

POLICY TITLE:	Safeguarding Children
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Applies to:	All Service Types: England, Scotland, Wales
Version Number:	01
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Author:	Priory Education and Children's Services Quality Team
Ratified by:	Safety and Safeguarding Governance Committee
Responsible signatory:	Mary Rayner, Director for Quality Assurance & Improvement
Outcome:	<p>This policy:</p> <ul style="list-style-type: none"> aims to ensure that children are effectively safeguarded whilst living and learning in Priory Education and Children's Services Sites.
Cross Reference:	<p>ECS04 Positive Behaviour Management ECS06 Running Away/Missing HR01 Safer Recruitment and Selection including Prevention of Illegal Working HR07 Disclosure (including DBS, Access NI and Disclosure Scotland) OP03 Complaints OP04 Incident Management, Reporting and Investigation OP21 Confidential Reporting (Whistleblowing) OP32 Looked After Children OP08.1 Responding to suspected radicalisation Priory Group Employee Handbook</p>

EQUALITY AND DIVERSITY STATEMENT

Priory Group is committed to the fair treatment of all in line with the Equality Act 2010. An equality impact assessment has been completed on this policy to ensure that it can be implemented consistently regardless of any protected characteristics and all will be treated with dignity and respect.

In order to ensure that this policy is relevant and up to date, comments and suggestions for additions or amendments are sought from users of this document. To contribute towards the process of review, e-mail RARHelpdesk@priorygroup.com

SAFEGUARDING CHILDREN

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Safeguarding Children Policy

Governance Committee Responsible	Group Safeguarding Forum
Divisional Governance Committee Responsible	Safety and Safeguarding Governance Committee
Organisational Lead	Trevor Torrington: Group CEO
Nominated Divisional Lead	Mary Rayner: Director of Quality
Status & Review Cycle	Statutory Annual
Next Review Date	January 2018

Safeguarding Statement

Priory Group recognises our moral and statutory responsibility to safeguard and promote the welfare of all children and young people. We endeavour to provide a safe and welcoming environment where children and young people are respected and valued. We are alert to the signs of abuse and neglect and follow our procedures to ensure that children and young people receive effective support, protection and justice. Child protection forms part of the site's safeguarding responsibilities.

Key Safeguarding Personnel at **[Insert Site Name]**

The Designated Safeguarding Lead (DSL) is:

Contact Details: Email: Telephone:

The deputy DSL(s) is/are:

Contact Details: Email: Telephone:

The nominated regional safeguarding lead is:

Contact Details: Email: Telephone:

The Registered Manager/Headteacher is:

Contact Details: Email: Telephone:

The Operations Director (who is also the Chair of Governors for Schools) is:

Contact Details: Email: Telephone:

In the event of an allegation against the Principal/DSO/DSL you should contact:
(Operations Director)

Safeguarding Children Policy

1 INTRODUCTION

1.1 In order to effectively implement this Priory policy, Education & Children's Services facilities will have local procedures in place where necessary, to be read in conjunction with this document, to ensure best practice, and cover local anomalies.

1.2 This policy has been developed in accordance with the principles established by the Children Acts 1989 and 2004; the Education Act 2002, and in line with government publications: 'Working Together to Safeguard Children' 2015, Revised Safeguarding Statutory Guidance 2 'Framework for the Assessment of Children in Need and their Families' 2000, 'What to do if You are Worried a Child is Being Abused' 2015. The guidance also reflects, both 'Keeping Children Safe in Education' 2016, and local Safeguarding Children Board SSCB Child Protection Procedures. Revised Prevent Duty Guidance for England and Wales 2015 + Guidance for safer working practices for those working with children and young people in education settings October 2015 + Disqualification under the Childcare Act 2006

1.3 This policy applies to all members of staff.

1.4 Terminology

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

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

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

1.4.3 **Staff** refers to all those working for or on behalf of Priory Group, full or part time, temporary or permanent, in either a paid or voluntary capacity, including contractors and consultants.

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

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

1.4.6 **Extremism** is vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs. We also include in our definition of extremism calls for the death of members of our armed forces, whether in this country or overseas.

1.4.7 **An ideology** is a set of beliefs.

1.4.8 **Designated Safeguarding Lead** (may also be referred to as Designated Safeguarding Officer)

2 POLICY PRINCIPLES

2.1 The welfare of the child is paramount.

- 2.2 All children and young people regardless of age, gender, culture, language, race, ability, sexual identity or religion have equal rights to protection, safeguarding and opportunities.
- 2.3 We recognise that all adults, including temporary staff, volunteers and governors, have a full and active part to play in protecting our children and young people from harm and have an equal responsibility to act on any suspicion or disclosure that may suggest a child is at risk of harm.
- 2.4 All staff believe that our sites should provide a caring, positive, safe and stimulating environment that promotes the social, physical and moral development of the individual child or young person.
- 2.5 Children and young people and staff involved in child protection issues will receive appropriate support.

3 POLICY AIMS

- 3.1 To demonstrate the commitment of [insert site name] with regard to safeguarding and child protection to children and young people, parents and other partners.
- 3.2 To support the child or young person's development in ways that will foster security, confidence and independence.
- 3.3 To provide an environment in which children and young people feel safe, secure, valued and respected, and feel confident to, and know how to approach adults if they are in difficulties, believing they will be effectively listened to.
- 3.4 To raise the awareness of all staff of the need to safeguard children and of their responsibilities in identifying and reporting possible cases of abuse.
- 3.5 To provide a systematic means of monitoring children or young people known or thought to be at risk of harm, and ensure we contribute fully to assessments of need and support packages for those children and young people.
- 3.6 To emphasise the need for good levels of communication between all members of staff.
- 3.7 To develop a structured procedure within the site which will be followed by all members of the site community in cases of suspected abuse.
- 3.8 To develop and promote effective working relationships with other agencies, especially the Police and Social Care.
- 3.9 To ensure that all staff working within our site who have access to children have been checked as to their suitability, including verification of their identity, qualifications, and a satisfactory DBS check (according to guidance), and where applicable, a single central record is kept.

4 VALUES

- 4.1 Supporting Children and Young People
 - 4.1.1 We recognise that a child or young person who is abused or witnesses violence may feel helpless and humiliated, may blame themselves, and find it difficult to develop and maintain a sense of self-worth
 - 4.1.2 We recognise that the site may provide the only stability in the lives of children or young people who have been abused or who are at risk of harm.

- 4.1.3 We accept that research shows that the behaviour of a child or young person in these circumstances may range from that which is perceived to be normal to aggressive or withdrawn.
- 4.1.4 Our site will support all children and young people by:
- (a) Encouraging self-esteem and self-assertiveness, through the formal and informal curriculum as well as our relationships, whilst not condoning aggression or bullying
 - (b) Promoting a caring, safe and positive environment within the site
 - (c) Responding sympathetically to any requests for time out to deal with distress and anxiety
 - (d) Offering details of helplines, counselling or other avenues of external support
 - (e) Liaising and working together with all other support services and those agencies involved in the safeguarding of children and young people
 - (f) Notifying Social Care as soon as there is a significant concern
 - (g) Providing continuing support to a child/young person about whom there have been concerns who leaves the site by ensuring that all appropriate information is copied under confidential cover to the child's new setting.
- 4.1.5 Children and young people are taught to understand and manage risk through our person, social, health and economic (PSHE) education and Relationship and Sex Education and through all aspects of lifeskills learning. This includes online safety.
- 4.2 Prevention / Protection
- 4.2.1 We recognise that the site plays a significant part in the prevention of harm to our children and young people by providing them with good lines of communication with trusted adults, supportive friends and an ethos of protection.
- 4.2.2 The community will therefore:
- (a) Work to establish and maintain an ethos where children and young people feel secure, are encouraged to talk and are always listened to
 - (b) Include regular consultation with children e.g. through safety questionnaires, participation in anti-bullying week, and talking to children and young people regularly.
 - (c) Ensure that all children and young people know there is an adult at the site whom they can approach if they are worried or in difficulty
 - (d) Include safeguarding across the formal and informal learning curriculum, including PSHE, opportunities which equip children and young people with the skills they need to stay safe from harm and to know to whom they should turn for help. In particular this will include anti-bullying work, online-safety, road safety, pedestrian and cycle training, personal safety/independent travel
 - (e) Ensure all staff are aware of guidance for their use of mobile technology and have discussed safeguarding issues around the use of mobile technologies and their associated risks.

5 SAFE SITE, SAFE STAFF

- 5.1 We will ensure that:
- (a) all staff receive information about the site's safeguarding arrangements, the safeguarding statement, professional behaviour and boundaries policy (code of conduct), child protection policy, the role and names of the Designated Safeguarding Lead and their deputy(ies)
 - (b) all staff receive safeguarding and child protection training at induction in line with advice from their Local Safeguarding Children's Board which is regularly updated and receive safeguarding and child protection updates (for example, via email, e-bulletins and staff meetings), as required, but at least annually
 - (c) all members of staff are trained in and receive regular updates in online safety and reporting concerns
 - (d) all staff and governors have regular child protection awareness training, updated by the

- DSL as appropriate, to maintain their understanding of the signs and indicators of abuse
- (e) The child protection policy is made available via the Group website, and where applicable individual school website so that parents/carers are made aware of this policy and their entitlement to have a copy. All parents/carers are made aware of the responsibilities of staff members with regard to child protection procedures through the publication of the Child Protection Policy and reference to it in the school's prospectus or site Statement of Purpose
 - (f) The name of the designated members of staff for child protection, the Designated Safeguarding Lead and deputy(ies), are clearly advertised in the site with a statement explaining the site's role in referring and monitoring cases of suspected abuse
 - (g) All staff will be given a copy of Part 1 and Annex A of Keeping Children Safe in Education 2016 and will sign to say they have read and understood it, using appropriate formats to test knowledge.

6 ROLES AND RESPONSIBILITIES

6.1 **All members of the Governance function** understand and fulfil their responsibilities, namely to confirm that site leaders ensure;

- (a) there is a Child Protection and Safeguarding policy together with a staff behaviour policy (code of conduct)
- (b) child protection, safeguarding, recruitment and managing allegations policies and procedures, including the staff behaviour policy (code of conduct), are consistent with statutory requirements, are reviewed annually and that the Child Protection policy is publically available on the Group/school websites or by other means
- (c) that all staff including temporary staff and volunteers are provided with the site's child protection policy and staff behaviour policy
- (d) all staff have read Keeping Children Safe in Education (2016) part 1 and Annex A and that mechanisms are in place to assist staff in understanding and discharging their roles and responsibilities as set out in the guidance
- (e) the site operates a safer recruitment procedure that includes statutory checks on staff suitability to work with children and disqualification by association regulations and by ensuring that there is at least one person on every recruitment panel who has completed safer recruitment training
- (f) the site has procedures for dealing with allegations of abuse against staff (including the headteacher, school principal and registered manager), volunteers and against other children and that a referral is made to the DBS if a person in regulated activity has been dismissed or removed due to safeguarding concerns, or would have had they not resigned
- (g) a member of the Governing Body, usually the Chair, is nominated to liaise with the LA on Child Protection issues and in the event of an allegation of abuse made against the Headteacher, School principal, registered manager; for social care sites this will be the responsibility of the Children's Services Operations Manager
- (h) a member of the senior leadership team has been appointed as the Designated Safeguarding Lead (DSL) and will take lead responsibility for safeguarding and child protection and that the role is explicit in the role holder's job description
- (j) on appointment, the DSL and deputy(ies) undertake appropriate DSL training and 'Update' training at least every two years
- (k) all other staff have safeguarding training updated as appropriate; (See Training Matrix)
- (l) at least one member of every interview panel has completed safer recruitment training to be repeated every five years.

6.2 **The Headteacher/Registered Manager** will ensure that:

- (a) where the Child Protection and Safeguarding Policy and procedures are implemented and followed by all staff
- (b) sufficient time, training, support, resources, including cover arrangements necessary, is allocated to the DSL and deputy(ies) DSL(s) to carry out their roles effectively, including the assessment of children and young people and attendance at strategy discussions and

other necessary meetings

- (c) where there is a safeguarding concern that the child's wishes and feelings are taken into account when determining what action to take and what services to provide
- (d) systems are in place for children and young people to express their views and give feedback which operate with the best interest of the child
- (e) all staff feel able to raise concerns about poor or unsafe practice and that such concerns are handled sensitively and in accordance with the whistle-blowing procedures
- (f) that children and young people are provided with opportunities to learn about safeguarding, including keeping themselves safe online
- (g) they liaise with the Local Authority Designated Officer (LADO) or equivalent postholder, before taking any action and on an ongoing basis, where an allegation is made against a member of staff or volunteer
- (h) anyone who has harmed or may pose a risk to a child is promptly referred to the Disclosure and Barring Service.

6.3 **The Designated Safeguarding Lead:**

- (a) holds ultimate responsibility for safeguarding and child protection in the site
- (b) acts as a source of support and expertise in carrying out safeguarding duties for the whole site community
- (c) encourages a culture of listening to children and young people and taking account of their wishes and feelings
- (d) is appropriately trained with updates every two years and will refresh their knowledge and skills at regular intervals but at least annually
- (e) will refer a child if there are concerns about possible abuse, to the appropriate local authority team and act as a focal point for staff to discuss concerns
- (f) will keep detailed, accurate records of all concerns about a child even if there is no need to make an immediate referral
- (g) will ensure that all such records are kept confidential, stored securely
- (h) will liaise with the Local Authority and work with other agencies and professionals in line with Working Together to Safeguard Children
- (j) has a working knowledge of relevant LSCB procedures
- (k) will ensure that either they, or another staff member, attend case conferences, core groups, or other multi-agency planning meetings, contribute to assessments, and provide a report where required which has been shared with the parents
- (l) will ensure that any child/young person currently with a child protection plan who is absent in the educational setting without explanation for two days is referred to their key worker's Social Care Team
- (m) will ensure that all staff sign to say they have read, understood and agree to work within the site's child protection policy, staff behaviour policy (code of conduct) and Keeping Children Safe in Education Part 1 and annex A and ensure that the policies are used appropriately
- (n) will organise child protection and safeguarding induction, regularly updated training and a minimum of annual updates (including online safety) for all staff, keep a record of attendance and address any absences
- (p) will undertake the Divisional Safeguarding Audit annually and as required
- (q) will ensure that the name of the designated members of staff for Child Protection, the Designated Safeguarding Lead and deputies, are clearly advertised in the site, with a statement explaining the site's role in referring and monitoring cases of suspected abuse.

6.4 **The Deputy Designated Safeguarding Lead(s)** (DSL) is/are trained to the same standard as the Designated Safeguarding Lead and, in the absence of the DSL, carries out those functions necessary to ensure the ongoing safety and protection of children and young people. In the event of the long-term absence of the DSL the deputy will assume all of the functions above.

6.5 **All staff**

- (a) understand that it is everyone's responsibility to safeguard and promote the welfare of

children and that they have a role to play in identifying concerns, sharing information and taking prompt action

- (b) consider, at all times, what is in the best interests of the child
- (c) know how to respond to a child/young person who discloses abuse through delivery of 'Working together to Safeguard Children', and 'What to do if you suspect a Child is being Abused' (2015)
- (d) will refer any safeguarding or child protection concerns to the DSL or if necessary where the child/young person is at immediate risk to the police or Children's Social Care;
- (e) will provide a safe environment in which children can live and learn
- (f) will sign to say they have read and understood Part 1 and Annex A of Keeping Children Safe in Education 2016

7 CONFIDENTIALITY

- 7.1 **[Insert Site Name]** recognises that in order to effectively meet a child's needs, safeguard their welfare and protect them from harm the site must contribute to inter-agency working in line with Working Together to Safeguard Children (2015) and share information between professionals and agencies where there are concerns.
- 7.2 All staff must be aware that they have a professional responsibility to share information with other agencies in order to safeguard children and that the Data Protection Act 1998 is not a barrier to sharing information where the failure to do so would place a child at risk of harm
- 7.3 All staff must be aware that they cannot promise a child to keep secrets which might compromise the child's safety or wellbeing.
- 7.4 However, we also recognise that all matters relating to child protection are personal to children and families. Therefore, in this respect they are confidential and the Headteacher/Registered Manager and DSLs will only disclose information about a child to other members of staff on a need to know basis.
- 7.5 We will always undertake to share our intention to refer a child to Social Care with their parents /carers unless to do so could put the child at greater risk of harm, or impede a criminal investigation.

8 CHILD PROTECTION PROCEDURES

- 8.1 Abuse and neglect are forms of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Children may be abused in the family or in an institutional or community setting by those known to them or, more rarely, by others (e.g. via the internet). They may be abused by an adult or adults or by another child or children.
- 8.2 Further information about the four categories of abuse; physical, emotional, sexual and neglect, and indicators that a child may be being abused can be found in appendices 1 and 2.
- 8.3 Any child in any family in any school could become a victim of abuse. Staff should always maintain an attitude of "It could happen here".
- 8.4 There are also a number of specific safeguarding concerns that we recognise our children and young people may experience:
- (a) child missing from education (see para 21)
 - (b) child missing from home or care
 - (c) child sexual exploitation (CSE) (see para 14 and Appendix 3)
 - (d) bullying including cyberbullying (see para 10)
 - (e) domestic abuse (see para 13 and Appendix 5)
 - (f) drugs
 - (g) fabricated or induced illness

- (h) faith abuse
- (j) female genital mutilation (FGM) (see para 15 and Appendix 4)
- (k) forced marriage (see para 16)
- (l) gangs and youth violence
- (m) gender-based violence/violence against women and girls (VAWG)
- (n) mental health
- (p) private fostering
- (q) radicalisation (see para 12 and Appendix 6)
- (r) youth produced sexual imagery (sexting) (see para 24)
- (s) teenage relationship abuse (see para 24)
- (t) trafficking
- (u) peer on peer abuse (see para 24)

8.5 Staff are aware that behaviours linked to drug taking, alcohol abuse, truanting and sexting put children and young people in danger and that safeguarding issues can manifest themselves via peer on peer abuse.

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

8.7 **If staff are concerned about a child's welfare**

8.7.1 If staff notice any indicators of abuse/neglect or signs that a child may be experiencing a safeguarding issue they should record these concerns on a Safeguarding Concerns Form (**ECS Form: 01**) and pass it to the DSL. They may also discuss their concerns in person with the DSL but the details of the concern should be recorded in writing.

8.7.2 There will be occasions when staff may suspect that a child may be at risk, but have no 'real' evidence. For example, the child's behaviour may have changed, or physical or inconclusive signs may have been noticed. These possible indicators should be reported as concerns.

8.7.3 We recognise that the signs may be due to a variety of factors, for example, a parent has moved out, a pet has died, a grandparent is very ill or an accident has occurred. However, they may also indicate a child is being abused or is in need of safeguarding.

8.7.4 In these circumstances staff will try to give the child the opportunity to talk. It is fine for staff to ask the child/young person if they are OK or if they can help in any way.

8.7.5 Staff should use the Safeguarding Concern Form (**ECS Form: 01**) to record these early concerns and give the completed form to the DSL.

8.8 **If a Child/young person discloses to a member of staff**

8.8.1 We recognise that it takes a lot of courage for a child to disclose they are being abused. They may feel ashamed, guilty or scared, their abuser may have threatened that something will happen if they tell, they may have lost all trust in adults or believe that what has happened is their fault. Sometimes they may not be aware that what is happening is abuse.

8.8.2 A child who makes a disclosure may have to tell their story on a number of subsequent occasions to the police and/or social workers. Therefore, it is vital that their first experience of talking to a trusted adult is a positive one.

8.8.3 During their conversation with the child/young person staff will;

- (a) Listen to what the child has to say and allow them to speak freely
- (b) Remain calm and not overact or act shocked or disgusted – the child/young person may stop talking if they feel they are upsetting the listener

- (c) Reassure the child that it is not their fault and that they have done the right thing in telling someone
- (d) Not be afraid of silences – staff must remember how difficult it is for the child/young person and allow them time to talk
- (e) Take what the child is disclosing seriously
- (f) Ask open questions and avoid asking leading questions
- (g) Avoid jumping to conclusions, speculation or make accusations
- (h) Not automatically offer any physical touch as comfort. It may be anything but comforting to a child who is being abused.
- (j) Avoid admonishing the child for not disclosing sooner. Saying things such as 'I do wish you had told me about it when it started' may be the staff member's way of being supportive but may be interpreted by the child to mean they have done something wrong.
- (k) Tell the child what will happen next.

8.8.4 If a child/young person talks to any member of staff about any risks to their safety or wellbeing the staff member will let the child know that they will have to pass the information on – staff are not allowed to keep secrets.

8.8.5 The member of staff should write up their conversation as soon as possible on the Safeguarding Concern Form in the child's own words. Staff should make this a matter of priority (to be completed before they leave the site). The record should be signed and dated, the member of staff's name should be printed and it should also detail where the disclosure was made and who else was present. The record should be handed to the DSL.

8.8.6 In the first instance however the appropriate steps must be taken to ensure the immediate safety of the child/children thought to be at risk. Such steps, taken working together in liaison with all relevant multi-agency staff may include for example, moving a child/children to place of safety, restricting contact and or communication with those thought to represent a risk as a result of an allegation: Each case will be required to be managed according to individual context although the principle of ensuring the child's/children's immediate and ongoing safety remains at the core of actions

8.9 **Notifying Parents/Carers**

8.9.1 The Site will normally seek to discuss any concerns about a child/young person with their parents/carers. This must be handled sensitively and the DSL will make contact with the parent/carers in the event of a concern, suspicion or disclosure.

8.9.2 However, if the site believes that notifying parents could increase the risk to the child or exacerbate the problem, advice will first be sought from children's social care.

8.9.3 Where there are concerns about forced marriage or honour based violence parents should not be informed a referral is being made as to do so may place the child at a significantly increased risk.

8.10 **Making a referral**

8.10.1 Concerns about a child or a disclosure should be discussed with the DSL who will help decide whether a referral to children's social care

8.10.2 If a referral is needed then the DSL should make it. However, anyone can make a referral and if for any reason a staff member thinks a referral is appropriate and one hasn't been made by the DSL once aware of the issue, they can and should consider making a referral themselves.

8.10.3 The child (subject to their age and understanding) and the parents will be told that a referral is being made, unless to do so would increase the risk to the child.

- 8.10.4 If after a referral the child's situation does not appear to be improving the designated safeguarding lead (or the person that made the referral) should press for re-consideration to ensure their concerns have been addressed, and most importantly the child's situation improves.
- 8.10.5 If a child is in immediate danger or is at risk of harm a referral should be made to children's social care and/or the police immediately. Anybody can make a referral. Appropriate action must be taken to ensure the immediate safety of the child: This may include moving the child to a place of safety or restricting contact where high risk is suspected. These examples are not exclusive.
- 8.10.6 Where referrals are not made by the DSL, the DSL should be informed as soon as possible.

8.11 Supporting Staff

- 8.11.1 We recognise that staff working in the site who have become involved with a child who has suffered harm, or appears to be likely to suffer harm may find the situation stressful and upsetting.
- 8.11.2 We will support such staff by providing an opportunity to talk through their anxieties with the DSLs and to seek further support as appropriate.
- 8.11.3 When requested or identified through governance as a risk, safeguarding supervision will be provided to the DSL from the regional manager.

9 CHILDREN WHO ARE PARTICULARLY VULNERABLE

- 9.1 We recognise that some children are more vulnerable to abuse and neglect, and that additional barriers exist when recognising abuse for some children.
- 9.2 We understand that this increase in risk is due more to societal attitudes and assumptions or child protection procedures which fail to acknowledge children's diverse circumstances, rather than the individual child's personality, impairment or circumstances.
- 9.3 In some cases possible indicators of abuse such as a child's mood, behaviour or injury might be assumed to relate to the child's impairment or disability rather than giving a cause for concern. Or a focus may be on the child's disability, special educational needs or situation without consideration of the full picture. In other cases, such as bullying, the child may be disproportionately impacted by the behaviour without outwardly showing any signs that they are experiencing it.
- 9.4 Some children may also find it harder to disclose abuse due to communication barriers, lack of access to a trusted adult or not being aware that what they are experiencing is abuse.
- 9.5 To ensure that all of our children and young people receive equal protection we will be aware of children who are:
- (a) Disabled or have special educational needs
 - (b) Young carers
 - (c) Affected by parental substance misuse, domestic abuse or parental mental health needs
 - (d) Asylum seekers
 - (e) Living away from home
 - (f) Vulnerable to being bullied or engaged in bullying
 - (g) Already viewed as a 'problem'
 - (h) Living in temporary accommodation
 - (j) Live transient lifestyles
 - (k) Living in chaotic and unsupportive home situations
 - (l) Vulnerable to discrimination on the grounds of race, ethnicity, religion, disability or sexuality

- (m) At risk of sexual exploitation
- (n) Do not have English as a first language
- (p) At risk of female genital mutilation
- (q) At risk of forced marriage
- (r) At risk of being drawn into extremism.

10 ANTI BULLYING / CYBERBULLYING

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

11 RACIST INCIDENTS

- 11.1 Racist incidents are covered within the countering bullying policy; we acknowledge that repeated racist incidents or a single serious incident may lead to consideration under child protection procedures. We keep a record of racist incidents.

12 RADICALISATION AND EXTREMISM

- 12.1 The Prevent Duty for England and Wales (2015) under section 26 of the Counter-Terrorism and Security Act 2015 places a duty on education and other children's services to have due regard to the need to prevent people from being drawn into terrorism.
- 12.2 Extremism is defined as 'vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs'. We also include in our definition of extremism calls for the death of members of our armed forces, whether in this country or overseas.
- 12.3 Where radicalisation and/or extremism is recognised or suspected action should be taken in accordance with Policy OP08.1 Responding to Suspected Radicalisation with a notification also made to the Priory Prevent Lead.
- 12.4 Some children are at risk of being radicalised; adopting beliefs and engaging in activities which are harmful, criminal or dangerous.
- 12.5 We are clear that exploitation of vulnerable children and radicalisation should be viewed as a safeguarding concern and follows the Department for Education guidance for schools and childcare providers on preventing children and young people from being drawn into terrorism
- 12.6 We seek to protect children and young people against the messages of all violent extremism including, but not restricted to, those linked to Islamist ideology, or to Far Right / Neo Nazi / White Supremacist ideology, Irish Nationalist and Loyalist paramilitary groups, and extremist Animal Rights movements
- 12.7 Staff receive training to help identify early signs of radicalisation and extremism. Indicators of vulnerability to radicalisation are in detailed in Appendix 6.
- 12.8 Opportunities are provided to enable children and young people to discuss issues of religion,

ethnicity and culture. For schools the DfE advice Promoting Fundamental British Values as part of SMSC (spiritual, moral, social and cultural education) in Schools (2014) is followed.

- 12.8 The Governance body, the Head Teacher and the Designated Safeguarding Lead (DSL) will assess the level of risk within the site and put actions in place to reduce that risk.
- 12.9 Staff will not promote extremist views, or partisan political views
- 12.10 When any member of staff has concerns that a child/young person may be at risk of radicalisation or involvement in terrorism, they should speak with the DSL. They should then follow normal safeguarding procedures, and procedures for reporting incidents of suspected radicalisation (Policy OP 08.1). If the matter is urgent then the Police must be contacted by dialling 999. In non-urgent cases where police advice is sought then dial 101. The Department of Education has also set up a dedicated telephone helpline for staff and governors to raise concerns around Prevent (020 7340 7264).

13 DOMESTIC ABUSE

- 13.1 Domestic abuse represents one quarter of all violent crime. It is actual or threatened physical, emotional, psychological or sexual abuse. It involves the use of power and control by one person over another. It occurs regardless of race, ethnicity, gender, class, sexuality, age, religion, mental or physical ability. Domestic abuse can also involve other types of abuse.
- 13.2 We use the term domestic abuse to reflect that a number of abusive and controlling behaviours are involved beyond violence.
- 13.3 Slapping, punching, kicking, bruising, rape, ridicule, constant criticism, threats, manipulation, sleep deprivation, social isolation, and other controlling behaviours all count as abuse.
- 13.4 Living in a home where domestic abuse takes place is harmful to children and can have a serious impact on their behaviour, wellbeing and understanding of healthy, positive relationships. Children who witness domestic abuse are at risk of significant harm and staff are alert to the signs and symptoms of a child suffering or witnessing domestic abuse (See Appendix 5).

14 CHILD SEXUAL EXPLOITATION (CSE)

- 14.1 Child sexual exploitation is a form of sexual abuse where children are sexually exploited for money, power or status. More information and the indicators of CSE is set out in appendix 3. CSE can happen online and offline and all staff should be aware of the link between online safety and vulnerability to CSE.
- 14.2 Any concerns that a child is being or is at risk of being sexually exploited should be passed without delay to the DSL. We are aware there is a clear link between regular school absence/truancy and CSE. Staff should consider a child to be at potential CSE risk in the case of regular school absence/truancy and make reasonable enquiries with the child and parents to assess this risk.
- 14.3 The DSL will use the CSE Risk Assessment Tool (**ECS Form: 14.10**) on all occasions when there is a concern that a child is being or is at risk of being sexually exploited or where indicators have been observed that are consistent with a child who is being or who is at risk of being sexually exploited.
- 14.4 In all cases if the tool identified any level of concern staff should follow the reporting process outlined therein. If a child is in immediate danger the police should be called on 999.
- 14.5 We are aware that a child often is not able to recognise the coercive nature of the abuse and

does not see themselves as a victim. As a consequence the child may resent what they perceive as interference by staff. However, staff must act on their concerns as they would for any other type of abuse.

- 14.6 We include the risks of sexual exploitation in the PHSE and SRE and residential learning curriculum. Children and young people will be informed of the grooming process and how to protect themselves from people who may potentially be intent on causing harm. They will be supported in terms of recognising and assessing risk in relation to CSE, including online, and knowing how and where to get help

15 FEMALE GENITAL MUTILATION (FGM)

- 15.1 Female Genital Mutilation (FGM) is illegal in England and Wales under the FGM Act (2003). It is a form of child abuse and violence against women. A mandatory reporting duty requires teachers to report 'known' cases of FGM in under 18s, which are identified in the course of their professional work, to the police.
- 15.2 The duty applies to all staff employed or engaged to carry out teaching, health and social care, whether or not they have professional or qualified teacher status. The duty applies to the individual who becomes aware of the case to make a report. It should not be transferred to the Designated Safeguarding Lead, however the DSL should be informed.
- 15.3 If staff are informed by a girl under 18 that an act of FGM has been carried out on her or a teacher observes physical signs which appear to show that an act of FGM has been carried out on a girl under 18 and they have no reason to believe the act was necessary for the girl's physical or mental health or for purposes connected with labour or birth, the teacher should personally make a report to the police force in which the girl resides by calling 101. The report should be made by the close of the next working day.
- 15.4 Staff are trained to be aware of risk indicators of FGM which are set out in Appendix 4. Concerns about FGM outside of the mandatory reporting duty should be reported as per the site's child protection procedures. Staff should be particularly alert to suspicions or concerns expressed by female children and young people about going on a long holiday during the summer vacation period. There should also be consideration of potential risk to other girls in the family and practicing community.
- 15.5 Where there is a risk to life or likelihood of serious immediate harm the teacher should report the case immediately to the police, including dialling 999 if appropriate
- 15.6 There are no circumstances in which a teacher or other member of staff should examine a girl.

16 FORCED MARRIAGE

- 16.1 A forced marriage is a marriage in which one or both people do not (or in cases of people with learning disabilities cannot) consent to the marriage but are coerced into it. Coercion may include physical, psychological, financial, sexual and emotional pressure. It may also involve physical or sexual violence and abuse.
- 16.2 Forced marriage is recognised in the UK as a form of violence against women and men, domestic/child abuse and a serious abuse of human rights. Since June 2014 forcing someone to marry has become a criminal offence in England and Wales under the Anti-Social Behaviour, Crime and Policing Act 2014.
- 16.3 A forced marriage is not the same as an arranged marriage which is common in several cultures. The families of both spouses take a leading role in arranging the marriage but the choice of whether or not to accept the arrangement remains with the prospective spouses.

- 16.4 Staff should never attempt to intervene directly or through a third party. Contact should be made with the contact centre or the Forced Marriage Unit 020 7008 0151.

17 HONOUR-BASED VIOLENCE

- 17.1 Honour based violence (HBV) can be described as a collection of practices, which are used to control behaviour within families or other social groups to protect perceived cultural and religious beliefs and/or honour. Such violence can occur when perpetrators perceive that a relative has shamed the family and/or community by breaking their honour code.
- 17.2 Honour based violence might be committed against people who:
- (a) become involved with a boyfriend or girlfriend from a different culture or religion
 - (b) want to get out of an arranged marriage
 - (c) want to get out of a forced marriage
 - (d) wear clothes or take part in activities that might not be considered traditional within a particular culture.
- 17.3 It is a violation of human rights and may be a form of domestic and/or sexual abuse. There is no, and cannot be, honour or justification for abusing the human rights of others.

18 ONE CHANCE RULE

- 18.1 All staff are aware of the 'One Chance' Rule' in relation to forced marriage, FGM and HBV. Staff recognise they may only have one chance' to speak to a child/young person who is a potential victim and have just one chance to save a life.
- 18.2 We are aware that if the victim is not offered support following disclosure that the 'One Chance' opportunity may be lost. Therefore, all staff are aware of their responsibilities and obligations when they become aware of potential forced marriage, FGM and HBV cases.

19 PRIVATE FOSTERING ARRANGEMENTS

- 19.1 A private fostering arrangement occurs when someone other than a parent or close relative cares for a child for a period of 28 days or more, with the agreement of the child's parents. It applies to children under the age of 16 or 18 if the child is disabled. Children looked after by the local authority or who are placed in residential schools, children's homes or hospitals are not considered to be privately fostered.
- 19.2 Private fostering occurs in all cultures, including British culture and children may be privately fostered at any age.
- 19.3 We recognise that most privately fostered children remain safe and well but are aware that safeguarding concerns have been raised in some cases. Therefore, all staff are alert to possible safeguarding issues, including the possibility that the child has been trafficked into the country.
- 19.4 By law, a parent, private foster carer or other persons involved in making a private fostering arrangement must notify children's services as soon as possible. However, where a member of staff becomes aware that a child/young person may be in a private fostering arrangement they will raise this with the DSL and the DSL will notify the local authority of the circumstances.

20 LOOKED AFTER CHILDREN

- 20.1 The most common reason for children becoming looked after is as a result of abuse and neglect. We ensure that staff have the necessary skills and understanding to keep looked after children safe. Appropriate staff have information about a child's looked after legal status

and care arrangements, including the level of authority delegated to the carer by the authority looking after the child and contact arrangements with birth parents or those with parental responsibility

- 20.2 The SENCO where applicable (schools) and the DSL have details of the child's social worker and the name and contact details of the local authorities' virtual school head for children in care.

21 RUNNING AWAY/MISSING

- 21.1 Attendance, absence and exclusions are closely monitored. A child going missing from education is a potential indicator of abuse and neglect, including sexual abuse and sexual exploitation.
- 21.2 Please see Running Away/Missing Policy ESC 06 for full details
- 21.3 Staff must be alert to signs of children at risk of travelling to conflict zones, female genital mutilation and forced marriage.

22 ONLINE/ eSAFETY SAFETY

- 22.1 Our children and young people increasingly use electronic equipment on a daily basis to access the internet and share content and images via social media sites such as facebook, twitter, instagram, snapchat and oovoo.
- 22.2 Unfortunately, some adults and other children use these technologies to harm children. The harm might range from sending hurtful or abusive texts or emails, to grooming and enticing children to engage in sexual behaviour such as webcam photography or face-to-face meetings. Children and young people may also be distressed or harmed by accessing inappropriate material such as pornographic websites or those which promote extremist behaviour, criminal activity, suicide or eating disorders
- 22.3 Priory Group has an online/eSafety policy which explains how we try to keep children and young people safe in schools and homes and how we respond to online safety incidents (See flowchart, Appendix 7).
- 22.4 Children and young people are taught about online safety and all staff receive online safety training which is regularly updated.

23 PEER ON PEER ABUSE

- 23.1 In most instances, the conduct of children and young people towards each other will be covered by our behaviour policy. However, some allegations may be of such a serious nature that they may raise safeguarding concerns. We recognise that children are capable of abusing their peers. It will not be passed off as 'banter' or 'part of growing up'. The forms of peer on peer abuse are outlined below.
- 23.1.1 Domestic abuse – an incident or pattern of actual or threatened acts of physical, sexual, financial and/or emotional abuse, perpetrated by an adolescent against a current or former dating partner regardless of gender or sexuality.
- 23.1.2 Child Sexual Exploitation – children under the age of 18 may be sexually abused in the context of exploitative relationships, contexts and situations by peers who are also under 18.
- 23.1.3 Harmful Sexual Behaviour – Children and young people presenting with sexual behaviours that are outside of developmentally 'normative' parameters and harmful to themselves and others (For more information, please see Appendix 2).

- 23.1.4 Serious Youth Violence – Any offence of most serious violence or weapon enabled crime, where the victim is aged 1-19' i.e. murder, manslaughter, rape, wounding with intent and causing grievous bodily harm. 'Youth violence' is defined in the same way, but also includes assault with injury offences.
- 23.2 The term peer-on-peer abuse can refer to all of these definitions and a child may experience one or multiple facets of abuse at any one time. Therefore, our response will cut across these definitions and capture the complex web of their experiences.
- 23.3 There are also different gender issues that can be prevalent when dealing with peer on peer abuse (i.e. girls being sexually touched/assaulted or boys being subjected to initiation/hazing type violence).
- 23.4 We aim to reduce the likelihood of peer on peer abuse through:
- (a) the established ethos of respect, friendship, courtesy and kindness
 - (b) high expectations of behaviour
 - (c) clear consequences for unacceptable behaviour
 - (i) providing a developmentally appropriate learning opportunities which develops children and young people' understanding of healthy relationships, acceptable behaviour, consent and keeping themselves safe
 - (ii) systems for any child/young person to raise concerns with staff, knowing that they will be listened to, valued and believed
 - (iii) robust risk assessments and providing targeted work for children and young people identified as being a potential risk to other children and young people and those identified as being at risk.
- 23.5 Research indicates that young people rarely disclose peer on peer abuse and that if they do, it is likely to be to their friends. Therefore, we will also educate children and young people in how to support their friends if they are concerned about them, that they should talk to a trusted adult in the school and what services they can contact for further advice.
- 23.6 Any concerns, disclosures or allegations of peer on peer abuse in any form should be referred to the DSL using our child protection procedures as set out in this policy. Where a concern regarding peer on peer abuse has been disclosed to the DSL(s), advice and guidance will be sought from Children Social Care and where it is clear a crime has been committed or there is a risk of crime being committed the Police will be contacted.
- 23.7 Working with external agencies the site will respond to the unacceptable behaviour. If a child/young person's behaviour negatively impacts on the safety and welfare of other children and young people then safeguards will be put in place to promote the well-being of the children and young people affected and the victim and perpetrator will be provided with support.

24 YOUTH PRODUCED SEXUAL IMAGERY (SEXTING)

- 24.1 The practice of children and young people sharing images and videos via text message, email, social media or mobile messaging apps has become commonplace. However, this online technology has also given children the opportunity to produce and distribute sexual imagery in the form of photos and videos. Such imagery involving anyone under the age of 18 is illegal. We include explicit text communication in our processes below.
- 24.2 Youth produced sexual imagery refers to both images and videos where;
- (a) A person under the age of 18 creates and shares sexual imagery of themselves with a peer under the age of 18.
 - (b) A person under the age of 18 shares sexual imagery created by another person under the age of 18 with a peer under the age of 18 or an adult.
 - (c) A person under the age of 18 is in possession of sexual imagery created by another person under the age of 18.

- 24.3 All incidents of this nature should be treated as a safeguarding concern and in line with the UKCCIS guidance 'Sexting in schools and colleges: responding to incidents and safeguarding young people'.
- 24.4 Cases where sexual imagery of people under 18 has been shared by adults and where sexual imagery of a person of any age has been shared by an adult to a child is child sexual abuse and should be responded to accordingly.
- 24.5 If a member of staff becomes aware of an incident involving youth produced sexual imagery they should follow the child protection procedures and refer to the DSL as soon as possible. The member of staff should confiscate the device involved and set it to flight mode or, if this is not possible, turn it off. Staff should not view, copy or print the youth produced sexual imagery.
- 24.6 The DSL should hold an initial review meeting with appropriate staff and subsequent interviews with the children involved (if appropriate). Parents should be informed at an early stage and involved in the process unless there is reason to believe that involving parents would put the child at risk of harm. At any point in the process if there is concern a young person has been harmed or is at risk of harm a referral should be made to Children's Social Care or the Police as appropriate.
- 24.7 Referral should be made to Children's Social Care/Police, and must always be made if:
- (a) The incident involves an adult;
 - (i) There is good reason to believe that a young person has been coerced, blackmailed or groomed or if there are concerns about their capacity to consent (for example, owing to special education needs);
 - (ii) What you know about the imagery suggests the content depicts sexual acts which are unusual for the child's development stage or are violent;
 - (b) The imagery involves sexual acts;
 - (c) The imagery involves anyone aged 12 or under;
 - (i) There is reason to believe a child is at immediate risk of harm owing to the sharing of the imagery, for example the child is presenting as suicidal or self-harming.
- 24.8 The DSL will record all incidents of youth produced sexual imagery, including both the actions taken, actions not taken, reasons for doing so and the resolution in line with safeguarding recording procedures.

25 ALLEGATIONS AGAINST STAFF

- 25.1 All staff should take care not to place themselves in a vulnerable position with a child. It is always advisable for interviews or work with individual children or parents to be conducted in view of other adults.
- 25.2 All Staff should be aware of the site's own Behaviour Management policy and the Priory OP41 Professional Boundaries policy.
- 25.3 Guidance about conduct and safe practice, including safe use of mobile phones by staff and volunteers will be given at induction
- 25.4 We understand that a child/young person may make an allegation against a member of staff or staff may have concerns about another staff member.
- 25.5 If such an allegation is made, or information is received which suggests that a person may be unsuitable to work with children, the member of staff receiving the allegation or aware of the information, will immediately inform the Headteacher/Registered Manager
- 25.6 The Headteacher/Registered Manager on all such occasions will discuss the content of the

allegation with the Local Authority Designated Officer (LADO) at the earliest opportunity and before taking any further action.

- 25.7 If the allegation made to a member of staff concerns the Headteacher/Registered Manager, the person receiving the allegation will immediately inform the Regional Manager who will consult the LADO as in 23.6 above, without notifying the subject of the allegation first.
- 25.8 The site will follow the procedures for managing allegations against staff, procedures set out in Keeping Children Safe in Education, in accordance with HR guidance and site procedures for managing allegations.
- 25.9 Staff are reminded that publication of material that may lead to the identification of a staff member who is the subject of an allegation is prohibited by law.
- 25.9.1 Publication includes verbal conversations or writing including content placed on social media sites.

26 WHISTLE-BLOWING

- 26.1 We recognise that children cannot be expected to raise concerns in an environment where staff fail to do so.
- 26.2 All staff should be aware of their duty to raise concerns, where they exist, about the management of child protection, which may include the attitude or actions of colleagues, poor or unsafe practice and potential failures in the site's safeguarding arrangements. If it becomes necessary to raise concerns to somebody independent of the site they should report to a regional lead or follow the Priory Group Whistleblowing Policy and contact whistleblowing@priorygroup.com.
- 26.3 The NSPCC whistleblowing helpline is available for staff who do not feel able to raise concerns regarding child protection failures internally. Staff can call: 0800 028 0285 – line is available from 8:00 AM to 8:00 PM, Monday to Friday and Email: help@nspcc.org.uk.
- 26.4 The employee assist programme is available to staff and offers a confidential telephone counselling and legal information service. Call: 0800 531 6228 and quote: 72002

27 PHYSICAL INTERVENTION

- 27.1 We acknowledge that staff must only ever use physical intervention as a last resort, when a child is endangering him/herself or others, and that at all times it must be the minimal force necessary to prevent injury to another person. (Please refer to policy ECS 05 Physical Intervention)
- 27.2 Such events should be recorded and signed by a witness.
- 27.3 Staff who are likely to need to use physical intervention will be appropriately trained. Please refer to the Physical Intervention Policy
- 27.4 We understand that physical intervention of a nature which causes injury or distress to a child may be considered under child protection or disciplinary procedures.

28 EVALUATION, GOVERNANCE AND MONITORING

- 28.1 The Chief Executive Officer of Priory Education and Children's Services has ultimate responsibility for its schools, care homes, residential settings and colleges.
- 28.2 The school/care home/residential setting also has an Operations Director and Regional Operations Managers to whom the School Principal reports. The OD and ROMs visit the

school/care home/residential setting regularly, supervise the School Principals and Registered Managers and writes a report. The OD reports to the CEO.

- 28.3 An overview of Safeguarding issues is reported to the office of the CEO on a monthly basis at the monthly Education and Children's Services Business Review Meeting. This includes reporting on the operation of our procedure; it also includes reporting on any deficiencies in the procedure and actions taken to remedy any such deficiencies.
- 28.4 In addition, Priory Education and Children's Services has a Compliance Team which engages in both monthly monitoring, including the monitoring of all Care Standards, and which carries out a six-monthly audit of a range of aspects of the service, including Care Standards and, by definition, safeguarding. A report is generated by each of these visits, progress on which is then monitored.
- 28.5 Evaluation of this policy and procedures will be based on monitoring of:
- (a) Young persons' views, as gathered in a variety of ways
 - (b) Family views, as gathered through the Parent/Carer Support Group and its Parent Partners
 - (c) Professional judgement
 - (d) Local Authority LSCB guidance
 - (e) Local Safeguarding team guidance
 - (f) Ofsted guidance
 - (g) Department for Education guidance
 - (h) Monthly Regulation 44 monitoring; this is done by the compliance inspector, who visits the school/care home/residential setting on a monthly basis and reports back to the Priory Compliance Team, and the Priory Management Team, and as such is another person from outside the school/care home/residential setting who monitors our procedures against all relevant regulations, guidance and standards
 - (j) Regulation 45 monitoring, carried out by the Senior Management of the home and reported to the Priory Compliance Team and subsequently to Ofsted
 - (k) Feedback on reports to the office of the Managing Director of Priory Education and Children's Services through the Compliance Team and through monthly monitoring.
- 28.6 Outcomes of monitoring will be used to make recommendations about any improvements required to the policy and procedure. This will take place as and when required.
- 28.7 Monitoring is undertaken by the Education Quality team and outcomes are reported to the Priory Board against Quality Performance indicators on a monthly basis. The Board holds Priory Education and Children's Services to account for its performance.
- 28.8 Priory also has a Safeguarding Committee (which is a sub-committee of the group-wide Assurance Committee) who meet quarterly and report on safeguarding developments to the Priory Boards.
- 28.9 The Education and Children's Services Division has a Safety and Safeguarding Governance Committee which meets at least quarterly to review all safety and safeguarding incidents and related issues, reporting back to the division and the safeguarding committee on actions required to address any concerns identified, sharing any learning points and best practice guidance.
- 28.10 An annual audit of Safeguarding Provisions and practice is undertaken for all sites within the division.

29 REFERENCES

- 29.1 Children Act 1989
Protecting Children and Young People: The Charter (2004) Scottish Government
Protection of Children (Scotland) Act 2003

National Guidance for Child Protection in Scotland (2014) Scottish Government
 'Working Together to Safeguard Children' March 2015
 'Keeping Children Safe in Education' September 2016
 The prevent duty Ref: DFE-00174-2015
 The Education (Independent School Standards)(England) Regulations 2010 as amended 2012
 Multi-Agency Practice Guidelines: Female Genital Mutilation: 2011 HM Government
 Safeguarding Children and Young People from Sexual Exploitation. Supplementary Guidance to Working Together, Dept for Education (2009)
http://webarchive.nationalarchives.gov.uk/20130401151715/http://www.education.gov.uk/publications/eOrderingDownload/Safeguarding_CPY_from_sexual_exploitation.pdf
 What to do if you suspect a child is being sexually exploited. Step by step Guide, Supplementary Guidance. Department for Education (2012)
<https://www.gov.uk/government/publications/what-to-do-if-you-suspect-a-child-is-being-sexually-exploited>
 NSPCC Fact sheet - What can schools do to protect children and young people from sexual exploitation? (2012)
<http://www.nspcc.org.uk/globalassets/documents/information-service/factsheet-schools-protect-children-young-people-sexual-exploitation-cse.pdf>
 Disqualification under the Childcare Act 2006. Statutory guidance for local authorities, maintained schools, independent schools, academies and free schools', DfE, 2015
 Inspecting safeguarding in early years, education and skills settings: Guidance for inspectors undertaking inspection under the common inspection framework DfE: 150067 June 2015 (Draft)

For Scotland:

<http://www.scotland.gov.uk/Publications/2014/05/3052/13>
 A guide to implementing GIRFEC (2012) Scottish Government
 Getting it right for children and families (2014) Scottish Government
 Child Protection Guide for Health Professionals (2013) Scottish Government
 Children's Hearing (2011) Act Scottish Government
 National Risk Assessment Framework (2012) Scottish Government

For Wales:

Safeguarding and Promoting the Welfare of Children who are at Risk of Abuse through Sexual Exploitation, <http://www.awcpp.org.uk/wp-content/uploads/2014/03/CSE-Protocol-Review-FINAL-REVISION-October-2013.pdf>

ASSOCIATED FORMS:

ECS Form: 06 – Running Away /Missing – **Individual Risk Assessment**
ECS Form: 01 - **Safeguarding Referral Form**
ECS Form: 01B - **Local arrangements for safeguarding children**
ECS Form: 14.10 – **CSE Risk Assessment**
OP Form 20 – **Raising a Prevent Concern**
Safeguarding Training Matrix

Appendix 1

Recognising signs of child abuse

Categories of Abuse:

- Physical Abuse
- Emotional Abuse (including Domestic Abuse)
- Sexual Abuse (including child sexual exploitation)
- Neglect

Signs of Abuse in Children:

The following non-specific signs may indicate something is wrong:

- Significant change in behaviour
- Extreme anger or sadness
- Aggressive and attention-seeking behaviour
- Suspicious bruises with unsatisfactory explanations
- Lack of self-esteem
- Self-injury
- Depression
- Age inappropriate sexual behaviour
- Child Sexual Exploitation.

Risk Indicators

The factors described in this section are frequently found in cases of child abuse. Their presence is not proof that abuse has occurred, but:

- Must be regarded as indicators of the possibility of significant harm
- Justifies the need for careful assessment and discussion with designated / named / lead person, manager, (or in the absence of all those individuals, an experienced colleague)
- May require consultation with and / or referral to Children's Services

The absence of such indicators does not mean that abuse or neglect has not occurred.

In an abusive relationship the child may:

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

The parent or carer may:

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

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

Recognising Physical Abuse

The following are often regarded as indicators of concern:

- An explanation which is inconsistent with an injury
- Several different explanations provided for an injury
- Unexplained delay in seeking treatment
- The parents/carers are uninterested or undisturbed by an accident or injury
- Parents are absent without good reason when their child is presented for treatment
- Repeated presentation of minor injuries (which may represent a "cry for help" and if ignored could lead to a more serious injury)
- Family use of different doctors and A&E departments
- Reluctance to give information or mention previous injuries

Bruising

Children can have accidental bruising, but the following must be considered as non accidental unless there is evidence or an adequate explanation provided:

- Any bruising to a pre-crawling or pre-walking baby
- Bruising in or around the mouth, particularly in small babies which may indicate force feeding
- Two simultaneous bruised eyes, without bruising to the forehead, (rarely accidental, though a single bruised eye can be accidental or abusive)
- Repeated or multiple bruising on the head or on sites unlikely to be injured accidentally
- Variation in colour possibly indicating injuries caused at different times
- The outline of an object used e.g. belt marks, hand prints or a hair brush
- Bruising or tears around, or behind, the earlobe/s indicating injury by pulling or twisting
- Bruising around the face
- Grasp marks on small children
- Bruising on the arms, buttocks and thighs may be an indicator of sexual abuse

Bite Marks

Bite marks can leave clear impressions of the teeth. Human bite marks are oval or crescent shaped. Those over 3 cm in diameter are more likely to have been caused by an adult or older child.

A medical opinion should be sought where there is any doubt over the origin of the bite.

Burns and Scalds

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

- Circular burns from cigarettes (but may be friction burns if along the bony protuberance of the spine)
- Linear burns from hot metal rods or electrical fire elements
- Burns of uniform depth over a large area
- Scalds that have a line indicating immersion or poured liquid (a child getting into hot water is his/her own accord will struggle to get out and cause splash marks)

- Old scars indicating previous burns/scalds which did not have appropriate treatment or adequate explanation

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

Fractures

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

Non-mobile children rarely sustain fractures.

There are grounds for concern if:

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

Scars

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

Recognising Emotional Abuse

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

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

The following may be indicators of emotional abuse:

- Developmental delay
- Abnormal attachment between a child and parent/carer e.g. anxious, indiscriminate or not attachment
- Indiscriminate attachment or failure to attach
- Aggressive behaviour towards others
- Scape-goated within the family
- Frozen watchfulness, particularly in pre-school children
- Low self esteem and lack of confidence
- Withdrawn or seen as a "loner" – difficulty relating to others

Recognising Signs of Sexual Abuse

Boys and girls of all ages may be sexually abused and are frequently scared to say anything due to guilt and/or fear. This is particularly difficult for a child to talk about and full account should be taken of the cultural sensitivities of any individual child/family.

Recognition can be difficult, unless the child discloses and is believed. There may be no physical signs and indications are likely to be emotional/behavioural.

Some behavioural indicators associated with this form of abuse are:

- Inappropriate sexualised conduct
- Sexually explicit behaviour, play or conversation, inappropriate to the child's age
- Continual and inappropriate or excessive masturbation
- Self-harm (including eating disorder), self mutilation and suicide attempts
- Involvement in prostitution or indiscriminate choice of sexual partners
- An anxious unwillingness to remove clothes e.g. for sports events (but this may be related to cultural norms or physical difficulties)

Some physical indicators associated with this form of abuse are:

- Pain or itching of genital area
- Blood on underclothes
- Pregnancy in a younger girl where the identity of the father is not disclosed
- Physical symptoms such as injuries to the genital or anal area, bruising to buttocks, abdomen and thighs, sexually transmitted disease, presence of semen on vagina, anus, external genitalia or clothing

Recognising Neglect

Evidence of neglect is built up over a period of time and can cover different aspects of parenting. Indicators include:

- Failure by parents or carers to meet the basic essential needs e.g. adequate food, clothes, warmth, hygiene and medical care
- A child seen to be listless, apathetic and irresponsive with no apparent medical cause Failure of child to grow within normal expected pattern, with accompanying weight loss
- Child thrives away from home environment
- Child frequently absent from school
- Child left with adults who are intoxicated or violent
- Child abandoned or left alone for excessive periods

Appendix 2

Sexual Abuse by Young People

The boundary between what is abusive and what is part of normal childhood or youthful experimentation can be blurred. The determination of whether behaviour is developmental, inappropriate or abusive will hinge around the related concepts of true consent, power imbalance and exploitation. This may include children and young people who exhibit a range of sexually problematic behaviour such as indecent exposure, obscene telephone calls, fetishism, bestiality and sexual abuse against adults, peers or children.

Developmental Sexual Activity encompasses those actions that are to be expected from children and young people as they move from infancy through to an adult understanding of their physical, emotional and behavioural relationships with each other. Such sexual activity is essentially information gathering and experience testing. It is characterised by mutuality and of the seeking of consent.

Inappropriate Sexual Behaviour can be inappropriate socially, inappropriate to development, or both. In considering whether behaviour fits into this category, it is important to consider what negative effects it has on any of the parties involved and what concerns it raises about a child or young person. It should be recognised that some actions may be motivated by information seeking, but still cause significant upset, confusion, worry, physical damage, etc. It may also be that the behaviour is "acting out" which may derive from other sexual situations to which the child or young person has been exposed. If an act appears to have been inappropriate, there may still be a need for some form of behaviour management or intervention. For some children, educative inputs may be enough to address the behaviour.

Abusive sexual activity included any behaviour involving coercion, threats, aggression together with secrecy, or where one participant relies on an unequal power base. In order to more fully determine the nature of the incident the following factors should be given consideration. The presence of exploitation in terms of:

- ❖ **Equality** – consider differentials of physical, cognitive and emotional development, power and control and authority, passive and assertive tendencies
- ❖ **Consent** – agreement including all the following:
 - Understanding that is proposed based on age, maturity, development level, functioning and experience
 - Knowledge of society's standards for what is being proposed
 - Awareness of potential consequences and alternatives
 - Assumption that agreements or disagreements will be respected equally
 - Voluntary decision
 - Mental competence
- ❖ **Coercion** – the young perpetrator who abuses may use techniques like bribing, manipulation and emotional threats of secondary gains and losses that is loss of love, friendship, etc. Some may use physical force, brutality or the threat of these regardless of victim resistance.

In evaluating sexual behaviour of children and young people, the above information should be used only as a guide. Further information and advice is available in the Surrey multi-agency protocol "Working with Sexually Active Young People" available at www.surreycc.gov.uk/safeguarding, by choosing Safeguarding Children – Protocols and Guidance for Professionals. Assessment, Consultation and Therapy (ACT) 01306 745310 can also assist professionals in identifying sexual behaviour of concern in children and adolescents.

Appendix 3

Child Sexual Exploitation

The following list of indicators is not exhaustive or definitive but it does highlight common signs which can assist professionals in identifying children or young people who may be victims of sexual exploitation.

Signs include:

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

Appendix 4

Female Genital Mutilation (FGM)

It is essential that staff are aware of FGM practices and the need to look for signs, symptoms and other indicators of FGM.

What is FGM?

It involves procedures that intentionally alter/injure the female genital organs for non-medical reasons.

4 types of procedure:

Type 1 Clitoridectomy – partial/total removal of clitoris

Type 2 Excision – partial/total removal of clitoris and labia minora

Type 3 Infibulation entrance to vagina is narrowed by repositioning the inner/outer labia

Type 4 all other procedures that may include: pricking, piercing, incising, cauterising and scraping the genital area.

Why is it carried out?

Belief that:

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

Is FGM legal?

FGM is internationally recognised as a violation of human rights of girls and women. It is **illegal** in most countries including the UK.

Circumstances and occurrences that may point to FGM happening are:

- Child talking about getting ready for a special ceremony
- Family taking a long trip abroad
- Child's family being from one of the 'at risk' communities for FGM (Kenya, Somalia, Sudan, Sierra Leon, Egypt, Nigeria, Eritrea as well as non-African communities including Yemeni, Afghani, Kurdistan, Indonesia and Pakistan)
- Knowledge that the child's sibling has undergone FGM
- Child talks about going abroad to be 'cut' or to prepare for marriage

Signs that may indicate a child has undergone FGM:

- Prolonged absence from school and other activities
- Behaviour change on return from a holiday abroad, such as being withdrawn and appearing subdued
- Bladder or menstrual problems
- Finding it difficult to sit still and looking uncomfortable
- Complaining about pain between the legs
- Mentioning something somebody did to them that they are not allowed to talk about
- Secretive behaviour, including isolating themselves from the group
- Reluctance to take part in physical activity
- Repeated urinal tract infection
- Disclosure

The 'One Chance' rule

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

Appendix 5

Domestic Abuse

How does it affect children?

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

What are the signs to look out for?

Children affected by domestic abuse reflect their distress in a variety of ways. They may change their usual behaviour and become withdrawn, tired, start to wet the bed and have behavioural difficulties. They may not want to leave their house or may become reluctant to return. Others will excel, using their time in your care as a way to escape from their home life. None of these signs are exclusive to domestic abuse so when you are considering changes in behaviours and concerns about a child, think about whether domestic abuse may be a factor.

Appendix 6

INDICATORS OF VULNERABILITY TO RADICALISATION

1. Radicalisation refers to the process by which a person comes to support terrorism and forms of extremism leading to terrorism.
2. Extremism is defined by the Government in the Prevent Strategy as:
Vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs.
We also include in our definition of extremism calls for the death of members of our armed forces, whether in this country or overseas.
3. Extremism is defined by the Crown Prosecution Service as:
The demonstration of unacceptable behaviour by using any means or medium to express views which:
 - Encourage, justify or glorify terrorist violence in furtherance of particular beliefs;
 - Seek to provoke others to terrorist acts;
 - Encourage other serious criminal activity or seek to provoke others to serious criminal acts; or
 - Foster hatred which might lead to inter-community violence in the UK.
4. There is no such thing as a "typical extremist": those who become involved in extremist actions come from a range of backgrounds and experiences, and most individuals, even those who hold radical views, do not become involved in violent extremist activity.
5. Children and young people may become susceptible to radicalisation through a range of social, personal and environmental factors - it is known that violent extremists exploit vulnerabilities in individuals to drive a wedge between them and their families and communities. It is vital that school staff are able to recognise those vulnerabilities.
6. Indicators of vulnerability include:
 - Identity Crisis – the student / child/young person is distanced from their cultural / religious heritage and experiences discomfort about their place in society;
 - Personal Crisis – the student / child/young person may be experiencing family tensions; a sense of isolation; and low self-esteem; they may have dissociated from their existing friendship group and become involved with a new and different group of friends; they may be searching for answers to questions about identity, faith and belonging;
 - Personal Circumstances – migration; local community tensions; and events affecting the student / child/young person's country or region of origin may contribute to a sense of grievance that is triggered by personal experience of racism or discrimination or aspects of Government policy;
 - Unmet Aspirations – the student / child/young person may have perceptions of injustice; a feeling of failure; rejection of civic life;
 - Experiences of Criminality – which may include involvement with criminal groups, imprisonment, and poor resettlement / reintegration;
 - Special Educational Need – students / children and young people may experience difficulties with social interaction, empathy with others, understanding the consequences of their actions and awareness of the motivations of others.
7. However, this list is not exhaustive, nor does it mean that all young people experiencing the above are at risk of radicalisation for the purposes of violent extremism.

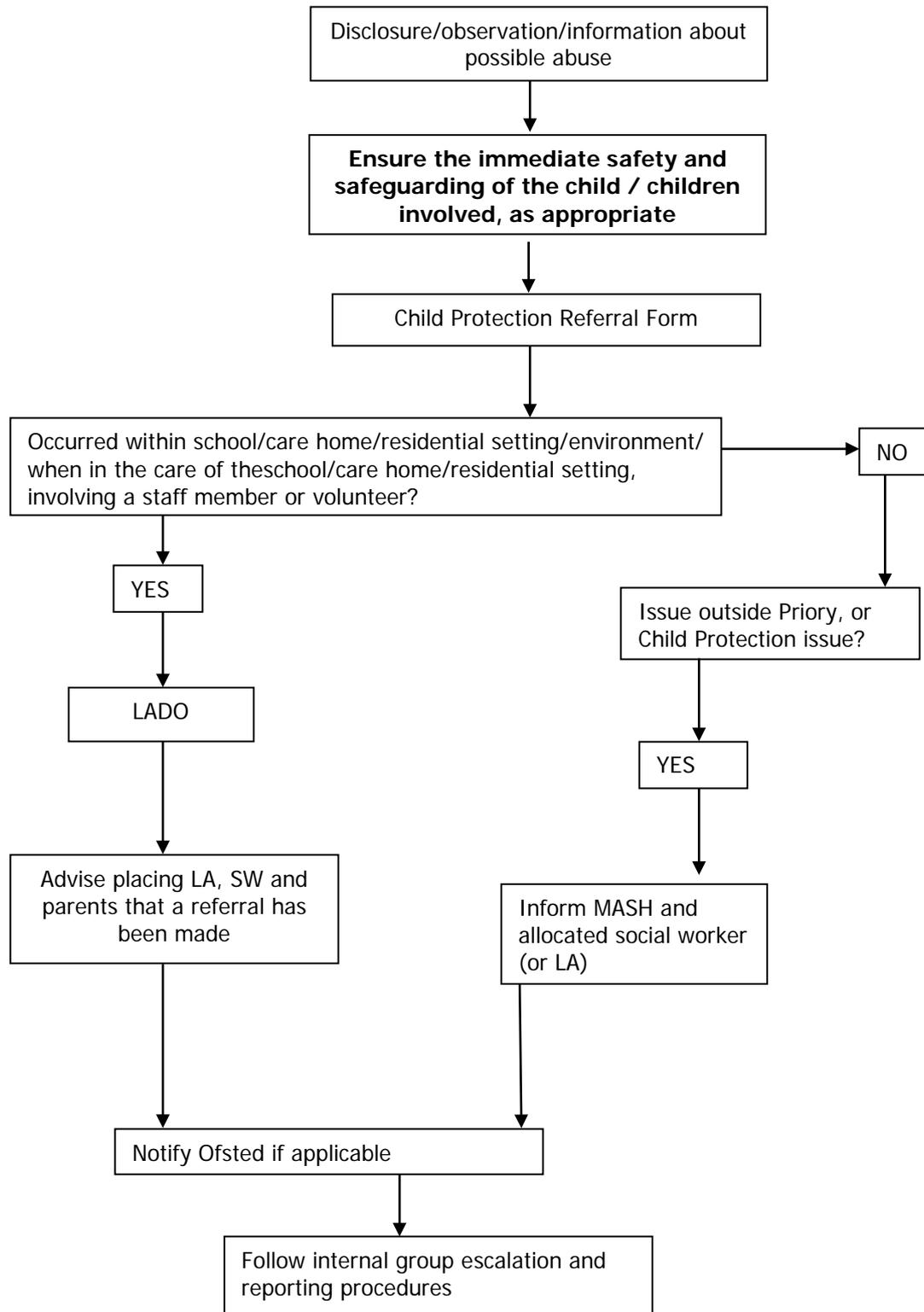
8. More critical risk factors could include:
- Being in contact with extremist recruiters;
 - Accessing violent extremist websites, especially those with a social networking element;
 - Possessing or accessing violent extremist literature;
 - Using extremist narratives and a global ideology to explain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

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

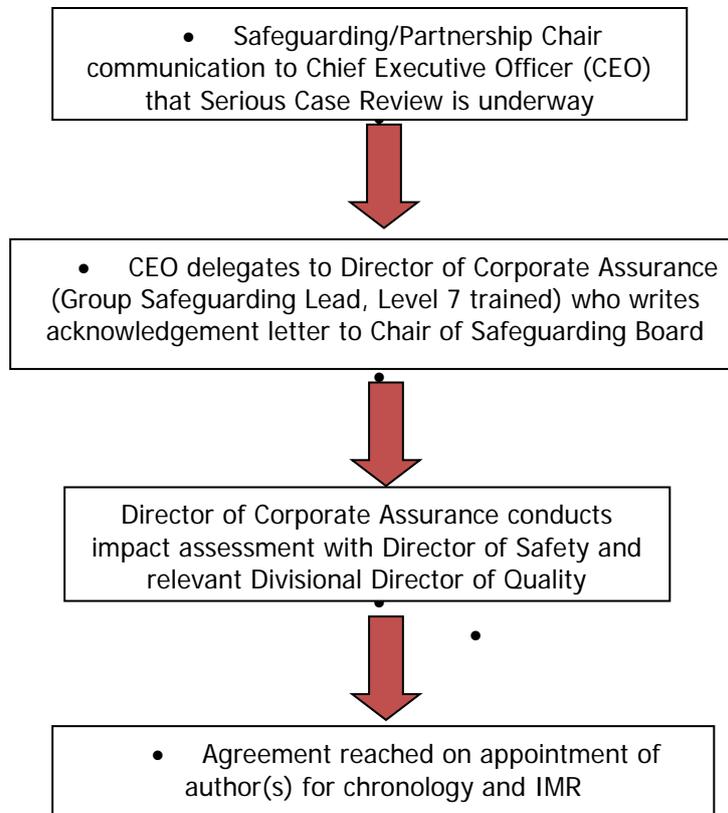
Appendix 7 PROCEDURES: WHAT TO DO IF YOU HAVE A CONCERN

INTERNAL SAFEGUARDING PROCEDURES

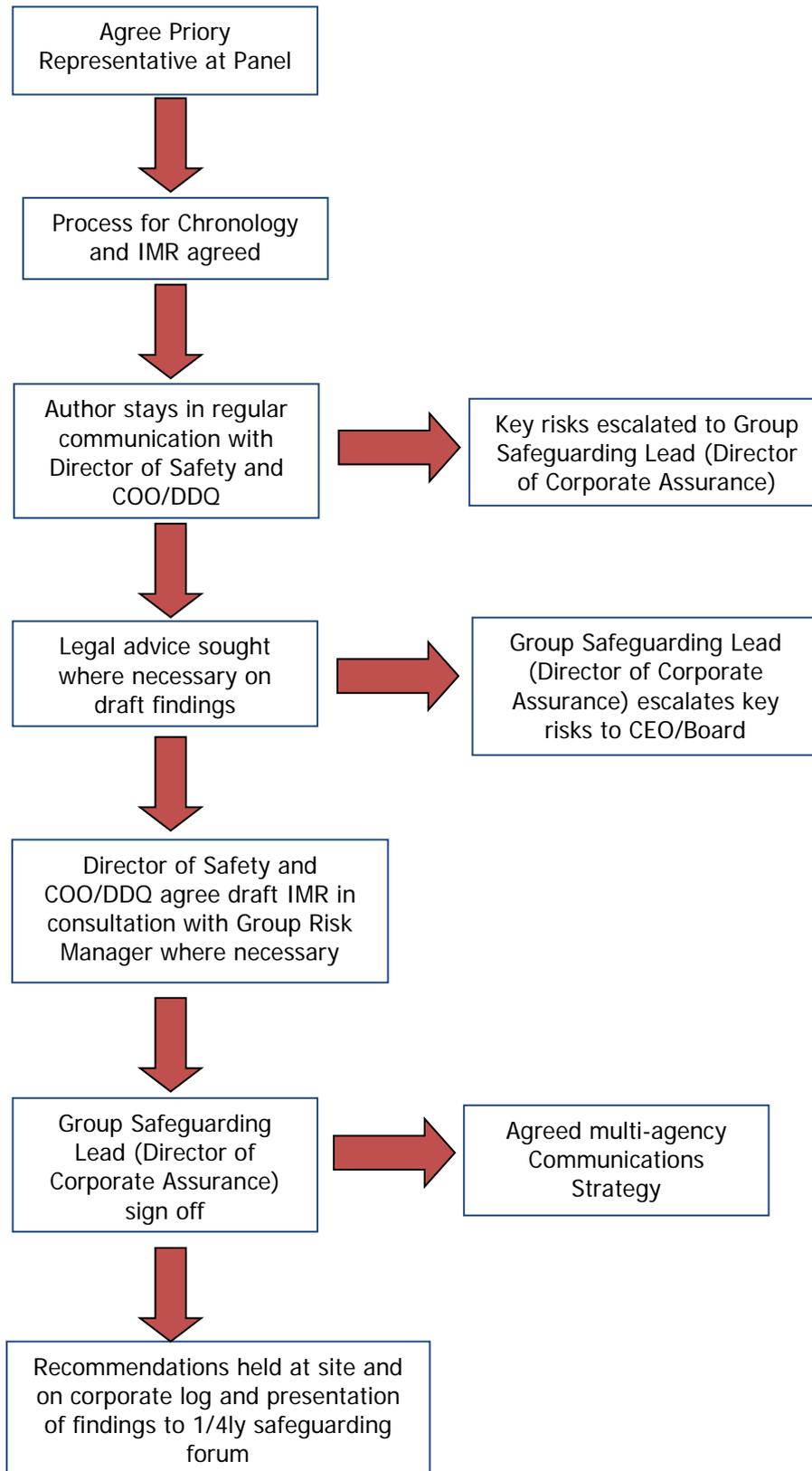
The following flowchart details actions that must be taken following suspicion that a child has been abused.



Serious Case Reviews - Process for Appointment of Writer for Chronology and IMR



Serious Case Reviews - Process for Chronology and IMR



Appendix 8

Further advice on child protection is available from:

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

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

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

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

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

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

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

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