COGNITA
TEACHING EXCELLENCE

Safeguarding and Child Protection Policy

January 2017

Signed: Janehee

Key facts

The safety of our pupils is our number one priority

Safeguarding and promoting the welfare of children is everyone's responsibility

We operate within a culture of openness and recognise and accept that abuse can happen in any organisation

We are a 'sharing organisation' – all concerns should be reported

All concerns about a child (including signs of abuse and neglect) must be reported immediately to the Designated Safeguarding Lead (DSL) or in their absence to the Deputy Designated Safeguarding Lead (DDSL)

In the event that a child is in immediate danger or at risk of harm a referral should be made to Children's Social Care and/or the police immediately

Allegations or higher level concerns about another staff member or adult in school should be referred to the Headteacher/Principal

Allegations or higher level concerns about the Headteacher/Principal should be referred to the Cognita Assistant Director of Education

All low level concerns or "nagging doubts" should be shared with the DSL or Headteacher/Principal

This Policy must be read alongside:

'Keeping Children Safe in Education' – DFE Statutory Guidance

Introduction

This policy complies with:

- 'The Education (Independent School Standards) Regulations' (ISSR) - 2014
- 'Keeping Children Safe in Education' (KCSIE) - Sep 2016
- 'Working Together to Safeguarding Children' (WTSC) - 2015
- 'Prevent Duty Guidance for England and Wales' - 2015
- 'Statutory Framework for the Early Years Foundation Stage' - 014

It is also informed by DfE advice, 'What to do if you are worried a child is being abused – advice for practitioners' 2015

In child protection matters the school will follow the inter-agency and child protection procedures laid down by the relevant Local Safeguarding Children Board LSCB.

Application

This policy applies to all teaching, non-teaching, residential, pastoral, support, peripatetic, contract staff and ancillary staff, volunteers, non-school based Cognita staff and any other adults working at the School. All references in this document to "staff" or "members of staff" should be interpreted as relating to the aforementioned unless otherwise stated. It applies to adults in the early years phase of the School.

Throughout the document, the term DSL is used. For staff in the early years, they should report directly to the Early Years DSL.

This Safeguarding Policy and the Code of Conduct applies to all pupils and adults in the school, including when being educated off-site and undertaking an educational visit. It also applies to students who are on an exchange and being hosted by the School.

Publication

This Policy is updated annually and is published to all staff and volunteers and placed on the school website.

Rather than duplicating content from Keeping Children Safe in Education (September 2016) in this policy, it should be understood that the School will always refer to this document as the benchmark for all safeguarding practice and decision making.

Overview of this policy

- Contact details
- Part A: Aims and objectives of safeguarding in our school
- Part B: Actions where there are concerns about a child
- Part C: Identifying concerns – types and signs of abuse and neglect
- Part D: Specific safeguarding issues
- Part E: Actions where there are concerns or allegations about the conduct of an adult
- Part F: Responsibilities and training
- Part G: Proprietorial oversight
- Part H: Other safeguarding policies

Contact details

The following pages outline the contact details of named staff in school, Cognita and external agencies linked to child protection and safeguarding.

Where a child is in immediate danger or at risk of harm a referral should be made to children's social care and/or the police immediately.

School and Cognita Contacts	
Designated Safeguarding Lead (DSL)	Mrs Tracy Phillips
Deputy Designated Safeguarding Lead (Deputy DSL)	Mrs Karen Williams
Any other staff trained to DSL level	Mrs Jane Lee Mrs Laura Barbour
Designated Practitioner with responsibility for safeguarding in early years	Mrs Karen Williams
Deputy Designated Practitioner with responsibility for safeguarding in early years	Mrs Laura Barbour
Headteacher/Principal	Mrs Jane Lee
Cognita Assistant Director of Education (Chair of Governors) Contact details	Mr John Coleman
Independent Chair of the School Safeguarding Governance Committee	Mr Patrick Atkinson

Local Authority Contacts	
Our school follows the safeguarding protocols and procedures of our safeguarding children board (LSCB)	Plymouth City Council Plymouth Safeguarding Children Board www.plymouthscb.org.uk
The Designated Officer for child protection (sometimes referred to as the LADO)	Mr Simon White 01752 307144
Local authority children's social care referral team(s)	Advice & Assessment Service 01752 308600
Local authority Prevent Lead	Mr Peter Aley Peter.aley@plymouth.gov.uk 01752 304321
Local authority's out of hours contact numbers	Advice & Assessment Out of Hours 01752 346984

Police	
Local Police Emergency	999
Local Police non-emergency	101

Location of local authority safeguarding and child protection documents in school	
Local authority documents, e.g. thresholds, referral forms and related guidance can be found:	refer to www.plymouthscb.org.uk all up to date procedures and policies can be found here

Regional Contacts	
Cornwall	Tel: 0300 123 116 Email: multiagencyreferralunit@cornwall.gov.uk Prevent Tel: 01872323653 Out of Hours: 01208 251 300
Devon - Mash	Tel: 0345 155 107 Email: mashsecure@devon.gcsx.gov.uk www.devongoveuk/index/childrenfamilies/childprotection/mashreferral.htm

National Contacts	
NSPCC 24/7 Helpline	Tel: 0808 800 5000 Email: help@nspcc.org.uk
NSPCC Text line	88858
NSPCC ChildLine	Tel: 0800 1111
NSPCC FGM helpline	Tel: 0800 028 3550 Email: fgmhelp@nspcc.org.uk
NSPCC Whistleblowing helpline	Tel: 0800 028 0285 (8am – 8pm) Email: help@nspcc.org.uk
DfE Prevent helpline for schools & parents	Tel: 020 7340 7264 (non-emergency) Email: counter.extremism@education.gsi.gov.uk
The Lucy Faithfull Foundation (LFF)	Tel: 0800 1000 900 Email: help@stopitnow.org.uk www.parentsprotect.co.uk
National Bullying Helpline	Tel: 0845 22 55 787
UK Safer Internet Centre helpline for School Staff	Tel: 0844 381 4772 Email: helpline@saferinternet.org.uk
Internet Watch Foundation hotline for reporting criminal content	www.iwf.org.uk
Educate Against Hate	http://educateagainsthate.com

Part A: Aims and objectives of safeguarding in our school

Our commitment is to safeguard and promote the welfare, health (including mental health) and safety of our pupils by creating and maintaining an open, safe, caring and supportive atmosphere.

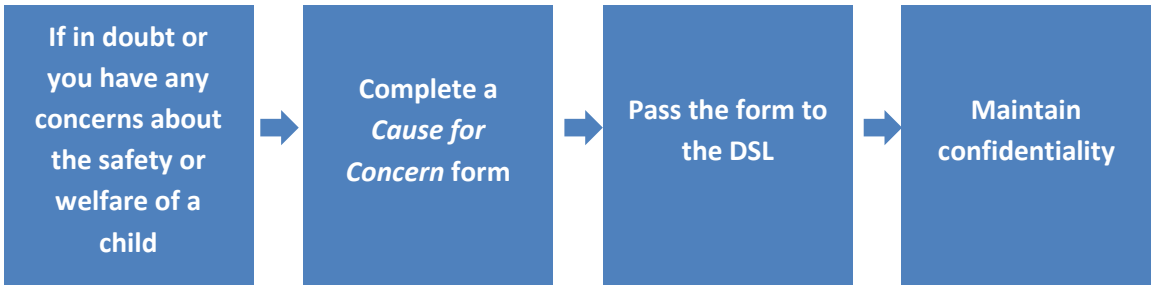
We have three primary aims:

- Prevent harm
- Protect pupils from harm
- Support pupils and staff when child protection and safeguarding incidents occurs

The school achieves these aims by:

- Ensuring the recruitment of individuals who are suitable and appropriate to work with children and who have positive safeguarding attitudes.
- Providing excellent pastoral care and fostering optimism and a positive school atmosphere where pupils feel secure and are encouraged to talk. Pupils are encouraged to find a person (whether a staff member or peer) whom they trust and to speak to that person about any issues which may be worrying them. Pupils are additionally reminded of specific individuals with whom they are able to talk.
- Valuing and promoting effective relationships with parents and professionals from other agencies.
- Teaching pupils, via PSHE and a varied curriculum, to identify, reduce and manage risks. This includes educating pupils, through regular internal and externally provided ICT safety talks, about the safe use of electronic equipment and access to the internet.
- Ensuring that children are safeguarded from potentially harmful and inappropriate online material through embedding a whole school approach towards online safety, including the acceptable use of mobile technology and the use of appropriate filters and monitoring systems.
- Ensuring that all staff are properly trained, supported and supervised to enable them to identify abuse and welfare concerns and deal with such concerns appropriately and sensitively.
- Encouraging staff to discuss child protection, safeguarding and welfare concerns confidentially with the Designated Safeguarding Lead (DSL) in order to ensure they have confidence in their own abilities to identify and appropriately handle welfare concerns and cases of abuse and neglect.
- Creating a culture of openness, trust and transparency in which any concerns about the conduct of staff, visitors and other adults in school can be shared and dealt with in an appropriate and sensitive manner.
- Following the procedures laid down in this Policy and by the LSCB(s) locally as appropriate.

Part B: Actions where there are concerns about a child



Safeguarding is everyone's responsibility

Safeguarding is everyone's responsibility and all staff, regardless of their role, should exercise vigilance and be watchful for, and aware of, signs that a child may be in need of help as well as the signs of abuse and neglect (see below for a list of some common signs). If a staff member has any concerns about a child s/he should complete a 'Cause for Concern' form and hand it to the Designated Safeguarding Lead ("DSL") or in their absence to the Deputy Designated Safeguarding Lead ("DDSL"). The DSL (or DDSL if appropriate) will discuss the matter with the member of staff and will decide on an appropriate course of action. This discussion and actions taken will be recorded on a Cause for Concern Form.

Early help and inter-agency work

All staff should be aware of the early help process, and understand their role in it. This includes:

- identifying emerging problems and potential unmet needs;
- liaising with the DSL;
- sharing information with other professionals to support early identification and assessment; and
- in some cases, acting as the lead professional in undertaking an assessment of the need for early help.

All staff should be alert to identifying children who may benefit from early help. Early help means providing support as soon as a problem emerges at any point in a child's life. If a member of staff has a concern that a child may be in need of early help then s/he should, in the first instance, discuss early help requirements with the DSL.

Where a child and family would benefit from coordinated support from more than one agency (e.g. education, health, police) there should be an inter-agency early help assessment - such as the Common Assessment Framework. This should identify what help the child and family require to prevent needs escalating to a point where intervention would be needed via a statutory assessment under the Children Act 1989. If early help is appropriate, where they are not taking the lead, then the DSL should support the member of staff in liaising with other agencies, and setting up an inter-agency early help assessment as appropriate.

The early help assessment should be undertaken by a lead professional who should provide support to the child and family, act as an advocate on their behalf and coordinate the delivery of support services. The lead professional role could be undertaken by the DSL or a teacher (or a GP, family support worker, health visitor and/or special educational needs coordinator). Decisions as to who performs this role should be taken on a case by case basis and should be informed by the child and their family.

For an early help assessment to be effective:

- it should be undertaken with the agreement of the child and their parents or carers, and should involve the child and their family as well as all of the professionals who are working with them;
- a teacher (or other relevant professional) should be able to discuss concerns they may have about a child and family with a social worker in the local authority. Children's social care in each local authority should set out the process for how this will happen; and

- if parents and/or the child do not consent to an early help assessment, then the lead professional should make a judgement as to whether, without help, the needs of the child will escalate. If so, a referral to children's social care may be necessary.

Effective early help in a school setting involves the School (under the guidance of the DSL) providing high quality support, in cooperation with or coordinating other agencies as appropriate, to help address the assessed needs of the child and their family early, in order to significantly improve the outcomes for the child. It is hoped that in each case this should improve the welfare of the relevant child. However, each case should be kept under constant review, and consideration should be given to a referral to children's social care if the child's situation does not appear to be improving.

Child in need, suffered or at risk of significant harm or in immediate danger

If at any time it is considered that the child may be a child in need, has suffered or is at risk of significant harm, or is in immediate danger, a referral should be made immediately to children's social care – in the local authority where the child lives and in accordance with the threshold document published by the relevant LSCB. In cases of significant harm or immediate danger the police should be notified immediately.

A child's wishes

A child's wishes and feelings should be taken into account when determining what action to take and what services to provide. Systems are in place for children to express their views and give feedback to School staff. These operate with the best interests of the child at their heart. Where possible, referrals will be made by the DSL, although any member of staff can make a referral to children's social care. If a member of staff makes a referral themselves, they should inform the DSL as soon as possible. The exception to this is that where a teacher, in the course of their work in the profession, has a concern about Female Genital Mutilation having been carried out on a girl under the age of 18, they have a legal duty to notify the police immediately and directly. Any other member of staff must report concerns immediately to the DSL.

Please refer to Working Together to Safeguard Children (March 2015) and the flowchart in KCSIE (KCSIE 2016) for further details on the process for staff when they have concerns about a child.

Reporting and handling a concern

When reporting and/or handling a concern about a child all staff should act with the utmost discretion and any pupils who are involved will receive appropriate care and support. Staff should always listen to a pupil who wants to talk about a concern. If a child tells a member of staff that they know about or have been a victim of child abuse or neglect the member of staff should:

- Allow the child to speak freely and remain calm. Do not interrupt the child or be afraid of silences.
- Provide reassuring nods and words such as, "I am so sorry this has happened", "You are doing the right thing in talking to me". Avoid saying things like, "I wish you had told me about this earlier" or "I cannot believe what I am hearing".
- Limit questioning to the minimum necessary for clarification and avoid leading questions such as, "Has this happened to your siblings?"
- At an appropriate time tell the child that the matter will be referred in confidence to the appropriate people. Promises of confidentiality should not be given (see Confidentiality section below).
- Tell the child what will happen next. The child may want to accompany you to see the DSL, otherwise let the child know that someone will come to see them before the end of the day.
- Write up their conversation as soon as possible on the concern form and hand it to the DSL.
- Seek support if they feel distressed.

Peer on peer abuse

If a member of staff thinks for whatever reason that a pupil may pose a risk of harm to himself or to others (this includes but is not limited to cases of serious bullying) the member of staff should report their concern to the DSL as soon as possible (see the School's Anti-Bullying Policy which is accessible on the School's website for further details).

All staff should be aware (a) that safeguarding issues can manifest themselves via peer on peer abuse; and (b) that children are capable of abusing their peers. Such abuse should never be tolerated or normalised through the common myth that it is part of growing up. This is most likely to include but is not limited to bullying (including cyber bullying), gender based violence, grooming, inappropriate or harmful sexualised play (younger children), sexual assaults, sexting and gender issues within groups of girls and boys. Should an allegation of abuse be made against another pupil all children involved (whether perpetrator or victim) will be treated as being "at risk". Where there is reasonable cause to suspect that a child is suffering, or likely to suffer, significant harm, the allegation will be referred to children's social care. The concern may indicate that one or more of the pupils concerned may be in need of additional support by local agencies and in those cases the DSL should follow local inter-agency procedures. Where appropriate, the matter will be dealt with under the School's Behaviour Policy with the use of relevant disciplinary sanctions.

Confidentiality

Staff should never guarantee confidentiality to pupils or adults wishing to tell them about something serious as this may ultimately not be in the best interests of the child. They should guarantee that they will not tell anyone who does not have a clear need to know and that they will pass on information in confidence only to the people who must be told in order to ensure that the appropriate action is taken. All staff involved will also take whatever steps they can to protect the informant from any retaliation or unnecessary stress that may occur after a disclosure has been made.

Part C: Identifying Concerns - Types and signs of abuse and neglect

Abuse, neglect and safeguarding issues are rarely standalone events that can be covered by one definition or label. In most cases multiple issues will overlap with one another.

Abuse

Abuse is a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others (e.g. via the internet). They may be abused by an adult or adults or another child or children.

One of the best ways to help children is by being aware of the signs of possible abuse. All staff should be aware of the signs of abuse and neglect so that they are able to identify children who may be in need of help or protection. These signs can take many forms including physical injuries and behavioural indicators. Although in most cases these signs will manifest themselves in children who are themselves the victims of abuse, it is important to remember that adults can also display significant indicators which suggest the existence of their own abuse as children. Staff should also be alert to any comments or jokes made by other children in the School.

All staff should familiarise themselves with the list below which, although not exhaustive, includes common signs of abuse which, if present, may indicate a problem requiring follow up. It is important to recognise that some young people who are being sexually exploited or abused do not exhibit any external signs of this abuse. Sometimes children don't even realise that what's happening is abuse. It is also sometimes difficult to tell the difference between injuries suffered as part of normal childhood activities and those caused by abuse. If a staff member is unsure he/she should discuss the case with the DSL. The NSPCC website includes advice on how to spot signs and patterns of abuse and neglect.

Physical abuse

Physical abuse is 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.

There isn't one sign to look out for that will prove that a child is being physically abused. But if a child often has injuries, there seems to be a pattern, or the explanation doesn't match the injury then this should be investigated. Signs of physical abuse can include:

- injuries to parts of the body where accidents are unlikely, such as thighs, back, abdomen;
- respiratory problems from drowning, suffocation or poisoning;
- untreated or inadequately treated injuries;
- bruising which looks like hand or finger marks;
- cigarette burns, human bites; or
- scarring, scalds and burns.

Sexual abuse

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 children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (including via the internet). Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children. Signs of sexual abuse displayed by children may include:

- pregnancy
- sexually transmitted infection
- pain/itching/bleeding/bruising/discharge to the genital area/anus;
- urinary infections/sexually transmitted diseases;
- difficulty walking or sitting; or
- persistent sore throats.

Neglect

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

Once a child is born, neglect may involve a parent or carer failing to:

- 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.

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

- the child seems underweight or is very small for their age;
- they are poorly clothed, with inadequate protection from the weather;
- they are often absent from school for no apparent reason; or
- they are regularly left alone, or in charge of younger brothers or sisters.

Emotional abuse

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

Behavioural signs of abuse and neglect

If a child is being abused, their behaviour may change in a number of ways. For example they may:

- behave aggressively or be disruptive, act out, demand attention and require more discipline than other children;
- become angry or disinterested and/or show little creativity;
- seem frightened of certain adults;
- become sad, withdrawn or depressed;
- have trouble sleeping;
- become sexually active at a young age;
- exhibit inappropriate sexual knowledge for their age or sexualised behaviour in their play with other children;
- refuse to change for gym or participate in physical activities;
- develop eating disorders;
- self-harm;

- refuse to attend school or run away from home;
- lack confidence or have low self-esteem; or
- use drugs or alcohol.

Children with Special Educational Needs and/or Disabilities

Children with special educational needs (SEN) and disabilities can face additional safeguarding challenges and additional barriers can exist when recognising abuse and neglect in this group of children. These include:

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

Signs of abuse or neglect manifested by the parents or other responsible adult

- unrealistic expectations of the child i.e. demands a level of academic or physical performance of which they are not capable;
- offers conflicting or unconvincing explanation of any injuries to the child;
- appears indifferent to or overtly rejects the child;
- denies existence of or blames the child for the child's problems at home or at school;
- sees and describes the child as entirely worthless, burdensome or in another negative light;
- refuses offers of help for the child's problems; or
- is isolated physically/emotionally.

Grooming

Grooming is the process by which an individual prepares a child, significant adults and the environment for abuse of this child. Children and young people can be groomed online or in the real world, by a stranger or by someone they know. Groomers may be male or female. They could be any age. Many children and young people do not understand that they have been groomed, or that what has happened is abuse. The signs of grooming are not always obvious. Groomers will also go to great lengths not to be identified. Children may:

- be very secretive, including about what they are doing online;
- have older boyfriends or girlfriends;
- go to unusual places to meet friends;
- have new things such as clothes or mobile phones that they can't or won't explain;
- have access to drugs and alcohol;
- go missing from home or school;
- display behavioural changes;
- have sexual health issues; or
- present as suicidal, self/harming, feeling depressed, unworthy.

In older children, signs of grooming can easily be mistaken for 'normal' teenage behaviour, but you may notice unexplained changes in behaviour or personality, or inappropriate sexual behaviour for their age. See the NSPCC website for further information about grooming link.

Signs of grooming and/or online abuse

A child may be experiencing abuse online if they:

- spend lots, much more, or much less time online, texting, gaming or using social media;
- are withdrawn, upset or outraged after using the internet or texting;
- are secretive about who they're talking to and what they're doing online or on their mobile phone; and/or

- have lots of new phone numbers, texts or e-mail addresses on their mobile phone, laptop or tablet.

Signs of grooming manifested by sex offenders

It is important to remember that not all sex offenders will exhibit these signs and if an individual exhibits some or all of these signs it does not mean that they are a sex offender.

- Overly affectionate behaviour with a child
- Affording special attention or preferential treatment to a child
- Excessive time spent alone with a child outside of the classroom/school
- Frequently spending time with a child in private or isolated areas
- Transporting a child to or from the school
- Making friends with a child's parents and visiting their home
- Acting as a particular child's confidante
- Giving small gifts, money, toys, cards, letters to a child
- Using texts, telephone calls, e-mails or social networking sites to inappropriately communicate with a child
- Flirtatious behaviour or making suggestive remarks or comments of a sexual nature around a child

Modus operandi of institutional grooming

- Target vulnerable victim - Perpetrators target victims who are vulnerable, isolated, insecure and/or have greater emotional needs.
- Gain victim's trust – Offenders may allow a child to do something (e.g. eat ice cream, stay up late, view pornography) which is not normally permitted by the child's parents or the school in order to foster secrecy.
- Gain the trust of others – Institutional offenders are often popular with children and parents, successfully grooming not only the victim but also other members of the victim's family and the community at large.
- Filling a need / becoming more important to the child - This can involve giving gifts, rewards, additional help or advice, favouritism, special attention and/or opportunities for special trips or outings.
- Isolating the child - The perpetrator may encourage dependency and subtly undermine the victim's other relationships with friends or family members.
- Sexualising the relationship - This can involve playful touches, tickling and hugs. It may involve adult jokes and innuendo or talking as if adults, for example about marital problems or conflicts
- Maintaining control and secrecy - Offenders may use their professional position to make a child believe that they have no choice but to submit to the offender.

Signs of grooming for radicalisation

There are no known definitive indicators that a young person is vulnerable to radicalisation, but there are a number of signs that together increase their risk of being groomed in this way. Signs of vulnerability include:

- Underachievement
- Being in possession of extremist literature
- Poverty
- Social exclusion
- Traumatic events
- Global or national events
- Religious conversion
- Change in behaviour
- Extremist influences
- Conflict with family over lifestyle
- Confused identity
- Victim or witness to race or hate crimes

- Rejection by peers, family, social groups or faith

Part D: Specific Safeguarding Issues

All staff should have an awareness of safeguarding issues some of which are listed below. Further details should be read at Annex A of Keeping Children Safe in Education (September 2016). Safeguarding can link to issues such as drug-taking, alcohol abuse, truanting and sexting. Sexting can become an aspect of online safety abuse, between adults/children.

Female Genital Mutilation (FGM)

Professionals in all agencies, and individuals and groups in relevant communities, need to be alert to the possibility of a girl being at risk of FGM, or already having suffered FGM. There is a range of potential indicators that a child or young person may be at risk of FGM, which individually may not indicate risk but if there are two or more indicators present it could signal a risk to the child or young person. Victims of FGM are likely to come from a community that is known to practise FGM. Staff should note that girls at risk of FGM may not yet be aware of the practice or that it may be conducted on them, so sensitivity should always be shown when approaching the subject. Warning signs that FGM may be about to take place, or may have already taken place, can be found on pages 16-17 of the Multi-Agency Practice Guidelines. Chapter 9 of those Guidelines (pp42-44) focuses on the role of schools. FGM can also link to Honour Based Violence (see KCSIE for further information).

Where a teacher discovers that an act of FGM appears to have been carried out on a girl who is aged under 18, he or she has a statutory duty to personally report it to the police. Those failing to report such cases to the police will face disciplinary sanctions. Unless the teacher has good reason not to they should still consider and discuss the case with the DSL and involve children's social care as appropriate. Any other adults with concerns about FGM should report their concerns to the DSL immediately.

Child Sexual Exploitation (CSE)

CSE is a form of abuse which involves children receiving something in exchange for sexual activity. CSE involves an imbalance of power in the relationship; it can involve varying degrees of coercion, intimidation or enticement, including unwanted pressure from peers to have sex, sexual bullying including cyberbullying and grooming. In addition to the behavioural indicators above, key indicators of CSE include appearing with unexplained gifts or new possessions; associating with other young people involved in exploitation; and having older boyfriends or girlfriends. Any concerns regarding CSE should be immediately reported to the DSL.

Action if a pupil is missing

The School needs to be aware of those pupils who are persistently absent or missing from school as this may be an indicator of welfare concerns, including abuse or neglect. All staff must also be aware of their role to prevent children from going missing from education. For details of the School's procedures and responses please see our separate policy entitled ‘Lost or Missing Children’ and ‘Attendance Policy’. The latter contains the school’s procedures for unauthorised absence, including on repeat occasions, as well as referral to the local authority.

Preventing radicalisation and extremism

It is the School’s duty under the Counter Terrorism & Security Act 2015 (The Prevent Duty) to have due regard to the need to prevent pupils from being drawn into terrorism. The referral procedures set out above also apply where there are concerns about children who may be at risk of being drawn into terrorism. The School also has in place a specific Preventing Extremism and Radicalisation Policy which sets out in detail the training requirements, prevention measures and procedures which staff must follow if they have concerns about a child being drawn into terrorism. All staff should familiarise themselves with and follow the procedures set out in this policy. The DSL is the designated Prevent duty person responsible for co-ordinating action within the school and liaising with other agencies, including the Prevent Lead.

Corporal punishment
Corporal punishment, or the threat of it, is never permitted in this School.

Online safety
Staff should be aware of the risks from potentially harmful and inappropriate online material. Annex C of KCSIE provides useful information and web links for teachers.

Teaching about safety and safeguarding
The School takes a proactive approach to teaching children about safety and safeguarding. In addition to PSHE, this is undertaken across the curriculum. As well as explicit teaching opportunities, staff use incidental opportunities to promote safe messages and teach about how to manage risk.

Part E: Actions where there are safeguarding concerns or allegations about the conduct of another adult.

The safety and wellbeing of children in our school is dependent on the vigilance of all our staff and their prompt communication to the DSL or Headteacher of any concerns, no matter how small, about any conduct by an adult which causes you to doubt that adult's suitability to work with or have access to children. Such concerns may arise in relation to any adult. All references in this section to "adult" should be interpreted as meaning any adult (defined above) and any visitor, unless otherwise stated. The School is conscious of its duty of care to pupils and will always act, including if alerted to the possibility of abuse arising from situations or persons outside the school setting.

The notification and prompt handling of all concerns about adults is fundamental to safeguarding children. It helps to identify and prevent abuse and to protect adults against misunderstandings or misinterpretations. It also encourages openness, trust and transparency and it clarifies expected behaviours. Those raising concerns or reporting allegations in good faith will always be supported, and adults in respect of whom concerns or allegations have been raised will not suffer any detriment unless the concern or allegation is found to be substantiated.

Low level concerns

Aims

The overarching aim of the School's low-level concern policy is to facilitate a culture in which the clear values and expected behaviours which are set out in our Code of Conduct are lived, constantly monitored, and reinforced by all staff. This is consistent with 'Working Together to Safeguard Children' which states *"Children are best protected when professionals are clear about what is required of them individually and how they need to work together".* In particular the intention of this policy is to:

- maintain a culture of openness, trust and transparency in which staff are confident and clear about expected behaviours of themselves and their colleagues, the delineation of boundaries and reporting lines.
- ensure staff feel empowered to raise any low-level concern, whether about their own or a colleague's behaviour, where that behaviour might be construed as falling short of the standards set out in our Code of Conduct.
- provide for responsive, sensitive and proportionate handling of such concerns when they are raised – maintaining on the one hand confidence that concerns when raised will be handled promptly and effectively whilst on the other hand protecting staff from false allegations or misunderstandings.

What is a low-level concern?

A low-level concern for this purpose is any concern, no matter how small and even if no more than a 'nagging doubt', that an adult may have acted in a manner inconsistent with the School's Code of Conduct or simply – even if not linked to a particular act or omission – a sense of unease as to the adult's behaviour particularly towards or around children.

From time to time an individual may find him/herself in a situation which might appear compromising to others or which could be misconstrued. Equally, an individual may for whatever reason have behaved in a manner which on reflection he/she considers falls below the standard set out in the Code of Conduct. Self-reporting in these circumstances is encouraged as it demonstrates both awareness of the expected behavioural standards and self-awareness as to the individual's own actions or how they could be perceived. As such the School sees self-reporting of low-level concerns as an important means of maintaining a culture where everyone aspires to the highest standards of conduct and behaviour.

What should I do if I have one?

Where a low-level concern exists it should be reported to the DSL or to the Headteacher as soon as reasonably possible and in any event within 24 hours of becoming aware of it (where the concern relates to a particular incident).

How will my low-level concern be handled?
The DSL will discuss all low level concerns s/he receives with the Headteacher as soon as possible and in any event within 24 hours of becoming aware of it. The Headteacher will in the first instance satisfy him/herself that it is a low-level concern and should not be reclassified as a higher level concern/allegation and dealt with under the appropriate procedure below. The circumstances in which a low-level concern might be reclassified are where (a) the threshold is met for a higher level concern/allegation (b) there is a pattern of low-level concerns which collectively amount to a higher level concern/allegation or (c) there is other information which when taken into account leads to a higher level concern/allegation. Where the Headteacher is in any doubt whatsoever, advice will be sought from the LA Designated Officer, if necessary on a no-names basis.

Having established that the concern is low-level the DSL or Headteacher as appropriate will discuss it with the individual who has raised it and will take any other steps to investigate it as necessary. Most low-level concerns by their very nature are likely to be minor and will be dealt with by means of management guidance, training etc.

What records will be kept?
Where a low-level concern has been communicated, a confidential record will be kept in a central file which logs all low-level concerns. This is necessary to enable any patterns to be identified. However no record will be made of the concern on the individual's personnel file (and no mention made in job references) unless either (a) the concern (or group of concerns) has been reclassified as a higher level concern as above or (b) the concern (or group of concerns) is sufficiently serious to result in formal action under the School's grievance, capability or disciplinary procedure.

Higher level concerns and allegations

When handling allegations, the School and Cognita will always adhere to the guidance in Keeping Children Safe in Education (September 2016).

What is a higher level concern or allegation?
A higher level concern or allegation is any behaviour where an adult is alleged to have:

(a) behaved in a way that has harmed a child, or may have harmed a child;
(b) possibly committed a criminal offence against or related to a child; or
(c) behaved towards a child or children in a way that indicates he or she could pose a risk of harm to children

A higher level concern or allegation may be triggered by one specific incident or by a pattern of behaviour or low-level concerns which when considered collectively amount to a higher level concern/allegation.

What should I do if I have one?
Higher level concerns or allegations should be reported to the Headteacher immediately. The adult to whom the concern or allegation (referred to hereafter as allegation) relates should not be informed.

If the allegation is about the Headteacher, it must be referred to the Cognita Assistant Director of Education (ADE) immediately, without informing the Headteacher. The ADE will liaise with the Designated Officer of the Local Authority ((LA) Designated Officer) as set out below and inform the Cognita Director of Education.

How will higher level concerns or allegations be handled?
The Headteacher (or ADE in the case of an allegation about the Head) will contact the (LA) Designated Officer for advice or make a referral as soon as possible and in any event within 24 hours of the School

becoming aware of the allegation. All such allegations will be referred without delay. Borderline cases will be discussed without identifying individuals in the first instance. The Headteacher will discuss all allegations with the DSL unless it relates to the DSL.

The (LA) Designated Officer will discuss with the Headteacher (or ADE in case of allegations about the Head), and any other relevant agencies such as the police, which further steps (if any) should be taken; this could involve informing parents. Where a referral to the police has been made directly the Headteacher (or ADE) will inform the (LA) Designated Officer of the referral as soon as possible and in any event within 24 hours of the School becoming aware of the allegation. There may be cases where the (LA) Designated Officer or police are made aware of an allegation before the School is and in those cases they will notify the School of the allegation immediately. All discussions with external agencies should be recorded in writing.

Confidentiality and Information sharing

When an allegation is made, the School and Cognita will make every effort to maintain confidentiality and guard against unwanted publicity while an allegation is being investigated or considered. The Education Act 2002 introduced reporting restrictions preventing the publication of any material that may lead to the identification of a teacher who has been accused by, or on behalf of, a pupil from the same school (where that identification would identify the teacher as the subject of the allegation). The reporting restrictions apply until the point that the accused person is charged with an offence, the accused person waives their right to anonymity or until the Secretary of State or the General Teaching Council for Wales publishes information about an investigation or decision in a disciplinary case arising from the allegation.

The legislation imposing restrictions makes clear that “publication” of material that may lead to the identification of the teacher who is the subject of the allegation is prohibited. “Publication” includes “any speech, writing, relevant programme or other communication in whatever form, which is addressed to the public at large or any section of the public”. This means that a parent who, for example, published details of the allegation on a social networking site would be in breach of the reporting restrictions (if what was published could lead to the identification of the teacher by members of the public).

The initial sharing of information and investigation may lead to a decision that no further action is to be taken in which case this decision should be recorded by the Headteacher and an agreement should be reached with the (LA) Designated Officer on what information should be put in writing to the individual concerned. The Headteacher should then consider with the (LA) Designated Officer what action should follow, both in respect of the individual and those who made the initial allegation. Where appropriate the matter will be dealt with under the School's Behaviour Policy or, in the case of staff, the relevant School Disciplinary Procedure.

The person against whom an allegation is made, and parents or carers of a child or children involved, should normally be informed as soon as possible after the result of the initial investigation is known. However where a strategy discussion is needed or police or children's social care need to be involved neither the person against whom the allegation has been made, nor the parents, should be informed until these agencies have been consulted.

During the course of the investigation the School in consultation with the (LA) Designated Officer will decide what information should be given to parents, staff and other pupils and how press enquiries are to be dealt with.

When the individual against whom the allegations have been made is spoken to, he/she will be warned that anything said will be recorded. The School will appoint a representative to keep the person informed of the likely course of action and the progress of the case. They should also advise the individual to contact their trade union representative, if they have one, or a colleague for support. They should also be given access to

welfare counselling or medical advice where this is provided by the employer. They will be kept informed of the timescales in accordance with Keeping Children Safe in Education (September 2016).

Circumstances where suspension will be considered

If there is cause to suspect that a child or children at the School are at risk of harm from the accused person or if the case is so serious that it might be grounds for dismissal then the person concerned may be suspended. Due weight should be given to the views of the (LA) Designated Officer and to the police when making a decision about suspension and all alternative options should be considered prior to taking that step. The reasons and justification for suspension will be recorded and the individual informed of them. In the case of staff the matter will normally be dealt with in accordance with the Staff Disciplinary Procedure. In cases where the School is made aware that the Secretary of State has made an interim prohibition order in respect of an individual at the School it will be necessary to immediately suspend that person from teaching pending the findings of the NCTL's investigation.

Referrals to other agencies

A prompt referral to the DBS will be made in circumstances where a member of staff has been removed from working in regulated activity where an allegation is substantiated, or would have been so removed had they not resigned or the School ceased to use the person's services[1]. Failure to make a report by an employer where the member of staff has harmed or is likely to harm a child constitutes a criminal offence. For teacher, separate consideration will be given to whether to refer the matter to the National College for Teaching and Leadership (NCTL) in order to consider prohibiting the individual from teaching.

Settlement agreements will never be used where the criteria for a referral to DBS or NCTL are met. The School and Cognita will make every endeavour to complete the investigation and due process, even where the member of staff concerned refuses to cooperate or resigns before that person's notice period expires. Similarly, where a member of staff's notice of employment expires, the School and Cognita will always endeavour to complete the investigation and reach a conclusion.

If there has been a substantiated allegation against a member of staff, the School will work with the (LA) Designated Officer to identify any changes which could be made to help prevent similar events in the future.

Records of higher level concerns or allegations

In registered settings: The proprietor will inform Ofsted of any allegations of serious harm or abuse by any person living, working, or looking after children at the premises (whether the allegations relate to harm or abuse committed on the premises or elsewhere). The proprietor will notify Ofsted of the action taken in respect of the allegations. These notifications must be made as soon as is reasonably practicable, but at the latest within 14 days of the allegations being made. The (LA) Designated Officer will also be informed within 24 hours of the concern coming to light and a referral made in writing.

A record will be made of all conversations, including any advice or recommendations by the (LA) Designated Office. These records and any associated documentation shall be maintained in a folder which relates exclusively to allegations against staff. A clear and comprehensive summary of all allegations shall be kept on the confidential personnel file of the accused, and a copy provided to the person concerned. The summary shall include details of how the allegation was followed up and resolved, and a note of any action taken and decisions reached. Allegations that are found to have been malicious will be removed from personnel records. However, for all other allegations, the School will in accordance with KCSIE retain a clear and comprehensive summary of the allegation, details of how the allegation was followed up and

[1] For further detail on the DBS referral criteria please see section 35 of the Safeguarding Vulnerable Groups Act 2006 and the DBS website: https://www.gov.uk/guidance/making-barring-referrals-to-the-dbs

resolved, and a note of any action taken and decision reached on the personnel record. A copy should be provided to the person concerned.
The personnel record should be retained until normal pension age or for a period of 10 years from the date of the allegation, if that is longer. Those allegations that are false, unsubstantiated or malicious will not be included within employer references provided by the School. Allegations that have been found to be unsubstantiated or malicious should be referred to children's social care in case the child concerned is in need of services or may have been abused by someone else.

Miscellaneous

Disciplinary, Grievance Procedures

Where a safeguarding concern or allegation triggers another procedure such as grievance or disciplinary, that procedure shall only be followed once the immediate safeguarding concern or allegation has been fully investigated.

Support for staff

Where the impact of a serious child protection case, or allegation against an adult working in or linked to the school, has a detrimental effect on staff well-being, Cognita will facilitate access to support and/or counselling if requested.

Parents and pupils

If a parent or pupil has a safeguarding concern, question, doubt or allegation about the conduct an adult, s/he should raise it with the Headteacher. If a parent or pupil raises their concern with another member of staff, it will be immediately passed onto the Headteacher in accordance with this policy.

Feedback

The School uses an online survey to seek annual feedback from staff, parents and pupils on their ability to raise concerns and allegations. This enables the School to ensure (a) that all staff, pupils and parents have the confidence to raise concerns or allegations and know who to speak to if they have a concern; and (b) that these concerns or allegations are dealt with promptly and appropriately by the School.

Part F: Responsibilities and Training

Designated Safeguarding Lead (DSL)

The Designated Safeguarding Lead takes lead responsibility for safeguarding and child protection in the school. The DSL is a member of the senior leadership team. The school also has named Deputy DSLs ensuring there is always an appropriately trained and designated person in the school at all times. The responsibilities of the DSL include: managing referrals, working with other professionals and agencies (including LSCB), keeping up to date with relevant training, keeping staff up to date with relevant safeguarding training, maintaining a secure awareness of child protection and safeguarding, maintaining accurate records, transferring records. The DSL has a specific job description which mirrors Annex B in Keeping Children Safe in Education (September 2016). The DSL and Deputy DSL[s] liaise with the Headteacher on safeguarding issues and would refer any cases of suspected abuse to the local authority children's social care and the police. These senior members of staff have the necessary status and authority to take responsibility for safeguarding matters including committing resources and, where appropriate, supporting and directing other staff.

All child protection and safeguarding concerns, discussions and decisions made and the reasons for such decisions are recorded accurately and kept securely in a locked cabinet, if in paper form. Records are carefully managed by the DSL.

Inter-agency working

We are fully committed to inter-agency working in line with statutory guidance. We work with all external agencies in the best interests of the child. We will always adhere to the procedures and practice of the local authority as part of the inter-agency safeguarding procedures set up by the LSCB(s). Information will be shared securely with other professionals and local agencies. This commitment includes for children who are in the care of local authority where we recognise additional vulnerability to under-achievement.

Support for and supervision of staff

All staff should feel comfortable and confident approaching the DSL, Deputy DSL or any other member of senior leadership about any safeguarding and/or pastoral care concerns, including in relation to unsafe practice (see Whistleblowing section below). If a staff member would like additional support and/or training in order to fulfil their safeguarding responsibilities, including in identifying and/or handling concerns they should speak to the DSL who will work with the member of staff to ensure that they are adequately supported. Safeguarding and pastoral care responsibilities are a key part of staff appraisals and staff should use this process to build and improve their knowledge, confidence and experience in this area.

Training

As part of their induction programme all newly appointed staff, including part-time, temporary and voluntary staff, receive training in safeguarding issues including:

- this Safeguarding and Child Protection Policy;
- Keeping Children Safe in Education (September 2016) Part 1 and Annex A for adults working directly with children;
- the School's Code of Conduct;
- the School's Safeguarding: Preventing Extremism and Radicalisation;
- 'What to do if you're worried a child is being abused – advice for practitioners' (2015);
- the School's Whistleblowing Policy; and
- the role of the DSL.

At induction (and annually thereafter, as minimum) staff are trained on:

- identifying signs of abuse;
- knowing what to do to raise concerns;

- knowing how to make a referral (including if the DSL is not available or the DSL is not acting); and
- recognising the need for early help.

Staff should re-read KCSIE each time it is updated by the DfE, and are told of updates by the DSL and Deputy DSL. Staff are expected to sign to note they have read and understood the content of KCSIE Part 1. Refresher training for staff is provided regularly in line with advice from the LSCB. All staff are provided with safeguarding and child protection updates annually, as minimum. The DSL leads on ensuring that regular safeguarding and child protection updates are circulated to all staff.

The DSL and Deputy DSL[s] receive advanced safeguarding and child protection training at least annually. This includes inter-agency working protocols, KCSIE and the child protection procedures for the LCSB(s) and training in preventing extremism.

Part G: Proprietorial oversight

Cognita is the proprietor responsible for the School. Our school has a named Assistant Director of Education (ADE) who is the Cognita representative and Chair of Governors with an overview of the safeguarding and child protection procedures.

Our school has a named Independent Chair that leads two Safeguarding Governance Committee (SGC) meetings each year. On each occasion, the Independent Chair receives reports from the DSL and Headteacher on the effectiveness of the school's child protection and safeguarding procedures, practice and culture. The Independent Chair samples the Single Central Register when they visit the school and carries out an evaluation of aspects of the School's safeguarding systems, procedures and policies. This includes sampling staff and student views face to face, as well as evaluating the school's effectiveness in relation to safeguarding.

The Cognita Safeguarding Auditor conducts an annual audit of the School's safeguarding procedures. This review involves (i) separate discussions with the Head teacher and DSL about (a) any safeguarding issues which may have emerged over the course of the year and (b) inter-agency co-operation and in particular the School's relationship with the LSCB and Designated Officer(s); and (ii) a review of written evidence including (a) written reports prepared by the DSL; (b) training records of all staff (including the DSL/Deputy DSL); and (c) records of any safeguarding conversations and referrals between the School and external agencies.

The School completes a self-assessment audit on request by the LSCB(s) and submits this to the relevant local authority in respect of section 11 of the Children Act (2004). This demonstrates to the LA that the School takes into account the need to safeguard and promote the welfare of children, and provides appropriate confirmation that there are safe systems and processes in place. Any additional priorities for development should be included into the school improvement plan.

Further detail on broader proprietorial oversight can be found in the Cognita Governance Handbook.

Part H: Other safeguarding policies

Code of Conduct

All staff must behave responsibly and professionally in all dealings with children and specifically with pupils for whom they have a duty of care. All staff must follow the procedures set out in our separate policy entitled 'Code of Conduct'. Staff should always avoid behaviour which might be misinterpreted by others, and report in accordance with Part E of this Safeguarding and Child Protection Policy.

As a result of their knowledge, position and/or the authority invested in their role, all adults working with children and young people are in positions of trust in relation to the young people in their care. A relationship between a member of staff and a pupil cannot be a relationship between equals. There is potential for exploitation and harm of vulnerable young people and all members of staff have a responsibility to ensure that an unequal balance of power is not used for personal advantage or gratification. Staff should note that it is an offence for a person aged 18 or over and in a position of trust to touch a child in a sexual way or have a sexual relationship with a child, even if the relationship is consensual. A position of trust could arise even if the member of staff does not teach the child.

Cognita does not permit the use of personal mobile phones and cameras by staff where children are present.

Whistleblowing

All adults have a responsibility to report any concerns about poor or unsafe practice, including in relation to the care and protection of a pupil or pupils. If a member of staff believes that best practice in this area is not being adhered to or that practice may put a pupil or pupils at risk they should in the first instance report their concern to the Headteacher/Principal, unless their concern relates to the Headteacher/Principal in which case they should report their concern to the Cognita Assistant Director of Education (ADE).

Concerns raised under this policy are distinct from concerns or allegations about an adult's suitability to work with or have access to children, which should be reported in accordance with Section E above.

No member of staff will suffer a detriment or be disciplined for raising a genuine concern about unsafe practice, provided that they do so in good faith and following the whistleblowing procedures. Where an adult feels unable to raise a concern about poor safeguarding practice with the Headteacher/Principal or ADE, or where they feel that their concern is not being addressed, they can raise their concern externally:

- Guidance can be found at - https://www.gov.uk/whistleblowing
- The NSPCC whistleblowing helpline is available for adults who do not feel able to raise concerns regarding child protection failures internally. Staff can call: 0800 028 0285 – line is available from 8:00am to 8:00pm, Monday to Friday or email: help@nspcc.org.uk

Safe Recruitment

Our school prioritises embedding a culture of safe recruitment as part of our strategy for preventing harm to children (see Safer Recruitment Policy). Statutory procedures for checking the suitability of staff and volunteers who work with children are always followed, including checking their identity, obtaining enhanced Disclosure and Barring certificates from the applicant including barred list information for those in regulated activity, mental and physical fitness, right to work in the UK, verifying professional qualifications as appropriate, overseas background checks as appropriate, prohibition from teaching and/or management of an independent school checks, detailed references and interview information. All such recruitment checks are recorded on the School's Single Central Register and all applicants show the original DBS certificate to the School before they take up the post or as soon as practicable afterwards and in which

case, the School will ensure a separate barred list check has been undertaken in advance. A Risk Assessment will be in place, approved by the Headteacher, until full DBS clearance is received. This will fully detail reasons and the supervision in place to mitigate any risks. This will be reviewed fortnightly.

Assurance is obtained that appropriate suitability checks apply to any staff employed by another organisation who might be working onsite (such as building or service contractors) and to any individual working with the School's pupils (such as after school clubs) or on an external site (such as on school visits). Any individual working on our School site, and/or off-site with our pupils, for whom an enhanced DBS check with barred list has not been obtained will not be allowed to work in regulated activity and will be supervised by school staff at all times. The School adheres to the definition of supervision as "reasonable day to day supervision by another person engaging in regulated activity" and follows Annex F of Keeping Children Safe in Education (September 2016) accordingly. Importantly, the following points are adhered to:

- there must be supervision by a person who is in regulated activity
- the supervision must be regular and day to day; and
- the supervision must be 'reasonable' in all the circumstances to ensure the protection of children.

Review of Policy and Procedures

The School carries out an annual review of this Policy, led by the DSL. This includes an evaluation of the extent to which these policies have been effectively implemented throughout the school. The School will remedy any deficiencies or weaknesses in child protection arrangements without delay and without waiting for the next policy review date, should any be necessary.

Appendices for Safeguarding Policy

These appendices accompany the Safeguarding Policy and cover the following three areas:

Appendix A	-	Peer on Peer Abuse
Appendix B	-	Youth Produced Sexual Imagery (Sexting)
Appendix C	-	Online Safety
Appendix D	-	Private fostering arrangements and looked after children

Appendix A – Peer on Peer Abuse

All staff should be alert to the risk of peer on peer abuse and understand their role in preventing, identifying and responding to it. Staff should know that children are capable of abusing their peers, they should never dismiss abusive behaviour as a normal part of growing up, or 'banter', and should not develop high thresholds before taking action. Peer on peer abuse should be taken as seriously as abuse by adults.

What is peer on peer abuse?

For these purposes, peer on peer abuse is any form of abuse perpetrated by a child towards another child. It can take many different forms including, but not limited to, serious bullying (including cyber-bullying)[2], relationship abuse[3], domestic violence[4], child sexual exploitation[5], youth and serious youth violence[6], harmful sexual behaviour[7], and gender-based violence[8].

These categories of abuse rarely take place in isolation and often indicate wider safeguarding concerns. For example, a teenage girl may be in a sexually exploitative relationship with a teenage boy who is himself being physically abused by a family member or by older boys. Equally, while children who abuse may have power over those who they are abusing, they may be simultaneously powerless to others.

Youth produced sexual imagery can but does not always constitute abusive behaviour. All incidents involving youth produced sexual imagery should be responded to with reference to the School's Youth Produced Sexual Imagery Policy (see Appendix B) and in accordance with the School's Safeguarding Policy.

What role does gender play?

Peer on peer abuse often manifests itself differently for boys than it does for girls. For example, girls seem to be at greater risk of sexual assault and/or exploitation, whereas boys seem to be at greater risk of physical gang-related violence and serious youth violence.

When does behaviour become abusive?

It can be difficult to distinguish between abusive behaviour which should be dealt with in accordance with the procedure set out below, and behaviour which does not constitute abuse, such as low level bullying (where the School's anti-bullying policy should be followed) or age appropriate sexual experimentation.

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[2] Please see the School's anti-bullying policy.

[3] https://www.disrespectnobody.co.uk/relationship-abuse/what-is-relationship-abuse/

[4] This type of abuse relates to abuse between children aged 16 and 17 who are or have been intimate partners or family members. The abuse includes but is not limited to psychological, physical, sexual, financial and emotional.

[5] This is a form of sexual abuse where children are sexually exploited for money, power or status. This abuse can be perpetrated by other children or by adults. It can involve violent, humiliating and degrading sexual assaults. In some cases, children are persuaded or forced into exchanging sexual activity for money, drugs, gifts, affection or status. Consent cannot be given, even where a child may believe they are voluntarily engaging in sexual activity with the person who is exploiting them. Child sexual exploitation does not always involve physical contact and can happen online.

[6] Serious youth violence is any of the most serious offences where the victim is aged 19 or below, including murder, manslaughter, rape, wounding with intent and causing grievous bodily harm. Youth violence also includes assault with injury offences.

[7] This is any sexual behaviour by a child or young person which is outside of developmentally "normative" parameters. This can (but does not always) include abusive behaviour such as sexual assaults.

[8] This is violence that is directed against one gender as a result of their gender.

Factors which may indicate that behaviour is abusive include (a) where it is repeated over time and/or where the perpetrator intended to cause serious harm: (b) where there is an element of coercion or pre planning; and (c) where there is an imbalance of power, for example, as a result of age, size, social status or wealth. This list is not exhaustive and staff should always use their professional judgment and discuss any concerns with the DSL.

How can I identify victims of peer on peer abuse?

By being alert to children's well-being and to signs of abuse. Signs that a child may be suffering from peer on peer abuse overlap with those relating to other types of abuse (please see section C of the Safeguarding Policy for indicators of abuse) and include (a) failing to attend school, disengaging from classes or struggling to carry out school related tasks to the standard you would ordinarily expect; (b) physical injuries; (c) having difficulties with mental health and/or emotional wellbeing; (d) becoming withdrawn, shy, experiencing headaches, stomach aches, anxiety, panic attacks, suffering from nightmares or lack of sleep or sleeping too much; (e) drugs and/or alcohol use; (f) changes in appearance and/or starting to act in a way that is not appropriate for the child's age. Again, this list is not exhaustive and the presence of one or more of these signs does not necessarily indicate abuse.

Are some children particularly vulnerable to abusing or being abused by their peers?

Any child can be affected by peer on peer abuse and staff should be alert to signs of such abuse amongst all children. Research suggests that (a) peer on peer abuse is more prevalent amongst children aged 10 and older although it also affects younger children, including by way of harmful sexual behaviour; (b) children who are particularly vulnerable to abuse or to abusing others include those who have (i) witnessed or experienced abuse or violence themselves; (ii) suffered from the loss of a close family member or friend; or (iii) experienced considerable disruption in their lives.

How prevalent is peer on peer abuse?

Recent research suggests that peer on peer abuse is one of the most common forms of abuse affecting children in the UK. For example, more than four in ten teenage schoolgirls aged between 13 and 17 in England have experienced sexual coercion (Barter et al 2015). Two thirds of contact sexual abuse experienced by children aged 17 or under was perpetrated by someone who was also aged 17 or under (Radford et al 2011) and over a third of young boys in England admitted to watching porn and having negative attitudes towards women (University of Bristol and University of Central Lancashire 2015).

What should I do if I suspect either that a child may be being abused, or that a child may be abusing others?

If a member of staff thinks for whatever reason that a child may be at risk of abuse from another child or young person, or that a child may be abusing others, the member of staff should report their concern to the DSL without delay in accordance with Section B of the Safeguarding Policy. If a child is in immediate danger, or at risk of harm, a referral to children's social care and/or the police should be made immediately (see Section B of the Safeguarding Policy).

How will the DSL respond to concerns of peer on peer abuse?

The DSL will discuss the behaviour with the member of staff and will where necessary take any immediate steps to ensure the safety of the victim(s) or any other child.

Where the DSL considers or suspects that the behaviour might constitute abuse children´s social care should be contacted immediately and in any event within 24 hours of the DSL becoming aware of it. The DSL will discuss the incident with children's social care and agree on a course of action, which may include (a) taking any steps to ensure the safety and wellbeing of any children affected; (b) further investigation; (c) referral to other agencies such as the police (where a crime may have been committed), CAMHS, a specialist harmful sexual behaviour team and/or youth offending services; and (d) a strategy meeting.

Any response should be decided in conjunction with children's social care and other relevant agencies and should:

- investigate the incident and the wider context and assess and mitigate the risk posed by the perpetrator(s) to the victim(s) and to other children;

- consider that the abuse may indicate wider safeguarding concerns for any of the children involved;

- treat all children (whether perpetrator or victim) as being at risk - while the perpetrator may pose a significant risk of harm to other children, s/he may also have considerable unmet needs and be at risk of harm themselves;

- take into account the complexity of peer on peer abuse and of children´s experiences and consider the interplay between power, choice and consent. While children may appear to be making choices, if those choices are limited they are not consenting;

- take appropriate action in respect of the perpetrator – any action should address the abuse, the causes of it and attitudes underlying it. Factors to consider include: the risk the perpetrator(s) poses and will continue to pose to other children, their own unmet needs, the severity of the abuse and the causes of it. Disciplinary action may be appropriate, including (a) to ensure that the perpetrator takes responsibility for and realises the seriousness of his or her behaviour; (b) to demonstrate to the perpetrator and others that abuse can never be tolerated; and (c) to ensure the safety and wellbeing of the victim and other children in the School. Permanent exclusion will only be considered as a last resort and only where necessary to ensure the safety and wellbeing of the victim(s) and other children in the School;

- provide on-going support to victim(s) including by (a) ensuring their immediate safety; (b) responding promptly and appropriately to the abuse; (c) assessing and addressing any unmet needs; (d) following the procedures set out in the Safeguarding Policy (including where the child is in need of early help or statutory intervention); (e) monitoring the child´s wellbeing closely and ensuring that s/he receives on-going support from all relevant staff members within the School; (f) engaging with the child´s parents and any external agencies to ensure that the child´s needs are met in the long-term;

- consider the lessons that can be learnt from the abuse and put in place measures to reduce the risk of such abuse recurring. This may include, for example: gender and equalities work, work around school safety, security and supervision, awareness raising for staff, students and parents about a particular form of abuse, training for staff on handling certain types of incidents or abuse.

How does the School raise awareness of and reduce the risk of peer on peer abuse?

The School actively seeks to prevent all forms of peer on peer abuse by educating students and staff, challenging the attitudes that underlie such abuse, encouraging a culture of tolerance and respect amongst all members of the school community, and responding to all cases of peer on peer abuse and any cases of bullying (no matter how trivial) promptly and appropriately.

Children are educated about the nature and prevalence of peer on peer abuse via PSHE, they are told what to do if they witness or are victims of such abuse, the effect that it can have on the victims and the possible reasons for it, including vulnerability of the perpetrator. They are regularly informed about the School's approach to such issues, including its zero tolerance policy towards all forms of bullying and peer on peer abuse.

Staff are trained on the nature, prevalence and effect of peer on peer abuse, how to prevent, identify and respond to it.

Appendix B – Youth Produced Sexual Imagery

Whilst professionals refer to the issue as 'sexting' there is no clear definition of 'sexting'. According to research, many professionals consider sexting to be 'sending or posting sexually suggestive images, including nude or semi-nude photographs, via mobiles or over the internet.' Yet, recent NSPCC research has revealed that when children are asked 'What does sexting mean to you?' they are more likely to interpret sexting as 'writing and sharing explicit messages with people they know.'[9] Similarly, a recent ChildLine survey has revealed that many parents think of sexting as flirty or sexual text messages rather than images.

This policy only covers the sharing of sexual imagery by children. Creating and sharing sexual photos and videos of under-18s is illegal, and therefore causes the greatest complexity for schools (amongst other agencies) when responding. It also presents a range of risks which need careful management.

On this basis, this policy introduces the phrase 'youth produced sexual imagery' and uses this instead of 'sexting'.[10] This is to ensure clarity about the issues this advice addresses.

What is youth produced sexual imagery?

'Youth produced sexual imagery' best describes the practice because:

- 'Youth produced' includes children sharing images that they, or another child, have created of themselves.
- 'Sexual' is clearer than 'indecent'. A judgement of whether something is 'decent' is both a value judgement and dependent on context.
- 'Imagery' covers both still photos and moving videos (and this is what is meant by reference to imagery throughout the policy).

What types of incidents are covered by this policy?

Yes:

- A child creates and shares sexual imagery of themselves with a peer (also under the age of 18).
- A child shares sexual imagery created by another child with a peer (also under the age of 18) or an adult.
- A child is in possession of sexual imagery created by another child.

No:

- The sharing of sexual imagery of children by adults as this constitutes child sexual abuse and schools should always inform the police.
- Children sharing adult pornography or exchanging sexual texts which do not contain imagery.[11]
- Sexual imagery downloaded from the internet by a child.[12]

[9] For the purposes of this policy 'child', 'youth' and 'young person' refers to anyone under the age of 18; 'adult' refers to anyone aged 18 or over

[10] This is in accordance with the new advice *Sexting in schools and colleges: responding to incidents and safeguarding young people*, which has been published by the UK Council for Child Internet Safety

[11] All such incidents should be responded to with reference to the School's Online Safety Policy at Appendix C, and in line with the School's Safeguarding Policy

[12] As above

- Sexual imagery downloaded from the internet by a child and shared with a peer (also under the age of 18) or an adult.[13]

Disclosure

Disclosure about youth produced sexual imagery can happen in a variety of ways. The child affected may inform a class teacher, the DSL in School, or any member of the School staff. They may report through an existing reporting structure, or a friend or parent may inform someone in School or colleague, or inform the police directly.

All members of staff (including non-teaching staff) should be aware of how to recognise and refer any disclosure of incidents involving youth produced sexual imagery. This will be covered within staff training and within the School's Safeguarding Policy.

Any direct disclosure by a child should be taken very seriously. A child who discloses they are the subject of sexual imagery is likely to be embarrassed and worried about the consequences. It is likely that disclosure in School is a last resort and they may have already tried to resolve the issue themselves.

Handling incidents

All incidents involving youth produced sexual imagery should be responded to in line with the School's Safeguarding Policy.

When an incident involving youth produced sexual imagery comes to a member of staff's attention:

- The incident should be referred to the DSL as soon as possible.
- The DSL should hold an initial review meeting with appropriate School staff.
- The DSL will follow the procedures and guidance set out in '*Sexting in schools and colleges: responding to incidents and safeguarding young people*'.
- There should be subsequent interviews with the children involved (if appropriate).
- Parents should be informed at an early stage and involved in the process unless there is good reason to believe that involving parents would put the child at risk of harm.
- At any point in the process if there is a concern a child has been harmed or is at risk of harm a referral should be made to children's social care and/or the police immediately.

Education

Teaching about safeguarding issues in the classroom can prevent harm by providing children with skills, attributes and knowledge to help them navigate risks. The School will provide children with opportunities to learn about the issue of youth produced sexual imagery, as part of its commitment to ensure that they are taught about safeguarding, including online, through teaching and learning opportunities – as also referred to in the School's Online Safety Policy at Appendix C.

[13] As above

Appendix C - Online Safety

All staff should be aware of the risks posed to children by technology and the internet and should understand their role in preventing, identifying and responding to harm caused by its use. This Policy should be read alongside the School's E-Safety Policy and which sets out the School's approach to online safety in further detail, as well as the School's Youth Produced Sexual Imagery Policy (see Appendix B)

The School has adopted a whole school approach to online safety which (a) captures the range and complexity of the risks and of children's experiences of those risks; (b) seeks to mitigate those risks as far as possible without depriving children of the significant benefits provided by technology and the internet; and (c) handles all cases of online harm appropriately and with sensitivity.

What are the risks?

The risks posed to children by the internet and technology are wide-ranging and include risks resulting from:

Content - being exposed to harmful material
This includes but is not limited to (a) violent pornography or sexual images of children which affect a child´s perception of girls, love and relationships; (b) material promoting harmful behaviours such as self-harm or eating disorders; (c) propaganda or material promoting extremism, radicalisation and/or terrorism; (d) material showing or depicting extreme violence or brutality; and (e) social media such as Facebook and Instagram which can provide children with distorted and unrealistic images of others' lives, causing some children to feel inadequate or distressed about their own lives.

Contact - being subjected to harmful interaction with others online
This includes but is not limited to (a) cyber-bullying; and (b) contact from individuals seeking to groom children for the purposes of sexual abuse or radicalisation.

Conduct - personal online behaviour that increases the likelihood of or causes of harm
This includes but is not limited to (a) responding to and engaging with individuals seeking to groom or abuse children; (b) youth produced sexual imagery.

Online harm can be caused via a number of different media, including but not limited to: mobile phones and apps; social media; the internet; and video games.

How can I identify a child who may be at risk of online harm?

Any child may suffer from online harm and all staff should be alert to the risk of it. Indicators that a child may be being abused or harmed online overlap with other indicators of abuse which can be found at Section C of the Safeguarding Policy. For further indicators that a child may be suffering from online harm, please see here.

What should I do if I suspect that a child may be at risk of or suffering from online harm?

Follow the procedure set out at Section B of the Safeguarding Policy and discuss any concerns with the DSL immediately. The DSL will discuss the incident with you and agree on a course of action in accordance with the safeguarding procedures set out in the Safeguarding policy.

What preventative measures is the School taking?

Pupils are educated about the risk of online harm – including youth produced sexual imagery, and the ways to mitigate those risks in PSHE, computing classes, assemblies and tutor groups.

Staff are trained on the risks posed by technology and the internet and the ways in which they can prevent, identify and respond to cases appropriately and with sensitivity to cases of online harm.

The School actively engages with parents to ensure a joined up approach when responding to cases of harm, and to ensure as far as possible that parents are aware of and understand the risks of it, are able to identify and respond appropriately to cases of online harm.

The School takes measures to limit children's exposure to these risks from the school's IT systems, including by putting in place appropriate filers and monitoring systems which protect children from harm whilst not over-blocking.

Information sharing

Cognita and the School recognise the fundamental importance of information sharing in protecting children from harm and promoting children's wellbeing. The importance of information sharing between agencies is highlighted in a number of serious case reviews which demonstrate that where information is not shared, concerning patterns of behaviour are often missed and children often do not receive the support they need see link.

The School shares information in accordance with the Data Protection Act 1998 and the guidance set out in Chapter One of Working Together to Safeguard Children (March 2015) and in Information sharing: Advice for practitioners providing safeguarding services to children, young people, parents and carers view link and view link here.

The DSL is trained on the above guidance and works with staff to ensure that (a) fears about sharing information do not stand in the way of the need to promote the welfare and protect the safety of children; (b) they understand and follow this guidance; and (c) they feel confident about the ways in which they share information, including with parents, other staff, and external professionals and agencies.

Appendix D – Private fostering arrangements and looked after children

Private Fostering Arrangements

A private fostering arrangement occurs when someone other than a parent or close relative cares for a child for a period of 28 days or more, with the agreement of the child's parents. It applies to children under the age of 16 or 18 if the child is disabled. Children looked after by the local authority or who are placed in residential schools; children's homes or hospitals are not considered to be privately fostered.

Private fostering occurs in all cultures, including British culture and children may be privately fostered at any age. Examples of private fostering situations include:

- children and teenagers living apart from their families for a variety of reasons e.g. if a parent is ill, has had to temporarily move for work or there has been an argument within the family
- children with parents working or studying elsewhere in the UK or with parents overseas
- children on holiday exchanges

By law, a parent, private foster carer or other persons involved in making a private fostering arrangement must notify Children's Social Care as soon as possible. Where a member of staff becomes aware that a pupil may be in a private fostering arrangement s/he should raise this with the DSL. Where Children's Social Care are not already aware of the circumstances the DSL make a referral to them.

Cognita recognises that most privately fostered children remain safe and well but are aware that safeguarding concerns may be raised in some cases. Therefore, all staff are alert to possible safeguarding issues, including the possibility that the child has been trafficked into the country.

Looked After Children

A child who is being looked after by their local authority is known as a child in care. They might be living with foster parents; at home with their parents under the supervision of social services; in residential children's homes; or other residential settings like schools or secure units. They might have been placed in care voluntarily by parents struggling to cope. Or, children's services may have intervened because a child was at significant risk of harm.

As a result of their experiences both before and during care, looked after children are at greater risk than their peers; they are, for example, four times more likely than their peers to have a mental health difficulty. Providing a secure, caring environment and enabling such children to develop strong, trusting and stable relationships with professionals is critical to their safety and wellbeing.

Cognita ensures that staff receive training on looked after children, including on the reasons children become looked after, their legal status, the support that staff can provide to keep such children safe and the ways in which they can maximise educational stability for looked after children.

The DSL (a) is responsible for ensuring that any looked after children are adequately supported by staff in school; (b) has contact details of the child's social worker and the name and contact details of the virtual school head for children in care; (c) ensures that relevant staff members have sufficient information about the child's looked after legal status and care arrangements; and (d) works with the virtual school head to discuss how staff can best support the progress of looked after children in the school and meet the needs in the child's personal education plan.

Ownership and consultation	
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Audience	
Audience	All school based staff and volunteers

Document application and publication	
England	Yes
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Spain	No – separate policies available

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Related documentation	All safeguarding related policies, including: o Acceptable Use Policy o Accidents and Incidents Recording and Reporting o Anti-Bullying and Behaviour policy o Code of Conduct o Complaints Procedure Statement o Data Protection Policy o Early Years Foundation Stage (EYFS) Policy o Exclusions procedures o First Aid o Health and Safety Handbook o Health and Safety Policy o Intimate Care Policy o Learning Outside the Classroom/Educational Visits Policy o Online Safety Policy o Premises Management o Risk Assessment Policy: Welfare, Health & Safety o Safeguarding Children: Preventing Extremism and Radicalisation o Safeguarding: Safer Recruitment Policy o Special Educational Needs Policy o Spiritual, Moral, Social and Cultural Policy o Staff Discipline, Conduct and Grievance Policies o Staff Handbook o Supporting Pupils with Medical Conditions o Use of Reasonable Force