All incidences of bullying including cyber bullying and prejudice-based and discriminatory bullying should be reported and will be managed through our [Anti-Bullying Policy](#) and in some circumstances could lead to a child protection referral. Staff will work with individual children/young people who have been bullied and those who have bullied others to assist them to understand their actions. If the bullying is



particularly serious or if the procedures taken are ineffective the Safeguarding Team will consider implementing child protection procedures.

Staff allowing or condoning bullying may face disciplinary proceedings. This includes cyber, racist, homophobic & gender related bullying. (See also: e) Child-on-child/child on child abuse)

**d) Child on child sexual violence and sexual harassment and other harmful sexual behaviour.**

This is a form of [Child-on-child abuse](#). Children/young people may be sexually harmed by other children/young people inside or outside of education settings and online. The setting has a zero-tolerance approach to sexual violence & sexual harassment and all reports will be taken seriously.

Staff have been trained to recognise abusive behaviours, grading these using a recognised framework. Where there is concern a young person may have been sexually abused by another young person the local authority and parents will be contacted and we will plan together how best to respond.

We regularly review our actions and decisions with locally agreed multi-safeguarding arrangements put in place by the safeguarding partners to ensure that our learners feel confident to make reports and disclosures to the setting. We provide support to both alleged victims and perpetrators.

‘Upskirting’ typically involves taking a picture under a person’s clothing without them knowing, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress, or alarm. It is a criminal offence and may constitute sexual harassment. We recognise sexual violence (rape, penetration and sexual assault) and sexual harassment (unwanted conduct of a sexual nature) are

crimes and will always follow the DfE [guidance](#) when allegations are received.

**e) Child-on-child abuse**

This covers any kind of physical abuse (such as hitting, kicking, shaking, biting and hair pulling), sexual abuse (such as rape, assault by penetration and sexual assault, making someone strip or engage in sexual activity with another), emotional or financial abuse or coercive control exercised between children/young people. It may occur within or out of education settings and can sometimes be linked to [gang involvement](#). It includes bullying, prejudice-based bullying, discriminatory bullying, cyberbullying, [consensual and non-consensual sharing of nude and semi-nude images and/or videos](#), abuse in intimate personal relationships between children, [sexual violence, harassment](#) (sexual comments, remarks, jokes and online sexual harassment which can be standalone or part of a broader pattern of abuse).

A [whole setting preventative approach](#) is taken to enable students to confidently report abuse (SHARP reporting system), knowing their concerns will be treated seriously, and knowing they can safely express views and feedback. Even if there are no reported cases of [Child-on-child abuse](#), this setting is aware that such abuse may still be taking place but is not being reported. We will continue to work with our learners to make our procedures more accessible. It should be recognised that the behaviour in question is harmful to both the perpetrator (who is a child/young person) and the victim. Behaviour may be intimate or nonintimate.

Although both the perpetrator and victim of Child-on-child abuse are under 18, understanding the power dynamic between children and young people is very important in helping to identify and respond to Child on Child

abuse – there will be a power imbalance and this may be due to age or status – social or economic – and the perpetrator in one situation may be the powerless victim in another so it is essential to try to understand the perpetrator and what is driving their behaviour before taking sanctions. We will also deal supportively and effectively with reports/disclosures that turn out to be unsubstantiated, unfounded, false or malicious.

A thorough investigation of the concerns should take place to include any wider contexts which may be known. However, the victim should always be made to feel safe, and actions will need to be taken to separate victim and perpetrator and ensure that the abuse is not allowed to continue. Staff will remain vigilant and will not downplay the scale or scope of abuse. The issues of the interplay between power, choice and consent should be explored with children/young people. How a setting responds is seen to influence the confidence of others to report what is happening to them. Harmful sexual behaviour must be addressed to help prevent problematic, abusive and/or violent behaviour in the future. How a setting responds to a disclosure or incident will impact future victims of sexual violence or sexual harassment. Students may not directly inform staff about their abuse. It may be that staff overhear a conversation or changes in the student/student's behaviour indicate abuse or harm. Sexual assault can result in a range of health needs so the safeguarding team will signpost to sources of support.

#### **f) Racist and other Hate Incidents**

We value each member of the setting's community as an individual. We are therefore committed to equality of opportunity for all staff, students and visitors, and to meeting the requirements of the [Equality Act 2010](#). Equality does not mean treating everyone the same; it means treating people fairly, with respect, having

regard for their rights and wishes. Sometimes, this might mean giving people extra help so that they have the same chances. We follow our Equality policy and acknowledge repeated racist, disablist, homophobic, transphobic or other hate incidents or a single serious incident may lead to consideration as a disciplinary matter and under Child Protection procedures. All hate incidents, including for example jokes, name-calling or excluding someone on the basis of race, disability, religion, sexual orientation, gender fluidity etc. will be taken seriously and must be reported to the head teacher.

More information can be found via the Educate Against Hate website and can support in identifying behaviours that may be of a concern.

[https://educateagainsthate.com/radicalisationand-extremism/?utm\\_source=KCSIE&utm\\_medium=GOVUK&utm\\_campaign=CED](https://educateagainsthate.com/radicalisationand-extremism/?utm_source=KCSIE&utm_medium=GOVUK&utm_campaign=CED)

#### **g) Forced Marriages & 'Honour' Based Abuse**

Forced marriage is when a person faces physical pressure to marry (e.g. threats, physical violence or sexual violence) or emotional and psychological pressure (e.g. if you're made to feel like you're bringing shame on your family).

So-called 'honour-based' abuse (HBA) encompasses incidents or crimes which have been committed to protect or defend the honour of the family and/or the community, including female genital mutilation (FGM), forced marriage, and practices such as breast ironing. Abuse committed in the context of preserving "honour" often involves a wider network of family or community pressure and can include multiple perpetrators.

If staff become aware of either possibility it must be reported immediately to the Safeguarding Team or the Police.



## **h) Female Genital Mutilation**

Female Genital Mutilation is a form of violence against women and young girls and considered as child abuse in the UK wherever it has occurred. It is a grave violation of the human rights of girls and women to life and their right to mental and physical health. The UK Government has signed international human rights laws against FGM, including the Convention on the Rights of the Child, and enacted the FGM Act 2003 which includes [mandatory reporting](#) by teachers who become aware that this may be planned or has happened for any child (U18)

## **i) Child Criminal Exploitation (CCE)**

Child Criminal Exploitation occurs where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child or young person under the age of 18. The victim may have been criminally exploited even if the activity appears consensual. Child Criminal Exploitation does not always involve physical contact; it can also occur through the use of technology. It can include being threatened, forced or manipulated into:

- Child sexual exploitation
- Working in cannabis factories
- Shoplifting
- Pickpocketing
- Vehicle crime
- County lines
- Modern slavery
- Serious violence

It is important to note that the experience of girls who are criminally exploited can be very different to that of boys. Both boys and girls being criminally exploited may be at higher risk of sexual exploitation.

## **j) Criminality, anti-social or gang related behaviour**

Education settings often identify children/young people involved in these kinds of behaviours. We will be particularly aware of the risks of our more vulnerable children/young people being drawn into challenges and difficulties and respond with sensitivity rather than judgement.

We recognise the particular issues in our local community and respond with awareness and sensitivity to the pressures on children/young people, while holding firm boundaries around the setting to ensure it is a safe place for our students. We achieve this through the promotion of equality and choice throughout the curriculum and setting values. We also build relationships with students, understand who they admire and relate to, and create an environment where it is safe to talk about even the most difficult of things.

Where we become aware of the [signs of gang activity](#) we will talk with the student/student and their family, link with preventative services in our area and where necessary [involve the Police](#).

## **k) Serious violence & Knife Crime**

Knife crime does occur in our local community, and we take particular steps to reduce the impact on our students/students. Central to this is awareness through the curriculum and in the relationships students/students have with staff. The setting will report the carrying of knives, but more importantly will explore with students/students who are concerned safe ways to manage their fears and enable them to build safe relationships with adults so they can talk to us when worried about themselves, their family, their friends or others in the community.

## **l) Children/young people at court**

Where courts are involved in children/young people's lives the setting will take additional steps to support them and their family. This includes facilitating access to an age appropriate [guide for young witnesses](#), or supporting families going through separation with [help on child arrangements](#).

#### m) **Family in prison**

We recognise the additional risks for students with family members in prison. The setting will adapt to support the different arrangements required and take action to support the student/student in the setting following the guidance of the [National Information Centre on Children of Offenders](#).

#### n) **Homelessness & Poverty**

Children/young people's life chances are dependent upon a complex combination of household income, equality of opportunities and social inclusion/exclusion. While some children/young people who grow up in low-income households will go on to achieve their full potential, many others will not. Poverty places strains on family life and excludes children/young people from the everyday activities of their peers.

Coupled with poverty the setting has a heightened awareness of homelessness. The definition of homelessness means not having a home of your own. You are homeless if you have nowhere to stay and are living on the streets, but you can be homeless even if you have a roof over your head.

Poverty and homelessness may have an impact in terms of tiredness, appearance, mental and physical health, stress, anxiety, attainment, self-esteem and vulnerability to the other safeguarding issues identified.

The setting pays particular attention to these children/young people, providing support for engagement wherever possible and talking to parents about their worries. Where these issues are causing the student/student significant harm, the child protection process is followed.

#### o) **Child Sexual Exploitation**

Child sexual exploitation (CSE) is a form of sexual abuse that involves the manipulation and/or coercion of children/young people under the age of 18 into penetrative or nonpenetrative sexual activity in exchange for things such as money, gifts, accommodation, affection, or status. The victims can be male or female. The manipulation or 'grooming' process involves befriending children/young people, gaining their trust, and often feeding them drugs and alcohol, or making them look at sexual images or watch sexual activities, encouraging children/young people to behave in sexually inappropriate ways or grooming a child/young person over the internet, as a one-off occurrence or over a long period of time, before the abuse begins. It may also happen without the child/young person's immediate knowledge by for example, others sharing videos or images of them on social media. The abusive relationship between victim and perpetrator involves an imbalance of power which limits the victim's options. It is a form of abuse which is often misunderstood by victims and outsiders as consensual. While children/young people may believe they are in a loving relationship, no child/young person under the age of 18 can ever consent to being abused or exploited. CSE is a serious crime and can have a long-lasting adverse impact on a child/young person's physical and emotional health. It may also be linked to child trafficking. All staff must be aware of the indicators of sexual exploitation and all concerns reported immediately to the Safeguarding Team.

## **Substance misuse**

The setting takes a serious view of substance misuse while recognising that children/young people may get caught up in misusing substances through vulnerability or exploitation. All cases of substance misuse should be brought to the attention of the head teacher and Designated Safeguarding Lead who will consider both the student behaviour policy and any factors that may indicate a young person is in need of help or protection.

### **p) County Lines**

County lines are a network between an urban centre and county location where drugs are sold often over a mobile phone. Children and vulnerable people are used to transport drugs, cash or even weapons. It can involve intimidation, blackmail and serious violence.

We recognise the potential for these issues near our setting and are particularly aware of the risks to children/young people who are, or previously have, been subject to safeguarding concerns, where there are unstable home conditions, social isolation, significant money issues or homelessness, gang activity or where children/young people have been excluded from education.

We will be vigilant for the for the [signs of exploitation](#) and take prompt action to involve [the Police](#) and Children's Services where concerned.

### **q) Trafficking**

The two most common terms for the illegal movement of people – 'trafficking' and 'smuggling', are very different. In human smuggling, immigrants and asylum seekers pay people to help them enter a country illegally; after which there is no longer a relationship. Trafficked victims are coerced or deceived by the

person arranging their relocation. On arrival at their destination the trafficked child or person is denied their human rights and is forced into exploitation by the trafficker or person into whose control they are delivered.

- Children/young people are a special case: any child/young person transported between or within countries or cities/towns for exploitative reasons is considered to be a trafficking victim, whether or not they have been deceived. This is partly because it is not considered possible for children/young people to give informed consent under these circumstances.
- Even when a child/young person understands what has happened, they may still appear to submit willingly. Any concerns about trafficking and exploitation must be reported to the Safeguarding Team immediately.

## r) **Radicalisation and Extremism**

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 Government in the Prevent Strategy 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.

Extremism includes, for example, far right views, animal rights activism and religious fundamentalism.

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.

Children/young people 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 our staff are able to recognise those vulnerabilities.

Indicators of vulnerability include:

- **Identity Crisis** – the child/young person is distanced from their cultural / religious heritage and experiences discomfort about their place in society;
- **Personal Crisis** – the child/young person 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 young person'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 child/young person 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 or disability** – children/young people 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 children/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;

- Significant changes to appearance and/or behaviour;
- Experiencing a high level of social isolation resulting in issues of identity crisis and/or personal crisis.

## **Preventing Radicalisation**

In order to reduce the risks of children/young people being radicalised we have:

- Ensured the Designated Safeguarding lead, deputies and a substantial portion of the staff group completed Prevent training;
- maintained and applied a good understanding of the relevant guidance in relation to preventing children/young people from becoming involved in terrorism, and protecting them from radicalisation by those who support terrorism or forms of extremism which lead to terrorism;
- raised awareness about our role and responsibilities in relation to protecting children/young people from radicalisation and involvement in terrorism;
- raised awareness about the safeguarding processes relating to protecting children/young people from radicalisation and involvement in terrorism;
- identified the Designated Safeguarding Lead as the first point of contact for case discussions relating to children/young people who may be at risk of radicalisation or involved in terrorism;
- collated relevant information from referrals of vulnerable children/young people into the Channel process (where applicable);
- ensured the Designated Safeguarding Lead (or designate) could attend Channel meetings as necessary and carry out any actions as agreed;
- ensured that progress on actions would be reported to the Channel Co-ordinator; and
- shared any relevant additional information in a timely manner.

[Further advice and local services can be found here.](#)

## **t) Online and Internet Use**

For many adults, there is a separation in their minds between 'real life' and the 'online world'. The connected world embraces both online and offline and is the norm for most children/young people, having grown up with the use of mobiles phones, tablets and computers on a daily basis. While mobile devices are a source of fun, entertainment, communication and education we know that some adults and children/young people will use these technologies to harm children/young people. Our policy states they may not be used in school time. The harm might range from hurtful and abusive texts and e-mails, to enticing children/young people to engage in sexually harmful conversations, webcam photography or face-face meetings. In many cases, abuse will take place concurrently via online channels and in daily life. Children/young people can also abuse other children online via abusive, harassing, and or misogynistic messages, the nonconsensual sharing of indecent/sexual images, especially around chat groups and the sharing of abusive images and pornography to those who do not wish to receive such content. Our online safety policy explains how we try to keep children/young people safe in the home. The setting follows [UK Council for Internet Safety and Department for Education Guidance](#) around 'sharing nudes and semi-nudes' – staff will immediately report concerns to the Designated Safeguarding Lead.

Social networking sites are the more obvious sources of inappropriate and harmful behaviour and children/young people cannot access these

on our IT system. We will work with children/young people on how to maintain their own safety and how to summon help if they are concerned about what they see online. Some children/young people will undoubtedly be chatting on mobiles or social networking sites at home and parents are encouraged to consider measures to keep their children safe.

The staff Code of Conduct provides further advice and guidance regarding the use of social networking and electronic communication with children/young people in our care. In our setting, online safety is considered whilst planning the curriculum, any teacher training, when planning the role and responsibilities of the designated safeguarding lead and any parental engagement.

[Further information can be found in our setting's attendance](#)

[-safety policy.](#)

#### s) **Photography and images**

The vast majority of people who take or view photographs or videos of children/young people do so for entirely innocent, understandable and acceptable reasons. We know some people abuse children/young people through taking or using images, so we must ensure that the following safeguards are in place.

While parents are permitted to bring in a camera to events, no staff member should use their personal equipment to take photographs of children/young people. the setting provides equipment for this purpose.

Where a staff member has concerns someone is taking photographs in breach of this policy, they should contact the head teacher. To protect children/young people we need to:

- a) seek parental consent for photographs to be taken or published (for example, on our website or in the newspapers or other publications).

- b) ensure that the child/young person is appropriately dressed.
- c) encourage children/young people to tell us if they are worried about any photographs that are taken of them.

Consensual sharing of indecent and/or sexual images, especially between older children/young people of the same age, may require a different response. It might not be abusive but children/young people need to know it is illegal, whilst non-consensual is illegal and abusive. Staff should be aware that many indecent images in current circulation were taken by the child/young person themselves or their friend/ peer group. Sex, sexuality and relationships should be an ageappropriate topic in the home and include what to do if children/young people are worried about an image they see.

#### t) **Private Fostering**

Private fostering is when a child or young person under 16 years old (or 18 if they have a disability) is to be looked after for a period of 28 days or more by someone who is not a close relative, guardian or person with parental responsibility. Close relatives include parents, step-parents, aunts, uncles, brothers, sisters and grandparents.

By law, [the local authority](#) must be told about all private fostering situations. The child/young person's parents, private foster carer and anyone else (including the setting) involved in/aware of the arrangement are legally required to inform the local authority.

It is then the local authority's legal duty to make sure all private fostering arrangements are safe for the child or young person. Once informed of the arrangement the local authority will check the suitability of private foster carers, make regular visits to the child or young person and ensure advice, help and support is available when needed.



u) **Body Image and confidence** Children/young people come under increasing pressure to conform to so-called ideals by other children, adults, sometimes parents, the mass media, [through social media](#) and through their own view of themselves. [Research](#) shows more than half of children/young people worry about the way they look, and this can lead to withdrawal, isolation, emotional and at its extremes serious physical harm. We work assertively to tackle these values, support individuality and teach body confidence at the setting and encourage children/young people to work together to present a positive and healthy view of body shape.

v) **Young carers**

A young carer is someone aged 18 or under who helps look after a relative who has a condition, such as a disability, illness, mental health condition, or a drug or alcohol problem.

Most young carers look after one of their parents and/or care for siblings. They do extra jobs in and around the home, such as cooking, cleaning, helping with medication or helping someone to get dressed and move around. Some children/young people give a lot of physical help to a parent or sibling who is disabled or ill. Along with doing things to help, they may also be giving emotional support to family members.

Children and young people are not supposed to undertake inappropriate or excessive caring roles that may have an impact on their development. The [Care and Support Statutory Guidance 2016](#) (First contact & identifying needs, s6.68-6.73) lists some duties which would be considered inappropriate, but you should also consider the impact of the following caring responsibilities on children/young people:

- personal care such as bathing and toileting
- strenuous physical activity such as lifting
- administering medication

- maintaining the family budget
- emotional support to the adult

w) **Children/young people going missing**

All staff are aware that children/young people going missing, particularly repeatedly, can act as a vital warning sign of a range of safeguarding possibilities. Early intervention is necessary to identify the existence of any underlying safeguarding risk and to help prevent the risks of a child/young person going missing in future. Staff are aware of the setting's unauthorised absence and children missing from education procedures. This will be informed by [Nottinghamshire's CME guidance](#) and [flowchart procedures](#). Appendix

x) **Modern slavery**

Modern slavery is the illegal exploitation of people for personal or commercial gain. Victims are trapped in servitude, which they are deceived and coerced into, and feel they cannot leave. It can include:

- human trafficking
- sexual exploitation
- criminal exploitation
- forced labour
- domestic servitude

We work within the remit of the local [Modern Slavery procedures](#). Concerns will be referred to children's services or [the police](#) for them to then follow the [National Referral Mechanism](#).

y) **Children/young people who have previously had a social worker**

Children/young people who have previously been 'Looked After' by a local authority or had a

social worker may require additional support. This includes children/young people who have returned home from care, who have been adopted, or who are care leavers.

The setting will assess the need for additional support to all children/young people who have previously had a social worker.



## Appendix B - Child-on-child Abuse Policy

### Child on Child abuse/Sexual Harassment and Sexual Violence Policy

#### Introduction

Bramcote College recognises that children are vulnerable to and capable of abusing other children. We take such abuse as seriously as abuse perpetrated by an adult. This includes verbal as well as physical abuse. Child on Child abuse will not be tolerated or passed off as part of "banter" or "growing up".

We are committed to a whole school approach to ensure the prevention, early identification, and appropriate management of Child-on-child abuse within our school and beyond.

In cases where Child on Child abuse is identified we will follow our child protection procedures, taking a contextual approach to support all children and young people who have been affected by the situation.

We recognise that Child on Child abuse can manifest itself in many ways such as:

- Child Sexual Exploitation
- Sexting or youth produced digital imagery
- Up skirting
- Bullying
- Radicalisation
- Abuse in intimate relationships
- Children who display sexually harmful behaviour
- Gang association and serious violence (County Lines)
- Technology can be used for bullying and other abusive behaviour

We also recognise that these behaviours can occur online as well as face to face.

Some of these behaviours will need to be handled with reference to other policies in school such as the behaviour policy, anti-bullying policy, child protection policy and online safety policy.

This policy concentrates on Child-on-child abuse in the context of sexual harassment and sexual violence. It is compliant with the statutory guidance on Child-on-child abuse as set out in Keeping Children Safe in Education (September 2021) and should be read in conjunction with the Local Safeguarding Children Partnership (LSCP) Safeguarding Policy and Procedures, and any relevant Practice Guidance issued by it.

## Aims

### The policy will: -

- Set out our strategies for preventing, identifying, and managing Child on Child abuse
- Take a contextual approach to safeguarding all children and young people involved. Acknowledging that children who have allegedly abused other children or displayed harmful sexual behaviour are themselves vulnerable and may have been abused by another child, parents, or adults in the community
- Recognise that this behaviour can occur online as well as face to face and both are part of our safeguarding duty of care

## Understanding Child-on-child abuse

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

The impact of this behaviour on children can be very distressing and have an impact on academic achievement and emotional health and wellbeing.

Sexual harassment and sexual violence may also occur online and offline.

## The Context

All behaviour takes place on a spectrum. Understanding where a child's behaviour falls on a spectrum is essential to being able to respond appropriately to it.

In this policy we recognise the importance of distinguishing between problematic and abusive sexual behaviour (Harmful Sexual Behaviour or HSB).

We are adopting the NSPCC definition of HSB as: -

"Sexual behaviours expressed by children...that are developmentally inappropriate, may be harmful towards self or others, or be abusive towards another child...or adult."

We will also use Simon Hackett's continuum model to demonstrate the range of sexual behaviours.

(Appendix 1)

## Vulnerable groups

We recognise that all children can be at risk however we acknowledge that some groups are more vulnerable. This can include: experience of abuse within their family; living with domestic violence; young people in care; children who go missing; children with additional needs (SEN and/or disabilities); children who identify or are perceived as LGBTQ+ and/or have other protected characteristics under the Equalities Act 2010.

**Children who identify as LGBT are recognised as being potentially at greater risk of harm. It is acknowledged that children who are perceived as being LGBT by other children are at a similar or at the same level of risk as children who identify as LGBT. Risks can be compounded where children who are LGBT lack a trusted adult with whom they can be open. It is therefore vital that staff endeavour to reduce the additional barriers faced and provide a safe space for them to speak out or share their concerns with members of staff.**

Whilst research tells us girls are more frequently identified as being abused by other children and, girls are more likely to experience unwanted sexual touching in schools abuse is not confined to girls.

Boys are less likely to report intimate relationship abuse and may display other behaviour such as antisocial behaviour. Boys report high levels of victimisation in areas where they are affected by gangs. We recognise that both boys and girls experience Child on Child abuse, but they do so in gendered ways.

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

## Responding to alleged incidents responding to reports of sexual violence and sexual harassment

All reports of Child on Child abuse will be made on a case by case basis with the Designated Safeguarding Lead or their deputy taking a leading role using their professional judgement and supported by other agencies such as social care or the police as required.

### The immediate response to a report

- The school or college will take all reports seriously and will reassure the victim that they will be supported and kept safe.
- All staff will be trained to manage a report.
- Staff will not promise confidentiality as the concern will need to be shared further (for example, with the designated safeguarding lead or social care) staff will however only share the report with those people who are necessary to progress it.
- A written report will be made as soon after the interview as possible recording the facts as presented by the child. These may be used as part of a statutory assessment if the case is escalated later.
- Where the report includes an online element the school or college will follow advice on searching, screening and confiscation. The staff will not view or forward images

unless unavoidable and only if another member of staff (preferably the DSL) is present.

- The DSL will be informed as soon as possible.

## Risk Assessment

When there has been a report of sexual violence, the Designated Safeguarding Lead (or a deputy) will make an immediate risk and needs' assessment. Where there has been a report of sexual harassment, the need for a risk assessment should be considered on a case-by-case basis. The risk and needs' assessment should consider:

- The victim, especially their protection and support.
- The alleged perpetrator; and
- All the other children (and, if appropriate, adult students and staff) at the school or college, especially any actions that are appropriate to protect them.

Risk assessments will be recorded and be kept under review within our schools CPOMS system.

The designated safeguarding lead (or a deputy) will ensure they are engaging with MASH.

## Action following a report of sexual violence and/or sexual harassment

Following an incident, we will consider

- The wishes of the victim in terms of how they want to proceed. This is especially important in the context of sexual violence and sexual harassment.
- The nature of the alleged incident(s), including whether a crime may have been committed and consideration of harmful sexual behaviour.
- The ages of the children involved.
- The developmental stages of the children involved.
- Any power imbalance between the children. For example, is the alleged perpetrator significantly older, more mature or more confident? Does the victim have a disability or learning difficulty?
- If the alleged incident is a one-off or a sustained pattern of abuse.
- Are there ongoing risks to the victim, other children, adult students or school or college staff, and other related issues and wider context?

## Follow up Actions

### Children sharing a classroom:

Whilst the school or college establishes the facts of the case and starts the process of liaising with children's social care and the police:

- The perpetrator will be removed from any classes they share with the victim.
- We will consider how best to keep the victim and alleged perpetrator a reasonable distance apart on school or college premises and on transport to and from the school or college.

These actions are in the best interests of both children and should not be perceived to be a judgment on the guilt of the alleged perpetrator.

## Options to manage the report

### Manage internally

1. In some cases of sexual harassment, for example, one-off incidents, we may decide that the children concerned are not in need of early help assessment or statutory intervention and that it would be appropriate to handle the incident internally, perhaps through utilising the behaviour and bullying policies and by providing pastoral support.

This decision will be made based on the principle that sexual violence and sexual harassment is never acceptable and will not be tolerated. All decisions, and discussions around making these decisions will be recorded and stored.

2. In line with 1 above, we may decide that the children involved do not require statutory interventions but may benefit from early help assessment. Early help assessment means providing support as soon as a problem emerges, at any point in a child's life. Providing early help is more effective in promoting the welfare of children than reacting later. Early help assessments can be particularly useful to address non-violent harmful sexual behaviour and may prevent escalation of sexual violence.

3. Where a child has been harmed, is at risk of harm, or is in immediate danger, we will make a referral to the MASH following locally agreed protocols. (Pathway to Provision V9)

Where statutory assessments are appropriate, the Designated Safeguarding Lead or a deputy will be working alongside, and cooperating with, the relevant lead social worker.

Collaborative working will help ensure the best possible package of coordinated support is implemented for the victim and, where appropriate, the alleged perpetrator and any other children that require support.

## Reporting to the Police

Any report to the police will generally be made through the MASH as above. The

Designated Safeguarding Lead (and their deputies) will follow local processes for referrals.

Where a report of rape, assault by penetration or sexual assault is made, the starting point is this will be passed on to the police. Whilst the age of criminal responsibility is ten, if the alleged perpetrator is under ten, the starting principle of reporting to the police remains. The police will take a welfare, rather than a criminal justice, approach.

Where a report has been made to the police, the school or college will consult the police and agree what information can be disclosed to staff and others, the alleged perpetrator and their parents or carers. They will also discuss the best way to protect the victim and their anonymity.

Where there is a criminal investigation, we will work closely with the relevant agencies to support all children involved (especially potential witnesses). Where required, advice from the police will be sought to help us.

Whilst protecting children and/or taking any disciplinary measures against the alleged perpetrator, we will work closely with the police (and other agencies as required), to ensure any actions the school or college take do not jeopardise the police investigation.

## The end of the criminal process

If a child is convicted or receives a caution for a sexual offence, the school/academy will update its risk assessment, ensure relevant protections are in place for all children. We will consider any suitable action following our behaviour policy. If the perpetrator remains in school/academy we will be very clear as to our expectations regarding the perpetrator now they have been convicted or cautioned. This could include expectations regarding their behaviour and any restrictions we think are reasonable and proportionate about the perpetrator's timetable.

Any conviction (even with legal anonymity reporting restrictions) is potentially going to generate interest among other pupils or students in the school or college.

We will ensure all children involved are protected, especially from any bullying or harassment (including online).

Where cases are classified as "no further action" (NFA'd) by the police or Crown Prosecution Service, or where there is a not guilty verdict, we will continue to offer support to the victim and the alleged perpetrator for as long as is necessary. A not guilty verdict or a decision not to progress with their case will likely be traumatic for the victim. The fact that an allegation cannot be substantiated does not necessarily mean that it was unfounded. We will continue to support all parties in this instance.

## Support for Children Affected by Sexual-Assault

Support for victims of sexual assault is available from a variety of agencies (see Appendix 3).

We will support the victim of sexual assault to remain in school but if they are unable to do so we will enable them to continue their education elsewhere. This decision will be made only at the request of the child and their family.

If they are moved, we will ensure the new school is aware of the ongoing support they may need. The DSL will support this move.

Where there is a criminal investigation the alleged perpetrator will be removed from any shared classes with the victim and we will also consider how best to keep them a reasonable distance apart on the school premises or on school transport. This is in the best interest of the children concerned and should not be perceived to be a judgement of guilt before any legal proceedings. We will work closely with the police.

Where a criminal investigation into a rape or assault by penetration leads to a conviction or caution, we may take suitable action, if we have not already done so. In all but the most exceptional of circumstances, the rape or assault is likely to constitute a serious breach of discipline and lead to the view that allowing the perpetrator to remain in the same school or college would seriously harm the education or welfare of the victim (and potentially other pupils or students).

Where a criminal investigation into sexual assault leads to a conviction or caution, we may, if we have not already done so, consider any suitable sanctions using our behaviour policy, including consideration of permanent exclusion.

Where the perpetrator is going to remain at the school or college, the principle would be to continue keeping the victim and perpetrator in separate classes and continue to consider the most appropriate way to manage potential contact on school and college premises and transport. The nature of the conviction or caution and wishes of the victim will be especially important in determining how to proceed in such cases.

Reports of sexual assault and sexual harassment will, in some cases, not lead to a report to the police (for a variety of reasons). In some cases, rape, assault by penetration, sexual assault or sexual harassment are reported to the police and the case is not progressed or are reported to the police and ultimately result in a not guilty verdict. None of this means the offence did not happen or that the victim lied. The process will have affected both victim and alleged perpetrator. Appropriate support will be provided to both as required and consideration given to sharing classes and potential contact as required on a case-by-case basis.

All the above will be considered with the needs and wishes of the victim at the heart of the process (supported by parents and carers as required). Any arrangements should be kept under review.

## Physical Abuse

While a clear focus of Child on Child abuse is around sexual abuse and harassment, physical assaults and initiation violence and rituals from pupils to pupils can also be abusive.



These are equally not tolerated and if it is believed that a crime has been committed, will be reported to the police.

The principles from the anti-bullying policy will be applied in these cases, with recognition that any police investigation will need to take priority.

When dealing with other alleged behaviour which involves reports of, for example, emotional and/or physical abuse, staff can draw on aspects of Hackett's continuum (Appendix 1) to assess where the alleged behaviour falls on a spectrum and to decide how to respond. This could include, for example, whether it:

- is socially acceptable
- involves a single incident or has occurred over a period of time
- is socially acceptable within the friendship group
- is problematic and concerning
- involves any overt elements of victimisation or discrimination e.g. related to race, gender, sexual orientation, physical, emotional, or intellectual vulnerability
- involves an element of coercion or pre-planning
- involves a power imbalance between the child/children allegedly responsible for the behaviour
- involves a misuse of power

## Online Behaviour

Many forms of Child-on-child abuse have an element of online behaviour including behaviours such as cyberbullying and sexting.

## Prevention

Our school (Bramcote College) actively seeks to raise awareness of and prevent all forms of Child-on-child abuse by:

- Educating all Governors, Senior Leadership Team, staff, and volunteers, students, and parents about this issue. This will include training all Governors, Senior Leadership Team, staff and volunteers on the nature, prevalence, and effect of Child-on-child abuse, and how to prevent, identify and respond to it. This includes
  - (a) Contextual Safeguarding.
  - (b) The identification and classification of specific behaviours; and
  - (c) The importance of taking seriously all forms of Child-on-child abuse (no matter how low level they may appear) and ensuring that no form of Child-on-child abuse is ever dismissed as horseplay or teasing.

- Educating children about the nature and prevalence of Child-on-child abuse via PSHE / RHE/RSHE and the wider curriculum.
- Students are frequently told what to do if they witness or experience such abuse, the effect that it can have on those who experience it and the possible reasons for it, including vulnerability of those who inflict such abuse.
- They are regularly informed about the School's approach to such issues, including its zero-tolerance policy towards all forms of Child-on-child abuse.
- Engaging parents on this issue by:
  - (a) Talking about it with parents, both in groups and one to one.
  - (b) Asking parents what they perceive to be the risks facing their child and how they would like to see the School address those risks.
  - (c) Involving parents in the review of School policies and lesson plans; and
  - (d) Encouraging parents to hold the School to account on this issue.
- Ensuring that all Child-on-child abuse issues are fed back to the Designated Safeguarding Lead so that they can spot and address any concerning trends and identify students who maybe in need of additional support. [This is done by way of a weekly staff meeting at which all concerns about students (including Child-on-child abuse issues) are discussed].
- Challenging the attitudes that underlie such abuse (both inside and outside the classroom).
- Working with Governors, Academy Trusts, Senior Leadership Team, all staff and volunteers, [students] and parents to address equality issues, to promote positive values, and to encourage a culture of tolerance and respect amongst all members of the School community;
- Creating conditions in which our students can aspire to and realise safe and healthy relationships.
- Creating a culture in which our students feel able to share their concerns openly, in a nonjudgmental environment, and have them listened to; and
- Responding to cases of Child-on-child abuse promptly and appropriately.

## Multi-agency working

The school actively engages with its local partners in relation to Child-on-child abuse, and works closely with, Nottinghamshire Safeguarding Children Partnership (NSCP), Nottinghamshire Multi-Agency Safeguarding Hub (MASH), children's social care, and/or other relevant agencies, and other schools.

The relationships the school has built with these partners are essential to ensuring that the School is able to prevent, identify early and appropriately handle cases of Child-on-child abuse. They help the school

- (a) To develop a good awareness and understanding of the different referral pathways that operate in its local area, as well as the preventative and support services which exist.
- (b) To ensure that our students can access the range of services and support they need quickly.
- (c) To support and help inform our local community's response to Child-on-child abuse.
- (d) To increase our awareness and understanding of any concerning trends and emerging risks in our local area to enable us to take preventative action to minimise the risk of these being experienced by our students.

The School actively refers concerns/allegations of Child-on-child abuse where necessary to Nottinghamshire MASH children's social care, and/or other relevant agencies.

Children resident out of county but attending a Nottinghamshire school /academy will be reported to their home MASH or equivalent Social Care

In cases involving children who are subject to risk, harm, and abuse and who have LAC status, the children's social worker must be informed and a coordinated approach to address any incidents or concerns will be required.

## Appendix 1

Simon Hackett (2010) has proposed a continuum model to demonstrate the range of sexual behaviours presented by children and young people, from those that are normal, to those that are highly deviant:

<b>Normal</b>	<b>Inappropriate</b>	<b>Problematic</b>	<b>Abusive</b>	<b>Violent</b>
Developmentally expected	<ul style="list-style-type: none"> <li>• Single instances of inappropriate sexual behaviour</li> </ul>	<ul style="list-style-type: none"> <li>• Problematic and concerning behaviours</li> </ul>	<ul style="list-style-type: none"> <li>• Victimising intent or outcome</li> </ul>	<ul style="list-style-type: none"> <li>• Physically violent sexual abuse</li> </ul>
Socially acceptable	<ul style="list-style-type: none"> <li>• Socially acceptable behaviour within peer group</li> </ul>	<ul style="list-style-type: none"> <li>• Developmentally unusual and socially unexpected</li> </ul>	<ul style="list-style-type: none"> <li>• Includes misuse of power</li> </ul>	<ul style="list-style-type: none"> <li>• Highly intrusive</li> </ul>
Consensual, mutual, reciprocal	<ul style="list-style-type: none"> <li>• Context for behaviour may be inappropriate</li> </ul>	<ul style="list-style-type: none"> <li>• No overt elements of victimisation</li> </ul>	<ul style="list-style-type: none"> <li>• Coercion and force to ensure victim compliance</li> </ul>	<ul style="list-style-type: none"> <li>• Instrumental violence which is physiologically and/or sexually arousing to the perpetrator</li> </ul>
Shared decision making	<ul style="list-style-type: none"> <li>• Generally consensual and reciprocal</li> </ul>	<ul style="list-style-type: none"> <li>• Consent issues may be unclear</li> <li>• May lack reciprocity or equal power</li> <li>• May include levels of compulsivity</li> </ul>	<ul style="list-style-type: none"> <li>• Intrusive</li> <li>• Informed consent lacking, or not able to be freely given by victim</li> <li>• May include elements of expressive violence</li> </ul>	<ul style="list-style-type: none"> <li>• Sadism</li> </ul>

<https://www.nspcc.org.uk/globalassets/documents/publications/harmful-sexual-behaviourframework.pdf>

## Appendix 2

### Support for Young People: Local and National

- Nottinghamshire Children and Young People's Independent Sexual Violence Advisors (ChiIVAs) provided by IMARA provide emotional and practical support for victims of sexual violence. They are based within the specialist sexual violence sector and will help the victim understand what their options are and how the criminal justice process works if they have reported or are considering reporting to the police. ChISVAs will work in partnership with schools and colleges to ensure the best possible outcomes for the victim.

[www.imara.org.uk/about-us/chisva-service](http://www.imara.org.uk/about-us/chisva-service)

- Child and adolescent mental health services (CAMHS)

[www.nottinghamshirehealthcare.nhs.uk/camhs](http://www.nottinghamshirehealthcare.nhs.uk/camhs)

<https://www.nottinghamshirehealthcare.nhs.uk/camhs>

- Rape Crisis Centre's can provide therapeutic support for children over 13 who have experienced sexual violence.

[www.nottsssvss.org.uk](http://www.nottsssvss.org.uk)

- Internet Watch Foundation (to potentially remove illegal images) [www.iwf.org.uk](http://www.iwf.org.uk)

## Appendix 3

### Useful Publications and Websites

#### Government Publications

Sexual harassment and sexual violence in schools

[www.gov.uk/government/publications/sexual-violence-and-sexual-harassment-betweenchildren-in-schools-and-colleges](http://www.gov.uk/government/publications/sexual-violence-and-sexual-harassment-betweenchildren-in-schools-and-colleges)

Keeping Children safe in Education - [www.gov.uk/government/publications/keepingchildren-safe-in-education](http://www.gov.uk/government/publications/keepingchildren-safe-in-education)

Preventing youth violence and gang involvement

[www.gov.uk/government/publications/advice-to-schools-and-colleges-on-gangs-andyouth-violence](http://www.gov.uk/government/publications/advice-to-schools-and-colleges-on-gangs-andyouth-violence)

Preventing and tackling bullying in schools

[www.gov.uk/government/publications/preventing-and-tackling-bullying](http://www.gov.uk/government/publications/preventing-and-tackling-bullying) Ofsted –

Review of sexual abuse in schools and colleges June 2021

[www.gov.uk/government/publications/review-of-sexual-abuse-in-schools-and-colleges](http://www.gov.uk/government/publications/review-of-sexual-abuse-in-schools-and-colleges)

#### Other useful documents

Sexting

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

[www.gov.uk/government/publications/sharing-nudes-and-semi-nudes-advice-foreducation-settings-working-with-children-and-young-people/sharing-nudes-and-seminudes-advice-for-education-settings-working-with-children-and-young-people](http://www.gov.uk/government/publications/sharing-nudes-and-semi-nudes-advice-foreducation-settings-working-with-children-and-young-people/sharing-nudes-and-seminudes-advice-for-education-settings-working-with-children-and-young-people)

Child-on-child abuse

Farrer & Co - Child-on-child abuse toolkit, guidance on child-on-child abuse policy and template Child-on-child abuse policy [www.farrer.co.uk/Global/Child-on-child%20abuse%20toolkit%2014.pdf](http://www.farrer.co.uk/Global/Child-on-child%20abuse%20toolkit%2014.pdf)

Anti-bullying Alliance

Sexual Bullying: Developing Effective Anti-bullying Practice

A guide for school staff and other professionals

[https://antibullyingalliance.org.uk/sites/default/files/uploads/attachments/Sexual%20bullying%20%20anti-bullying%20guidance%20for%20teachers%20and%20other%20professionals%20%20FINAL\\_0\\_0.pdf](https://antibullyingalliance.org.uk/sites/default/files/uploads/attachments/Sexual%20bullying%20%20anti-bullying%20guidance%20for%20teachers%20and%20other%20professionals%20%20FINAL_0_0.pdf)

Preventing abuse among children and young people-guidance from Stop it Now

What is Age appropriate? <http://www.stopitnow.org/ohc-content/what-is-age-appropriate> NSPCC-Harmful sexual behaviour

<https://www.nspcc.org.uk/preventing-abuse/child-abuse-and-neglect/harmful-sexualbehaviour/>

NCB Harmful sexual behaviour

<https://www.ncb.org.uk/resources-publications/resources/workforce-perspectives-harmfulsexual-behaviour>

NSPCC –Is this sexual abuse?

<https://www.nspcc.org.uk/globalassets/documents/research-reports/nspcc-helplines-reportpeer-sexual-abuse.pdf>

Online sexual harassment

Project deSHAME- Digital Exploitation and Sexual Harassment Amongst Minors in Europe  
Understanding, Preventing, Responding <https://www.childnet.com/our-projects/project-des shame>

Sexism

It's Just Everywhere- a study on sexism in schools –and how we tackle it

<https://ukfeminista.org.uk/wp-content/uploads/2017/12/Report-Its-just-everywhere.pdf> A

**video on supporting children** who are victims of sexual abuse.

A link to **South West Grid for Learning**, a charity that provides support regarding abuse and technology, and **The Marie Collins Foundation**, a harmful-sexual-behaviour support service.

A **county lines toolkit for professionals**.

Government guidance on **forced marriage**.

LGFL "**Undressed**" - a website that features a video and song that schools can use to teach young children about the risk of being tricked into getting undressed online.

## Appendix C – The Designated Safeguarding Lead

The Governing Body will ensure there is a suitably qualified and trained Designated Safeguarding Lead (DSL) who is a senior member of the leadership team, with at least one Deputy trained to the same level. The following responsibilities form part of the DSL's Job Description. The DSL will:

- Ensure safeguarding students is a central ethos in the setting
- ensure all staff are familiar with the Safeguarding Children policy and part 1 (or Annex A as appropriate) and Annex B of Keeping Children Safe in Education.
- Ensure all staff have developed skills and knowledge to identify and report abuse, including safeguarding concerns or allegations of abuse against staff.
- Be the first point of contact for any member of staff worried about a child/young person and provide advice and support to resolve that concern. The DSL will ensure they or a Deputy is available to staff during school hours and for any out of hours/out of term activities.
- Maintain oversight and hold ultimate lead responsibility (which cannot be delegated) for any concern about a child/young person, including those requiring early help assessments or child protection. This will include managing referrals by ensuring they or a deputy are allocated to any child/young person referred to children's services (including children/young people in care and those who have returned home from care). This person will keep the DSL up to date (if not the DSL), communicate all significant information and provide reports to other agencies and attend all relevant meetings for that child/young person.
- Ensure the child protection files are up to date and kept in a secure and confidential place with concerns and referrals in separate files for each child/young person in line with Keeping Children Safe in Education. When children/young people leave the school or college the DSL should ensure their child protection file is transferred to the new school or college as soon as possible, and within 5 days for an in-year transfer or within the first 5 days of the start of a new term. The DSL should plan for the transition of children/young people early and consider what information is to be shared ahead of the file transfer. Files should be sent securely, and confirmation of receipt obtained.
- Refer cases as necessary to other agencies, including the Channel programme where there is a concern about radicalisation, [the Police where a crime may have been committed](#) and the Disclosure & Barring Service. The DSL will also liaise with senior mental health leads.
- Take the lead responsibility for promoting educational outcomes i.e. the academic progress and attainment, of children or young people in need (including those who have or have had a social worker) and maintaining their high aspirations by knowing the welfare, safeguarding, and child protection issues that children/young people are



experiencing or have experienced. The DSL will ensure relevant staff have information to help these children/young people achieve, identify the challenges they may experience and enable access to adjustments to best support their progress.

- Where they are not the Head Teacher, liaise closely with the Head Teacher about any ongoing enquiries, police investigations or concern for children/young people.
- **Liaise with the headteacher or principal to inform him or her of issues - especially ongoing enquiries under section 47 of the Children Act 1989 and police investigations. This should include being aware of the requirement for children to have an Appropriate Adult. Further information can be found in the Statutory guidance - PACE Code C 2019.**
- Ensure the Safeguarding Children policy is reviewed at least annually, is available publicly and that parents are aware of the role of the setting in safeguarding children/young people including referral to other agencies
- Review the staff CPD programme to ensure information is updated, particularly that Child on Child abuse, sexual violence and sexual harassment and harmful sexual behaviour is understood by all staff, and to ensure there is an annual review of online safety
- Consider how barriers to reporting could be overcome for students with SEND or physical health issues
- Check safer recruitment processes are compliant
- Receive relevant safeguarding training (along with any deputy DSLs) at least every two years and Prevent awareness training. The DSL and their deputies must seek out additional learning opportunities (this might be via e-bulletins, meeting other Designated Safeguarding Leads, or simply taking time to read and digest safeguarding developments) to ensure their knowledge and skills are refreshed regularly (at least annually) and they are aware of any change in requirements, including through their local safeguarding children partnership. Training should provide designated safeguarding leads with a good understanding of their own role, and the processes, procedures, and responsibilities of other agencies, particularly children's social care.

## Appendix D – The Governance body and Safeguarding Governor (or equivalent)

Our Governance body has the strategic leadership responsibility for the setting's safeguarding arrangements and ensures we comply with our duties under legislation. They ensure the setting follows the [Keeping Children Safe in Education](#) and [Charity Commission](#) guidance (where applicable), ensuring policies, procedures, training and the teaching of safeguarding in our setting are effective and comply with the law at all times. We have a Safeguarding Link Governor on our Local Governing Body, Christine Anderson [Christine.anderson@whptrust.org](mailto:Christine.anderson@whptrust.org), to take leadership

responsibility for our setting's safeguarding arrangements who is trained in line with local safeguarding children partnership (LSCP) requirements.

We ensure there is a whole school/college approach to safeguarding, ensuring safeguarding and child protection are at the forefront and underpin all relevant aspects of process and policy development, all operating with the best interests of the child/young person at their heart. We check policies and procedures are in place so there is action in a timely manner to safeguard and promote children/young people's welfare including: an effective behaviour policy, a staff behaviour policy, appropriate safeguarding arrangements for children who go missing from education, a safer recruitment policy etc. We ensure our systems and processes are fair and comply with the [law](#) on personal information fairly and lawfully and to keep the information held safe and secure

We check the Head Teacher has appointed an appropriately senior member of staff to the role of designated safeguarding lead, as well as one or more deputy designated safeguarding leads. We ensure they contribute to multi-agency working in line with statutory guidance [Working Together to Safeguard Children](#) and follow the LSCP arrangements.

Our governors all complete relevant safeguarding training and ensure that all staff undergo safeguarding and child protection training (including online safety) on a regular basis, in line with any advice from the LSCP.

**This training equips them with the knowledge to provide strategic challenge to test and assure themselves that the safeguarding policies and procedures in place in our school are effective and support the delivery of a robust whole school approach to safeguarding.**

## **Contacting the Governors**

Our [governors](#) review this policy annually and update where required. This is so we can keep up to date with safeguarding issues as they emerge and evolve, including lessons learnt and is available on our website.

## Appendix

### E - Links to relevant legislation and guidance

[Working together to safeguard children](#): A guide to inter-agency working to safeguard and promote the welfare of children DfE 2018 (updated December 2020)

[Misuse of Drugs Act 1971](#)

[Keeping Children Safe in Education](#), DfE 2021

[Teaching online safety in school](#): Guidance supporting schools to teach their students how to stay safe online, within new and existing school subjects, DfE June 2019

[SEND Code of Practice](#): 0 to 25 years  
Statutory guidance for organisations which work with and support children and young people who have special educational needs or disabilities DfE, 2015 (updated April 2020)

[Children missing education](#): Statutory guidance for local authorities, DfE 2016

[Framework for the Assessment of Children in Need and their Families](#) 2000 (archived 2013)

[What to do if you're worried a child is being abused](#): Advice for practitioners, DfE, 2015

[The Equality Act 2010](#): guidance. Information and guidance on the Equality Act 2010, including age discrimination and public sector Equality Duty

[Safeguarding children who may have been trafficked: practice guidance](#), HMG, 2011

[Revised Prevent duty guidance: for England and Wales](#), HO 2021

[Protecting children from radicalisation: the prevent duty](#), DfE 2015

[Children Act 1989](#)

[Human Rights Act 1998](#)

[UN Convention on the Rights of the Child](#)

[Data Protection Act 2018](#)

[Data protection: toolkit for schools](#), DfE 2018

[Guide to the UK General Data Protection Regulation \(UK GDPR\)](#), ICO

[Sexual Offences Act 2003](#)

[Children Act 2004](#)

[Education Act 2002](#)

[Protection of Freedom Act 2012](#)

[Counter-Terrorism and Security Act 2015](#)

[Female Genital Mutilation Act 2003](#)

[Serious Crime Act 2015](#)

[Mandatory reporting of female genital mutilation: procedural information](#), HO 2016

[The Anti-social Behaviour, Crime and Policing Act 2014](#)

[Forced Marriage guidance](#), FCO & FCDO 2013 (updated 2021)

[Malicious Communications Act 1988](#)

[Communications Act 2003](#)

[Public Order Act 1986](#)

[Nottinghamshire Safeguarding Children Partnership Procedures](#)

[The Modern Slavery Act 2015](#)

[Information sharing: Advice for practitioners providing safeguarding services to children, young people, parents and carers](#), HMG 2018

[Mental health and behaviour in schools](#), DfE 2018

[The Domestic Abuse Act 2021](#)

## Appendix F - CPOMS Recording and Monitoring

A written record of any concerns about a child will be made within 24 hours. The College uses the [CPOMS Safeguarding and Child Protection Software\(www.cpoms.co.uk/\)](http://www.cpoms.co.uk/) for recording and monitoring child protection and other safeguarding issues. Records will comprise a mixture of directly recorded information, uploads of electronic documents and scans of other evidence where appropriate such as handwritten accounts or other paper information. This system was introduced into the College in September 2017. During the process of transferring existing records, some paper based filing will still exist which will comprise a mixture of paper 'concern's files or 'child protection confidential' Files.

All records will provide a factual and evidence based account with accurate recording of any actions. Records will identify the person making the record, be dated and, where appropriate, be witnessed. Where an opinion or professional judgement is recorded this should be clearly stated as such.

**At no time should an individual teacher/employee or College be asked to or consider taking photographic evidence of any injuries or marks to a child's person. This type of behaviour could lead to the employee being taken into managing allegations procedures. The body map approach should be used in accordance with recording guidance.**

**Any concerns should be reported and recorded without delay to the appropriate safeguarding services, e.g. MASH or the child's social worker if already an open case to social care.**

A chronology will be kept CPOMS Employees, particularly pastoral employees, will record any concerns on CPOMS and will take responsibility for alerting the DSL should the number of concerns rise or, in their professional judgement, become significant.

### **Why recording is important**

Our employees will be encouraged to understand why it is important that recording is comprehensive and accurate and know the messages from serious case reviews in terms of recording and sharing information. It is often when a chronology of information is pieced together that the level of concern escalates or the whole or wider picture becomes known. We acknowledge that without information being recorded it can be lost. This could be crucial information, the importance of which is not always necessarily apparent at the time. On occasions, this information could be crucial evidence to safeguard a child or be evidence in future criminal prosecutions.

### **Access to CPOMS**

The following roles have enhanced access to CPOMS

- HOYs
- DSL
- Deputy DSLs
- Head Teacher
- Members of the Pastoral and SLT team

- All staff have limited access to record safeguarding concerns and log student and parent interactions

### Management of CPOMS

- The DSL must log in to CPOMS everyday
- Notifications must be cleared within 24 hours

### Record Keeping

- The College will keep detailed, accurate, secure written records of child protection and welfare concerns and referrals through CPOMS and, where necessary, ensure that a stand-alone file is created as necessary for children with safeguarding concerns. These records are kept confidentially and securely and separate from the child's educational record
- Through CPOMS the school will maintain a chronology of significant incidents for each child with safeguarding concerns. CPOMS has replaced the CP hardcopy report forms as our means of reporting any safeguarding concerns. However these forms will still be used if for any reason the online system is not available. It is vital that everyone follows the same procedures when using this system. Staff with access may also log behaviour incidents, SEND or vulnerable pupils information or conversations with parents on CPOMS if you feel that they are relevant to the inclusion team – parent has lost job, benefits stopped, parents separated etc.
  - Log in to CPOMS (<https://bramcotecollege.cpoms.net>) ○ Add incident ○ Type in the name of the child you wish to report on (a list of options will appear, please click the right one as we cannot delete incidents)
  - Begin writing up the incident.
    - ✦ WHAT HAPPENED?
    - ✦ WHERE DID IT HAPPEN?
    - ✦ WHEN DID IT HAPPEN?
    - ✦ WHO WAS PRESENT WHEN IT HAPPENED?
    - ✦ HAS IT HAPPENED BEFORE?
    - ✦ WHAT HAPPENED AFTERWARDS?
    - ✦ WHAT HAPPENED BEFOREHAND?
    - ✦ HAVE YOU TOLD ANYONE ELSE?
    - ✦ IT IS OK TO STATE WHY YOU ARE CONCERNED BY THIS ○
  - Choose a category.
  - If you are reporting an incident that concerns other children in school please add them in the linked students bar. (This may be siblings, friends or other children involved in an incident in school)

- Scan and attach any Emails / incident notes / statements as required ○
- Notify other staff as required ○ Add incident

**The paper based concern file (where maintained, alongside records on CPOMS)**

The establishment of a 'concern' file, which is separate from the child's main College file, is an important principle in terms of storing and collating information about children which relates to either a child protection or safeguarding concern or an accumulation of concerns

about a child's welfare which are outside of the usual range of concerns which relate to ordinary life events. It needs to be borne in mind that what constitutes a 'concern' for one child may not be a 'concern' for another and the particular child's circumstances and needs will differ i.e. a child subject to a child protection plan, looked after child, CiN may be looked at differently to a child recently bereaved, parental health issues, etc. Professional judgement will therefore be an important factor when making this decision and will need clear links between pastoral employees and Designated Safeguarding Leads in the College.

The College will keep records of concerns about children even where there is no need to refer the matter to MASH/Children's Social Care (or similar) immediately. Records will be kept up to date and reviewed regularly by the DSL to evidence and support actions taken by employees in discharging their safeguarding arrangements.

Original notes will be retained (and kept in the 'Concern' file) where relevant as this is a contemporaneous account; they may be important in any criminal proceedings arising from current or historical allegations of abuse or neglect. Electronic copies should be stored in CPOMS.

The concern file can be active or non-active in terms of monitoring i.e. a child is no longer LAC, subject to a child protection plan or EHAF and this level of activity can be recorded on the front sheet, where written records still exists pending transfer to CPOMS, as a start and end date. If future concerns then arise it can be re-activated and indicated as such on the front sheet and on the chronology in CPOMS as new information arises.

Where children leave the College, the college must ensure their concern/child protection file is transferred to the new College as soon as possible (this should be as soon as possible and no later than 15 working days). This should be transferred separately from the main pupil file, ensuring secure transit and confirmation of receipt should be obtained. Where the receiving

College uses CPOMS, this will be done as a system-based transfer. Where the receiving College does not use CPOMS or the child's record is still paper based, this will be done securely. It would good practice, wherever possible, for the file to be hand-delivered to the receiving designated safeguarding lead with a discussion taking place to enable a smooth and safe transition for the child.

### **Recording Practice**

Timely and accurate recording will take place when there are any issues regarding a child. Each and every episode/incident/concern/activity regarding that child, including telephone calls to other professionals, needs to be recorded on the chronology kept within the confidential/CPOMS file for that child. This will include any contact from other agencies to discuss concerns relating to a child. Actions will be agreed and roles and responsibility of each agency will be clarified and outcomes recorded. Support and advice will be sought from Children's Social Care, or Early Help assessments whenever necessary. In this way a picture can emerge and this will assist in promoting an evidence based assessment and



determining any action(s) that needs to be taken. This may include no further action, undertaking an EHAF, or making a referral to the Local Authority safeguarding hubs/Children's Social Care

The DSL will have a systematic means of monitoring children known or thought to be at risk of harm (through the concern file and through an ongoing dialogue with pastoral employees). They will ensure that we contribute to assessments of need and support multiagency plans for those children.

The College uses standard templates and forms for recording information which is not directly entered onto CPOMS. These are specific to the College and reflect any mandatory or required Local Authority or Local Children's Safeguarding Board procedures, where these exist. The DSL will ensure that all employees are familiar with the reporting/recording formats for the College. These form part of the College's safeguarding practice and employees are required to ensure they follow these.