




**MOUNT HOUSE
SCHOOL**

INSPIRING EVERY INDIVIDUAL

SCHOOL POLICIES

SAFEGUARDING

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Next Review	September 2025	

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Purpose

Mount House School is committed to safeguarding and promoting the physical, mental and emotional welfare of every student, both inside and outside of the school premises. We implement a whole-school preventative approach to managing safeguarding concerns, ensuring that the wellbeing of the student is at the forefront of all action taken.

This policy sets out a clear and consistent framework for delivering this promise, in line with safeguarding legislation and statutory guidance. It will be achieved by:

- Ensuring that all staff are trained and understand their responsibilities under safeguarding legislation and statutory guidance
- Ensuring all staff are alert to the signs of child abuse, and know to refer concerns to the Designated Safeguarding Lead (DSL).
- Ensuring appropriate action is taken in a timely manner to safeguard and promote children's welfare
- Teaching students how to keep safe and recognise behaviour that is unacceptable.
- Identifying and making provision for any student that has been subject to, or is at risk of, abuse, neglect, or exploitation.
- Creating a culture of safer recruitment by adopting procedures that help deter, reject or identify people who might pose a risk to children.
- At the heart of our Safeguarding Policy is fostering a culture of 'it can, and does, happen here'. Staff are vigilant and maintain a professional curiosity at all times regarding the welfare of students.

In Keeping Children Safe in Education (KCSIE), safeguarding and promoting the welfare of children is defined as:

- "providing help and support to meet the needs of children as soon as problems emerge,
- protecting children from maltreatment, whether that is within or outside the home, including online,
- preventing the impairment of children's mental and physical health or development,
- ensuring that children grow up in circumstances consistent with the provision of safe and effective care, and
- taking action to enable all children to have the best outcomes."

Acronyms

This policy contains a number of acronyms used in the Education sector. These acronyms are listed below alongside their descriptions.

Acronym	Long form	Description
CCE	Child criminal exploitation	A form of abuse where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into taking part in criminal activity in exchange for something the victim needs or wants, for the financial advantage or other advantage of the perpetrator or facilitator, and/or through violence or the threat of violence.
MASH	Multi-agency safeguarding hub	The single point of contact for all professionals to report safeguarding concerns.
CSCS	Children's Social Care Services	The CSCS work with families who need support. This ranges from the point of a referral being made, through to a single assessment and, where necessary, into longer term working relationships for ongoing advice, support, guidance and interventions to keep children safe.
CSE	Child sexual exploitation	A form of sexual abuse where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into sexual activity in exchange for something the victim needs or wants, for the financial advantage, increased status or other advantage of the perpetrator or facilitator, and/or through violence or the threat of violence.
DBS	Disclosure and Barring Service	The service that performs the statutory check of criminal records for anyone working or volunteering in a school.
DfE	Department for Education	The national government body with responsibility for children's services, policy and education, including early years, schools, higher and further education policy, apprenticeships and wider skills in England.
DPO	Data protection officer	The appointed person in school with responsibility for overseeing data protection strategy and implementation to ensure compliance with the UK GDPR and Data Protection Act.
DSL	Designated safeguarding lead	A member of the senior leadership team who has lead responsibility for safeguarding and child protection throughout the school.
EEA	European Economic Area	The Member States of the European Union (EU) and three countries of the European Free Trade Association (EFTA) (Iceland, Liechtenstein and Norway; excluding Switzerland).

EHC plan	Education, health and care plan	A funded intervention plan which coordinates the educational, health and care needs for students who have significant needs that impact on their learning and access to education. The plan identifies any additional support needs or interventions and the intended impact they will have for the student.
ESFA	Education and Skills Funding Agency	An agency sponsored by the Department for Education with accountability for funding education and skills training for children, young people and adults.
FGM	Female genital mutilation	All procedures involving the partial or total removal of the external female genitalia or other injury to the female genital organs. FGM is illegal in the UK and a form of child abuse with long-lasting harmful consequences.
UK GDPR	UK General Data Protection Regulation	Legislative provision designed to strengthen the safety and security of all data held within an organisation and ensure that procedures relating to personal data are fair and consistent.
HBA	'Honour-based' abuse	So-called 'honour-based' abuse involves crimes that have been committed to defend the honour of the family and/or community.
HMCTS	HM Courts and Tribunals Service	HM Courts and Tribunals Service is responsible for the administration of criminal, civil and family courts and tribunals in England and Wales. HMCTS is an executive agency, sponsored by the Ministry of Justice.
IICSA	Independent Inquiry into Child Sexual Abuse	The Independent Inquiry into Child Sexual Abuse is analysing case files from the Disclosure and Barring Service to learn more about the behaviours of perpetrators who have sexually abused children in institutions, and to understand institutional responses to these behaviours.
KCSIE	Keeping children safe in education	Statutory guidance setting out schools and colleges' duties to safeguard and promote the welfare of children.
LA	Local authority	A local government agency responsible for the provision of a range of services in a specified local area, including education.
LAC	Looked-after children	Children who have been placed in local authority care or where children's services have looked after children for more than a period of 24 hours.
LGBTQ+	Lesbian, gay, bisexual, transgender and queer plus	Term relating to a community of people, protected by the Equality Act 2010, who identify as lesbian, gay, bisexual or transgender, or other protected sexual or gender identities.
NPCC	The National Police Chiefs' Council	The National Police Chiefs' Council is a national coordination body for law enforcement in the United

		Kingdom and the representative body for British police chief officers.
PLAC	Previously looked-after children	Children who were previously in local authority care or were looked after by children's services for more than a period of 24 hours. PLAC are also known as care leavers.
PSHE	Personal, social and health education	A non-statutory subject in which students learn about themselves, other people, rights, responsibilities and relationships.
RSHE	Relationships, sex and health education	A compulsory subject from year 7 for all students. Includes the teaching of sexual health, reproduction and sexuality, as well as promoting positive relationships.
SCR	Single central record	A statutory secure record of recruitment and identity checks for all permanent and temporary staff, proprietors, contractors, external coaches and instructors, and volunteers who attend the school in a non-visitor capacity.
SENCO	Special educational needs coordinator	A statutory role within all schools maintaining oversight and coordinating the implementation of the school's special educational needs policy and provision of education to students with special educational needs.
SLT	Senior leadership team	Staff members who have been delegated leadership responsibilities in a school.
TRA	Teaching Regulation Agency	An executive agency of the DfE with responsibility for the regulation of the teaching profession.
VSH	Virtual school head	Virtual school heads are in charge of promoting the educational achievement of all the children looked after by the local authority they work for, and all children who currently have, or previously had, a social worker.

Designated Safeguarding Team	
DSL – Mr Gerrard Crosby, Deputy Head Pastoral	crosbyg@mounthouse.org.uk (0208-449-6889)
Deputy DSL - Mrs N Hillcoat-Hyde	hillcoat-hyden@mounthouse.org.uk
Deputy DSL - Ms Patrice Smyth (from April 2024)	smythp@mounthouse.org.uk
Designated Safeguarding Governor – Mr Nigel Helliwell	helliwelln@mounthouse.org.uk
Borough of Barnet, Local Authority	
Local Authority Designated Officer (LADO): Rob Wratten	0208-359-5117 (direct); 0208-359-4066 (office hours); 0208-359-2000 (out of hours) LADO@barnet.gov.uk
Barnet Multi-Agency Safeguarding Hub (MASH) MASH, 2 Bristol Avenue, Colindale, NW9 4EW	0208-359-4066 (office hours); 0208-359-2000 (out of hours Duty Team)
Barnet Safeguarding Children Partnership	MASH@barnet.gov.uk
Barnet Adult Social Care	0208-359-5000 (office hours); 0208-359-2000 (out of hours Duty Team) Email: socialcaredirect@barnet.gov.uk After Hours
Enfield Multi-Agency Safeguarding Hub (MASH)	0208-379-5555 (office hours); 0208-379-1000 (out of hours Duty Team) All referrals now go through the Children’s Portal www.enfield.gov.uk/childrensportal
Enfield Safeguarding Children Partnership	childrensmash@enfield.gov.uk
Enfield Adult Social Care	https://mylife.enfield.gov.uk/homepage
Prevention of Extremism	https://www.educateagainsthate.com/what-should-i-do-if-i-have-a-concern-about-a-child/
	https://www.barnet.gov.uk/community/community-safety/radicalisation-and-prevent
Reporting for FGM (Female Genital Mutilation)	101 (non-emergency), 999 (emergency)
Advice and Guidance	0800-028-3550; help@NSPCC.org.uk
Forced Marriage Unit:	0207-008-0151; fm@fcdo.gov.uk

Childline	0800-1111 www.childline.org.uk/get-support/
Online Sexual Abuse (CEOP)	https://www.ceop.police.uk/Safety-Centre/ https://www.ceop.police.uk/ceop-reporting/
NSPCC Child Protection Helpline	0808-800-5000 https://www.nspcc.org.uk/preventing-abuse/reporting-abuse
GOV.UK webpage for reporting child abuse to your local council	https://www.gov.uk/report-childabuse-to-local-council
NSPCC/Home Office Child Abuse Whistleblowing Helpline	www.nspcc.org.uk/keeping-children-safe/our-services/nspcc-helpline/ 0800-028-0285 (8am–8pm) help@NSPCC.org.uk
NSPCC/Home Office Report Abuse in Schools Helpline – helpline for potential victims of sexual harassment and abuse in education settings	0800-136-663, on Monday to Friday 8am-10pm, or 9am–6pm at weekends help@NSPCC.org.uk
Ofsted – impartial advice and guidance re ‘whistleblowing’	enquiries@ofsted.gov.uk 0300-123-1231
Independent Schools Inspectorate CAP House, 9 – 12 Long Lane, London, EC1A 9HA	0207-600-0100 info@isi.net
Disclosure and Barring Service DBS Referrals, PO Box 181, Darlington, DL1 9FA	0300-020-0190 customerservices@dbs.gov.uk

Although referrals in cases of abuse and/or need to Children’s Services are usually made through the DSL, anyone may make a referral using the contact details above.

Any member of staff or volunteer who has concerns about poor or unsafe practice either in general or in any specific case should follow the guidance given in the school’s Whistleblowing Policy.

Related school policies

- Anti-Bullying Policy
- Attendance Policy
- Behaviour Policy
- Educational Trips and Visits Policy
- Equality, Diversity and Inclusion Policy

- Exclusions Policy
- First Aid Policy
- Health & Safety Policy
- ICT, Internet and Social Media Acceptable Use of IT Policy
- Low Level Concern Policy
- Online Safety Policy
- Prevent Duty Policy
- Risk Assessment for Student Welfare Policy
- RSE Policy (Relationships and Sex Education Policy)
- Safer Recruitment Policy
- SEND Policy (Special Educational Needs and Disabilities Policy)
- Smoking, Drugs Alcohol and Other Substances Policy
- Staff Code of Conduct
- Student Supervision, Lost, Missing and Absent Children Policy
- Whistleblowing Policy.

All school policies are updated on a regular basis. The Board of Directors undertakes an annual review of the Safeguarding Policy and scrutinises all relevant safeguarding records from the preceding 12 months.

Legal Framework

This policy has been authorised by the Board of Directors, and is addressed to all members of staff, students on placement, contractors, agency staff, volunteers and Directors, wherever they are coming into regular contact with children, even where this is away from the School. It is publicly available on the School's website. This policy is based on the Department for Education's (DfE's) statutory guidance [Keeping Children Safe in Education \(2024\)](#) and [Working Together to Safeguard Children \(2023\)](#). The policy is also based on the following legislation:

Legislation

- The Rehabilitation of Offenders Act 1974
- Children Act 1989
- The Human Rights Act 1998
- Sexual Offences Act 2003
- Female Genital Mutilation Act 2003 (as inserted by the Serious Crime Act 2015)
- Children Act 2004
- Safeguarding Vulnerable Groups Act 2006 (Schedule 4 defines what regulated activity is)
- Apprenticeships, Children and Learning Act 2009
- Equality Act 2010
- The Education (School Teachers' Appraisal) (England) Regulations 2012 (as amended)
- Anti-social Behaviour, Crime and Policing Act 2014
- Counter-Terrorism and Security Act 2015
- The UK General Data Protection Regulation (UK GDPR)
- Data Protection Act 2018

- Voyeurism (Offences) Act 2019
- Domestic Abuse Act 2021
- Marriage and Civil Partnership (Minimum Age) Act 2022
- European Convention on Human Rights (ECHR)
- The Public Sector Equality Duty (PSED).

Statutory guidance

- Home Office (2023) 'Prevent duty guidance: Guidance for specified authorities in England and Wales'
- DfE (2023) 'Working Together to Safeguard Children 2023'
- DfE (2024) 'Keeping children safe in education 2024'
- DfE (2024) 'Working together to improve school attendance'
- DfE (2022) 'Keeping children safe in out of school settings'
- HM Government (2020) 'Multi-agency statutory guidance on female genital mutilation'
- HM Government (2023) 'Channel Duty Guidance: Protecting people susceptible to radicalisation'
- Home Office and Foreign, Commonwealth and Development Office (2023) 'Multi-agency statutory guidance for dealing with forced marriage and Multi-agency practice guidelines: Handling cases of forced marriage'.

Role and Responsibilities

All staff will:

- Undertake Level 1 Safeguarding Training annually, including online safety training (which, amongst other things, includes an understanding of the expectations and responsibilities relating to filtering and monitoring)
- Read Part 1 of KCSIE and sign a document to ensure they have completed it and understood their role
- Read the following policies and sign to confirm they have understood their roles and responsibilities: Behaviour Policy; Safeguarding Policy; Staff Code of Conduct
- New members of staff will receive training during their induction, including during their New Staff Induction Day and during their New Staff Training Programme.
- Receive and understand child protection and safeguarding (including online safety) updates, e.g. via email and staff comms, as required, and at least annually.

All staff have a responsibility to:

- Consider, at all times, what is in the best interests of the student.
- Maintain an attitude of 'it could happen here' where safeguarding is concerned.
- Provide a safe environment in which students can learn.
- Be prepared to identify students who may benefit from early help.
- Be aware of the school's systems which support safeguarding, including any policies, procedures, information and training provided upon induction.
- Be aware of the role and identity of the DSL and deputy DSLs.
- Be aware of the local early help process and understand their role in it.

- Be aware of, and understand, the process for making referrals to CSCS, as well as for making statutory assessments under the Children Act 1989 and their role in these assessments.
- Make a referral to CSCS and/or the police immediately (see [when to call the police: guidance for schools and colleges](http://www.npcc.police.uk) on www.npcc.police.uk), if at any point there is a risk of immediate serious harm to a child.
- Support social workers in making decisions about individual children, in collaboration with the DSL.
- Be aware of and understand the procedure to follow in the event that a child confides they are being abused, exploited or neglected.
- Be aware that a student may not feel ready or know how to tell someone that they are being abused, exploited or neglected, and/or may not recognise their experiences as harmful.
- Promote dialogue and understanding, and ensure all students feel listened to and understood.
- Empower students and allow them to understand their rights to safety and privacy, and to help them understand what they can do to keep themselves protected from harm.
- Avoid victim-blaming attitudes, and challenge it in a professional way if it occurs.
- Maintain appropriate levels of confidentiality when dealing with individual cases.
- Reassure victims that they are being taken seriously, that they will be supported, and that they will be kept safe.
- Speak to the DSL if they are unsure about how to handle safeguarding matters.
- Be aware of safeguarding issues that can put students at risk of harm.
- Be aware of behaviours that could potentially be a sign that a student may be at risk of harm.

Teachers, including the Head, have a responsibility to:

- Safeguard students' wellbeing and maintain public trust in the teaching profession as part of their professional duties, as outlined in the 'Teachers' Standards'.
- Personally report any cases to the police where it appears that an act of FGM has been carried out, also referred to as 'known' cases, as soon as possible.

The governing board has a duty to:

- Take strategic leadership responsibility for the school's safeguarding arrangements.
- Ensure that the school complies with its duties under the above child protection and safeguarding legislation.
- Guarantee that the policies, procedures and training opportunities in the School are effective and comply with the law at all times.
- Guarantee that the school contributes to multi-agency working in line with the statutory guidance '[Working Together to Safeguard Children](#)'.
- Confirm that the school's safeguarding arrangements take into account the procedures and practices of the LA as part of the inter-agency safeguarding procedures.
- Understand the local criteria for action and the local protocol for assessment, and ensure these are reflected in the school's policies and procedures.

- Comply with its obligations under section 14B of the Children Act 2004 to supply the local safeguarding arrangements with information to fulfil its functions.
- Ensure that staff working directly with children read at least Part one of KCSIE.
- Ensure that staff who do not work directly with children read Annex A of KCSIE.
- Ensure that mechanisms are in place to assist staff to understand and discharge their role and responsibilities in regard to safeguarding children.
- Ensure a senior board level lead takes leadership responsibility for safeguarding arrangements.
- Appoint a member of staff from the SLT to the role of DSL as an explicit part of the role-holder's job description.
- Appoint one or more deputy DSLs to provide support to the DSL, and ensure that they are trained to the same standard as the DSL and that the role is explicit in their job descriptions.
- Facilitate a whole-school approach to safeguarding; this includes ensuring that safeguarding and child protection are at the forefront and underpin all relevant aspects of process and policy development.
- Where there is a safeguarding concern, ensure the child's wishes and feelings are taken into account when determining what action to take and what services to provide.
- Ensure systems are in place, children to confidently report abuse, knowing that their concerns will be treated seriously, and they can safely express their views and give feedback; these systems will be well-promoted, easily understood, and easily accessible.
- Ensure that staff have due regard to relevant data protection principles that allow them to share and withhold personal information.
- Ensure that a member of the governing board is nominated to liaise with the LA and/or partner agencies on issues of child protection and in the event of allegations of abuse made against the Head or another governor.
- Guarantee that there are effective and appropriate policies and procedures in place.
- Ensure all relevant persons are aware of the school's local safeguarding arrangements, including the governing board itself, the SLT and DSL.
- Make sure that students are taught about safeguarding, including protection against dangers online (including when they are online at home), through teaching and learning opportunities, as part of providing a broad and balanced curriculum.
- Adhere to statutory responsibilities by conducting pre-employment checks on staff who work with children, taking proportionate decisions on whether to ask for any checks beyond what is required.
- Ensure that staff are appropriately trained to support students to be themselves at school (e.g. if they are LGBTQ+).
- Ensure the school has clear systems and processes in place for identifying possible mental health problems in students, including clear routes to escalate concerns and clear referral and accountability systems.
- Guarantee that volunteers are appropriately supervised.
- Make sure that at least one person on any appointment panel has undertaken safer recruitment training.

- Ensure that all staff receive safeguarding and child protection training updates, e.g. emails, as required, but at least annually.
- Ensure that all governors receive appropriate safeguarding and child protection training upon their induction and that this training is updated regularly.
- Certify that there are procedures in place to handle allegations against staff, supply staff, volunteers and contractors.
- Confirm that there are procedures in place to make a referral to the DBS and the Teaching Regulation Agency (TRA), where appropriate, if a person in regulated activity has been dismissed or removed due to safeguarding concerns or would have been had they not resigned.
- Guarantee that there are procedures in place to handle students' allegations against other students.
- Ensure that appropriate disciplinary procedures are in place, as well as policies pertaining to the behaviour of students and staff.
- Ensure that procedures are in place to eliminate unlawful discrimination, harassment and victimisation, including those in relation to child-on-child abuse.
- Guarantee that there are systems in place for students to express their views and give feedback.
- Establish an early help procedure and ensure all staff understand the procedure and their role in it.
- Appoint a designated teacher to promote the educational achievement of LAC and ensure that this person has undergone appropriate training.
- Ensure that the designated teacher works with the VSH to discuss how the student premium funding can best be used to support LAC.
- Introduce mechanisms to assist staff in understanding and discharging their roles and responsibilities.
- Make sure that staff members have the skills, knowledge and understanding necessary to keep LAC safe, particularly with regard to the student's legal status, contact details and care arrangements.
- Put in place appropriate safeguarding responses for students who become absent from education, particularly on repeat occasions and/or for prolonged periods, to help identify any risk of abuse, neglect or exploitation, and prevent the risk of their disappearance in future.
- Ensure that all members of the governing board have been subject to an enhanced DBS check.
- Create a culture where staff are confident to challenge senior leaders over any safeguarding concerns.
- Be aware of their obligations under the Human Rights Act 1998, the Equality Act 2010 (including the Public Sector Equality Duty), the Data Protection Act 2018, the UK GDPR and the local multi-agency safeguarding arrangements.

The Head has a duty to:

- Ensure that the policies and procedures adopted by the governing board, particularly concerning referrals of cases of suspected abuse and neglect, are followed by staff.
- Provide staff with the appropriate policies and information upon induction.

The DSL and DDSL(s) will:

- Undertake Level 2 Safeguarding Training on a bi-annual cycle
- Work closely with the LEA and other providers to ensure the school is abreast of safeguarding developments
- Provide the relevant training and information for all staff to understand child protection and safeguarding (including online safety) via email or Staff Comms, as required, and at least annually.

The DSL/DDSL training will include:

- The assessment process for providing early help and statutory intervention, including local criteria for action and MASH referral arrangements.
- How LAs conduct child protection case conferences and a child protection review conferences, to enable the DSL to attend and contribute to these effectively when required.
- The importance of providing information and support to MASH.
- The lasting impact that adversity and trauma can have.
- How to be alert to the specific needs of children in need, students with SEND and/or relevant health conditions, and Young Carers.
- The importance of internal and external information sharing.
- The Prevent duty.
- The risks associated with online safety, including the additional risks faced online by students with SEND.

The DSL and DDSLs have a duty to:

- Take lead responsibility for safeguarding and child protection, including online safety and understanding the filtering and monitoring systems and processes in place.
- Provide advice and support to other staff on child welfare, safeguarding and child protection matters.
- Take part in strategy discussions and inter-agency meetings, and/or support other staff to do so.
- Contribute to the assessment of children, and/or support other staff to do so.
- During term time, be available during school hours for staff to discuss any safeguarding concerns (where a DSL is not available a DDSL should always be on site).
- Arrange, alongside the School, adequate and appropriate cover for any activities outside of school hours or terms.
- Refer cases:
 - To CSCS where abuse and neglect are suspected, and support staff who make referrals to CSCS.
 - To the Channel programme where radicalisation concerns arise, and support staff who make referrals to the Channel programme.
 - To the DBS where a person is dismissed or has left due to harm, or risk of harm, to a child.
 - To the police where a crime may have been committed, in line with the National Police Chiefs' Council (NPCC) guidance.
- Act as a source of support, advice and expertise for all staff.
- Act as a point of contact with the safeguarding partners.

- Liaise with the Head to inform them of issues, especially regarding ongoing enquiries under section 47 of the Children Act 1989 and police investigations.
- Liaise with the deputy DSLs to ensure effective safeguarding outcomes.
- Liaise with the case manager and the LA designated officers (LADOs) for child protection concerns in cases concerning staff.
- Liaise with staff on matters of safety, safeguarding and welfare, including online and digital safety.
- Liaise with staff when deciding whether to make a referral by liaising with relevant agencies so that children's needs are considered holistically.
- Liaise with the senior mental health lead and, where available, the mental health support team, where safeguarding concerns are linked to mental health.
- Promote supportive engagement with parents in safeguarding and promoting the welfare of children, including where families may be facing challenging circumstances.
- Work with the Head and relevant strategic leads, taking lead responsibility for promoting educational outcomes by knowing the welfare, safeguarding and child protection issues that children in need are experiencing, or have experienced, and identifying the impact that these issues might be having on their attendance, engagement and achievement at school. This includes:
 - Ensuring that the School knows which students have or had a social worker.
 - Understanding the academic progress and attainment of these students.
 - Maintaining a culture of high aspirations for these students.
 - Supporting teachers to provide additional academic support or reasonable adjustments to help these students reach their potential.
 - Helping to promote educational outcomes by sharing the information about the welfare, safeguarding and child protection issues these students are experiencing with teachers and the SLT.
- Ensure that child protection files are kept up to date and only accessed by those who need to do so.
- Ensure that a student's child protection file is transferred as soon as possible, and within five days, when transferring to a new school, and consider any additional information that should be shared.
- Ensure each member of staff has access to and understands the school's Child Protection and Safeguarding Policy and procedures – this will be discussed during the staff induction process.
- Work with the governing board to ensure the school's Child Protection and Safeguarding Policy is reviewed annually, and the procedures are updated and reviewed regularly.
- Ensure the School's Child Protection and Safeguarding Policy is available publicly, and parents are aware that the School may make referrals for suspected cases of abuse or neglect, as well as the role the School plays in these referrals.
- Link with safeguarding partner arrangements to make sure that staff are aware of the training opportunities available and the latest local policies on safeguarding.
- Undergo training, and update this training at least every two years.
- Obtain access to resources and attend any relevant or refresher training courses.
- Encourage a culture of listening to children and taking account of their wishes and feelings; this includes understanding the difficulties students may have in approaching

staff about their circumstances and considering how to build trusted relationships that facilitate communication.

- Support and advise staff and help them feel confident on welfare, safeguarding and child protection matters: specifically, to ensure that staff are supported during the referrals processes; and to support staff to consider how safeguarding, welfare and educational outcomes are linked, including to inform the provision of academic and pastoral support.
- Understand the importance of information sharing, including within school, with other schools, and with the safeguarding partners, other agencies, organisations and practitioners.
- Understand relevant data protection legislation and regulations, especially the Data Protection Act 2018 and the UK GDPR.
- Keep detailed, accurate, secure written records of safeguarding concerns, decisions made, and whether or not referrals have been made, and understand the purpose of this record-keeping.

The designated teacher has a responsibility for promoting the educational achievement of LAC and PLAC, and for children who have left care through adoption, special guardianship or child arrangement orders or who were adopted from state care outside England and Wales.

Concerns about students

If a member of staff has any concern about a student's welfare, or a student has reported a safeguarding concern in relation to themselves or a peer, they will act on them immediately by speaking to the DSL or deputy DSLs.

Staff will be aware that students may not feel ready or know how to tell someone that they are being abused, exploited or neglected, and/or they may not recognise their experiences as harmful. Staff will be aware that this must not prevent them from having professional curiosity and speaking to the DSL, or deputy DSL, if they have a concern about a student.

All staff members are aware of the procedure for reporting concerns and understand their responsibilities in relation to confidentiality and information sharing, as outlined in the Communication and Confidentiality section of this policy. Please see the next section on 'Raising a Safeguarding Concern' and Appendix C for a flowchart of our specific procedures once a concern has been shared about a child.

Where the DSL is not available to discuss the concern, staff members will contact the deputy DSLs with the matter. If the DDSLs are unavailable, please go straight to the Head. In the unlikely situation of none of the staff aforementioned being available, all staff should be aware of the process of making a referral via the local authority's MASH. If a referral is made about a student by anyone other than the DSL, the DSL will be informed as soon as possible.

The LA will make a decision regarding what action is required within one working day of the referral being made and will notify the referrer. Staff are required to monitor a referral if they do not receive information from the LA regarding what action is necessary for the student. If the situation does not improve after a referral, the DSL will ask for reconsideration to ensure that their concerns have been addressed and that the situation improves for the student.

If early help is appropriate, the case will be kept under constant review. If the student's situation does not improve, a referral will be considered. All concerns, discussions and decisions made, as well as the reasons for making those decisions, will be recorded in writing by the DSL/DDSL and kept securely on MyConcern.

If a student is in immediate danger, a referral will be made to MASH and/or the police immediately. If a student has committed a crime, such as sexual violence, the police will be notified without delay. In exceptional circumstances the school reserves the right to keep a student under their care for their own safety. In such a circumstance, the DSL will liaise with the Head and Safeguarding Director or Chair where possible.

Where there are safeguarding concerns, the school will ensure that the student's wishes are always taken into account, and that there are systems available for students to provide feedback and express their views. When responding to safeguarding concerns, staff members will act calmly and supportively, ensuring that the student feels like they are being listened to and believed.

An inter-agency assessment will be undertaken where a child and their family could benefit from coordinated support from more than one agency. These assessments will identify what help the child and family require in preventing needs escalating to a point where intervention would be needed.

Raising a Safeguarding Concern

All members of staff, volunteers and Directors must know:

- the signs and symptoms of abuse.
- how to respond to a student who discloses abuse.
- what to do if they are concerned about a child.

A member of staff aware of (either by disclosure or otherwise) abuse or suspecting abuse, including situations of abuse which may involve other staff members:

1. must listen carefully to the child, be supportive and keep an open mind. Staff should not take a decision as to whether or not the abuse has taken place.
2. must respond in a calm and non-judgemental way, asking questions which are open-ended e.g. is there anything else you want to tell me? Yes? And?
3. must not ask leading questions, that is, a question which suggests its own answer. Use words: 'Tell', 'Explain', 'Describe', never 'Why'. If at all possible the questions asked should be recorded. The member of staff should not lay blame or criticise either the child or the perpetrator.
4. should observe any bruises but should not ask a child to remove or adjust their clothing to observe them
5. must reassure the child, but never give a guarantee of absolute confidentiality. They cannot promise to keep any secrets that might compromise the child's safety or well-being. The member of staff should explain that they need to pass the information to the DSL who will ensure that the correct action is taken.
6. must keep a sufficient written record of the conversation. This should be done immediately. The recording must be a clear, precise, factual account of the

observations. The record should include the date, time and place of the conversation and the essence of what was said and done by whom and in whose presence. Include any observations on noticeable non-verbal behaviour and actual words used by the child.

7. must record the disclosure on MyConcern **immediately** and get any notes to the DSL, the Head or the Chairman of the Board of Directors, as appropriate.
8. must complete a body map (available on MyConcern) for any injuries or bruises observed
9. should speak to either of the DSL about any concern about a child – any concerns, either not meeting the threshold for a referral, or not being referred on the advice of the LADO, will be recorded in the ‘confidential’ platform, in our case MyConcern.
10. All evidence, (for example, scribbled notes, mobile phones containing text messages, clothing, and computers), must be securely preserved.

*where a staff member feels the child is at immediate risk and they need to remain under supervision, staff should consult the Head and/or the DSL to determine the best course of action for the safety of the child / children in your care.

Record Keeping by the School

All safeguarding concerns, discussions and decisions (and justifications for those decisions) will be recorded, including details of the concern, the context, and any action taken; and these records will be reviewed so that potential patterns of concerning, problematic or inappropriate behaviour is identified and dealt with appropriately, either through the school’s disciplinary procedures or (if a pattern of behaviour moves from a concern to meeting the harms threshold) in which case it will be referred to the LADO as above. If members of staff are in any doubt about recording requirements, they should discuss their concerns with the DSL/DDSL. Recently updated (April 2024) DfE guidance “[Data protection in schools - Guidance - GOV.UK \(www.gov.uk\)](https://www.gov.uk/guidance/data-protection-in-schools)” helps school staff and governors understand how to comply with data protection law, develop their data policies and processes, know what staff and student data to keep and follow good practices for preventing personal data breaches.

Information is held confidentially and stored securely, in a separate file for each child. Records include:

- a clear and comprehensive summary of the concern;
- details of how the concern was followed up and resolved; and
- a note of any action taken, decisions reached and the outcome.

Staff will record any welfare concern that they have about a child using the MyConcern online safeguarding portal, which immediately alerts the DSL team. Records will be completed as soon as possible after the incident/event, using the child’s words.

If a member of staff is unable to use the online system then a paper Incident Concern Form (with body map if injuries have been observed) should be completed and handed without delay to the DSL.

Safeguarding records are kept for individual children and are maintained separately from all

other records relating to the child in the school. Safeguarding records are kept in accordance with data protection legislation and are retained centrally and securely by the DSL. Safeguarding records are shared with staff on a 'need to know' basis only.

All safeguarding records will be transferred in accordance with data protection legislation to the child's subsequent school/setting, under confidential and separate cover. These will be given to the new DSL and a receipt of delivery will be obtained. Where a student joins or leaves the school at non-standard transition times, the school will report this to the local authority.

The Head will be kept informed of any significant issues by the DSL.

Early help

Early help is support for children of all ages that improves a family's resilience and outcomes, or reduces the chance of a problem getting worse. Support should be given as soon as a problem emerges at any point in a child's life, from the early/primary years through to the teenage years. The school will be proactive in ensuring that every student is able to access full-time education to aid their development and protect them from harm whilst utilising the unique position of having regular daily contact with students to identify concerns as early as possible.

Any student may benefit from early help, but in particular, staff will be alert to the potential need for early help for students who:

- Are disabled, have certain health conditions, or have specific additional needs.
- Have SEND, regardless of whether they have a statutory EHC plan.
- Are suffering from mental ill health.
- Are Young Carers.
- Show signs of being drawn into anti-social or criminal behaviour, including gang involvement and association with organised crime groups or county lines.
- Are frequently missing or going missing from care or from home.
- Are at risk of modern slavery, trafficking, or sexual or criminal exploitation.
- Are at risk of being radicalised.
- Have family members in custody or is affected by parental offending.
- Are in a family circumstance presenting challenges for them, such as drug and alcohol misuse, adult mental health problems, or domestic abuse.
- Are misusing drugs or alcohol.
- Are at risk of HBA, such as FGM or forced marriage.
- Are privately fostered.
- Have experienced multiple suspensions and are at risk of, or have been, permanently excluded from school, alternative provision or a PRU.

The school will not limit its support to students affected by the above and will be mindful of a variety of additional circumstances in which students may benefit from early help, for example, if they are:

- Bereaved.

- Viewing problematic or inappropriate online content or developing inappropriate relationships online.
- Have recently returned home to their family from care.
- Missing education, or are persistently absent from school, or not in receipt of full-time education.

Staff will be mindful of all signs of abuse, neglect and exploitation and use their professional curiosity to raise concerns to the DSL.

The DSL will take the lead where early help is appropriate. This includes liaising with other agencies and setting up an inter-agency assessment as appropriate. The local early help process will be followed as required.

Staff may be required to support other agencies and professionals in an early help assessment, in some cases acting as the lead practitioner. Any such cases will be kept under constant review and consideration given to a referral to MASH for assessment for statutory services if the student's situation is not improving or is worsening.

Abuse, neglect and exploitation

All staff will be aware of the indicators of abuse, neglect and exploitation and will understand that children can be at risk of harm inside and outside of the school, inside and outside of home, and online. Staff will also be aware that students can be affected by seeing, hearing or experiencing the effects of abuse. **See Appendix A for more detailed information on children at Risk of Abuse or Neglect.**

All staff will understand that abuse, neglect, exploitation and other safeguarding issues are rarely standalone events that can be given a specific definition or one label alone. Staff will understand that, in most cases, multiple issues will overlap one another; therefore, staff will be vigilant and always raise concerns with the DSL.

All staff, especially the DSL and deputy DSLs, will be aware that safeguarding incidents and/or behaviours can be associated with factors outside the school and/or can occur between children outside of these environments; this includes being aware that students can be at risk of abuse or exploitation in situations outside their families (extra-familial harms). All staff will be aware of the appropriate action to take following a student being identified as at potential risk of abuse and, in all cases, will speak to the DSL if they are unsure.

All staff will be aware that technology is a significant component in many safeguarding and wellbeing issues, including online abuse, cyberbullying, and the sharing of indecent images.

Specific safeguarding issues

There are certain specific safeguarding issues that can put children at risk of harm – staff will be aware of these issues.

Appendix B of this policy sets out details about specific safeguarding issues that students may experience and outlines specific actions that would be taken in relation to individual cases.

Child-on-child abuse

For the purposes of this policy, “**child-on-child abuse**” is defined as abuse by one or more students against another student, both inside and outside of school, or online.

The school has a zero-tolerance approach to abuse, including child-on-child abuse.

All staff will be aware that child-on-child abuse can occur between students of any age and gender, both inside and outside of school, as well as online. All staff will be aware of the indicators of child-on-child abuse, how to identify it, and how to respond to reports. All staff will also recognise that even if no cases have been reported, this is not an indicator that child-on-child abuse is not occurring. All staff will speak to the DSL if they have any concerns about child-on-child abuse.

When identifying students at risk of potential harm or who have been harmed by their peers, staff members will look out for a number of indicators including, but not limited to, the following:

- Injuries in unusual places, such as bite marks on the neck, that are also inconsistent with their age
- Lack of concentration and acting withdrawn
- Knowledge ahead of their age, e.g. sexual knowledge
- Use of explicit language
- Fear of abandonment
- Depression and low self-esteem
- Changes to their social group, e.g. spending time with older students, or social isolation
- Alcohol or substance misuse

All staff will understand the importance of challenge inappropriate behaviour between peers, and will not tolerate abuse as “banter” or “part of growing up”.

Child-on-child abuse can be manifested in many different ways, including:

- Bullying, including cyberbullying and prejudice-based or discriminatory bullying.
- Abuse in intimate personal relationships between peers – sometimes known as ‘teenage relationship abuse’.
- Physical abuse – this may include an online element which facilitates, threatens and/or encourages physical abuse.
- Sexual violence – this may include an online element which facilitates, threatens and/or encourages sexual violence.
- Sexual harassment, including online sexual harassment, which may be standalone or part of a broader pattern of abuse.
- Causing someone to engage in sexual activity without consent.
- The consensual and non-consensual sharing of nude and semi-nude images and/or videos.
- Sextortion – individuals being forced into paying money or meeting another financial demand, after a person has threatened to release nude or semi-nude photos of them

(this could be a real photo, or a fake image created of the victim by the person threatening its release)

- Upskirting.
- Initiation and hazing-type violence and rituals, which can include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group, and may also include an online element.

All staff will be clear as to the school's policy and procedures regarding child-on-child abuse and the role they have to play in preventing it and responding where they believe a child may be at risk from it.

In all instances of child-on-child abuse the safeguarding team will:

- Reassure the victim, ensuring that they feel safe in school
- If necessary, put in place a Safety / Wellbeing Plan for the victim
- Offer the student support through, onsite/offsite counselling, our Pastoral Assistant, SEMH support or a referral to Early help/BICS
- Assess whether a MASH or Police referral is required
- Complete a risk assessment
- Where appropriate, sanction the perpetrator in line with the behaviour and anti-bullying policy
- Refer the perpetrator for support through early help, safer schools' team or MASH
- Staff will follow these procedures, as well as the procedures outlined in the school's Anti-bullying Policy, Behaviour Policy and Exclusions Policy, where relevant.

If an allegation of abuse is made against a student at the school, where the victim is also a student at the school and where there is reasonable cause to suspect that the victim is suffering, or is likely to suffer, significant harm, that student may be suspended from School during the investigation and the School's Behaviour, and Exclusions, policies will apply. Reference should be made to the school's Anti-bullying Policy, noting that instances of bullying are potentially a child protection concern given, for example, the fact that emotional and physical abuse may arise from bullying. Any such abuse will be referred to local agencies to seek their advice on whether a formal referral should be made along with referring the student(s) to an external agency.

It would be expected that, in the event of a disclosure of child on child abuse, that all children involved, whether perpetrator or victim, would be treated as being 'at risk'. The school will provide appropriate support to all children involved, whether alleged perpetrator(s) or victim, and this support will continue if required even after the immediate cause for concern has been dealt with. Particular attention will be paid to the needs of children identified as being more vulnerable including those with SEND.

It is important to remember that the person who first encounters a case of alleged child on child (or any) abuse is not responsible for deciding whether abuse has occurred. That is a task for the professional team of DSL and child protection agencies, following a referral from the DSL.

Students will be made aware of how to raise concerns or make a report and how any reports

will be handled. This includes the process for reporting concerns about friends or peers. Students will also be reassured that they will be taken seriously, be supported, and kept safe.

In the event of any report of child on child sexual abuse, the school will follow the guidelines and procedure detailed in KCSIE 2024, Part 5: Child on child sexual violence and sexual harassment, paragraphs 474-565.

The school looks to minimise the risk of child-on-child abuse through: annual safeguarding training and updates at INSET; student assemblies that focus on the school's core value of respect; and through the RSE programme that focuses on promoting positive and respectful relationships.

Online safety and personal electronic devices

The school will adhere to the Online Safety Policy at all times.

As part of a broad and balanced curriculum, all students will be made aware of online risks and taught how to stay safe online.

Through training, all staff members will be made aware of:

- Student attitudes and behaviours which may indicate they are at risk of potential harm online.
- The procedure to follow when they have a concern regarding a student's online activity.

The school will ensure that appropriate filtering systems are in place on school devices and school networks to prevent children accessing inappropriate material, in accordance with the school's Online Safety Policy. The school will, however, ensure that the use of filtering and monitoring systems does not cause "over blocking", which may lead to unreasonable restrictions as to what students can be taught online. The school will also ensure that it meets the [filtering and monitoring standards](#) published by the DfE.

Staff will be aware of the filtering and monitoring systems in place and will know how to escalate concerns where they are identified. Staff will be made aware of their expectations and responsibilities relating to filtering and monitoring systems during their induction.

Further information regarding the school's approach to online safety can be found in the Online Safety Policy and Appendix C

Communicating with parents

As part of the usual communication with parents, the school will reinforce the importance of students being safe online and inform parents that they will find it helpful to understand what systems the school uses to filter and monitor internet use.

The school will also make it clear to parents what their children are being asked to do online for school.

Reviewing online safety

The school will carry out an annual review of its approach to online safety, supported by an annual risk assessment that considers and reflects the risks faced by students.

Personal electronic devices

The use of personal electronic devices, including mobile phones and cameras, by staff and students is closely monitored by the school, in accordance with the **ICT, Internet and Social Media Acceptable Use of IT Policy and Staff Code of Conduct**

Photographs and videos of students will be carefully planned before any activity with particular regard to consent and adhering to the school's Data Protection Policy and Photography Policy. The Data Manager will oversee the planning of any events where photographs and videos will be taken.

Where photographs and videos will involve students who are LAC, adopted students, or students for whom there are security concerns, the Head will liaise with the DSL to determine the steps involved. The DSL will, in known cases of students who are LAC or who have been adopted, liaise with the students' social workers, carers or adoptive parents to assess the needs and risks associated with the students.

Staff will report any concerns about students' or other staff members' use of personal electronic devices to the DSL, following the appropriate procedures.

Upskirting

Under the Voyeurism (Offences) Act, it is an offence to operate equipment for the purpose of upskirting. **"Operating equipment"** includes enabling, or securing, activation by another person without that person's knowledge, e.g. a motion-activated camera.

Upskirting will not be tolerated by the School. Any incidents of upskirting will be reported to the DSL, who will then decide on the next steps to take, which may include police involvement.

Consensual and non-consensual sharing of indecent images and videos

The Dec 2020 govt guidance document ["UKCIS Sharing nudes and semi-nudes: advice for education settings working with children and young people"](#) provides detailed advice for schools and colleges regarding the consensual and non-consensual sharing of nudes and semi-nudes images and/or videos, which is a criminal offence. The school will ensure that staff treat the consensual and non-consensual sharing of nude and semi-nude images and/or videos (also known as "sexting" or youth-produced sexual images) as a safeguarding concern.

Staff will receive appropriate training regarding child sexual development and will understand the difference between sexual behaviour that is considered normal and expected for the age of the student, and sexual behaviour that is inappropriate and harmful. Staff will receive appropriate training around how to deal with instances of sharing nudes and semi-nudes in the school community, including understanding motivations, assessing risks posed to students depicted in the images, and how and when to report instances of this behaviour.

Staff will be aware that creating, possessing, and distributing indecent imagery of children is a criminal offence, regardless of whether the imagery is created, possessed, and distributed

by the individual depicted; however, staff will ensure that students are not unnecessarily criminalised.

Where a member of staff becomes aware of an incident of sharing nudes and/or semi-nudes, they will refer this to the DSL as soon as possible. Where a student confides in a staff member about the circulation of indecent imagery, depicting them or someone else, the staff member will:

- Refrain from viewing, copy, printing, sharing, storing or saving the imagery.
- Tell the DSL immediately if they accidentally view an indecent image and seek support.
- Explain to the student that the incident will need to be reported.
- Respond positively to the student without blaming or shaming anyone involved, and reassuring them that they can receive support from the DSL.
- Report the incident to the DSL.

The DSL will attempt to understand what the image contains **without viewing it** and the context surrounding its creation and distribution – he/she will categorise the incident into one of two categories:

- **Aggravated:** incidents which involve additional or abusive elements beyond the creation and distribution of indecent images of students, including where there is an adult involved, where there is an intent to harm the student depicted, or where the images are used recklessly.
- **Experimental:** incidents involving the creation and distribution of indecent images of students where there is no adult involvement or apparent intent to cause harm or embarrassment to the student.

Where it is necessary to view the imagery, e.g. if this is the only way to make a decision about whether to inform other agencies, the DSL should:

- Discuss this decision with the Head or member of the SLT.
- Ensure the image is, where possible, viewed by someone of the same sex as the individual depicted.
- Ensure viewing takes place on school premises and with another member of staff present in the room – this staff member does not need to view the imagery.
- Record how and why the decision was made to view the imagery in accordance with the Records Management Policy.

Where the incident is categorised as ‘experimental’, the students involved are supported to understand the implications of sharing indecent imagery and to move forward from the incident. Where there is reason to believe that indecent imagery being circulated will cause harm to a student, the DSL escalates the incident to CSCS. Where indecent imagery of a student has been shared publicly, the DSL will work with the student to report imagery to sites on which it has been shared and will reassure them of the support available.

Prevention of Radicalisation

Children can be vulnerable and susceptible to extremist ideology and radicalisation. Similar to protecting children from other forms of harms and abuse, protecting children from this risk is part of Mount House School’s safeguarding approach:

- **Extremism** is the vocal or active opposition to our fundamental values, including the

rule of law, individual liberty and the mutual respect and tolerance of different faiths and beliefs. This also includes calling for the death of members of the armed forces. For the full Government definition of extremism, see '[New definition of extremism' \(2024\) - GOV.UK \(www.gov.uk\)](#).

- **Radicalisation** refers to the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups. It is a social process but also a deeply personal experience. The Department for Education has also published supporting advice for schools and further education settings on managing the risk of radicalisation in their education setting
- (<https://www.gov.uk/government/publications/the-prevent-duty-safeguarding-learners-vulnerable-to-radicalisation>).
- Terrorism is an action that endangers or causes serious violence to a person/people; causes serious damage to property; or seriously interferes or disrupts an electronic system. The use or threat **must** be designed to influence the government or to intimidate the public and is made for the purpose of advancing a political, religious or ideological cause.

There is no single way of identifying whether a child is vulnerable, and therefore may be susceptible to interest in/involvement with an extremist ideology. Background factors combined with specific influences such as family and friends may contribute to a child's vulnerability. Similarly, radicalisation can occur through many different methods (such as social media) and settings (such as the internet). The accepted view is that a complex relationship between the various aspects of an individual's identity and vulnerability, determines their susceptibility to extremism.

However, it is possible to protect vulnerable people from extremist ideology and intervene to prevent those at risk of radicalisation being radicalised. As with other safeguarding risks, staff should be alert to changes in children's behaviour which could indicate that they may need help or protection. Staff should use their judgement in identifying children who might be at risk of radicalisation and act proportionately which may include the DSL/DDSL making a referral to the Channel programme.

The Prevent Duty - all schools and colleges are subject to a duty under section 26 of the Counter-Terrorism and Security Act 2015 (the CTSA 2015), in the exercise of their functions, to have "due regard to the need to prevent people from being drawn into terrorism". This duty is known as the Prevent duty. The Prevent duty is part of the school's wider safeguarding obligations, see the (Dec 2023) revised [Prevent duty guidance: for England and Wales](#), especially paragraphs 141 - 210, which are specifically concerned with education providers. To prevent radicalisation we do the following:

- Staff training - the DSL will complete specialised training to enable them to train/equip staff via Prevent, Channel and other appropriate training to identify and assess children at risk of being drawn into terrorism and to challenge extremist ideas. Staff in regular contact with students receive training in how to identify signs of radicalism in students through observing changes in behaviour etc. Staff are advised on actions to take should they identify such behaviours, such as reporting to DSL immediately.
- Advice and support – the DSL will provide advice and support to other members of staff on protecting children from radicalisation, with particular attention to the needs

of children identified as more vulnerable, including those with SEND, who may therefore be more susceptible. The DSL and Senior Leadership Team ensure the school RSE Policy and PSHE / Morning Programme incorporates specific sections that assist the students to understand the dangers of extremist arguments.

- IT considerations – the school will ensure that the students are safe from terrorist and extremist material when accessing the internet through suitable filtering. Students will also be taught about online safety more generally.
- The DSL and SLT ensure the school IT and e-safety policies - have safety procedures in place to block any possible route for students to be targeted online or through the internet where they may be susceptible to terrorist or extremist material.
- The School IT service provider is responsible for checking that no terrorist or 'grooming' organisations contact or are able to access students.
- The Head ensures parents are continually warned of the dangers of their children being targeted through the internet on home computers.
- If the DSL suspects a student is being radicalised they may discuss the matter with parents. If the DSL considers the child to be at risk of significant harm they may contact the LADO immediately without informing the parents, and then act accordingly.

The Channel Programme

Channel is a programme which focuses on providing support at an early stage to people who are identified as being vulnerable to being drawn into terrorism. It provides a mechanism for schools to make referrals if they are concerned that an individual might be vulnerable to radicalisation. An individual's engagement with the programme is entirely voluntary at all stages.

Non-violent extremism

Schools should not only be alert to violent extremism but also non-violent extremism, including certain divisive or intolerant narratives which can reasonably be linked to terrorism. See Educate Against Hate which provides further information on extremist narratives.

(<https://www.educateagainsthate.com/category/school-leaders/advice-and-training-school-leaders/>)

Context of safeguarding incidents

Safeguarding incidents can occur outside of school and can be associated with outside factors. All staff, particularly the DSL and deputy DSLs, will always consider the context of safeguarding incidents. Assessment of students' behaviour will consider whether there are wider environmental factors that are a threat to their safety and/or welfare. The school will provide as much contextual information as possible when making referrals to MASH.

Students potentially at greater risk of harm

The school recognises that some groups of students can face additional safeguarding challenges, both online and offline, and understands that further barriers may exist when determining abuse and neglect in these groups of students. Additional considerations for managing safeguarding concerns and incidents amongst these groups are outlined below.

Students who need social workers

Students may need social workers due to safeguarding or welfare needs. These needs can

leave students vulnerable to further harm and educational disadvantage.

As a matter of routine, the DSL will hold and use information from the LA about whether a student has a social worker in order to make decisions in the best interests of the student's safety, welfare, and educational outcomes.

Where a student needs a social worker, this will inform decisions about safeguarding, e.g. responding to unauthorised absence, and promoting welfare, e.g. considering the provision pastoral or academic support.

Home-educated children

Parents may choose elective home education (EHE) for their children. In some cases, EHE can mean that children are less visible to the services needed to safeguard and support them.

In line with the Education (Student Registration) (England) Regulations 2006, the school will inform the LA of all deletions from the admissions register when a student is taken off roll.

Where a parent has expressed their intention to remove a student from school for EHE, the school, in collaboration with the LA and other key professionals, will coordinate a meeting with the parent, where possible, before the final decision has been made, particularly if the student has SEND, is vulnerable, and/or has a social worker.

LAC and PLAC

Children most commonly become looked after because of abuse and/or neglect. Because of this, they can be at potentially greater risk in relation to safeguarding. PLAC, also known as care leavers, can also remain vulnerable after leaving care.

The governing board will ensure that staff have the skills, knowledge and understanding to keep LAC and PLAC safe. This includes ensuring that the appropriate staff have the information they need, such as:

- Looked after legal status, i.e. whether they are looked after under voluntary arrangements with consent of parents, or on an interim or full care order.
- Contact arrangements with parents or those with parental responsibility.
- Care arrangements and the levels of authority delegated to the carer by the authority looking after the student.

The DSL will be provided with the necessary details of students' social workers and the VSH, and, for PLAC, personal advisers.

Students with SEND

When managing safeguarding in relation to students with SEND, staff will be aware of the following:

- Certain indicators of abuse, such as behaviour, mood and injury, may relate to the student's disability without further exploration; however, it should never be assumed that a student's indicators relate only to their disability
- Students with SEND can be disproportionately impacted by issues such as bullying, without outwardly showing any signs
- Communication barriers may exist, as well as difficulties in overcoming these barriers
- Cognitive understanding – being able to understand the difference between fact and fiction in online content and then repeating the content/behaviour in school, or the

consequences of doing so.

When reporting concerns or making referrals for students with SEND, the above factors will always be taken into consideration. When managing a safeguarding issue relating to a student with SEND, the DSL will liaise with the school's SENCO, as well as the student's parents where appropriate, to ensure that the student's needs are met effectively.

The SEND Code of Practice is a useful source of information, and support is available from specialist organisations including The Special Educational Needs and Disabilities Information Advice and Support Services (SENDIASS).

LGBTQ+ students

The fact that a student may be LGBTQ+ is not in itself an inherent risk factor for harm; however, staff will be aware that LGBTQ+ students can be targeted by other individuals. Staff will also be aware that, in some cases, a student who is perceived by others to be LGBTQ+ (whether they are or not) can be just as vulnerable as students who identify as LGBTQ+.

Staff will also be aware that the risks to these students can be compounded when they do not have a trusted adult with whom they can speak openly with. Staff will endeavour to reduce the additional barriers faced by these students and provide a safe space for them to speak out and share any concerns they have.

LGBTQ+ inclusion is part of the statutory RSE curriculum and there is a range of support available to help schools counter homophobic, biphobic and transphobic bullying and abuse.

Students requiring mental health support

All staff will be made aware that mental health problems can, in some cases, be an indicator that a student has suffered, or is at risk of suffering, abuse, neglect or exploitation.

The school has an important role to play in supporting the mental health and wellbeing of their students as childhood experiences can have a lasting impact into adolescence and adulthood. Therefore it is key that staff are aware of how these children's experiences can impact on their mental health, behaviour and education. If staff have a mental health concern about a child that is also a safeguarding concern, immediate action will be taken, following the procedures in this policy and speaking to the DSL or a deputy.

Only appropriately trained professionals should attempt to make a diagnosis of a mental health problem; however school staff are well placed to observe children day-to-day and identify those whose behaviour suggests that they may be experiencing a mental health problem or be at risk of developing one.

The school accesses a range of advice to help it identify children in need of extra mental health support, including working with external agencies. More information can be found in the [mental health and behaviour in schools guidance](#), and Public Health England has produced a range of resources to support secondary school teachers to promote positive health, wellbeing and resilience among children. See [Rise Above](#) for links to all materials and lesson plans.

Empowering Students to be safe: Curriculum, Pastoral and Extra-Curricular Influences on Student Safeguarding and Welfare

Schools play a crucial role in preventative education. Preventative education is most effective in the context of a whole-school approach that prepares students and students for life in modern Britain and creates a culture of zero tolerance for sexism, misogyny/misandry, homophobia, biphobic and sexual violence/harassment. The School has a clear set of values and standards which are upheld and demonstrated throughout all aspects of school life.

Mount House acknowledges the important role that the curriculum, pastoral systems and some extra-curricular activities play in the maintenance of the welfare and safeguarding of students, as well as in the prevention of abuse and the preparation of the students for the responsibilities of adult life and citizenship. A planned programme of evidence-based Relationships and Sex Education delivered in regularly timetabled lessons and reinforced throughout the whole curriculum plays a vital role in this.

All teaching staff play a vital role in this process, helping to ensure that students relate well to one another and feel safe and comfortable within the School, and to know how to ask for help if their safety is threatened. We expect all the teaching and pastoral staff to lead by example, and to play a full part in promoting awareness that is age-appropriate, and stage of development-appropriate, amongst all our students on issues relating to health, safety and wellbeing. Particular attention is paid to the needs of children identified as being more vulnerable including those with SEND.

The school uses the following as part of their approach in ensuring that students develop a clear understanding of safeguarding issues including those regarding online safety, the dangers of radicalisation (and how they can build resilience against it), and the safeguarding dangers associated with alcohol, bullying, drug-taking, sexual assaults and sexting:

- PSHE Lessons
- Morning Programme
- Assemblies
- IT Lessons
- Workshops
- Speakers

All staff, including all non-teaching staff, have an important role in insisting that students adhere to the expectations of behaviour set out in the School's Behaviour Policy, and in enforcing the Anti-Bullying and Online Safety policies.

As part of developing a healthy, safer lifestyle, students will be taught, for example:

- To recognise and manage risks in different situations and then decide how to behave responsibly.
- To judge what kinds of physical contact are acceptable and unacceptable.
- To recognise when pressure from others (including people they know) threatens their personal safety and wellbeing, including knowing when and where to get help.
- To use assertiveness techniques to resist unhelpful pressure.
- Emotional literacy.
- Online Safety.

All computer equipment and internet access within the School will be subject to appropriate “parental controls” and Internet safety rules in line with our ICT acceptable Use and Online Safety Policy

Use of the school premises for non-school activities

Where the Board hires or rents out school facilities or the school premises to organisations or individuals, e.g. for providers to run community or extra-curricular activities, it will ensure that appropriate safeguarding arrangements are in place to keep students safe. The School will refer to the DfE’s [guidance](#) on keeping children safe in out-of-school settings in these circumstances.

Where the governing board provides the activities under the direct supervision or management of school staff, child protection arrangements will apply. Where activities are provided separately by another body, this may not be the case; therefore, the governing board will seek assurance that the body concerned has appropriate safeguarding and child protection policies and procedures in place, including inspecting these as needed. The governing board will also ensure that there are arrangements in place to liaise with the School on these matters where appropriate. The governing board will ensure safeguarding requirements are included in any transfer of control agreement, i.e. a lease or hire agreement, as a condition of use and occupation of the premises, and specify that failure to comply with this would lead to termination of the agreement.

Extracurricular activities and clubs

External bodies that host extra-curricular activities and clubs at the School, e.g. charities or companies, will work in collaboration with the school to effectively safeguard students and adhere to local safeguarding arrangements.

Staff and volunteers running extra-curricular activities and clubs are aware of their safeguarding responsibilities and promote the welfare of students. Paid and volunteer staff understand how they should respond to child protection concerns and how to make a referral to MASH or the police, if necessary.

All national governing bodies of sport that receive funding from either Sport England or UK Sport must aim to meet the Standards for Safeguarding and Protecting Children in Sport.

Work experience

When a student is sent on work experience, the School will ensure that the provider has appropriate safeguarding policies and procedures in place. Where the school has students conduct work experience at the School, an enhanced DBS check will be obtained if the student is over the age of 16.

Visiting Speakers

In accordance with the Prevent statutory guidance, the School has a protocol to ensure that visiting speakers are suitable and appropriately supervised. A visiting speaker will be invited only with the permission of a senior leader. Formal or informal background information about a visiting speaker will be obtained to decide whether to invite and/or permit a speaker

to attend the School. Where a visiting speaker is coming onto our school site, staff will need to complete a Visiting Speaker Form, which will be signed off by a member of the Senior Management Team.

Trips

Our same safeguarding protocols apply to school trips. Please see our Educational Trips and Visits Policy for more details about how we safeguard our students on trips.

Concerns about school safeguarding practices

Any concerns regarding the safeguarding practices at the School will be raised with the SLT, and the necessary whistleblowing procedures will be followed, as outlined in the Whistleblowing Policy. If a staff member feels unable to raise an issue with the SLT, they should access other whistleblowing channels such as the NSPCC whistleblowing helpline (0800 028 0285).

Safeguarding Concerns and Allegations Against Staff

All allegations against staff, supply staff, volunteers and contractors, will be dealt with appropriately and the School will liaise with the relevant parties.

When managing allegations against staff, the School will recognise the distinction between allegations that meet the 'harms threshold' and allegations that do not, also known as 'low-level concerns'. Allegations that meet the 'harms threshold' include instances where staff have:

- behaved in a way that has harmed a child, or may have harmed a child and/or;
- possibly committed a criminal offence against or related to a child and/or;
- behaved towards a child or children in a way that indicates he or she may pose a risk of harm to children; and/or
- behaved or may have behaved in a way that indicates they may not be suitable to work with children (which includes behaviour that may have happened outside school posing a transferable risk to children).

Procedures for allegations against a member of staff

If you are the person to whom the allegation is first reported you must:

- make a written record of the allegation using the informant's words - including time, date and place where the alleged incident took place, what was said and anyone else present.
- take the matter seriously and keep an open mind
- not investigate nor ask leading questions if seeking clarification, and must not make assumptions.
- not unilaterally determine its validity
- not determine whether it has met a certain threshold
- report the allegation at the earliest opportunity and without delay
- not discuss the allegation with anyone else.

Failure to report it in accordance with these procedures is a disciplinary matter.

The written record should be signed and dated and passed immediately to the Head. If the Head is absent, the allegation should be passed to whoever is deputising for the Head in their absence that day. Where there may be a conflict of interest in reporting an allegation to the Head (or the staff member deputising in their absence), a member of staff can report the matter to the Chair of the Board of Directors.

The matter will proceed as follows:

- **If, at any time, there is risk of immediate serious harm to a child, a referral will be made to the LADO or Assessment Team immediately.**
- The Head/Deputy/Chair of The Board of Directors will contact the LADO or the Barnet Social Care Assessment Team immediately, and at the latest within one working day of allegations being reported. They will consider the issue and advise on the action the school must take. All discussions with the LADO will be recorded in writing.
- If there are concerns about a child, but there is no need to make an immediate referral (this will be on the advice of the Assessment Team or LADO), written records will still be kept (and placed in the school's Safeguarding File).
- In the most serious of circumstances the Head/ Chair of The Board of Directors will contact the police.
- The Head will not investigate the allegation itself, or take written or detailed statements, before consulting the LADO, to assess the situation and agree the best course of action - including police involvement and the potential suspension of the member of staff or other alternative arrangement to be put in place until the allegation is resolved.
- No internal investigation should take place unless authorised by the LADO.
- The Head will, as soon as possible, and following briefing from the LADO, inform the subject of an allegation, providing as much information as possible at the time.
- Appropriate support will be offered to the person against whom an allegation has been made.
- Confidentiality should not be promised; however the person should be advised that the concern will be shared on a 'need-to-know' basis only. The School will take all care to ensure confidentiality during the process and will avoid publicity. Confidentiality will be maintained until the person involved is charged or the DfE/ TRA publish details about the investigations as part of disciplinary procedures.

Allegations concerning the Head - if the allegation made to a member of staff concerns the Head, the person receiving the allegation will immediately inform the Chair of the Board of Directors (daviesi@mounthouse.org.uk), without notifying the Head first, who will consult the LADO as above also without notifying the Head first. As above, any decision to suspend the Head would be taken by the Chair of The Board of Directors, having sought the advice of the LADO.

Allegations relating to external individuals or organisations that are using school premises - when the School receives an allegation relating to an incident that (may have) happened when an individual was using their school premises for the purposes of running activities for children (community groups, sports associations, extra-curricular activities), the School will follow the its regular safeguarding policies and procedures, including informing the LADO.

Low-Level Concerns

Where an allegation against staff falls below the 'harms threshold', it does mean it is insignificant. A low-level concern is any concern – no matter how small, and even if no more than causing a sense of unease or a 'nagging doubt' - that an adult working in or on behalf of the School may have acted in a way that:

- is inconsistent with the staff Code of Conduct, including inappropriate conduct outside of work; and
- does not meet the harm threshold or is otherwise not serious enough to consider a referral to the LADO.
- Examples of such behaviour could include, but are not limited to:
 - being over friendly with students;
 - having favourites;
 - taking photographs of students on their mobile phone, contrary to school policy;
 - engaging with a student on a one-to-one basis in a secluded area or behind a closed door
 - humiliating students.

The School deals with all concerns about adults working in or behalf of the School appropriately and promptly. It is never too late to report a concern. The School seeks to create an environment where staff are encouraged and feel confident to either refer someone or self-refer, where, for example, they have found themselves in a situation which could be misinterpreted, might appear compromising to others, and/or on reflection they believe they have behaved in such a way that they consider falls below expected professional standards.

Please see the Low-Level Concerns Policy for more details.

Support for Staff who are Subject to Allegations

The school has a duty of care to its employees. Being the subject of an allegation is traumatic for any member of staff, no matter how sensitively it is handled. Everyone who works with children is potentially at risk and must aim to minimise the risk. The School will act to minimise the stress inherent in allegations and disciplinary investigations and processes.

The School hopes to create a caring environment where staff feel able to raise concerns and feel supported in doing so. If staff should experience a situation that is an emergency or extremely urgent they may make a direct referral to external agencies.

The School will provide appropriate pastoral care to any member of staff who is subject to a formal allegation following a use-of-force incident. Individuals will be informed of concerns or allegations as soon as possible and explained the likely course of action, unless there is an objection by the investigation process, children's services or the police. The individual may be advised to contact their trade union representative, if they have one. If a decision is taken to suspend a teacher, the school will ensure that the teacher has access to a named contact who can provide support. They may also be given access to welfare counselling or medical advice if considered appropriate.

Malicious Accusations against Staff Members

Students that are found to have made malicious allegations are likely to have breached school behaviour policies. The school should therefore consider whether to apply an appropriate sanction, which could include Fixed-Term or Permanent Exclusion or a Managed Move (as well as referral to the police if there are grounds for believing a criminal offence may have been committed). In such a circumstance, the School would ensure it considers all the evidence, taking account of the student's age, the School's policies, equal opportunities legislation, and the personal circumstances of the student. Equally, it would need to review the impact on the staff member(s) involved as part of the decision-making process and ensure they are appropriately supported in recovering from such an experience. The School would review the case as a whole, which would lead to a wholesale review of how we would approach future cases of 'Malicious Accusations against Staff Members'.

Communication and confidentiality

When recording, holding, using and sharing information, the DSL will ensure that they:

- Understand the importance of information sharing, both within the School and with other schools on transfer including in year, between primary and secondary education, between secondary education and further education and where applicable between secondary education and higher education, as well as with safeguarding partners, other agencies, organisations and practitioners.
- Understand relevant data protection legislation and regulations, in particular the Data Protection Act 2018 and the UK GDPR.
- Are able to keep detailed, accurate, secure written records of all concerns, discussions and decisions made including the rationale of those decisions. This will include instances where referrals were and were not made to another agency such as LA children's social care or the Prevent programme.

All child protection and safeguarding concerns will be treated in the strictest of confidence in accordance with school data protection policies. All members of staff are aware that whilst they have duties to keep any information confidential, they also have a professional responsibility to share information with other agencies to safeguard children. Staff should never assume a colleague or another professional will take action and share information that might be critical in keeping children safe. They should be mindful that early information sharing is vital for effective identification, assessment and allocation of appropriate service provision. DfE Guidance on Information Sharing (July 2023) provides further detail:

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

All relevant staff have due regard to the relevant data protection principles, which allow them to share (and withhold) personal information, as provided for in the Data Protection Act 2018 and the GDPR. This includes:

- being confident of the processing conditions which allow them to store and share information for safeguarding purposes, including information which is sensitive and personal, and should be treated as 'special category personal data'.
- understanding that 'safeguarding of children and individuals at risk' is a processing condition that allows practitioners to share special category personal data. This includes allowing practitioners to share information without consent where there is good reason to do so, and that the sharing of information will enhance the

safeguarding of a child in a timely manner but it is not possible to gain consent, it cannot be reasonably expected that a practitioner gains consent, or if to gain consent would place a child at risk.

- for schools, not providing students' personal data where the serious harm test under the legislation is met. For example, in a situation where a child is in a refuge or another form of emergency accommodation, and the serious harms test is met, they must withhold providing the data in compliance with schools' obligations under the Data Protection Act 2018 and the GDPR. Where in doubt the School would seek independent legal advice.

Where there is an allegation or incident of sexual abuse or sexual violence, the victim is entitled to anonymity by law; therefore, the School will consult its policy and agree on what information will be disclosed to staff and others, in particular the alleged perpetrator and their parents. Where a report of sexual violence or sexual harassment is progressing through the criminal justice system, the School will do all it can to protect the anonymity of the students involved in the case.

Concerns will only be reported to those necessary for its progression and reports will only be shared amongst staff members and with external agencies on a need-to-know basis. During the disclosure of a concern by a student, staff members will not promise the student confidentiality and will ensure that they are aware of what information will be shared, with whom and why.

Where it is in the public interest, and protects students from harm, information can be lawfully shared without the victim's consent, e.g. if doing so would assist the prevention, detection or prosecution of a serious crime. Before doing so, the DSL will weigh the victim's wishes against their duty to protect the victim and others. Where a referral is made against the victim's wishes, it is done so carefully with the reasons for the referral explained to the victim and specialist support offered.

Depending on the nature of a concern, the DSL will discuss the concern with the parents of the students involved. Discussions with parents will not take place where they could potentially put a student at risk of harm. Discussion with the victim's parents will relate to the arrangements being put in place to safeguard the victim, with the aim of understanding their wishes in terms of support arrangements and the progression of the report. Discussion with the alleged perpetrator's parents will have regards to the arrangements that will impact their child, such as moving classes, with the reasons behind decisions being explained and the available support discussed. External agencies will be invited to these discussions where necessary.

Where confidentiality or anonymity has been breached, the school will implement the appropriate disciplinary procedures as necessary and will analyse how damage can be minimised and future breaches be prevented.

Where a student is leaving the School, the DSL will consider whether it is appropriate to share any information with the student's new provider, in addition to the child protection file, that will allow the new provider to support the student and arrange appropriate support for their

arrival.

The Data Protection Act 2018 does not prevent the sharing of information for the purposes of keeping children safe. **Fears about sharing information must not be allowed to stand in the way of the need to safeguard and promote the welfare and protect the safety of children.** Schools and colleges have clear powers to share, hold and use information for these purposes.

Safer recruitment

The School's full policy and procedures for safer recruitment are outlined in the Safer Recruitment Policy.

An enhanced DBS check with barred list information will be undertaken for all staff members engaged in regulated activity. A person will be considered to be in 'regulated activity' if, as a result of their work, they:

- Are responsible on a daily basis for the care or supervision of children.
- Regularly work in the School at times when children are on the premises.
- Regularly come into contact with children under 18 years of age.

The DfE's [DBS Workforce Guides](#) will be consulted when determining whether a position fits the child workforce criteria.

The governing board will conduct the appropriate pre-employment checks for all prospective employees, including internal candidates and candidates who have lived or worked outside the UK. The appropriate DBS and suitability checks will be carried out for all governors, volunteers, and contractors.

Ongoing suitability

Following appointment, consideration will be given to staff and volunteers' ongoing suitability – to prevent the opportunity for harm to children or placing children at risk.

Referral to the DBS

The school will refer to the DBS anyone who has harmed a child or poses a risk of harm to a child, or if there is reason to believe the member of staff has committed an offence and has been removed from working in regulated activity. The duty will also apply in circumstances where an individual is deployed to another area of work that is not in regulated activity or they are suspended.

Single central record (SCR)

The school keeps an SCR which records all staff, including agency and third-party supply staff, and teacher trainees on salaried routes who work at the School.

All members of the proprietor body are also recorded on the SCR.

The following information is recorded on the SCR:

- An identity check
- A barred list check

- An enhanced DBS check
- A prohibition from teaching check
- A check of professional qualifications, where required
- A check to determine the individual's right to work in the UK
- Additional checks for those who have lived or worked outside of the UK
- A section 128 check for those in management positions.

For agency and third-party supply staff, the School will also record whether written confirmation from the employment business supplying the member of staff has been received which indicates that all the necessary checks have been conducted (i.e. all the same checks the School would perform on any individual working in the School or who will be providing education on the School's behalf, including through online delivery) and the date that confirmation was received.

If any checks have been conducted for volunteers, this will also be recorded on the SCR. If risk assessments are conducted to assess whether a volunteer should be subject to an enhanced DBS check, the risk assessment will be recorded.

Written confirmation that supply agencies have completed all relevant checks will also be included.

The School is free to record any other information it deems relevant.

The details of an individual will be removed from the SCR once they no longer work at the School.

Complaints

Any complaint arising from the application of this policy should be directed in the first instance to the DSL at the School. Should the complainant be dissatisfied with the response given, then they should follow the School's complaints procedures.

Attention is also drawn to the contact details for ISI, NSPCC and Ofsted in the External Contacts section which might prove helpful to those with concerns about the conduct of a School.

Monitoring and review

This policy is reviewed at least annually by the DSL, DDSLs, the Head and the Chairman of the Board. This policy will be updated as needed to ensure it is up-to-date with safeguarding issues as they emerge and evolve, including any lessons learnt.

Any changes made to this policy will be communicated to all members of staff. All members of staff are required to familiarise themselves with all processes and procedures outlined in this policy as part of their induction programme. The next scheduled review date for this policy September 2025.

Appendix A – Children at Risk of Abuse, Neglect and Exploitation

Knowing what to look for is vital to the early identification of abuse, neglect and exploitation, so this detailed information will aid in this process.

All staff should be aware of indicators of abuse, neglect and exploitation, and specific safeguarding issues such as child criminal exploitation and child sexual exploitation, so that they are able to identify cases of children who may be in need of help or protection. If staff are unsure, they should always speak to the Designated Safeguarding Lead (or deputy).

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

All staff should be aware that abuse, neglect and safeguarding issues are rarely stand-alone events that can be covered by one definition or label. In most cases, multiple issues will overlap with one another. Behaviours linked to issues such as drug taking and or alcohol misuse, deliberately missing education and consensual and non-consensual sharing of nude and semi-nude images and/or videos can be signs that children are at risk.

All staff should be able to reassure victims that they are being taken seriously and that they will be supported and kept safe. A victim should never be given the impression that they are creating a problem by reporting abuse, sexual violence or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report.

All staff should also be aware that technology is a significant component in many safeguarding and wellbeing issues. Children are at risk of abuse and other risks online as well as face to face. In many cases abuse and other risks will take place concurrently both online and offline. Children can also abuse other children online, this can take the form of abusive, harassing, and misogynistic/misandrist messages, the non-consensual sharing of indecent images, especially around chat groups, and the sharing of abusive images and pornography to those who do not want to receive such content.

Abuse/Neglect are forms of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm, threatening harm or by failing to act to prevent harm. Harm can include ill treatment that is not physical, as well as the impact of witnessing the ill-treatment of others. This can be particularly relevant, for example, in relation to the impact of all forms of domestic abuse, including where they see, hear or experience its effects. Children may be abused in a family or in an institution or community setting by those known to them or by others (e.g. via the internet); they may be abused by an adult or adults, or by another child or children.

Concerns about a child's welfare (i.e. a child is in immediate danger or at risk of harm or of further harm) will be referred to the local authority children's social care team and/or the police immediately. No child should ever be sent back into a place of potential danger or risk without receiving specific guidance from the local authority's Safeguarding Children Partnership.

For details regarding this referral process please see the section Reporting Concerns About a Student. Any resultant social care assessments consider where children are being harmed in contexts outside the home, so the School provides as much information as possible as part of this process. This will allow any assessment to consider all the available evidence and enable a contextual approach to address such harm.

Types of abuse include: neglect, emotional, physical, and sexual. The sexual abuse of children by other children / child on child (e.g. sexual violence, sexual harassment, sexting, initiation/hazing and other rituals) is a specific safeguarding issue in education. Details of these and other types of abuse (including radicalisation, child sexual exploitation, child criminal exploitation, so-called 'honour-based' abuse including forced marriage, and FGM) and guidance on identifying them) are set down in Appendix C, noting that instances of actual or suspected FGM must be reported to the police.

It should be noted that the bullying of a child whether by an adult or adults, or by another child or other children, **directly or through electronic means**, is also potentially abuse. The school's Anti-Bullying and Online Safety Policies set out the school's strategies for dealing with all forms of bullying including cyber-bullying.

Appendix B – Safeguarding Issues and Actions

The terms “**children**” and “**child**” refer to anyone under the age of 18.

For the purposes of this policy, “**safeguarding and protecting the welfare of children**” is defined as:

- Providing help and support to meet the needs of students as soon as problems emerge.
- Protecting students from maltreatment, whether that is within or outside the home, including online.
- Ensuring that students grow up in circumstances consistent with the provision of safe and effective care.
- Taking action to enable all students to have the best outcomes.

For the purposes of this policy, “**consent**” is defined as having the freedom and capacity to choose to engage in sexual activity. Consent may be given to one sort of sexual activity but not another, and can be withdrawn at any time during sexual activity and each time activity occurs. A person only consents to a sexual activity if they agree by choice to that activity, and has the freedom and capacity to make that choice. Children under the age of 16 can never consent to any sexual activity. The age of consent is 16.

For the purposes of this policy, “**sexual violence**” refers to the following offences as defined under the Sexual Offences Act 2003:

- **Rape:** a person (A) commits an offence of rape if they intentionally penetrate the vagina, anus or mouth of another person (B) with their penis, B does not consent to the penetration, and A does not reasonably believe that B consents.
- **Assault by penetration:** a person (A) commits an offence if they intentionally penetrate the vagina or anus of another person (B) with a part of their body or anything else, the penetration is sexual, B does not consent to the penetration, and A does not reasonably believe that B consents.
- **Sexual assault:** a person (A) commits an offence of sexual assault if they intentionally touch another person (B), the touching is sexual, B does not consent to the touching, and A does not reasonably believe that B consents.
- **Causing someone to engage in sexual activity without consent:** a person (A) commits an offence if they intentionally cause another person (B) to engage in an activity, the activity is sexual, B does not consent to engaging in the activity, and A does not reasonably believe that B consents. This could include forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party.

For the purposes of this policy, “**sexual harassment**” refers to unwanted conduct of a sexual nature that occurs online or offline, inside or outside of school. Sexual harassment is likely to violate a student’s dignity, make them feel intimidated, degraded or humiliated, and create a hostile, offensive, or sexualised environment. If left unchallenged, sexual harassment can create an atmosphere that normalises inappropriate behaviour and may lead to sexual violence. **Sexual harassment can include, but is not limited to:**

- Sexual comments, such as sexual stories, lewd comments, sexual remarks about clothes and appearance, and sexualised name-calling.
- Sexual “jokes” and taunting.
- Physical behaviour, such as deliberately brushing against someone, interfering with someone’s clothes, and displaying images of a sexual nature.
- Online sexual harassment, which may be standalone or part of a wider pattern of sexual harassment and/or sexual violence. This includes:
 - The consensual and non-consensual sharing of nude and semi-nude images and/or videos.
 - Sharing unwanted explicit content.
 - Upskirting.
 - Sexualised online bullying.
 - Unwanted sexual comments and messages, including on social media.
 - Sexual exploitation, coercion, and threats.

For the purposes of this policy, “**upskirting**” refers to the act, as identified the Voyeurism (Offences) Act 2019, of taking a picture or video under another person’s clothing, without their knowledge or consent, with the intention of viewing that person’s genitals or buttocks, with or without clothing, to obtain sexual gratification, or cause the victim humiliation, distress or alarm. Upskirting is a criminal offence. Anyone, including students and staff, of any gender can be a victim of upskirting.

For the purposes of this policy, the “**consensual and non-consensual sharing of nude and semi-nude images and/or videos**”, colloquially known as “**sexting**”, is defined as the sharing between students of sexually explicit content, including indecent imagery. For the purposes of this policy, “**indecent imagery**” is defined as an image which meets one or more of the following criteria:

- Nude or semi-nude sexual posing
- A child touching themselves in a sexual way
- Any sexual activity involving a child
- Someone hurting a child sexually
- Sexual activity that involves animals.

For the purposes of this policy, “**abuse**” is defined as a form of maltreatment of a child which involves inflicting harm or failing to act to prevent harm. Harm can include ill treatment that is not physical as well as the impact of witnessing the ill treatment of others – this can be particularly relevant, for example, in relation to the impact on children of all forms of domestic abuse. Children may be abused in a family, institutional or community setting by those known to them or by others, e.g. via the internet. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Children may be abused by one or multiple adults or other children.

It is important that school staff recognise that abuse may take part in a number of ways and that abusers can be of any age and gender. In the majority of cases the adult is somebody known and trusted by the child, for example, a relative or close friend of the family. Some individuals seek to use voluntary and community organisations to gain access to children. It is

necessary to have an open mind when the possibility arises that a member of the school is suspected of abuse or inappropriate activity.

Child abuse can take many forms, all of which can cause long term damage to a child: physical abuse, emotional abuse, neglect, child sexual abuse and bullying. Domestic abuse can also be a form of child abuse, probably falling under emotional abuse. Such abuse can translate itself into many forms – for example, the student’s behaviour stands out from the group as either being extreme model behaviour or extremely challenging behaviour; or there is a sudden change in the student’s behaviour.

Bullying is a form of child abuse. It can be defined as using deliberately hurtful behaviour, usually over a period of time, where it is difficult for those being bullied to defend themselves. The three main types of bullying are:

- Physical
- Verbal
- Emotional.

All incidents of bullying must be reported to the Head or Deputy Heads and will be recorded in the bullying incident log held by the Deputy Heads. A more detailed guide can be found in the School’s Anti-Bullying Policy.

Self-Harm - whilst self-harm is not classed as child abuse it can be a sign that a child is being abused. If it comes to the attention of member of staff that a child is self-harming they should alert the DSL for child protection. Actions by the DSL might include:

- Contacting parents
- Contacting Child Adolescent Mental Health Service (CAMHS)
- Contacting Social Care if the child meets the referral criteria.

For the purposes of this policy, “**physical abuse**” is defined as a form of abuse which may involve actions such as hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating, or otherwise causing physical harm to a child. Physical abuse can also be caused when a parent fabricates the symptoms of, or deliberately induces, illness in a child.

Signs of possible physical abuse might include unexplained bruising or injury, including cigarette burns, bites, scalds and burns (especially to parts of the body where accidents are unlikely, such as thighs, back and abdomen). Signs of physical abuse can also be seen in behaviour and might include being sad, withdrawn or depressed, displaying untreated injuries or lingering illness, admission of punishment which seems excessive, shrinking from physical contact, having trouble sleeping, being aggressive or disruptive, showing fear of certain adults and fear of returning home or parents being contacted, fear of undressing or of medical help, over compliant behaviour, running away, deterioration in work, unexplained patterns of absence, having a lack of confidence or low self-esteem and use of drugs or alcohol.

For the purposes of this policy, “**emotional abuse**” is defined as the persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child’s emotional development. This may involve conveying to a child that they are worthless, unloved,

inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the child the opportunities to express their views, deliberately silencing them, 'making fun' of what they say or how they communicate. It may feature age- or developmentally inappropriate expectations being imposed on children, such as interactions that are beyond their developmental capability, overprotection and limitation of exploration and learning, or preventing the child from participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying, including cyber-bullying, causing the child to frequently 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, but it may also occur alone.

Signs of possible emotional abuse might include very low self-esteem, continual self-depreciation, fear of new situations, inappropriate emotional responses to a painful situation, self-harm, compulsive stealing, drug abuse, neurotic behaviour, eating problems, abnormal attachment between child and parent, aggressive behaviour towards others, attention-seeking behaviour and being withdrawn and socially isolated – often known as 'frozen watchfulness'. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.

For the purposes of this policy, "**sexual abuse**" is defined as abuse that involves forcing or enticing a child to take part in sexual activities, not necessarily involving violence, and regardless of whether the child is aware of what is happening. This may involve physical contact, including assault by penetration, or non-penetrative acts, such as masturbation, kissing, rubbing, and touching outside of clothing. It may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse. Sexual abuse can be perpetrated by people of any gender and age.

Signs of possible sexual abuse might include explicit or frequent sexual preoccupation in talk and play, sexualised behaviour or sexually provocative behaviour with adults, self-harm and an anxious unwillingness to remove clothes for sports etc. Other possible signs might include scratches, abrasions or persistent infection in the anal passage, pregnancy, frequent (public) masturbation, attempts to teach others about sexual activity, withdrawal from friends and aggressiveness, anger, anxiety or tearfulness.

For the purposes of this policy, "**neglect**" is defined as the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in serious impairment of a child's health or development. This may involve a parent or carer failing to provide a child with adequate food, clothing or shelter (including exclusion from home or abandonment); failing to protect a child from physical or emotional harm or danger; failing to ensure adequate supervision (including through the use of inappropriate caregivers); or failing to ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

Possible signs of neglect might include being unkempt, having an uncared-for appearance or having poor personal hygiene, being undernourished, underweight or constantly hungry,

being poorly clothed for example with inadequate protection from the weather, having unexplained absence from or being frequently late to school, having untreated medical problems, being constantly tired and being regularly left alone, or in charge of younger brothers or sisters.

Of course, all of the above may be apparent for a reason not connected in any way to abuse but they are all symptoms of possible abuse.

Sexual violence and sexual harassment between children (Child-on-Child Sexual Abuse)

All staff working with children are advised to maintain an attitude of “it could happen here”. The school will respond appropriately to all reports and concerns about sexual violence and/or sexual harassment both online and offline, including those that have happened outside of the School. The DSL/DDSL (who should have a complete safeguarding picture) will be the most appropriate person to advise on the initial response by the School. Children who are victims of sexual violence and sexual harassment will likely find the experience stressful and distressing. This will, in all likelihood, adversely affect their educational attainment.

Sexual violence and sexual harassment exist on a continuum and may overlap, they can occur online and offline (both physical and verbal) and are never acceptable. It is important that all victims are taken seriously and offered appropriate support. Staff should be aware that some groups are potentially more at risk. Evidence shows girls, children with SEND and LGBTQ+ children are at greater risk.

Staff should be aware of the importance of:

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

Sexual violence - It is important that school staff are aware of sexual violence and the fact children can, and sometimes do, abuse other children in this way. When referring to sexual violence we are referring to sexual offences under the Sexual Offences Act 2003 as described below:

- Rape: a person (A) commits an offence of rape if: he intentionally penetrates the vagina, anus or mouth of another person (B) with his penis, B does not consent to the penetration and A does not reasonably believe that B consents.
- Assault by Penetration: a person (A) commits an offence if: s/he intentionally penetrates the vagina or anus of another person (B) with a part of her/his body or anything else, the penetration is sexual, B does not consent to the penetration and A does not reasonably believe that B consents.
- Sexual Assault: a person (A) commits an offence of sexual assault if: s/he intentionally touches another person (B), the touching is sexual, B does not consent to the touching and A does not reasonably believe that B consents.

Consent is about having the freedom and capacity to choose. Consent to sexual activity may be given to one sort of sexual activity but not another, e.g. to vaginal but not anal sex or penetration with conditions, such as wearing a condom. Consent can be withdrawn at any time during sexual activity and each time activity occurs. Someone consents to vaginal, anal or oral penetration only if s/he agrees by choice to that penetration and has the freedom and capacity to make that choice.

Further information about consent can be found here: [Rape Crisis England & Wales - Sexual consent](#)

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

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

Whilst not intended to be an exhaustive list, sexual harassment can include:

- sexual comments, such as: telling sexual stories, making lewd comments, making sexual remarks about clothes and appearance and calling someone sexualised names;
- sexual "jokes" or taunting;
- physical behaviour, such as: deliberately brushing against someone, interfering with someone's clothes (schools should be considering when any of this crosses a line into sexual violence - it is important to talk to and consider the experience of the victim) and displaying pictures, photos or drawings of a sexual nature; and
- online sexual harassment. This may be standalone, or part of a wider pattern of sexual harassment and/or sexual violence. It may include:
 - consensual and non-consensual sharing of nudes and semi-nudes images and/or videos; As set out in semi-nudes: advice (which provides detailed advice for schools and colleges re taking and sharing nude photographs of under 18s being a criminal offence
 - sexualised online bullying;
 - sharing of unwanted explicit content;
 - upskirting (which is a criminal offence);
 - unwanted sexual comments and messages, including, on social media; and
 - sexual exploitation; coercion and threats.

The response to a report of sexual violence or sexual harassment - the initial response to a report from a child is incredibly important. How the School responds to a report can encourage or undermine the confidence of future victims of sexual violence and sexual harassment to report or come forward. Not recognising, acknowledging or understanding the scale of harassment and abuse and/or downplaying of some behaviours can actually lead to a culture of unacceptable behaviour.

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

If staff have a concern about a child or a child makes a report to them, they should follow the referral process as set out in the diagram in Appendix B, and KCSIE 2023 As is always the case, if staff are in any doubt as to what to do, they should speak to the DSL (or a deputy).

As always when concerned about the welfare of a child, all staff will act in the best interests of the child. In all cases, the school will follow general safeguarding principles as set out throughout this policy. Immediate consideration should be given as to how best to support and protect the victim and the alleged perpetrator(s) (and any other children involved/impacted).

Sexual Violence and Sexual Harassment - Toolkits

- [Childnet - STAR SEND Toolkit](#) equips, enables and empowers educators with the knowledge they need to support young people with special educational needs and disabilities.
- [Childnet - Just a joke?](#) provides lesson plans, activities, a quiz and teaching guide designed to explore problematic online sexual behaviour with 9- to 12-year-olds.
- [Childnet - Step Up, Speak Up](#) a practical campaign toolkit that addresses the issue of online sexual harassment amongst young people aged 13-17 years old.
- [Preventing Harmful Sexual Behaviour toolkit](#) by the Lucy Faithfull Foundation, the toolkit contains links to useful information, resources and support, including practical tips to prevent HSB.
- [NSPCC - Harmful sexual behaviour framework](#) An evidence-informed framework for children and young people displaying HSB.
- [Contextual Safeguarding Network – Beyond Referrals - Schools](#) levers for addressing HSB in schools.

For further information, please see Part Five KCSIE 2023 which contains detailed information on:

- what sexual violence and sexual harassment constitutes,
- important context to be aware of, including; what is consent, power imbalances, and developmental stages,
- harmful sexual behaviour (HSB), including that a child displaying HSB may be an indication that they are a victim of abuse themselves,
- related legal responsibilities for schools and colleges,
- advice on a whole school approach to preventing child on child sexual violence and sexual harassment, and
- more detailed advice on responding to reports of sexual violence and sexual harassment, including safeguarding and supporting both the victim(s) and alleged perpetrator(s).
- specific considerations, options and actions to take following a report of sexual violence and/or sexual harassment.

Children and the court system

Children are sometimes required to give evidence in criminal courts, either for crimes committed against them or for crimes they have witnessed. There is an age-appropriate guide to support children 12-17 year old. The guides explain each step of the process and support and special measures that are available.

Making child arrangements via the family courts following separation can be stressful and entrench conflict in families. This can be stressful for children. The Ministry of Justice has launched an online child arrangements information tool with clear and concise information on the dispute resolution service. This may be useful for some parents and carers.

Children who are Absent from Education

All staff should be aware that children being absent from school, particularly repeatedly and/or for prolonged periods, and children missing education can act as a vital warning sign of a range of safeguarding possibilities. This may include abuse and neglect such as sexual abuse or exploitation and can also be a sign of child criminal exploitation including involvement in county lines. It may indicate mental health problems, risk of substance abuse, risk of travelling to conflict zones, risk of female genital mutilation, so-called 'honour'-based abuse or risk of forced marriage. Early intervention is essential to identify the existence of any underlying safeguarding risk and to help prevent the risks of a child going missing in future. It is important that staff are aware of their school's unauthorised absence procedures and children missing education procedures.

Being persistently absent (including persistent absences for part of the school day), as well as missing, from education can be warning sign of a range of safeguarding concerns, including sexual abuse, sexual exploitation or child criminal exploitation. Where a student's absence has not been requested in advance by parents, school staff will chase the reason for the absence on the relevant morning. The absence report is forwarded to the Head of Year, who can check for any patterns of absence and follow up with the students and parents if necessary. Where a child misses school for five consecutive days without reason or satisfactory explanation, the DSL may make a referral to social services, being alert to the possible reasons for this absence – including the risk of abuse and neglect, child sexual abuse or exploitation, travelling to conflict zones, FGM and forced marriage and will refer all such concerns to the relevant local agencies. This may help prevent them going missing in future. For further information, please see the school's Student Supervision, Lost, Missing and Absent Children Policy and Attendance Policy.

The school will hold more than one emergency contact number for every student, giving additional contact options to make contact with a responsible adult when a child missing education is also identified as a welfare and/or safeguarding concern.

DfE 2022 guidance on school attendance, [Working together to improve school attendance \(publishing.service.gov.uk\)](https://www.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/106444/working-together-to-improve-school-attendance.pdf) includes information on how schools should work with local authority children's services where school absence indicates safeguarding concerns within the family or in the community.

Children with family members in prison

Approximately 200,000 children in England and Wales have a parent sent to prison each year. These children are at risk of poor outcomes including poverty, stigma, isolation and poor mental health. [NICCO](#) provides information designed to support professionals working with offenders and their children, to help mitigate negative consequences for those children.

Child Sexual Exploitation (CSE) and Child Criminal Exploitation (CCE)

Different forms of harm often overlap, and perpetrators may subject children and young people to multiple forms of abuse, such as criminal exploitation (including county lines) and sexual exploitation.

In some cases, the exploitation or abuse will be in exchange for something the victim needs or wants (for example, money, gifts or affection), and/or will be to the financial benefit or other advantage, such as increased status, of the perpetrator or facilitator.

Children can be exploited by adult males or females, as individuals or in groups. They may also be exploited by other children, who themselves may be experiencing exploitation – where this is the case, it is important that the child perpetrator is also recognised as a victim.

Whilst the age of the child may be a contributing factor for an imbalance of power, there are a range of other factors that could make a child more vulnerable to exploitation, including gender, sexual identity, cognitive ability, learning difficulties, communication ability, physical strength, status, and access to economic or other resources. Some of the following can be indicators of both child criminal and sexual exploitation where children:

- appear with unexplained gifts, money or new possessions;
- associate with other children involved in exploitation;
- suffer from changes in emotional wellbeing;
- misuse drugs and alcohol;
- go missing for periods of time or regularly come home late; and
- are persistently absent from education, including persistent absences for part of the school day.

Children who have been exploited will need additional support to help maintain them in education.

Child Sexual Exploitation (CSE) is a form of child sexual abuse. The victim may have been sexually exploited even if the sexual activity appears consensual. It is important to recognise that some young people who are being sexually exploited do not exhibit any external signs of abuse. Child Sexual Exploitation does not always involve physical contact; it can also occur through the use of technology.

Like all forms of child sex abuse, child sexual exploitation:

- can affect any child or young person (male or female) under the age of 18 years, including 16- and 17-year olds who can legally consent to have sex;
- can still be abuse even if the sexual activity appears consensual;

- can include both contact (penetrative and non-penetrative acts) and noncontact sexual activity;
- can take place in person or via technology, or a combination of both;
- can involve force and/or enticement-based methods of compliance and may, or may not, be accompanied by violence or threats of violence;
- may occur without the child or young person's immediate knowledge (e.g. through others copying videos or images they have created and posted on social media);
- can be perpetrated by individuals or groups, males or females, and children or adults. The abuse can be a one-off occurrence or a series of incidents over time, and range from opportunistic to complex organised abuse; and
- is typified by some form of power imbalance in favour of those perpetrating the abuse. Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including gender, sexual identity, cognitive ability, physical strength, status, and access to economic or other resources.

CSE can be a one-off occurrence or a series of incidents over time and range from opportunistic to complex organised abuse. It can involve force and/or enticement-based methods of compliance and may, or may not, be accompanied by violence or threats of violence. Some additional specific indicators that may be present in CSE are children who:

- are persistently absent from education, including persistent absences for part of the school day; and
- have older boyfriends or girlfriends; and
- suffer from sexually transmitted infections, display sexual behaviours beyond expected sexual development or become pregnant.

Further information on signs of a child's involvement in sexual exploitation is available in Home Office guidance: [Child sexual exploitation: guide for practitioners](#).

Child Criminal Exploitation (CCE) can include children being forced or manipulated into transporting drugs or money through county lines, working in cannabis factories, shoplifting or pickpocketing. They can also be forced or manipulated into committing vehicle crime or threatening/committing serious violence to others.

Children can become trapped by this type of exploitation as perpetrators can threaten victims (and their families) with violence, or entrap and coerce them into debt. They may be coerced into carrying weapons such as knives or begin to carry a knife for a sense of protection from harm from others. As children involved in criminal exploitation often commit crimes themselves, their vulnerability as victims is not always recognised by adults and professionals, (particularly older children), and they are not treated as victims despite the harm they have experienced. They may still have been criminally exploited even if the activity appears to be something they have agreed or consented to.

It is important to note that the experience of girls who are criminally exploited can be very different to that of boys. The indicators may not be the same, however professionals should be aware that girls are at risk of criminal exploitation too. It is also important to note that both boys and girls being criminally exploited may be at higher risk of sexual exploitation.

CCE does not always involve physical contact; it can also occur through the use of technology.

CCE can include children being forced to work in cannabis factories, being coerced into moving drugs or money across the country (county lines, see below), forced to shoplift or pickpocket, or to threaten other young people. Like other forms of abuse and exploitation, county lines exploitation:

- can affect any child or young person (male or female) under the age of 18 years;
- can affect any vulnerable adult over the age of 18 years;
- can still be exploitation even if the activity appears consensual;
- can involve force and/or enticement-based methods of compliance and is often accompanied by violence or threats of violence;
- can be perpetrated by individuals or groups, males or females, and young people or adults; and
- is typified by some form of power imbalance in favour of those perpetrating the exploitation. Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including gender, cognitive ability, physical strength, status, and access to economic or other resources.

County Lines

County lines is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs (primarily crack cocaine and heroin) into one or more importing areas [within the UK], using dedicated mobile phone lines or other form of “deal line”. Exploitation is an integral part of the county lines offending model with children and vulnerable adults exploited to move [and store] drugs and money. This can happen locally as well as across the UK – no specified distance of travel is required.

Offenders will often use coercion, intimidation, violence (including sexual violence) and weapons to ensure compliance of victims. Children can be targeted and recruited into county lines in a number of locations including schools (mainstream and special). Children are also increasingly being targeted and recruited online using social media. Children are often recruited to move drugs and money between locations and are known to be exposed to techniques such as ‘plugging’, where drugs are concealed internally to avoid detection.

Children can easily become trapped by this type of exploitation as county lines gangs create drug debts and can threaten serious violence and kidnap towards victims (and their families) if they attempt to leave the county lines network.

Key to identifying potential involvement in county lines are missing episodes (both from home and school), when the victim may have been trafficked for the purpose of transporting drugs and a referral to the National Referral Mechanism should be considered. If a child is suspected to be at risk of or involved in county lines, a safeguarding referral should be considered alongside consideration of availability of local services/third sector providers who offer support to victims of county lines exploitation.

Further information on the signs of a child’s involvement in county lines is available in

guidance published by the [Home Office](#).

Signs of Involvement in County Lines - a young person's involvement in county lines activity often leaves signs. A young person might exhibit some of these signs, either as a member or as an associate of a gang dealing drugs. Any sudden changes in a young person's lifestyle should be discussed with them. Some indicators of county lines involvement and exploitation are listed below, with those at the top of particular concern:

- Persistently going missing from school or home and / or being found out of area
- Unexplained acquisition of money, clothes, or mobile phones
- Excessive receipt of texts / phone calls
- Relationships with controlling / older individuals or groups
- Leaving home / care without explanation
- Suspicion of physical assault / unexplained injuries
- Parental concerns
- Carrying weapons
- Significant decline in school results / performance
- Gang association or isolation from peers or social networks
- Self-harm or significant changes in emotional wellbeing

Children At Risk From Serious Violence

All staff should be aware of indicators which may signal that children are at risk from, or are involved with serious violent crime. These may include increased absence from school, a change in friendships or relationships with older individuals or groups, a significant decline in performance, signs of self-harm or a significant change in wellbeing, or signs of assault or unexplained injuries.

Unexplained gifts or new possessions could also indicate that children have been approached by, or are involved with, individuals associated with criminal networks or gangs. All staff should be aware of the associated risks and understand the measures in place to manage these.

Advice is provided in the Home Office's 'Preventing youth violence and gang involvement' and its 'Criminal exploitation of children and vulnerable adults: county lines' guidance.

Cybercrime

Cybercrime is criminal activity committed using computers and/or the internet. It is broadly categorised as either 'cyber-enabled' (crimes that can happen offline but are enabled at scale and at speed online) or 'cyber dependent' (crimes that can be committed only by using a computer). Cyber-dependent crimes include:

- unauthorised access to computers (illegal 'hacking'), for example accessing a school's computer network to look for test paper answers or change grades awarded;
- denial of service (DoS or DDoS) attacks or 'booting'. These are attempts to make a computer, network or website unavailable by overwhelming it with internet traffic from multiple sources; and,

- making, supplying or obtaining malware (malicious software) such as viruses, spyware, ransomware, botnets and Remote Access Trojans with the intent to commit further offence, including those above.

Children with particular skill and interest in computing and technology may inadvertently or deliberately stray into cyber-dependent crime.

If there are concerns about a child in this area, the designated safeguarding lead (or a deputy), should consider referring into the Cyber Choices programme. This is a nationwide police programme supported by the Home Office and led by the National Crime Agency, working with regional and local policing. It aims to intervene where young people are at risk of committing, or being drawn into, low level cyber-dependent offences and divert them to a more positive use of their skills and interests.

Note that Cyber Choices does not currently cover 'cyber-enabled' crime such as fraud, purchasing of illegal drugs online and child sexual abuse and exploitation, nor other areas of concern such as online bullying or general online safety. Additional advice can be found at: [Cyber Choices](#), '[NPCC- When to call the Police](#)' and [National Cyber Security Centre - NCSC.GOV.UK](#)

Domestic Abuse

The Domestic Abuse Act 2021 recognises the impact of domestic abuse on children, as victims in their own right, if they see, hear or experience the effects of abuse. The statutory definition of domestic abuse ensures that different types of relationships are captured, including ex-partners and family members. The definition captures a range of different abusive behaviours, including physical, emotional and economic abuse and coercive and controlling behaviour. Both the person who is carrying out the behaviour and the person to whom the behaviour is directed towards must be aged 16 or over and they must be "personally connected" (as defined in section 2 of the 2021 Act).

Types of domestic abuse include intimate partner violence, abuse by family members, teenage relationship abuse and child/adolescent to parent violence and abuse. Anyone can be a victim of domestic abuse, regardless of gender, age, ethnicity, socioeconomic status, sexuality or background and domestic abuse can take place inside or outside of the home. The government will issue statutory guidance to provide further information for those working with domestic abuse victims and perpetrators, including the impact on children.

All children can witness and be adversely affected by domestic abuse in the context of their home life where domestic abuse occurs between family members. Experiencing domestic abuse and/or violence can have a serious, long lasting emotional and psychological impact on children. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result.

Young people can also experience domestic abuse within their own intimate relationships. This form of child-on-child abuse is sometimes referred to as 'teenage relationship abuse'. Depending on the age of the young people, this may not be recognised in law under the

statutory definition of 'domestic abuse' (if one or both parties are under 16). However, as with any child under 18, where there are concerns about safety or welfare, child safeguarding procedures should be followed and both young victims and young perpetrators should be offered support.

Operation Encompass operates in all police forces across England. It helps police and schools work together to provide emotional and practical help to children. The system ensures that when police are called to an incident of domestic abuse, where there are children in the household who have experienced the domestic incident, the police will inform the DSL in school before the child or children arrive at school the following day. This ensures that the school has up-to-date relevant information about the child's circumstances and can enable immediate support to be put in place, according to the child's needs. Operation Encompass does not replace statutory safeguarding procedures. Where appropriate, the police and/or schools should make a referral to children's social care if they are concerned about a child's welfare. More information about the scheme and how schools can become involved is available on the Operation Encompass website.

National Domestic Abuse Helpline - Refuge runs the National Domestic Abuse Helpline, which can be called free of charge and in confidence, 24 hours a day on 0808 2000 247. Its website provides guidance and support for potential victims, as well as those who are worried about friends and loved ones. It also has a form through which a safe time from the team for a call can be booked.

Additional advice on identifying children who are affected by domestic abuse and how they can be helped is available at:

- NSPCC- UK domestic-abuse Signs Symptoms Effects;
- Refuge what is domestic violence/effects of domestic violence on children;
- Safelives: young people and domestic abuse;
- Domestic abuse: specialist sources of support - GOV.UK (www.gov.uk) (includes information for adult victims, young people facing abuse in their own relationships and parents experiencing child to parent violence/abuse);
- Operation Encompass includes information for schools on the impact of domestic abuse on children.

So-called 'honour-based' abuse (including Female Genital Mutilation and Forced Marriage)

So-called 'honour-based' abuse (HBA) encompasses incidents or crimes which have been committed to protect or defend the honour of the family and/or the community, including female genital mutilation (FGM), forced marriage, and practices such as breast ironing. Abuse committed in the context of preserving "honour" often involves a wider network of family or community pressure and can include multiple perpetrators. It is important to be aware of this dynamic and additional risk factors when deciding what form of safeguarding action to take. All forms of HBA are abuse (regardless of the motivation) and should be handled and escalated as such.

Professionals in all agencies, and individuals and groups in relevant communities, need to be alert to the possibility of a girl being at risk of FGM, or already having suffered FGM, or indeed

any form of HBA.

Actions: If staff have a concern that a child might be at risk of HBA, or who has suffered HBA, they should speak to the DSL (or deputy), who will activate appropriate safeguarding procedures.

FGM – comprises all procedures involving partial or total removal of the external female genitalia or other injury to the female genital organs. It is illegal in the UK and a form of child abuse with long-lasting harmful consequences.

FGM Mandatory reporting duty for teachers - whilst all staff should speak to the DSL (or deputy) with regard to any concerns about female genital mutilation (FGM), there is a specific **legal** duty on **teachers**. If a **teacher**, in the course of their work in the profession, discovers that an act of FGM appears to have been carried out on a girl under the age of 18, the teacher **must** report this to the police. The teacher should also advise the DSL immediately who will involve children's social care.

Those failing to report such cases will face disciplinary sanctions. It will be rare for teachers to see visual evidence, and they should **not** be examining students, but the same definition of what is meant by "to discover that an act of FGM appears to have been carried out" is used for all professionals to whom this mandatory reporting duty applies. Information on when and how to make a report can be found at: [Mandatory reporting of female genital mutilation procedural information](#). The following is a useful summary of the FGM mandatory reporting duty: [FGM Fact Sheet](#).

Forced marriage - forcing a person into a marriage is a crime in England and Wales. A forced marriage is one entered into without the full and free consent of one or both parties and where violence, threats or any other form of coercion is used to cause a person to enter into a marriage. Threats can be physical or emotional and psychological. A lack of full and free consent can be where a person does not consent or where they cannot consent (if they have learning disabilities, for example). Nevertheless, some communities use religion and culture as a way to coerce a person into marriage. Schools and colleges can play an important role in safeguarding children from forced marriage.

In addition, since February 2023 it has also been a crime to carry out any conduct whose purpose is to cause a child to marry before their 18th birthday, even if violence, threats or another form of coercion are not used. As with the existing forced marriage law, this applies to non-binding, unofficial 'marriages' as well as legal marriages.

The Forced Marriage Unit has published [statutory guidance](#) and [Multi-agency guidelines](#), with pages 35-36 of which focus on the role of schools and colleges. School and college staff can contact the Forced Marriage Unit if they need advice or information: Contact: 020 7008 0151 or email fmufco.gov.uk.

Modern Slavery and the National Referral Mechanism

Modern slavery encompasses human trafficking and slavery, servitude and forced or

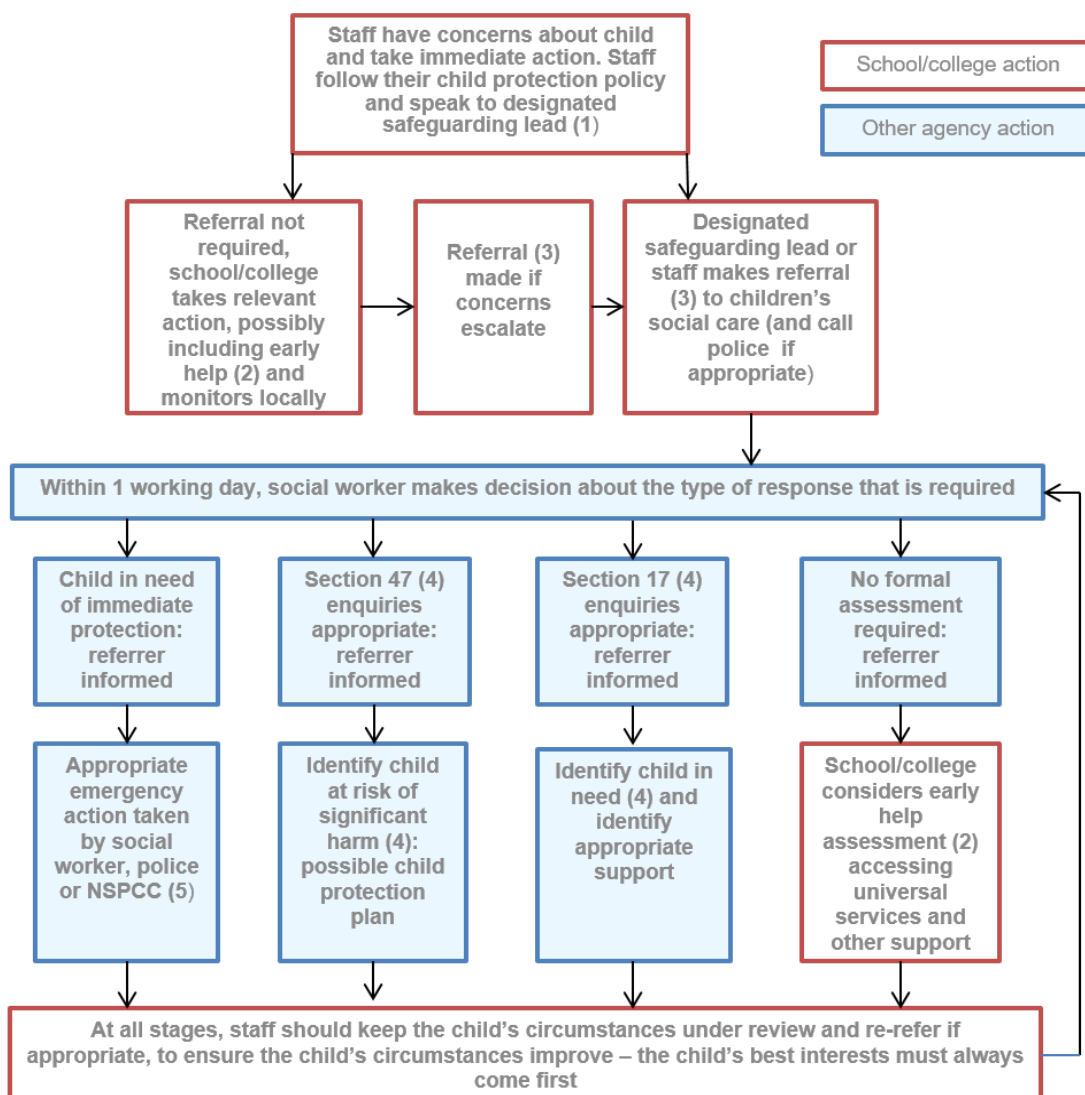
compulsory labour. Exploitation can take many forms, including: sexual exploitation, forced labour, slavery, servitude, forced criminality and the removal of organs.

Further information on the signs that someone may be a victim of modern slavery, the support available to victims and how to refer them to the NRM is available in the Modern Slavery Statutory Guidance. Modern slavery: how to identify and support victims - GOV.UK (www.gov.uk).

Appendix C

All staff members are aware of the procedure for reporting concerns and understand their responsibilities in relation to confidentiality and information sharing, as outlined in the Communication and Confidentiality section of this policy. Please see Appendix C for a flowchart of our specific procedures once a concern has been shared about a child.

Actions where there are concerns about a child



(1) In cases which also involve an allegation of abuse against a staff member, see Part Four of this guidance.

(2) Early help means providing support as soon as a problem emerges at any point in a child's life. Where a child would benefit from co-ordinated early help, an early help inter-agency assessment should be arranged. Chapter one of [Working together to safeguard children](#) provides detailed guidance on the early help process.

(3) Referrals should follow the local authority's referral process. Chapter one of [Working together to safeguard children](#).

(4) Under the Children Act 1989, local authorities are required to provide services for children in need for the purposes of safeguarding and promoting their welfare. This can include section 17 assessments of children in need and section 47 assessments of children at risk of significant harm. Full details are in Chapter One of [Working together to safeguard children](#).

(5) This could include applying for an Emergency Protection Order (EPO).

Appendix D: Additional advice and support

Abuse or Safeguarding issue	Link to Guidance/Advice	Source
Abuse	Supporting practice in tackling child sexual abuse - CSA Centre	Centre of Expertise on CSA
	What to do if you're worried a child is being abused	DfE advice
	Domestic abuse: Various Information/Guidance	Home Office
	Faith based abuse: National Action Plan	DfE advice
	Relationship abuse: disrespect nobody	Home Office
	Tackling Child Sexual Abuse Strategy	Home Office
	Together we can stop child sexual abuse	HM Govt campaign
Bullying	Preventing bullying - GOV.UK (www.gov.uk)	DfE advice
	Cyber bullying: advice for Heads and school staff	DfE advice
Children missing from education, home or care	https://www.gov.uk/government/publications/children-missing-education Children missing education	DfE statutory guidance
	Child missing from home or care	DfE statutory guidance
	Children and adults missing strategy	Home Office strategy
Children with family members in prison	National Information Centre on Children of Offenders	Barnardo's in partnership with Her Majesty's Prison and Probation Service (HMPPS) advice
Child Exploitation	Care of unaccompanied and trafficked children	DfE statutory guidance
	Modern slavery: how to identify and support victims	Home Office
	Trafficking: safeguarding children	DfE and HO guidance
	Child exploitation disruption toolkit (publishing.service.gov.uk)	Home Office
	County Lines Toolkit For Professionals The Children's Society	The Children's Society
Confidentiality	Gillick competence and Fraser guidelines NSPCC Learning	NSPCC
Drugs	From harm to hope: A 10-year drugs plan to cut crime and save lives - GOV.UK (www.gov.uk)	Home Office strategy 2022
	Information and advice on drugs	Talk to Frank website
	Drug and Alcohol education — teacher guidance & evidence review	PSHE Assocrn website

“Honour Based Abuse” (so called)	Female genital mutilation: information and resources	Home Office
	Female genital mutilation: multi agency statutory guidance	DfE, DH, and HO statutory guidance
	Forced marriage - GOV.UK (www.gov.uk)	Forced Marriage Unit (FMU) stat guidance
	FGM resource pack	HM Govt guidance
Health and Wellbeing	Fabricated or induced illness: safeguarding children	DfE, Department for Health and Home Office
	Rise Above: Free PSHE resources on health, wellbeing and resilience	Public Health England resources
	Medical-conditions: supporting students at school	DfE statutory guidance
	Mental health and behaviour	DfE advice
Homelessness	Homelessness: How local authorities should exercise their functions	HCLG
Information sharing	Information sharing advice for safeguarding practitioners - GOV.UK (www.gov.uk)	HM Govt guidance
	Data sharing information hub ICO	Information Commissioner's Office
Online	Sexting: responding to incidents and safeguarding children	UK Council for Child Internet Safety
	Cyberbullying Guidance Childnet	Childnet guidance
	Educate Against Hate - Prevent Radicalisation & Extremism	
	The National Grid for Learning - Safeguarding (lgfl.net)	
	E-safety for schools NSPCC Learning	NSPCC
	Searching, screening and confiscation at school - GOV.UK (www.gov.uk)	
	SWGfL - Safety & Security Online	
	The use of social media for online radicalisation - GOV.UK (www.gov.uk)	
	UKCIS Online Safety Audit Tool - GOV.UK (www.gov.uk)	
	A business guide for protecting children on your online platform - GOV.UK (www.gov.uk)	
	Parents and Carers - UK Safer Internet Centre	
Private fostering	Private fostering: local authorities	DfE - statutory guidance
Radicalisation	Prevent duty guidance	Home Office guidance
	Prevent duty: additional advice for schools	DfE advice

	Educate Against Hate Website	DfE and Home Office
	Prevent for FE and Training	Education and Training Foundation
	Online Safety Resource Centre - London Grid for Learning (lgfl.net)	London Grid for Learning
Serious Violence	Serious Violence Strategy - GOV.UK (www.gov.uk)	Home Office
	An analysis of indicators of serious violence: Findings from the Millennium Cohort Study and the Environmental Risk (E-Risk) Longitudinal Twin Study (publishing.service.gov.uk)	Home Office
	Our approach to evidence - Youth Endowment Fund	Home Office
	Advice to schools and colleges on gangs and youth violence - GOV.UK (www.gov.uk)	Home Office advice
	Tackling violence against women and girls strategy - GOV.UK (www.gov.uk)	Home Office strategy
	Violence against women and girls: national statement of expectations - GOV.UK (www.gov.uk)	Home Office guidance
Upskirting	Upskirting: know your rights	UK Govt
Violence	Gangs and youth violence: for schools and colleges	Home Office advice
	Serious violence strategy	Home Office
	Factors linked to serious violence and how these factors can be used to identify individuals for intervention	Home Office
	Youth Endowment Fund	Home Office
	Ending violence against women and girls 2016-2020 strategy	Home Office strategy
	Violence against women and girls: national statement of expectations for victims	Home Office guidance
	Sexual violence and sexual harassment between children in schools and colleges	DfE advice

Sexual Violence and Sexual Harassment – Specialist Organisations	
Believe in children Children's charity Barnardo's (barnardos.org.uk)	UK charity caring for and supporting some of the most vulnerable children and young people through their range of services.
The Lucy Faithfull Foundation Preventing Child Sex Abuse	UK-wide child protection charity dedicated to preventing child sexual abuse. They work with families affected by sexual abuse and also run the confidential Stop it Now! Helpline.
Meeting the needs of children abused online Marie Collins Foundation	Charity that, amongst other things, works directly with children, young people, and families to enable their recovery following sexual abuse.
NSPCC The UK children's charity NSPCC	Children's charity specialising in child protection with statutory powers enabling them to take action and safeguard children at risk of abuse.
Rape Crisis England & Wales	National charity and the umbrella body for their network of independent member Rape Crisis Centres
Homepage - UK Safer Internet Centre	Provides advice and support to children, young people, parents, carers and schools about staying safe online.
Harmful Sexual Behaviour – Specialist Organisations	
Harmful Sexual Behaviour Support Service SWGfL	Provides expert-led advice and guidance in tackling harmful sexual behaviours to professionals working with children and young people
Rape Crisis England & Wales	For information, advice, and details of local specialist sexual violence organisations
The Survivors Trust	For information, advice, and details of local specialist sexual violence organisations
Preventing harmful sexual behaviour in children - Stop It Now	The Lucy Faithfull Foundation - designed for parents, carers, family members and professionals, to help everyone play their part in keeping children safe. It has links to useful information, resources, and support as well as practical tips to prevent harmful sexual behaviour and provide safe environments for families
Overview Harmful sexual behaviour among children and young people Guidance NICE	For information on, amongst other things: developing interventions; working with families and carers; and multi-agency working.
Protecting children from harmful sexual behaviour NSPCC Learning Harmful sexual behaviour framework NSPCC Learning	Free and independent advice about HSB.
Beyond Referrals - Schools (csnetwork.org.uk)	Provides a school self assessment toolkit and guidance for addressing HSB in schools.
Support for Victims – Specialist Organisations	
Anti-Bullying Alliance	Detailed information for anyone being bullied, along with advice for parents and schools. Signposts to various helplines and websites for further support.
Rape Crisis England & Wales	Provide and signpost to a range of services to support people who have experienced rape, child abuse or any kind of sexual violence.

The Survivors Trust	UK-wide national umbrella agency with resources and support dedicated to survivors of rape, sexual violence and child sex abuse
Home - Victim Support	Supporting children and young people who have been affected by crime. Also provides support to parents and professionals who work with children and young people — regardless of whether a crime has been reported or how long ago it was.
Childline Childline	Provides free and confidential advice for children and young people
Sharing Nudes and Semi-nudes	
Nudes (thinkuknow.co.uk)	London Grid for Learning-collection of advice - Various information and resources dealing with the sharing of nudes and semi-nudes.
Sharing nudes and semi-nudes: advice for education settings working with children and young people - GOV.UK (www.gov.uk)	Advice for schools and colleges on responding to incidents of non-consensual sharing of nudes and semi-nudes.
Support for Parents and Carers	
Parents and carers CEOP Education (thinkuknow.co.uk)	Advice/resources on how to deal with concerns about what children may be doing online including advice on how to help challenge harmful sexual attitudes and start a conversation to support positive sexual behaviour.