TRURO HIGH SCHOOL
Where Girls Thrive

POLICY 1

CHILD PROTECTION AND SAFEGUARDING POLICY INCLUDING CHILD ON CHILD ABUSE

Policy reviewed by	DSL
Governors' Committee	Full Board
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TRURO HIGH SCHOOL

CHILD PROTECTION AND SAFEGUARDING

1. INTRODUCTION

1.1 This policy is applicable to EYFS, day and boarding students. Please note that within this policy, the words children, pupils and students may be used interchangeably.

1.2 This policy has regard for:

- *Keeping children safe in education 2024*
  - Part 1

    All school staff who work directly with children are required to read at least Part 1 of Keeping Children Safe in Education (KCSIE).
  - Annex A

    Staff who do not work directly with children on a regular basis can read Annex A, a condensed version of Part 1.
  - Annex B
    Staff who work directly with children should also read Annex B, which contains additional information about specific forms of abuse and safeguarding issues
- *Working together to safeguard children* (*WTSC*) (HM Government, February 2024) (click here)
- *Revised Prevent Duty Guidance: for England and Wales* (*Prevent*) (HM Government, July 2023) (click here)
- *The Prevent Duty: Departmental advice for schools and childcare providers* (DfE, June 2015) (click here)
- *What to do if you're worried a child is being abused: Advice for practitioners* (HM Government, March 2015) (click here)
- Criminal exploitation of children and vulnerable adults: county lines guidance. (Oct 2023)
- *Information sharing: Advice for practitioners providing safeguarding services to children, young people, parents and carers* (HM Government, Sept 2023) (click here)
- *Sexual violence and sexual harassment between children in schools and colleges: Advice for governing bodies, proprietors, headteachers, principals, senior leadership teams and designated safeguarding leads* (DfE, September 2021) (click here)
- Review of the Relationships Education, Relationships and Sex Education (RSE) and Health Education statutory guidance *(July 2024)* *(Click here)*
- South West Safeguarding and Child Protection Procedures (OSCP) (click here)
- *Promoting fundamental British values as part of SMSC in schools: Departmental advice for maintained schools* (DfE, November 2014) (click here)
- *Sharing nudes and semi-nudes: advice for education settings working with children and young people* (March 2024) (click here)
- *How social media is used to encourage travel to Syria and Iraq: Briefing note for schools* (HM Government & DfE) (click here)
- *Promoting and supporting mental health and wellbeing in schools and colleges (May 2024)* *click here*
- For links to further information and guidance, refer to Appendix B.

1.3 The Governing Body takes seriously its responsibility to ensure there is an effective child protection and safeguarding policy for the School. Governors undertake an annual review to satisfy themselves that the policy

and its procedures are implemented fully in practice. One Governor (Dr. Ruth Sullivan rsullivan@trurohigh.co.uk) is appointed as the board level lead on this and there is a deputy designated Governor (Lynda Barley lbarley@trurohigh.co.uk).

1.4 Safeguarding and promoting the welfare of children is defined in *KCSIE* 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; taking action to enable all children to have the best outcomes.' In some cases, a mental health issue could be an indicator of a Child Protection and/or Safeguarding concern. (see separate Mental Health & Wellbeing Policy)

1.5 Children includes everyone under the age of 18, but the School has a responsibility to safeguard all pupils in its care, including those 18 years of age or older.

1.6 The School is fully committed to safeguarding and all staff, including temporary, supply and ancillary staff and volunteers, and Governors have a full and active part to play in protecting pupils from harm, and the child's welfare must be their paramount concern. Safeguarding is **EVERYONE'S** responsibility. At all times, staff need to consider, what is in the best interest of the child.

1.7 The School recognises that safeguarding incidents could happen anywhere and staff should be alert to possible concerns being raised at Truro High School.

1.8 Staff at the school take a child-centered and increasingly, a trauma-informed approach to safeguarding.

1.9 All staff subscribe to the view that the School should provide a caring, positive, safe and stimulating environment which promotes the social, physical, moral and spiritual development of the individual child.

1.10 Definitions of abuse, neglect and exploitation can be found in Appendix A and further information on specific forms of abuse and safeguarding issues in Appendix B.

1.11 This policy should be read in conjunction with the following documents:

- Anti-bullying policy96
- Staff Recruitment Policy
- Use of Reasonable Force Policy
- Missing Pupils Policy
- Online Safety and Mobile Devices Policy including remote learning
- Low-Level Concerns Policy
- Whistle Blowing Policy
- Health and Safety Policy
- Staff Code of Conduct.
- Staff Development and Induction
- Safeguarding response to CME (see Appendix J)
- Mental Health and Wellbeing Policy
- PSHE & RSE policy

2. CONCERNS ABOUT A CHILD

2.1 Local procedures are set by the Cornwall and Isles of Scilly Safeguarding Children Partnership (OSCP), formerly the Cornwall and Isles of Scilly Safeguarding Board (LCSB). The full procedures for Cornwall and the Isles of Scilly can be found at Cornwall and the Isles of Scilly Safeguarding Partnership website (ciossafeguarding.org.uk). The School contributes to inter-agency working in accordance with the OSCP. The

OSCP follow the South West Safeguarding and Child Protection Procedures (Cornwall and the Isles of Scilly Safeguarding Children Partnership - Home page (ciossafeguarding.org.uk))

2.2 Any member of the school community who has concerns about a child being abused, neglected or at risk of being drawn into terrorism must report these concerns to the Designated Safeguarding Lead (DSL), Mrs Katie Hinks (Head of Prep), or to the Deputy Designated Safeguarding Leads (DDSL), Miss Deb Freeman (Deputy Head Wellbeing) and Mrs Dawn Kingston (School Nurse), or in their absence to a member of SLT. They will decide on whether to report the matter to the Multi-Agency Referral Unit (MARU).

2.3 Truro High School are part of Operation Encompass and the named contact is Katie Hinks (DSL).

2.4 Children with a social worker (CiN or CP) may be more vulnerable and need more support.

2.5 Any member of the school community is at liberty to report their concerns directly to the MARU.

2.6 Every member of staff has a responsibility to pursue a concern they have about a child. However, the DSL and DDSLs are most likely to have a complete safeguarding picture and be the most appropriate person to advise on the response to safeguarding concerns.

2.7 If, after a referral, the child's situation does not appear to be improving, the DSL (or the person who made the referral) will press for re-consideration to ensure concerns have been addressed and, most importantly, that the child's situation improves.

2.8 All staff should challenge inaction where they perceive it, by following the School's Escalation Procedures set out in Appendix E. (Also see Section 4 below).

2.9 **If a child is in immediate danger or is at risk of harm a referral should be made to the MARU or the police immediately. Parental consent is not needed and anybody can make a referral.**

2.10 Advice on how to identify signs of abuse or neglect is included in induction and annual training for all staff. See also Appendix A.

DfE advice is available on their website – see *What to do if you're worried a child is being abused: Advice for Practitioners* (click here). The NSPCC website also provides useful additional information.

2.11 Details of the MARU are as follows:

Telephone 0300 123 1116 (out of hours 01208 251300)

For a pupil over the age of 18:

Telephone 0300 1234 131 (out of hours 01208 251300)

2.12 For organisations or individuals using school premises the school understands and is committed to its responsibility to respond to allegations relating to incidents occurring when an individual or organisation uses a school's premises. As with all safeguarding allegations, the school would follow safeguarding policies and procedures, including informing the Local Authority Designated Officer (LADO).

3. ACTIONS & REFERRALS

3.1 If there are any concerns about a child, the following procedures must be followed (see Appendix B for a flowchart of the referral procedure.):

- Staff must report their concern on MY CONCERN Safeguarding Software.
- The DSL team will be alerted via email.

- If the concern is urgent, then staff should inform a member of the Safeguarding team (DSL or DDSLs) immediately.

- If the DSL or DDSLs are not available, do not delay appropriate action being taken. Staff should consider speaking to a member of the senior leadership team and/or take advice from local children's social care. In these circumstances, any action taken should be shared with the DSL (or DDSLs) as soon as is practically possible.

- Options will then include:
    - Managing any support for the child internally via the school's pastoral system.

    - An early help assessment. The Hub can be contacted on 01872 322277 or earlyhelphub@cornwall.gov.uk. (See section 7 below for further details on early help provision.)

      The DSL (or DDSL) will lead on liaising with other agencies and setting up an inter-agency assessment as appropriate. Should it be decided to report the matter to the MARU, both the department in Cornwall and the Isles of Scilly and, where it is different, the department where the child lives will be advised of the problem, on the same day when possible.

    - A referral for statutory services, for example, as the child might be in need, is in need or suffering or likely to suffer harm. The latter will be reported immediately to the MARU and certainly within 24 hours. The threshold for this referral might be low, with the emphasis on ensuring that a child receives the right help at the right time.

- In all cases concerns should be regularly reassessed in order to check whether the situation improves. This is done by the DSL (DDSLs) and/or at meetings of the Safeguarding Team or the School's Welfare Team.

- All staff should be aware of the process for making referrals to children's social care and for statutory assessments under the Children Act 1989, especially section 17 (children in need) and section 47 (a child suffering, or likely to suffer, significant harm) that may follow a referral, along with the role that they may be expected to play in such assessments.

- **Staff should not assume that somebody else will act and share information that might be critical in keeping children safe.**

- Detailed, accurate, secure written records of **all** concerns, discussions and **decisions made including the rationale for those decisions will be kept on MY CONCERN. This should include instances where** referrals were **or were not made to another agency such as LA children's social care or the Prevent program etc.**

3.2 Within one working day of a referral being made, a local authority social worker should acknowledge receipt to the referrer and decide about the next steps and the type of response that is required. This will include determining whether:

- the child requires immediate protection and urgent action is required
- the child is in need, and should be assessed under section 17 of the Children Act 1989
- there is reasonable cause to suspect the child is suffering or likely to suffer significant harm, and whether enquiries must be made and the child assessed under section 47 of the Children Act 1989
- any services are required by the child and family and what type of services

- further specialist assessments are required to help the local authority to decide what further action to take
- to see the child as soon as possible if the decision is taken that the referral requires further assessment.

3.3 The referrer should follow up if this information is not forthcoming.

3.4 If social workers decide to carry out a statutory assessment, staff should do everything they can to support that assessment (supported by the designated safeguarding lead (or deputy) as required).

4. ESCALATING CONCERNS

4.1 Once concerns have been passed on to designated staff or a referral has been made, if the child's situation does not appear to be improving, the referrer or the member of staff reporting concerns should consider following the School's escalation procedures to ensure their concerns have been addressed and, most importantly, that the child's situation improves.

4.2 If a member of staff who has passed on concerns about a child to designated staff is concerned about a lack of action or that the situation does not seem to be improving, they should follow the School's escalation procedures as set out in Appendix E.

4.3 Once a referral has been made, if the referrer remains concerned that the situation does not seem to be improving for the child or they are concerned with the outcome of the referral, they should follow the School's escalation procedures as set out in Appendix E. Consideration of the OSCP's escalation procedures should also be taken.

4.4 Once a referral has been made, if designated staff remain concerned that the situation does not seem to be improving for the child or they are concerned with the outcome of the referral, they should follow the School's escalation procedures for designated staff as set out in Appendix F.

4.5 Designated staff must also consider the Child protection and safeguarding - Cornwall Council policies which should be used in conjunction with the School's procedures.

4.6 If staff have concerns about a child, they should continue to seek action until the situation for the child improves.

4.7 See Section 16 for Whistleblowing procedures and the School's Whistleblowing policy.

5. DISCLOSURES

5.1 If confronted with a possible case of abuse, or disclosure of abuse, each member of staff should in the first instance follow the simple rules of listening and being supportive and non-judgemental, but without asking any leading questions.

5.2 Contemporaneous notes (as near verbatim as possible) should be kept of any conversation, and signed and dated by the member of staff.

5.3 If a pupil is deemed to be at risk, or has made an allegation or disclosure of abuse, it must be explained to the pupil that the member of staff is under a duty to report the matter and that a referral will be made to the police if a crime has been committed.

5.4 The pupil will need to be reassured that only the minimum number of people will need to know in order to keep her safe, and that it is in her best interests that the matter is reported.

5.5 Staff must not conduct any kind of investigation.

5.6 Staff cannot undertake to keep confidential what the pupil has told them. If a member of staff has concerns about any behaviour towards pupils, they must report these to the DSL or DDSLs.

5.7 For further guidance on dealing with a disclosure, see Appendix G.

6. INFORMATION SHARING

6.1 Information sharing is vital in identifying and tackling all forms of abuse, neglect and exploitation, and in promoting children's welfare, including their educational outcomes. All staff are made aware that they have a professional responsibility and have clear powers to share, hold and use information for these purposes.

6.2 All staff should be mindful that early information sharing is vital for effective identification, assessment and allocation of appropriate service provision.

6.3 *Information Sharing: Advice for Practitioners Providing Safeguarding Services to Children, Young People, Parents and Carers* supports staff who have to make decisions about sharing information.

6.4 There is a recommendation for school staff, governors and trustees to use the DfE Data Protection guidance for schools to understand data protection *Data protection in schools - Guidance - GOV.UK (www.gov.uk)* . Designated staff will undertake specialist training on this.

6.5 This advice includes the seven golden rules for sharing information (see Appendix H of this policy) and considerations with regard to the Data Protection Act 2018 and General Data Protection Regulation (GDPR).

6.6 If in any doubt about sharing information, staff should speak to the DSL, DDSLs or the Bursar.

6.7 Fears about sharing information **must not** be allowed to stand in the way of the need to promote the welfare, and protect the safety, of children.

7. EARLY HELP

7.1 All staff are made aware of the early help process and are asked to be alert to identifying children who may benefit from early help.

7.2 'Early help' means providing support as soon as a problem emerges at any point in a child's life from the foundation years through to the teenage years.

7.3 In the first instance staff should discuss early help requirements with the DSL or DDSLs who will take the lead on Early Help cases and liaise with other agencies and setting up an inter-agency assessment as appropriate.

7.4 Staff may be required to support other agencies and professionals in an early help assessment.

7.5 Any child may benefit from early help, but all staff need to be alert to the potential need for early help for a child who:

- is disabled and has specific additional needs
- has special educational needs (whether or not they have a statutory Education, Health and Care Plan)
- is a young carer
- is showing signs of being drawn in to anti-social or criminal behaviour, including gang involvement and association with organised crime groups
- is frequently missing/goes missing from education, care or from home
- is at risk of modern slavery, trafficking or exploitation
- is at risk of being radicalised or exploited

- is in a family circumstance presenting challenges for the child, such as drug and alcohol misuse, adult mental health issues and domestic abuse
- is misusing drugs or alcohol themselves
- has experienced multiple suspensions, is at risk of being permanently excluded from schools, colleges and in alternative provision or a pupil referral unit.
- has a parent or carer in custody or is affected by parental offending.
- has returned home to their family from care
- is a privately fostered child

8. HONOUR BASED ABUSE and VIOLENCE (including FGM & Forced Marriage)

8.1 The School understands its responsibility to be vigilant to so-called 'honour-based' violence (HBV) which encompasses crimes which have been committed supposedly 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.

8.2 In relation to Forced Marriage and updated to reflect the change in the law from February 2023 The school understands that it is a crime to carry out any conduct whose purpose is to cause a child to marry before their eighteenth birthday, even if violence, threats or another form of coercion are not used.

8.3 All forms of HBA are abuse (regardless of the motivation) and should be handled and escalated as such.

8.4 If in any doubt, all staff should speak to the DSL or a DDSL.

8.5 In October 2015 it became mandatory for teachers (persons employed or engaged to carry out teaching work at schools and other institutions in England) to report to the police cases where they discover that an act of FGM appears to have been carried out.

8.6 Unless there is good reason not to, teachers should still consider and discuss such a case with the DSL and involve the MARU.

8.7 In addition, all staff should follow the school child protection procedures set out in this policy to share their concerns with the DSL if they suspect FGM may have been carried out or that a girl may be at risk of FGM.

8.8 Signs and indicators of FGM are found in Appendix A and further information in Appendix B.

9. CHILD ON CHILD ABUSE (Sexual Violence & Harassment and Sharing Nudes and Semi-nudes)

9.1 All staff should be aware that children can abuse other children (referred to as child on child abuse). And that it can happen both inside and outside of school and online. It is important that all staff can recognise the indicators and signs of child on child abuse and know how to identify it and respond to reports.

9.2 This is most likely to include: bullying (including cyberbullying, prejudice-based and discriminatory bullying);

- abuse in intimate personal relationships between peers;
- physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (this may include an online element which facilitates, threatens and/or encourages physical abuse);
- sexual violence, such as rape, assault by penetration and sexual assault; (this may include an online element which facilitates, threatens and/or encourages sexual violence);
- sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment, which may be standalone or part of a broader pattern of abuse; causing someone to engage in sexual activity

without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party;

- consensual and non-consensual sharing of nude and semi-nude images and/or videos (also known as sexting or youth produced sexual imagery) further information in Annex K;
- Harmful sexual behaviour (**HSB**) which is developmentally inappropriate sexual behaviour displayed by children and young people which is harmful or abusive (Early Help can be particularly helpful in addressing NON-VIOLENT HSB) ;
- up skirting, which typically involves taking a picture under a person's clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm; and
- initiation/hazing type violence and rituals (this could 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).

9.3 It is essential that all staff understand the importance of challenging inappropriate behaviours between students, many of which are listed above, that are actually abusive in nature. Downplaying certain behaviours, for example dismissing sexual harassment as "just banter", "just having a laugh", "part of growing up" or "boys being boys" can lead to a culture of unacceptable behaviours, an unsafe environment for children and in worst case scenarios a culture that normalises abuse leading to children accepting it as normal and not coming forward to report it.

9.4 All staff should understand, that even if there are no reports at Truro High School, it does not mean it is not happening, it may be the case that it is just not being reported. If a member of staff has any concerns regarding child on child abuse they should speak to the DSL (or a deputy).

9.5 The School adopts a whole school extra familiar harms approach to tackling child on child abuse.

9.6 Child on child abuse is unacceptable and could constitute a criminal offence and will be taken very seriously.

9.7 Domestic abuse in intimate relationships between pupils is a form of child on child abuse.

9.8 Under the Children Act 1989 a bullying incident should be addressed as a child protection concern when there is 'reasonable cause to suspect that a child is suffering, or is likely to suffer, significant harm'.

9.9 Truro High School has a zero-tolerance approach to child on child abuse.

9.10 Please see Appendix K for Child on Child Abuse policy and procedures which includes further guidance on Sexual Violence & Sexual Harassment and Child Involved Sexual Imagery.

10. SEXUAL RELATIONSHIPS

10.1 Staff should be alert to the possibility of sexual relationships between pupils, between a pupil and a member of staff or between a pupil and someone from outside the School.

10.2 If a staff member has any concerns, they should discuss the matter with the DSL or a DDSL.

10.3 An inappropriate relationship would include a sexual relationship taking place at school or while a pupil is under the care of the School – or up to one year after leaving, or one taking place at any time which involved a pupil under the age of consent.

10.4 It is an offence for any member of staff to engage in sexual activity with a pupil of the school, even if that pupil is over the age of consent.

10.5 Boarding staff are given guidance on how to deal with potential issues in the boarding houses. See also the 'sexual violence and sexual harassment between pupils' guidance in the child on child abuse policy.

11. SEND

11.1 Children with special educational needs and disabilities (SEND) can provide additional safeguarding challenges.

11.2 In particular, barriers can exist to recognising abuse, neglect and exploitation in this group of children.

11.3 Staff are asked to be alert to the following:

- it can be easy to assume that indicators of possible abuse, such as behavior, mood and injury, relate to a child's impairment without further exploration;
- children with SEND can be disproportionately impacted by things like bullying without outwardly showing any signs;
- there could be communication difficulties and barriers.

12. EXTRA FAMILIAR HARMS

12.1 Safeguarding incidents and/or behaviours can be associated with factors outside of the school and/or can occur between children outside the school.

12.2 All staff, but especially the DSL and DDSLs should consider the context within which safeguarding incidents and/or behaviours occur.

12.3 This is known as extra familiar harms, which simply means assessments of children should consider whether wider environmental factors are present in a child's life that are a threat to their safety and/or welfare.

12.4 These factors include wider family, peers, school, wider community and culture.

12.5 These factors must also be considered within the on-line environment as well as in the real world..

12.6 Children's social care assessments should consider such factors so it is important that the school provides as much information as possible as part of the referral process. This will allow any assessment to consider all the available evidence and the full context of any abuse.

12.7 Please see Appendix I for an extra familiar harms diagram.

13. RADICALISATION

To be read alongside: https://www.gov.uk/government/publications/the-prevent-duty-safeguarding-learners-vulnerable-to-radicalisation and https://www.gov.uk/guidance/making-a-referral-to-prevent

13.1 Protecting children from the risk of radicalisation is part of the School's safeguarding duties (under the Prevent Duty).

13.2 During the process of radicalisation it is possible to intervene to prevent vulnerable people being radicalised.

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

13.4 There is no single way of identifying an individual who is likely to be susceptible to an extremist ideology. It can happen in many different ways and settings.

13.5 Specific background factors may contribute to vulnerability which are often combined with specific influences such as family, friends or online, and with specific needs for which an extremist or terrorist group may appear to provide an answer.

13.6 The internet, and the use of social media in particular, has become a major factor in the radicalisation of young people.

13.7 Katie Hinks, DSL, is also the School's lead / single point of contact (SPoC) on the Prevent Duty.

13.8 Staff are asked to be alert to:

- Disclosures by pupils of their exposure to the extremist actions, views or materials of others outside of school, such as in their homes or community groups, especially where pupils have not actively sought these out;
- Graffiti symbols, writing or artwork promoting extremist messages or images;
- Pupils accessing extremist material online, including through social media;
- Parental reports of changes in behaviour, friendship or actions and requests for assistance;
- Other schools, local authority services, and police reports of issues affecting pupils in other schools or settings;
- Pupils voicing opinions drawn from extremist ideologies and narratives;
- Use of extremist or 'hate' terms to exclude others or incite violence;
- Intolerance of difference, whether secular or religious or, in line with the School's Equal Opportunities Policy, views based on, but not exclusive to gender, disability, homophobia, race, colour or culture;
- Attempts to impose extremist views or practices on others;
- Anti-Western or Anti-British views.

Support and advice about extremism are available from:

Options:

1. Speak to the County Prevent Lead (Steve Rowell 07980 895 104)
2. Speak to the local Police
3. Anti-Terrorist Hotline 0800 789 321
4. Email: prevent@devonandcornwall.pnn.police.uk
5. Email: Prevent@cornwall.gov.uk
6. **If immediate and serious concerns - call '999'**
7. Devon and Cornwall Police 101 (the non-emergency police number)
8. DfE dedicated helpline 020 7340 7264; counter-extremism@education.gsi.gov.uk

Channel is a program that is part of the Prevent Strategy and provides early support to people who are at risk of being drawn into terrorism or supporting terrorist organizations. Channel's goal is to divert people away from potential risk through early intervention. Making a referral under Channel **will not** lead to the individual receiving a criminal record.

13.9 In the event of concerns about a pupil becoming radicalised, consideration will be given to the local authority Channel (Click here)

13.10 The school acknowledges that preventative education is most effective in the context of a whole-school approach that prepares pupils and students for life in modern Britain and creates a culture of zero tolerance for sexism, misogyny/misandry, homophobia, biphobia and sexual violence/harassment. This is reflected in the school's ethos, behaviour policy and pastoral and welfare system, as well as by a planned programme of evidence-based RSHE delivered in regularly timetabled lessons and reinforced throughout the whole curriculum.

14. SERIOUS VIOLENCE

14.1 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 and may be at risk of criminal exploitation.

14.2 All staff should be aware of the associated risks and understand the measures in place to manage these. For further information see Annex B. All staff should be aware of the range of risk factors which increase the likelihood of involvement in serious violence, such as being male, having been frequently absent or permanently excluded from school, having experienced child maltreatment and having been involved in offending, such as theft or robbery. Advice for schools and colleges 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.

15. MENTAL HEALTH

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

15.1 Only appropriately trained professionals should attempt to make a diagnosis of a mental health problem. Staff however, 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.

15.2 Where children have suffered abuse, neglect and exploitation, or other potentially traumatic adverse childhood experiences, this can have a lasting impact throughout childhood, adolescence and into adulthood. It is key that staff are aware of how these children's experiences, can impact on their mental health, behaviour and education.

15.3 If staff have a mental health concern about a child that is also a safeguarding concern, immediate action should be taken, following their child protection policy and speaking to the designated safeguarding lead or a deputy.

15.4 KCSIE September 2023 (paragraph 44) has a range of advice to help them identify children in need of extra mental health support, this includes working with external agencies. More information can be found in the mental health and behaviour in schools guidance.

16 ARRANGEMENTS FOR DEALING WITH ALLEGATIONS OF ABUSE AGAINST TEACHERS AND OTHER STAFF INCLUDING SUPPLY/AGENCY STAFF AND VOLUNTEERS

16.1 KCSiE 2024 states that these procedures should be followed in any case where it is alleged that a member of staff or other adult in school has:

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

16.2 If an allegation is made against an adult in school the quick resolution of that allegation must be a clear priority to the benefit of all concerned.

16.3 The School must, however, not undertake its own investigations without prior consultation with the Local Authority Designated Officer (LADO), or in the most serious cases, with the police, so as not to jeopardise statutory investigations. In borderline cases discussions with the LADO can be held informally and without naming the School or the individual. The LADO must be contacted within 24 hours of receipt of the allegation by the School. If a crime has been committed the matter must be reported to the police.

16.4 Any concern about abuse by a member of staff including supply/agency staff and volunteers, including by the DSL or a DDSL, or by a volunteer, should be reported immediately to the Headmistress; if the Headmistress is absent the report should be given to the Chair of the Governing Body.

16.5 Where an allegation relates to a member of supply staff provided by an agency, the agency should be fully involved.

16.6 Where the claim is made against the Headmistress, then it must be reported directly to the Chair of the Governing Body without notifying the Headmistress. Details of how to contact the Chair are displayed on staff room noticeboards.

16.7 Any member of the school community is at liberty to report their concerns directly to the LADO.

16.8 Every member of staff has a responsibility to pursue a concern they have about another member of staff. All staff should challenge inaction where they perceive it (see Section 4) and Appendix E and F for further information on the escalation procedures.

16.9 The LADO can be contacted on 01872 326536.

16.10 The LADO will discuss the allegation with the Headmistress (or Chair of the Governing Body) to confirm the details and establish whether or not it is demonstrably false or unfounded. Discussions should be recorded in writing and communication with both the individual and the parents/carers of the child/children should be agreed.

16.11 If the allegation is not demonstrably false or unfounded it may be necessary to suspend immediately – without prejudice – if:

- There is a potentially criminal act;
- The member of staff poses an ongoing risk to children;
- The member of staff's behaviour is totally unsuited to working with children and such behaviour cannot be prevented.

However, suspension will not be the default position; due weight will be given to the views of the LADO in reaching such a decision.

16.12 Procedures will be applied with common sense. There will be a risk assessment of the potential harm the accused person can inflict on pupils by staying in school. If the risk is deemed manageable, so that no pupil will come to harm, then there is no need to suspend that member of staff. The School has a duty of care to its employees: staff will be supported; for instance, they will be advised to contact their union and given advice on possible counselling available. A person will be appointed to keep the subject of an allegation informed of its progress.

16.13 The Headmistress will inform the accused person about the allegation as soon as possible after consulting the LADO, giving as much information as possible on the likely course of action. Parents/Carers of the pupil(s) involved will also be informed as soon as possible and kept informed about the progress of the case. In addition, parents/carers will be made aware of the restrictions on reporting or publishing allegations against teachers. The School will make every effort to maintain confidentiality.

16.14 If further investigation is needed, the Headmistress and LADO will first discuss when, and by whom, it will be carried out. Arrangements for alternative accommodation offsite away from pupils will be made where a member of boarding staff is suspended pending investigation of a child protection nature.

16.15 Allegations found to be malicious will be removed from personnel records. Any member of staff 'whistle blowing' in good faith will not suffer retribution or disciplinary action (see Section 16 below).

16.16 A summary record of allegations, other than those which are malicious, will be kept on the confidential personnel file of the accused, which will indicate how the allegation was followed up and resolved. A copy will be provided to the person concerned.

16.17 Allegations which have been proven to be false, unsubstantiated, malicious or unfounded will not be included in staff references.

16.18 The School will report to the Secretary of State, via the Disclosure and Barring Service (PO Box 181, Darlington DL1 9FA; tel: 01325 953795; email: dbsdispatch@dbs.gsi.gov.uk), within one month of leaving the School, any person whose services are no longer used because they is considered to have engaged in conduct that has harmed, or is likely to harm, a child, or otherwise poses a risk of harm to a child.

16.19 In this context, ceasing to use a person's services includes: dismissal; non-renewal of a fixed term contract; no longer engaging/refusing to engage a supply teacher provided by an employment agency; terminating the placement of a student teacher or other trainee; no longer using staff employed by contractors; no longer using volunteers; resignation, and voluntary withdrawal from supply teaching, contract working, a course of initial teacher training, or volunteering.

16.20 The School is committed to consider making a referral to the Teaching Regulation Agency (TRA) where a person in teaching work has been dismissed (or would have been dismissed had they not resigned) and a prohibition order may be appropriate. The reasons such an order would be considered are:

- unacceptable professional conduct that falls below the Teachers' Standards;
- the member of staff's behaviour is totally unsuited to working with children; and
- conviction or caution, at any time, for a relevant offence.

16.21 Where a referral has been made to the Disclosure and Barring Service (DBS), it is not necessary for a referral also to be made to TRA, as information is shared between the two bodies. Where a dismissal does not reach the threshold for DBS referral, separate consideration should be given to a TRA referral if the individual is / was in teaching work.

16.22 Staff teaching practical subjects (e.g. music, sport, art), especially in a one-to-one situation (e.g. instrumental music lessons), need to be aware of the heightened risks and must be vigilant. Guidance is set out in the Staff Code of Conduct.

17 STAFF BEHAVIOUR POLICY (Code of Conduct)

17.1 The School expects staff to maintain levels of behaviour as set out in the School's Staff Code of Conduct, Safer Working Procedures (2021) and the DfE's *Teachers' standards* (July 2011 and last updated July 2021).

17.2 If any member of staff is concerned that either their own or a colleague's behaviour has fallen short of the standards set out in our Code of Conduct, they should follow the procedures set out in our Low-Level Concerns Policy and inform the Headmistress or in her absence, the DSL. Records of Low-Level Concerns will be kept securely in CONFIDE, online secure reporting system.

18 WHISTLE BLOWING PROCEDURES

18.1 *WTSC* requires schools to have clear whistle blowing procedures suitably referenced in staff training and codes of conduct.

18.2 Truro High School promotes a culture where staff members should feel safe raising concerns. The School values staff and maintains a reflective practice in all that it does.

18.3 All staff have a duty to raise concerns, where they exist, about the management of child protection, which may include the attitude or actions of colleagues. They should speak in the first instance to the DSL or to the Headmistress (though see below 16.4). All concerns will be taken seriously and there will be no retribution or

disciplinary action taken against a member of staff for making such a report, provided that it is done in good faith.

18.4 The School has a separate Whistle Blowing Policy which is available to staff on the Shared Network. This outlines the procedures for reporting and handling concerns, including concerns about the attitude or actions of the DSL or of the Headmistress. Staff are regularly reminded of these procedures as part of staff training and they form part of the formal induction process. Support can be provided to staff by the Bursar where necessary.

18.5 The Designated Governor for Whistleblowing is Mr Jonathan Taylor.

18.6 Provision can be made for mediation and dispute resolution where it is necessary.

18.7 General guidance can be found at Advice on whistleblowing. The NSPCC whistle blowing helpline is available for staff who do not feel able to raise concerns regarding child protection failures internally. Staff can call 0800 028 0285, 8:00am-8:00pm, Monday to Friday, or email help@nspcc.org.uk.

19 SAFER RECRUITMENT

19.1 The School's Staff Recruitment Policy is found on the Shared Network.

19.2 Shortlisted candidates will be informed that online searches may be done as part of pre-recruitment checks.

20 ONLINE SAFETY

20.1 The School is alert to the need to safeguard pupils from potentially harmful and inappropriate material online. The School's Online Safety and Mobile Devices Policy including remote learning outlines how the School does this.

20.2 The School is committed to ensuring that all its pupils will be able to use existing, as well as up and coming technologies safely. We are also committed to ensuring that all those who work with children and young people, as well as their parents/carers, are educated as to the risks that exist so that they can take an active part in safeguarding children.

20.3 For further guidance on teaching pupils to use the Internet safely refer to the 2023 DfE guidance *Teaching on-line safety in schools.*

20.4 The School has appropriate filters in place and these are reviewed regularly. The School also uses monitoring software to help to identify pupils accessing or trying to access harmful or inappropriate material online.

20.5 The school ensures that all staff receive training on the expectations, applicable roles and responsibilities in relation to filtering and monitoring.

20.6 The designated safeguarding lead has lead responsibility for understanding the filtering and monitoring systems and processes in place.

20.7 The school uses WATCHGUARD firewall and Impero, key word filtering systems and students are required to make use of the school Wi-Fi when accessing the internet.

20.8 The Department for Education's new filtering and monitoring standards (DfE, 2023b), which support schools to have effective systems in place. Schools and colleges should consider meeting the DfE's Cyber security standards for schools and colleges (DfE, 2023c), to form part of the annual review.

21. **USE OF staff members' or other adults' personal CAMERAS AND MOBILE PHONES IN SCHOOL AND IN EYFS** including all electronic devices with imaging and sharing capabilities, in EYFS, not just mobile phones and cameras **is not permitted – please refer to our** Online Safety and Mobile Devices Policy including remote learning

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21.1 Staff members lock away their mobile phones and all electronic devices with imaging and sharing capabilities during contact time with pupils in EYFS.

21.2 Photographs of children are only taken using school iPads or, school mobile phones, or with school cameras, especially when on school trips.

21.3 School cameras are stored securely in school and only leave the premises for school trips. Photographs are only downloaded to the school network.

21.4 Staff are advised that:

- They should never to take photographs in a one-to-one situation with a pupil;
- Individual close-up pictures of children provide little context or purpose; most often an image of a group of children will show an activity or situation to better effect;
- No child should be favoured in the photographs;
- Images which could be considered to cause distress, upset or embarrassment must not be used;
- Images of all children must only be taken when they are in full suitable dress;
- The taking or making of images in sensitive areas, e.g. toilet cubicles and changing areas, is not permitted;
- Images for the purpose of publication (for example, the school website, newsletters or marketing materials) MUST have the consent of parents and, where appropriate, the pupils;
- It must be ensured that a child's full name does not appear in any caption or accompanying text alongside their photograph, e.g. displays, documentation, name cards;
- The minimum amount of information possible is to be provided, to preserve the identity of children.

22 THE ROLE OF THE DSL

The role of the DSL and the DDSLs is broad. Their role falls broadly into the following areas:

22.1 Managing referrals

- To refer cases of suspected abuse to the MARU as required;
- To support staff who make referrals to the MARU;
- To refer cases to the Prevent coordinator or the Channel programme where there is a radicalisation concern as required;
- To support staff who make referrals to Prevent or the Channel programme;
- To refer cases where a person is dismissed or left due to risk/harm to a child to the DBS as required;
- To refer cases where a crime may have been committed to the Police as required.

22.2 Work with others

- To liaise with the Headmistress to inform her of issues, especially ongoing enquiries under section 47 of the Children Act 1989 and police investigations;
- As required, to liaise with the 'case manager' (usually the Headmistress) and the designated officer(s) at the local authority for child protection concerns (all cases which concern a staff member);
- liaise with staff (especially pastoral support staff, school nurses, IT Technicians, Designated Teacher for Looked After Children and SENCOs) on matters of safety and safeguarding (including online and digital safety) and when deciding whether to make a referral by liaising with relevant agencies

- To liaise with staff on matters of safety and safeguarding and when deciding whether to make a referral by liaising with relevant agencies.
- To act as a source of support, advice and expertise for staff.
- act as a point of contact with the three safeguarding partners

22.3 Training

The DSL (and deputies) undergo training to provide them with the knowledge and skills required to carry out the role. This training should be updated at least every two years. The DSL should also undertake relevant Prevent training as the SPoC. In addition to the formal training set out above, their knowledge and skills should be refreshed (this might be via e-bulletins, meeting other designated safeguarding leads, or simply taking time to read and digest safeguarding developments) at regular intervals, as required, and at least annually, to allow them to understand and keep up with any developments relevant to their role:

- To understand the assessment process for providing early help and statutory intervention, including local criteria for action and local authority children's social care referral arrangements;
- To have a working knowledge of how local authorities conduct a child protection case conference and a child protection review conference and be able to attend and contribute to these effectively when required to do so;
- To ensure each member of staff has access to, and understands, the School's child protection policy and procedures, especially new and part time staff;
- To be alert to the specific needs of children in need, those with SEND and young carers;
- Understand relevant data protection legislation and regulations, especially the Data Protection Act 2018 and the General Data Protection Regulation.
- Understand the importance of information sharing, both within the school and college, and with the OSCB, other agencies, organisations and practitioners.
- To be able to keep detailed, accurate, secure written records of concerns and referrals;
- To understand and support the School with regards to the requirements of the Prevent Duty and be able to provide advice and support to staff on protecting children from the risk of radicalisation;
- To obtain access to resources and to attend any relevant or refresher training courses;
- To encourage a culture of listening to children and taking account of their wishes and feelings, among all staff, in any measures the School may put in place to protect them.
- Can recognise the additional risks that children with SEN and disabilities (SEND) face online, for example, from online bullying, grooming and radicalisation and are confident they have the capability to support SEND children to stay safe online;

22.3 Raising awareness

- To ensure the School's Child Protection and Safeguarding Policy and procedures are known, understood and used appropriately;
- To ensure the School's Child Protection and Safeguarding Policy is reviewed annually (as a minimum) and the procedures and implementation are updated and reviewed regularly, and to work with Governors regarding this;
- To ensure the Child Protection and Safeguarding Policy is available publicly and parents/carers are aware of the fact that referrals about suspected abuse or neglect may be made and the role of the School in this;
- To link with the OSCB to make sure staff are aware of training opportunities and the latest local policies on safeguarding.
- Help promote the educational outcomes by sharing information about the welfare, safeguarding and child protection issues that children, including children with a social worker are experiencing, or have experienced, with teachers and leadership staff. The DSL should ensure that staff know who these pupils are and support teaching staff to identify the challenges that children in this group might face and the academic support and adjustments that they could make best support these children.

22.4 Child Protection Files

- To ensure that child protection files are maintained in line with data protection legislation, held securely with access limited only to those who need to know, and retained in line with nationally recognised retention schedules. The designated safeguarding lead is responsible for ensuring that child protection files are kept up to date. Information should be kept confidential and stored securely. Historic information is kept in a locked filing cabinet. Information from January 2022 and moving forwards is stored securely on MY CONCERN.

Records should include:

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

- Where children leave the School, to ensure their child protection file is transferred to the new school or college as soon as possible ensuring a secure transit, and confirmation of receipt should be obtained (DDSL).
- The DSL will also consider sharing information with the new school or college in advance of a pupil leaving to allow them to continue to support the pupil and have support in place when they arrive.
- The DSL will ensure that all key staff such as designated safeguarding leads and Head of Learning Support are made aware of any information that they need to know upon the receipt of a child protection file for a new pupil.

22.5 Availability

- To be available for staff to discuss any safeguarding concerns.

22.6 It should be noted that whilst the activities of the DSL can be delegated to a DDSLs, the ultimate **lead responsibility** for child protection remains with the DSL; this **lead responsibility** should not be delegated.

23 TRAINING

23.3 The DSL and DDSLs have undertaken Multi-Agency Child Protection training and one DDSL has undertaken Training for Teachers Foundation training which allows the DSL to deliver Single Agency Safeguarding training in the School. They undertake regular training at least annually in accordance with locally-agreed procedures. The required training content for these roles is set out in Annex B of *KCSIE*.

23.4 All new staff and Governors receive formal training on child protection procedures as part of the induction process. This is conducted by the DSL or a DDSL. This training includes the explanation of the following and copies of the following documents*:

- The School's Child Protection and Safeguarding Policy*;
- Child on Child Abuse Policy*
- Online safety and mobile devices policy
- The School's Staff Code of Conduct and Whistle Blowing Policy*;
- Rewards and Sanctions Policy
- Safeguarding response to Children Missing in Education (see Appendix I)
- Their responsibility under the Prevent Duty;
- Mandatory reporting of suspected FGM;
- The School's duty to actively promote fundamental British values of democracy, the rule of law, individual liberty, and mutual respect and tolerance of those of different faiths and beliefs;
- The identity and contact details of the School's DSL and DDSL*;
- The requirement for all staff who work directly with children to do the following:
    - Part 1

      All school staff who work directly with children are required to read at least Part 1 of Keeping Children Safe in Education (KCSIE).
    - Annex A

      Staff who do not work directly with children on a regular basis can read Annex A, a condensed version of Part 1.

- Annex B
  Staff who work directly with children should also read Annex B, which contains additional information about specific forms of abuse and safeguarding issues

- How to manage a report on child on child abuse and child on child sexual violence and sexual harassment.
- Their responsibility to be aware of *What to do if you are worried a child is being abused – A guide for practitioners*.

23.5 All staff and Governors receive school specific safeguarding training delivered by the DSL and a DDSL in order to develop their understanding of the signs and indicators of abuse. This happens at the beginning of each academic year. All staff will receive regular safeguarding and child protection updates, in line with OSCP advice including in Prevent and online safety, including informal updates.

23.6 The School ensures that mechanisms are in place to enable all staff to read and understand their responsibilities in *KCSIE* Part 1 and Annex B where appropriate (see 21.2 above), together with the relevant policies.

23.7 The DSL and DDSLs provide school specific safeguarding training to regular volunteers and senior pupils taking on roles of responsibility within the School.

24 OVERSIGHT AND REVIEW OF POLICIES AND PROCEDURES

24.3 Governors must ensure that the School has a Child Protection and Safeguarding Policy and that this is known to all staff and Governors.

24.4 Dr Ruth Sullivan is the designated Governor for Child Protection and Safeguarding. She is supported by another Governor, who acts as her deputy, Revd Canon Dr Lynda Barley. Their role is to liaise with the DSL and DDSLs and champion safeguarding in all governing body matters. The DSL, Mrs Katie Hinks, is Prep School Head and the member of the Senior Leadership Team who takes responsibility for child protection matters.

24.5 The Prevent governor is Mr Julian Thould.

24.6 As part of an annual review, the designated Governor will monitor the efficiency by which policy and procedures have been implemented and report to the Governors. Any deficiencies will be remedied immediately. The review of child protection and safeguarding policy and procedures will appear as an agenda item at the summer term full board meeting of each academic year and the findings minuted.

24.7 The Governors should ensure that the School contributes to inter-agency working in line with statutory guidance in *WTSC*. This includes providing a co-ordinated offer of early help when additional needs of children are identified and contributing to inter-agency plans to provide additional support to children subject to child protection plans.

24.8 All schools should allow access for children's social care from the host local authority and, where appropriate, from a placing local authority, for that authority to conduct, or to consider whether to conduct, a section 17 or a section 47 assessment.

24.9 The Governors should ensure that their safeguarding arrangements consider the procedures and practice of the local authority as part of the inter-agency safeguarding procedures set up by the OSCP. Section 10 of the Children Act 2004 requires a local authority to make arrangements to promote co-operation between itself and its relevant partners and other organisations who are engaged in activities relating to children. Under section 14B of the Children Act 2004 the OSCP can require a school or college to supply information in order to perform its functions; this must be complied with.

24.10 This policy and relevant procedures will be reviewed at least annually by the DSL and the Headmistress. Reviews will also take place after any safeguarding incident and following the introduction of new statutory requirements. The policy will also be reviewed by the Governing Body at least annually, or as soon as changes are made to the policy.

25 ARRANGEMENTS FOR OTHER SAFEGUARDING AND WELFARE RESPONSIBILITIES

25.1 SAFEGUARDING CURRICULUM

The School actively promotes the welfare of children and fundamental British values explicitly through the PSHE curriculum, assemblies and pastoral days, and implicitly through the whole operation of the pastoral system. Pupils are given the information to keep themselves safe, including online (see Section 18 above). Safeguarding is taught through Relationship Education (Prep) and RSHE in the Senior School using the statutory guidance 'Relationships education, relationships and sex education (RSHE) and health education'

25.2 CHILDREN WHO ARE ABSENT FROM EDUCATION (CAE) AND ELECTIVE HOME EDUCATION (EHE)

CAE - A child going missing from education or who is absent from education, particularly repeatedly and/or for prolonged periods, can act as a vital warning sign of a range of safeguarding possibilities, is a potential indicator of abuse or neglect and could be for reasons such as sexual exploitation, travelling to conflict zones, forced marriages and female genital mutilation (FGM). If a child is away from school for a continuous period of 10 days or more without permission, the School will contact the local authority. If a child is absent from school on a regular basis, the School will seek to ascertain the reasons for these absences from the parents/carers and, if concerned, will contact the local authority. (see Appendix I)

EHE - Many home educated children have an overwhelmingly positive learning experience. The school would expect the parents' decision to home educate to be made with their child's best education at the heart of the decision. However, this is not the case for all, and home education can mean some children are less visible to the services that are there to keep them safe and supported in line with their needs. From September 2016 the Education (Pupil Registration) (England) Regulations 2006 were amended so that schools must inform their LA of all deletions from their admission register when a child is taken off roll. Where a parent/carer has expressed their intention to remove a child from school with a view to educating at home, the school recommend that LAs, schools, and other key professionals work together to coordinate a meeting with parents/carers where possible. Ideally, this would be before a final decision has been made, to ensure the parents/carers have considered what is in the best interests of each child. This is particularly important where a child has SEND, is vulnerable, and/or has a social worker. DfE guidance for local authorities on Elective home education sets out the role and responsibilities of LAs and their powers to engage with parents in relation to EHE. Although this is primarily aimed at LAs, schools should also be familiar with this guidance.

25.3 LEAVERS & JOINERS

The School notifies the local authority within five days when a pupil's name is added to the admission register at a non-standard admission point or within the ***first 5 days*** of the start of a new term. The School also notifies the local authority when a pupil is to be deleted from the admission register under any of the fifteen grounds set out in the Education (Pupil Registration) (England) Regulations 2006 as soon as the ground for deletion is met and no later than the time at which the pupil's name is deleted from the register. Staff must be alert to signs of girls at risk of travelling to conflict zones, female genital mutilation, forced marriage or other honour-based abuses. Further information and guidance can be found in *Children missing education: statutory guidance for local authorities – September 2016.*

26 DOMESTIC ABUSE

26.1 Children who witness domestic abuse are also victims

26.2 Witnessing domestic abuse can have a lasting impact on children

26.3 Children can be victims, and perpetrators, in their own relationships too

26.4 The abuse can be physical, sexual, financial, psychological or emotional. It can happen through technology too, for example image-based abuse, or using technology to harass, monitor or control the victim, or control their accounts. This is particularly common among young people

26.5 Extra-familial harms can include sexual harassment and domestic abuse in their own intimate relationships (teenage relationships)

26.6 Harm can include ill treatment that isn't physical, as well as witnessing the ill treatment of others - for example, the impact of all forms of domestic abuse on children

27. CHILDREN WHO ARE LESBIAN, GAY, BISEXUAL OR GENDER QUESTIONING

27.1 Nearly half of lesbian, gay and bisexual children experience derogatory comments in schools and settings. This increases to over 64% for Transgender children.

27.2 Children who are lesbian, gay, bisexual or gender questioning experience bullying are 20% more likely to self-harm, with 84% considering taking their own life.

27.3 Measures that can be taken to support a child who discloses or discusses their sexual orientation or questions their gender:

- Provide a safe quiet space.
- Ensure that all staff have an understanding of sexual orientation and are aware of the signs of poor mental health, such as suicidal thoughts, and how to have discussions.
- Allow the child to discuss what this looks like to them. Ask children what language they use to describe themselves.
- Manage prejudice incidents with a zero-tolerance approach and report them to the DSL/DDSL.
- Have a clear reporting system for children to report incidents and concerns.
- The school acknowledges the potential additional risks and vulnerability factors for children who are lesbian, gay, bisexual or gender questioning children.
- When supporting gender questioning children, the school will take a cautious approachand consider the broad range of the individuals needs in partnership with the child's parents (other than in the rare circumstances where involving the parents would constitue a risk to the child).

27.4 Safeguarding

Children who are lesbian, gay, bisexual or gender questioning face the same risks as all children, but they are at greater risk of some types of abuse. For example, they might experience homophobic, biphobic or transphobic bullying or hate crime. They might also be more vulnerable to or at greater risk of sexual abuse, online abuse or sexual exploitation[2]

There are some factors that might mean children and young people who are lesbian, gay, bisexual or gender questioning and feel less able to speak out about any worries or negative experiences they're having.

Barriers include:

- worrying that telling someone will 'out' them before they're ready
- fearing that it will make the bullying or abuse worse
- thinking no one will believe them
- feeling they are to blame for what they're experiencing
- worrying that adults will think their gender identity or sexuality is to blame for their experience of abuse

Due to various factors including under representation, children who are lesbian, gay, bisexual or gender questioning could be at higher risk of:

- grooming
- seeking out relationship and sexual information from unregulated websites
- attending adult nightclubs or using adult dating apps, with a particular sexual orientation focus
- being involved in unregulated group chats
- partaking in underage sexual activity
- sexual abuse
- learning from inaccurate/misinformation websites
- hate crime

APPENDIX A: Indicators of abuse, neglect and exploitation

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

Abuse: a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Children may be abused by an adult or adults or by another child or children.

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

It is OK to ask a child of sufficient age and understanding how they may have sustained an injury but not to ask any form of leading question.

- Bruising to the face (other than forehead) especially cheeks, eyes, ears mouth.
- Bleeding from the mouth or ear
- Bruising around the neck
- Bruising in a pattern suggestive of finger or hand print, or of an implement mark such as stick or belt
- Bruising which may indicate bite mark, look at the size of the bite mark
- Multiple bruises of different ages (more than you would expect for that stage of development)
- Burns and scalds, especially cigarette burns or those with inadequate / inconsistent explanations
- Fractures, particularly in children under 2 years
- Loss of consciousness, apnoeic episodes when other medical explanations are eliminated
- Poisoning, including prescribed or illicit drugs, alcohol, household substances
- Fabrication or suggestion of symptoms, tampering with test results or inducing illness of a child

There may also be behavioural indicators of physical abuse

- Flinching away from contact
- Extremes of behaviour
- Being bullied or being a bully
- Self-harm
- Truancy
- Running away

Emotional abuse: the persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. It may involve conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability as well as 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 cyberbullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.

.Symptoms are non-specific but may include:

- Impaired ability for play and enjoyment
- Lack of curiosity and natural exploratory behaviour
- Persistent head banging or rocking in a younger child
- Delayed language and social skills
- Low self-esteem and feeling of worthlessness
- Eating disturbances or poor growth
- A family history of domestic violence, mental illness of a carer or drug or alcohol misuse
- Behavioural difficulties including aggressive or disruptive behaviour, wetting or soiling, running away etc.
- Self-harm, overdose or attempted suicide
- Scapegoating
- Substance misuse

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

- Sexually abused children are frequently obedient to adults and anxious to please but with poor peer group relationships
- Physical signs may include genital/anal bleeding, lacerations or bruising
- Sexually transmitted disease
- Pregnancy

In younger children:

- Over sexualised language or play
- Acting out and aggressive behaviour
- Over sexualised behaviour

In older children:

- Withdrawn and/or overtly compliant behaviour
- Depression and suicidal behaviour
- Self-mutilation
- Running away
- School refusal and/or truancy
- Drug and alcohol abuse
- Eating disorders

At any age:

- A sudden change in normal behaviour patterns
- Sexual awareness and knowledge well in advance of what would be expected at the child's level of development
- Children who are being sexually abused do not necessarily display any behavioural disturbance

Neglect: the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy, for example, as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to: provide adequate food, clothing and shelter (including exclusion from home or abandonment); protect a child from physical and emotional harm or danger; ensure adequate supervision (including the use of inadequate care-givers); or ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

- Faltering growth where medical investigation has excluded any medical reason
- Basic needs not being met
- Poor skin care, hair loss, poor hygiene or inadequate clothing
- Lack of appropriate supervision (leading to risk of 'accidental' injury)
- Developmental delay, impaired language skills, poor social skills, apathetic or dejected presentation
- Persistent failure to follow any medical advice
- Poor school attendance
- Failure to protect from harm

Radicalisation:

Early indicators of radicalisation or extremism may include:

- showing sympathy for extremist causes
- glorifying violence, especially to other faiths or cultures
- making remarks or comments about being at extremist events or rallies outside school
- evidence of possessing illegal or extremist literature
- advocating messages similar to illegal organisations or other extremist groups
- out of character changes in dress, behaviour and peer relationships
- secretive behaviour
- online searches or sharing extremist messages or social profiles

- intolerance of difference, including faith, culture, gender, race or sexuality
- graffiti, art work or writing that displays extremist themes
- attempts to impose extremist views or practices on others
- verbalising anti-Western or anti-British views
- advocating violence towards others.

Definitions:

- Extremism: is the vocal or active opposition to our fundamental values, including democracy, 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.
- Radicalisation refers to the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups.
- 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 likely to be susceptible to 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 or the internet) and settings (such as within the home).

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 be in need of 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 designated safeguarding lead (or deputy) making a Prevent referral.

Female Genital Mutilation:

- difficulty walking, sitting or standing
- spending longer than normal in the bathroom or toilet
- unusual behavior after an absence from school
- reluctance to undergo normal medical examinations
- plea for help without explicit explanation due to embarrassment or fear

Prior to FGM taking place a girl may talk about being taken 'home' to visit family, a special occasion to 'become a woman' or an older female relative visiting the UK. If you suspect FGM, you must dial 999.

Child Criminal Exploitation (CCE):

CCE is where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child into any criminal activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial or other advantage of the perpetrator or facilitator and/or (c) through violence or the threat of violence.

Different forms of harm often overlap, and that 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, 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 well-being;
- misuse drugs and alcohol;
- go missing for periods of time or regularly come home late; and
- regularly miss school or education or do not take part in education.

Child Sexual Exploitation (CSE):

CSE occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into sexual activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial advantage or increased status of the perpetrator or facilitator. The victim may have been sexually exploited even if the sexual activity appears consensual.

CSE does not always involve physical contact; it can also occur through the use of technology. CSE can affect any child or young person (male or female) under the age of 18 years, including 16- and 17-year olds who can legally consent to have sex. It can include both contact (penetrative and non-penetrative acts) and non-contact sexual activity and 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).

The above CCE indicators can also be indicators of CSE, as can:
• children who have older boyfriends or girlfriends; and
• children who suffer from sexually transmitted infections or become pregnant.

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

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 sexual exploitation: guide for practitioners

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)

County lines:

County lines is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs using dedicated mobile phone lines or other form of "deal line". This activity can happen locally as well as across the UK - no specified distance of travel is required. Children and vulnerable adults are exploited to move, store and sell drugs and money. 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), further and higher educational institutions, pupil referral units, children's homes and care homes. Children are also increasingly being targeted and recruited online using social media.

Children can easily become trapped by this type of exploitation as county lines gangs can manufacture drug debts which need to be worked off or threaten serious violence and kidnap towards victims (and their families) if they attempt to leave the county lines network. A number of the indicators for CSE and CCE as detailed above may be applicable to where children are involved in county lines.

Some additional specific indicators that may be present where a child is criminally exploited through involvement in county lines are children who:
- go missing and are subsequently found in areas away from their home;
- have been the victim or perpetrator of serious violence (e.g. knife crime);

- are involved in receiving requests for drugs via a phone line, moving drugs, handing over and collecting money for drugs;
- are exposed to techniques such as 'plugging', where drugs are concealed internally to avoid detection;
- are found in accommodation that they have no connection with, often called a 'trap house or cuckooing' or hotel room where there is drug activity;
- owe a 'debt bond' to their exploiters;
- have their bank accounts used to facilitate drug dealing. Further information on the signs of a child's involvement in county lines is available in guidance published by the Home Office.

Cybercrime:

Cybercrime is criminal activity committed using computers and/or the internet. It is broadly categorised as either 'cyber-enabled' (crimes that can happen off-line but are enabled at scale and at speed on-line) 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 on-line and child sexual abuse and exploitation, nor other areas of concern such as on-line bullying or general on-line 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 received Royal Assent on 29 April 2021. The Act introduces the first ever statutory definition of domestic abuse and 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, based on the previous cross-government definition, 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 sexual identity, age, ethnicity, socioeconomic status, sexuality or background and domestic abuse can take place inside or outside of the home.

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.

Operation Encompass:

Operation Encompass operates in the majority of 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 key

adult (usually the designated safeguarding lead) 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 support to be given to the child according to their needs. Police forces not signed up to operation encompass will have their own arrangements in place.

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.

APPENDIX B:

Further information on Abuse and Safeguarding Issues

Annex B of KCSIE contains important additional information about specific forms of abuse and safeguarding issues.

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Where a child is suffering, or is likely to suffer from harm, it is important that a referral to local authority children's social care (and if appropriate the police) is made immediately.

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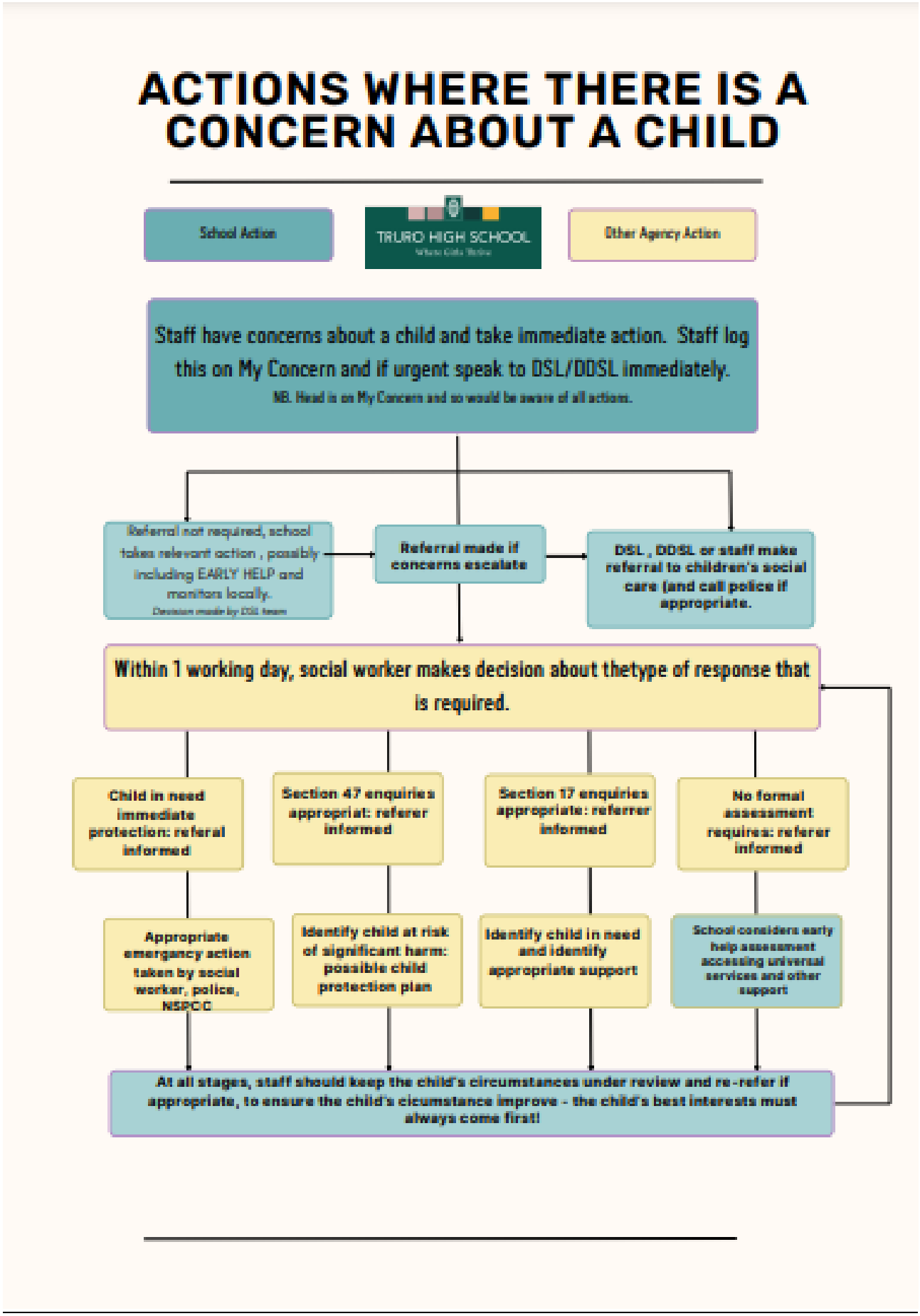
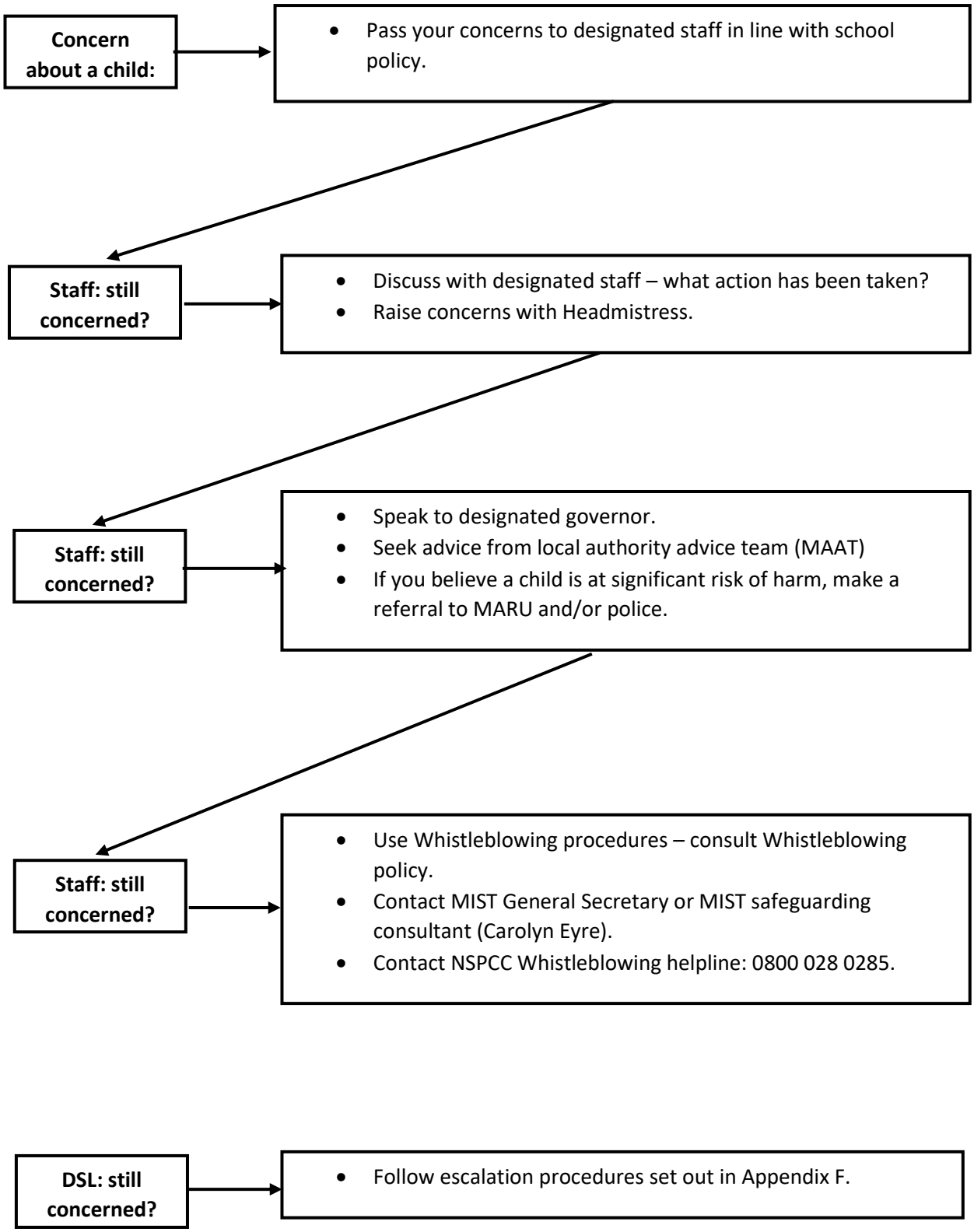
Additional advice and support There is a wealth of information available to support schools and colleges. Many useful resources can be found on Page 163-169 of KCSIE 2024.

APPENDIX C:


ACTIONS WHERE THERE IS A CONCERN ABOUT A CHILD
School Action
TRURO HIGH SCHOOL
Other Agency Action
Staff have concerns about a child and take immediate action. Staff log this on My Concern and if urgent speak to DSL/DDSL immediately.
NB. Head is on My Concern and so would be aware of all actions.
Referral not required, school takes relevant action , possibly including EARLY HELP and monitors locally.
Referral made if concerns escalate
DSL , DDSL or staff make referral to children's social care (and call police if appropriate.
Within 1 working day, social worker makes decision about thetype of response that is required.
Child in need immediate protection: referal informed
Section 47 enquiries appropriat: referer informed
Section 17 enquiries appropriate: referrer informed
No formal assessment requires: referer informed
Appropriate emergancy action taken by social worker, police, NSPCC
Identify child at risk of significant harm: possible child protection plan
Identify child in need and identify appropriate support
School considers early help assessment accessing universal services and other support
At all stages, staff should keep the child's circumstances under review and re-refer if appropriate, to ensure the child's cicumstance improve - the child's best interests must always come first!

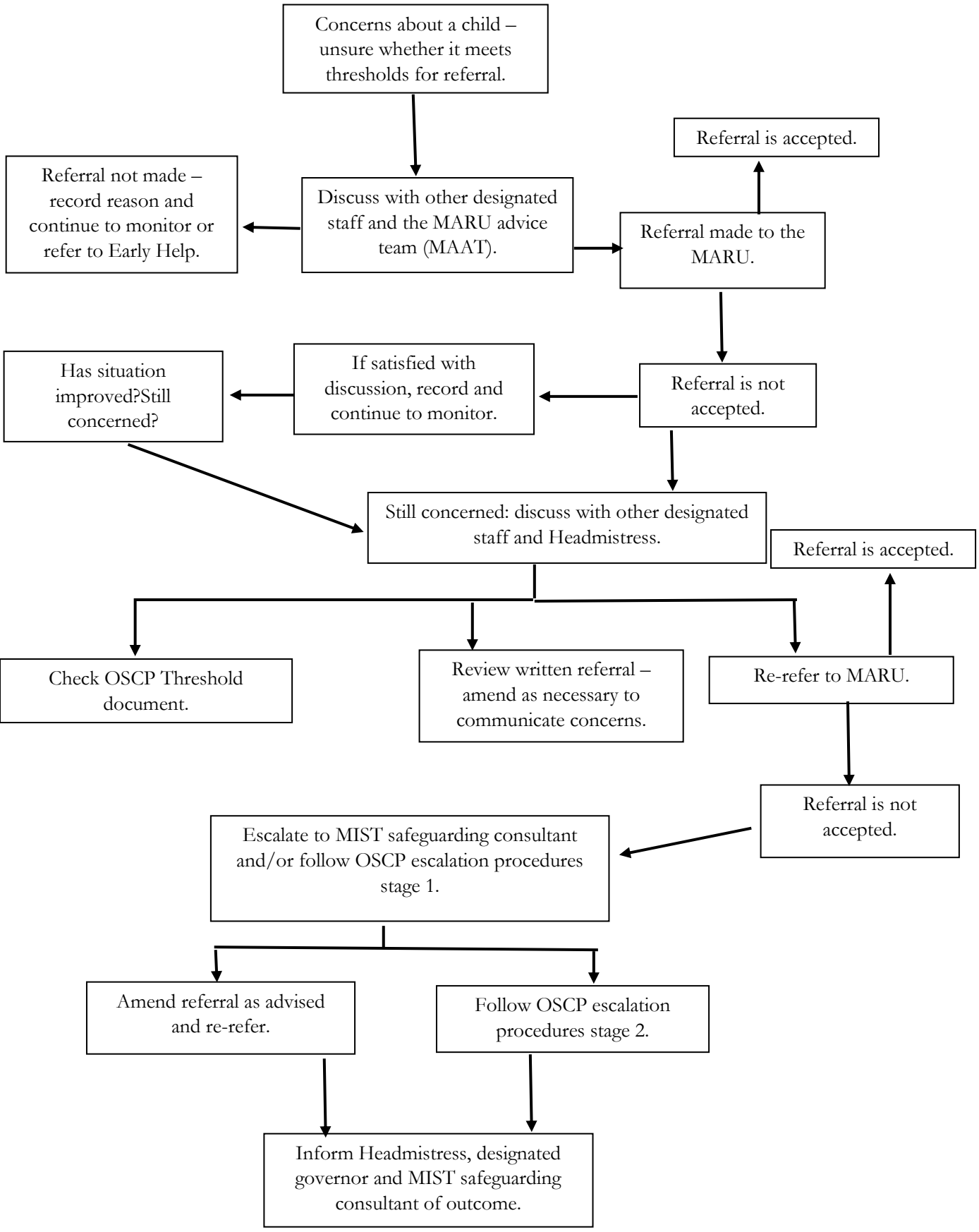
APPENDIX E: SCHOOL'S ESCALATION PROCEDURES (All staff)

These procedures should be read in conjunction with the OSCP Escalation Policy (click here)



APPENDIX F: SCHOOL'S ESCALATION PROCEDURES (Designated staff)

These procedures should be read in conjunction with the OSCP Escalation Policy (click here)



APPENDIX G: DEALING WITH A DISCLOSURE

DO

- Listen to the child / young person
- Take very seriously what they are trying to tell you, they are saying it for a reason
- Reassure them by saying they have done the right thing in talking about what has happened
- Try and remain calm, if they see you upset or angry then they might stop talking to you
- If they have not been clear about whom, what or where they are talking about it is OK to clarify what they have said, e.g. if the child says 'She did this to me', it is OK to ask 'Can you tell me her name?', 'What happened?'
- Liaise with your designated person immediately or alternatively contact the MARU directly (contact details on the front of this document)
- Record immediately after listening to the child/young person what both you and the child said verbatim. Where it took place, whether anyone else was present
- If the child has indicated they may be hurt, or you have noticed anything of concern, ensure this information is passed immediately to your designated person and together seek medical assistance / advice
- If possible the person to whom a disclosure has been made should be enabled to continue to support the child through the immediate process

DON'T

- Make a judgement on your own that the child is not telling the truth
- Promise the child you can keep it a secret
- Interrupt a child. Let them freely recall all that they want to
- Ask any leading questions, e.g. Was it? Did they do?
- Never ask the 'why' question – use TED (Tell / Explain / Describe) instead
- Make assumptions that you know what the child is talking about OR that someone else already knows this information
- Promise a child that it will be 'OK' now. You don't know that
- Force a child to recall more than they want to
- Ask the child to repeat the disclosure to anyone else
- Ask a child to show you marks / injuries that will involve them removing their clothing
- Act alone
- Delay passing on information

APPENDIX H:

The seven golden rules to sharing information

1. Remember that the General Data Protection Regulation (GDPR), Data Protection Act 2018 and human rights law are not barriers to justified information sharing, but provide a framework to ensure that personal information about living individuals is shared appropriately.

2. Be open and honest with the individual (and/or their family where appropriate) from the outset about why, what, how and with whom information will, or could be shared, and seek their agreement, unless it is unsafe or inappropriate to do so.

3. Seek advice from other practitioners, or your information governance lead, if you are in any doubt about sharing the information concerned, without disclosing the identity of the individual where possible.

4. Where possible, share information with consent, and where possible, respect the wishes of those who do not consent to having their information shared. Under the GDPR and Data Protection Act 2018 you may share information without consent if, in your judgement, there is a lawful basis to do so, such as where safety may be at risk. You will need to base your judgement on the facts of the case. When you are sharing or requesting personal information from someone, be clear of the basis upon which you are doing so. Where you do not have consent, be mindful that an individual might not expect information to be shared.

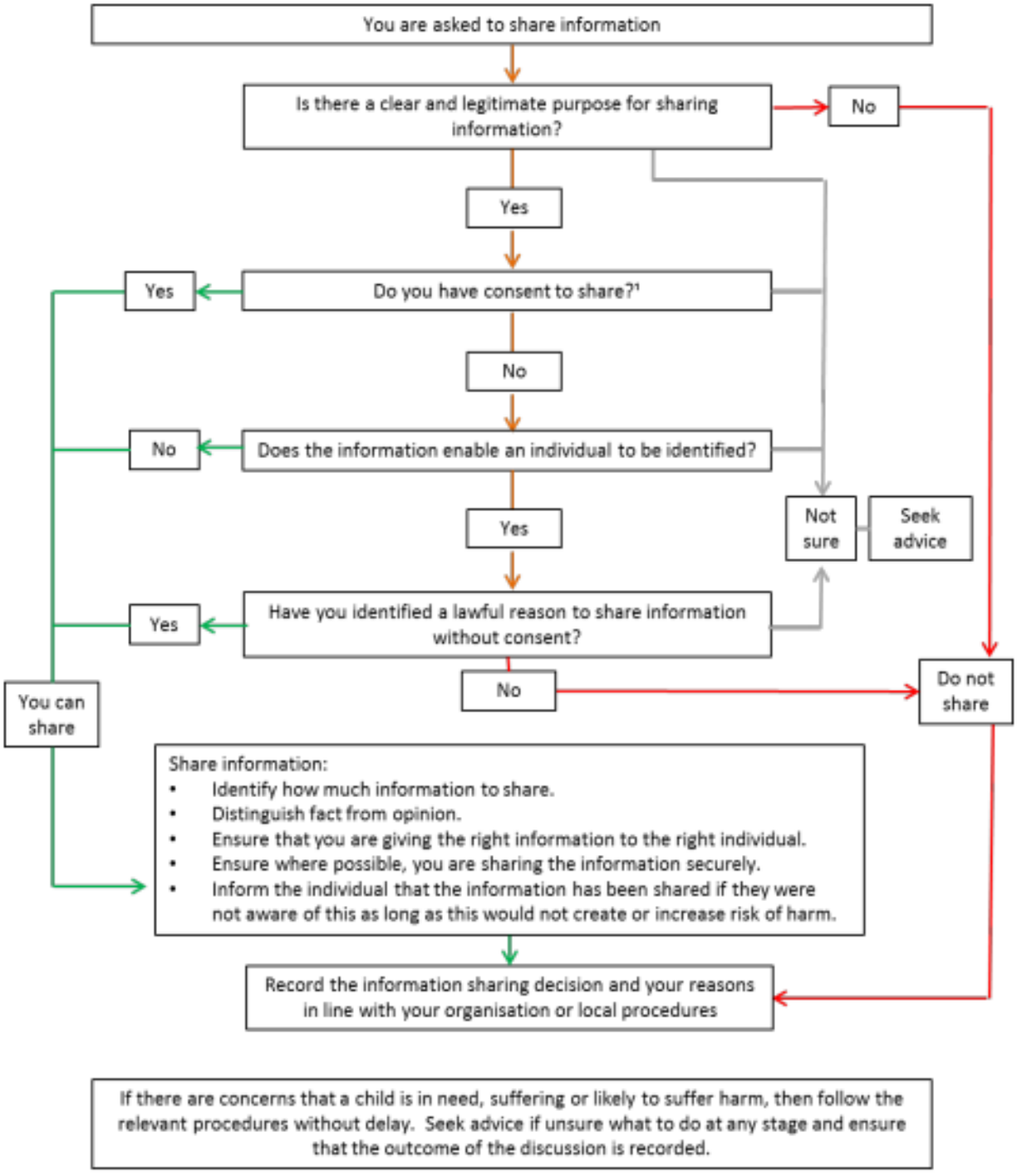
5. Consider safety and well-being: base your information sharing decisions on considerations of the safety and well-being of the individual and others who may be affected by their actions.

6. Necessary, proportionate, relevant, adequate, accurate, timely and secure: ensure that the information you share is necessary for the purpose for which you are sharing it, is shared only with those individuals who need to have it, is accurate and up to-date, is shared in a timely fashion, and is shared securely (see principles).

7. Keep a record of your decision and the reasons for it – whether it is to share information or not. If you decide to share, then record what you have shared, with whom and for what purpose.

APPENDIX H:

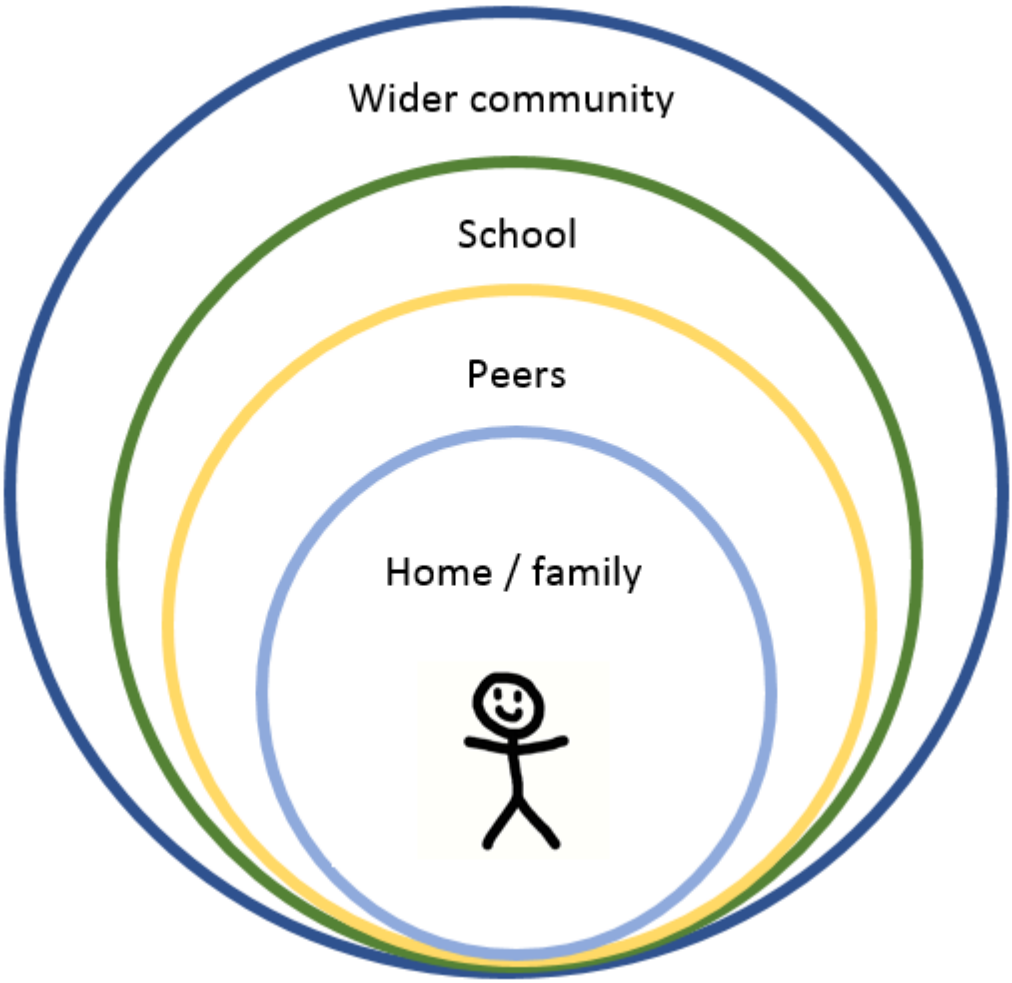
Flowchart of when and how to share information



1. Consent must be unambiguous, freely given and may be withdrawn at any time

APPENDIX I: EXTRA FAMILIAR HARMS DIAGRAM

The influences of each circle should be considered in relation to the physical and on-line environment of the child.



APPENDIX J: SAFEGUARDING RESPONSE TO CHILDREN MISSING IN EDUCATION

The statutory guidance Children Missing Education (September 2016) sets out the key principles to enable local authorities in England to implement their legal duty under section 436A of the Education Act 1996 to make arrangements to identify, as far as it is possible to do so, children missing education (CME).

- All children, regardless of their circumstances, are entitled to an efficient, full time education which is suitable to their age, ability, aptitude and any special educational needs they may have;
- Children missing education are children of compulsory school age who are not registered pupils at a school and are not receiving suitable education otherwise than at a school. Children missing education are at significant risk of underachieving, being victims of harm, exploitation or radicalisation, and becoming NEET (not in education, employment or training) later in life;
- Effective information sharing between parents, schools and local authorities is critical to ensuring that all children of compulsory school age are safe and receiving suitable education. Local authorities should focus their resources effectively in intervening early in the lives of vulnerable children to help prevent poor outcomes.
- Being absent, as well as missing, from education – including alunexplainable and/or persistent absences from education - can be warning sign of a range of safeguarding concerns, including sexual abuse, sexual exploitation or child criminal exploitation.

A child missing from education is not in itself a child protection matter, and there may be an innocent explanation for this. However, regular school attendance is an important safeguard and unexplained non-attendance can be an early indicator of problems, risk and vulnerability.

The School should endeavour to deal with this problem in three ways:

- By preventing poor school attendance and truancy;
- By acting once absence has occurred to establish children's safety and try to get them back to school;
- By taking action to trace children whose whereabouts are not known.
- All staff should be aware that children going missing, particularly repeatedly, can act as a vital warning sign of a range of safeguarding possibilities.

This may include abuse, neglect and exploitation, which may include sexual abuse or exploitation and child criminal exploitation. It may indicate mental health problems, risk of substance abuse, risk of travelling to conflict zones, risk of female genital mutilation or risk of forced marriage

Early intervention is necessary to identify the existence of any underlying safeguarding risk and to help prevent the risks of a child going missing in future.

All staff should be aware of our unauthorised absence and children missing from education procedures.

Risks:

These 'missing' children can be vulnerable; it is essential that all services work together to identify and re-engage these children back into appropriate education provision as quickly as possible. It is important to establish the reasons for the child being missing at the earliest possible stage.

- Possible reasons that should be considered include:
- Failure to start appropriate provision and never enter the system;
- Stopped attending, due to illegal exclusion or withdrawal by parent/carers;
- Failure to complete a transition between schools;
- Children from refugee and asylum-seeking families;
- Children from families who are highly mobile;
- Children at risk of a forced marriage;

- Children experiencing abuse, neglect and exploitation.
- Children who remain disengaged from education are potentially exposed to higher degrees of risk.
- Children who go missing or run away from home or care may be in serious danger and are vulnerable to crime, sexual exploitation or abduction as well as missing education.
- When families move between local authority areas it can sometimes lead to a child becoming 'lost' in the system and consequently missing education.
- Children from Gypsy, Roma and Traveller (GRT) families can become disengaged from education, particularly during the secondary school phase.
- Families of members of the Armed Forces are likely to move frequently - both in the UK and overseas and often at short notice.
- Children who have offended or are at risk of doing so are also at risk of disengaging from education

Indicators

- If a member of staff becomes aware that a child may have run away or gone missing, you should alert the DSL and reception to try to establish with the parents/carers, what has happened.
- If this is not possible, or the child is missing, the DSL will get together with the class teacher, assess the child's vulnerability by making reasonable enquiries, and refer any concerns about the child to Children's Services (MARU).

The School:

- Records attendance at the start of the school day and during the afternoon at 1.40pm on the school's MIS PASS.
- Informs the LA if: - a pupil fails to attend regularly - a pupil is absent for 10 or more school days in a row. The school should tell the LA why the pupil is absent if it knows. record in the register whether absence is authorised or unauthorised
- Notifies the local authority within five days when a pupil's name is added to the admission register at a non-standard transition point providing the local authority with all the information held within the admission register about the pupil.
- Notifies the local authority when a pupil's name is to be removed from the admission register at a non-standard transition point under any of the fifteen grounds set out in the regulations, as soon as the ground for removal is met and no later than the time at which the pupil's name is removed from the register.
- Attendance is monitored on a daily basis by tutors and reception. If a pupil is absent and the school have not received notification of this, reception will phone home. If the receptionist cannot get hold of the parent/carer, they will inform the DSL or DDSL immediately or the Headmistress is the safeguarding team are unavailable. Reception emails the Deputy Head Health & Wellbeing and Head of Prep an absence report so that they can identify patterns.
- Attendance is monitored fortnightly by the Deputy Head and Head of Prep and any concerns are followed up appropriately.
- Tutors and class teachers should inform the Deputy Head Pastoral or Head of Prep if they have a concern about a pupil's absence.

Protection and Action to be Taken:

The Headmistress should inform CME officer and the child's social worker immediately a child subject to a Child Protection Plan is missing.

- In the following circumstances a referral to Children's Services and / or the police should always be made promptly:
- The child may be the victim of a crime;
- The child is subject of a Child Protection Plan;
- The child is subject of Section 47 enquiries;

- The child is looked after;
- There is a known person posing a risk to children in the household or in contact with the household;
- There is a history of the family moving frequently;
- There are serious issues of attendance.

APPENDIX K: CHILD ON CHILD ABUSE POLICY AND PROCEDURES

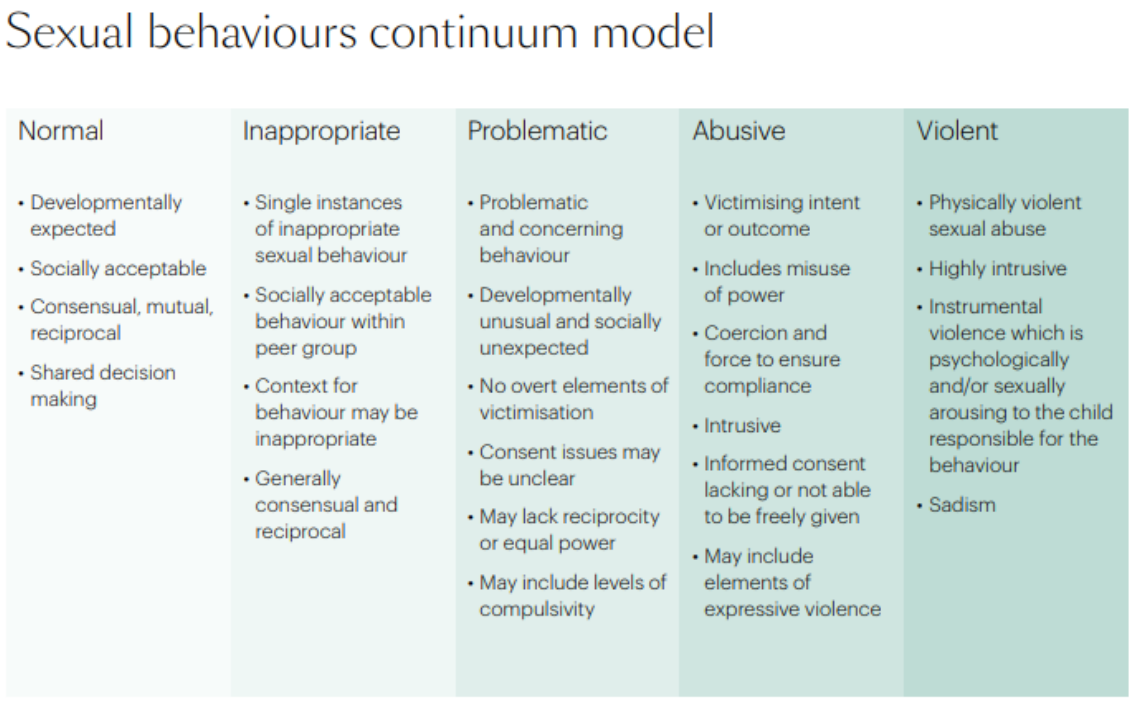
1.1 This policy:

- does not use the term 'victim' and/or 'perpetrator'. This is because our School takes a safeguarding approach to all individuals involved in concerns or allegations about child-on-child abuse, including those who are alleged to have been abused, and those who are alleged to have abused their peers, Research has shown that many children who present with harmful behaviour towards others, in the context of child-on-child abuse, are themselves vulnerable and may have been victimised by peers, parents or adults in the community themselves,
- uses the terms 'child' and 'children', which is defined as a person aged under 18. However, this policy applies to all students, regardless of age.
  Although the School's response to child-on-child abuse should be the same for all students, there may be some different considerations and actions in relation to their age.
- recognises the complexities of child on child abuse and as such, each incident will be dealt with on a case by case basis and with consideration of wider environmental factors.

2. Recognising Child on child abuse (child on child) abuse

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

Simon Hackett has proposed the following continuum model to demonstrate the range of sexual behaviours presented by children, which may be helpful when seeking to understand a student's sexual behaviour and deciding how to respond to it.



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

- is socially acceptable,
- involves a single incident or has occurred over a period of time,

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

3. Signs of child on child abuse;

3.1 Pupils who are being bullied or experiencing child on child abuse (child on child) abuse may display changes in their normal behaviour, such as:

- Becoming withdrawn and nervous;
- Feigning illness;
- Taking unusual or unauthorised absences;
- Clinging to adults

3.2 This list is not exhaustive and all staff should be alert to the well-being of students and to signs of abuse and should engage with these signs to determine whether they are caused by child-on-child abuse.
However, staff should be mindful of the fact that the way(s) in which children will disclose or present with behaviour(s) as a result of their experiences will differ.

3.3 Staff should routinely record any behavioural incidents on My Concern and raise any matters of concern with their Head of Faculty or the School's Welfare Team, who meet regularly to discuss behaviour and welfare matters, helping to identify any changes in behaviour or concerning patterns or trends at an early stage.

4. Vulnerable Pupils

Any child can be vulnerable to child-on-child abuse due to the strength of peer influence during childhood and adolescence, and staff should be alert to signs of such abuse amongst all children.

4.1 Individual and incidental factors can increase a child's vulnerability to abuse by their peers. For example, following an image of a child being shared, they could become more vulnerable to child-on-child abuse due to how others react and now perceive them,

4.2 Peer group dynamics play an important role in determining a child's vulnerability to such abuse. For example, children who are more likely to follow others or who are socially isolated from their peers may be more vulnerable to child-on-child abuse.

4.3 Children who are questioning or exploring their sexuality may also be particularly vulnerable to abuse by their peers.

4.4 Children with Special Educational Needs or Disabilities (SEND) are three times more likely to be abused than their peers, and additional barriers can sometimes exist when recognising abuse in children with SEND, including:

- assumptions that signs of possible abuse (such as behaviour, mood and injury) relate to a child's disability and are therefore not investigated;
- the potential for children with SEND to not outwardly show any signs or effects of bullying or abuse;
- communication barriers and difficulties.

4.5 Some children may be more likely to experience child-on-child abuse because of certain characteristics such as sexual orientation, ethnicity, race or religious beliefs.

4.6 Children with a social worker (CiN or CP) may be more vulnerable and need more support.

5. What is Contextual safeguarding (extra-familial harms)?

This policy adopts a whole-school community Contextual safeguarding (extra-familial harms) approach, which means:

- being aware of and seeking to understand the impact of wider social contexts and environmental factors; (see Appendix B).
- creating a safe culture in the School by implementing policies, procedures and a curriculum that addresses child-on-child abuse and harmful attitudes; promoting healthy relationships and attitudes to gender, sexuality and equality;
- being alert to and monitoring changes in students' behaviour or attendance, and
- working closely with local child protection agencies.

6. A whole school approach - School environment

The School actively seeks to raise awareness of and prevent all forms of child-on-child abuse by:

6.1 All staff and governors receive appropriate safeguarding and child protection training (including online safety which, amongst other things, includes an understanding of the expectations, applicable roles and responsibilities in relation to filtering and monitoring) which is regularly updated – at least annually.

6.2 Training all staff and governors on the nature, prevalence and effect of child-on-child abuse, and how to prevent, identify, and respond to it.

This includes:

- Contextual Safeguarding,
- the identification and classification of specific behaviours, including digital behaviours,
- the importance of taking seriously all forms of child-on-child abuse (no matter how 'low level' they may appear) and ensuring that no form of child-on-child abuse is ever dismissed as horseplay or banter,
- social media and online safety, including how to encourage children to use social media in a positive, responsible and safe way, and how to enable them to identify and manage abusive behaviour online.

6.3 Educating children about the nature and prevalence of child-on-child abuse, positive, responsible and safe use of social media, and the unequivocal facts about consent, via PSHE and the wider life of the school.

6.4 Communicating with parents on these issues by asking parents what they perceive to be the risks facing their child and how they would like to see the School address those risks. This policy is available on our website.

6.5 Supporting and prioritising the welfare of pupil mental health and providing in-school support, such as peer mentoring and counselling, to address underlying mental health needs. A large proportion of staff are trained to meet low-level mental health difficulties within the pupils.

6.6 Working with all stakeholders to promote positive values, and to encourage a culture of tolerance and respect amongst all members of the School community.

6.7 Creating conditions in which pupils can aspire to, and realise, safe and healthy relationships fostering a whole-school culture:

- which recognises that every member of the School community is responsible for building and maintaining safe and positive relationships, and helping to create a safe School environment in which violence and abuse are never acceptable,
- which encourages pupils to develop trusting relationships with staff, and staff understanding the importance of these relationships in providing students with a sense of belonging
- in which students feel able to share their concerns openly, in a non-judgmental environment.

6.8 Responding to cases of child-on-child abuse promptly and appropriately.

7. Multi-agency working

7.1 The School actively engages with and refers serious concerns to local safeguarding agencies in relation to child-on-child abuse, and works closely with the MARU, Early Help Hub, children's social care, the police and/or other relevant agencies in accordance with the Local Safeguarding Partnership's procedures, and other schools.

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

7.3 Child-on-child abuse can be a complex issue, and even more so where wider safeguarding concerns exist. It is often not appropriate for one single agency (where the alleged incident cannot be managed internally by the School itself) to try to address the issue alone – it requires effective partnership working.

8. Responding to concerns or allegations of child-on-child abuse

It is essential that all concerns and allegations of child-on-child abuse are handled sensitively, appropriately and promptly.

Any response should:

8.1 include a thorough investigation of the concerns or allegations, and the wider context in which they may have occurred (depending on the nature and seriousness of the alleged incident, it may be appropriate for the police and/or children's social care to carry out this investigation),

8.2 treat all children involved as being at potential risk – while the child allegedly responsible for the abuse may pose a significant risk of harm to other children, she may also have considerable unmet needs and be at risk of harm herself.

The School should ensure that a safeguarding response is in place for both the child who has allegedly experienced the abuse, and the child who has allegedly been responsible for it, and additional sanctioning work may be required for the latter (see section 14).

8.3 Any investigation must consider:

- that the abuse may indicate wider safeguarding concerns for any of the children involved, such as the child's peer group (both within and outside the School); family; the School environment; their experience of crime and victimisation in the local community; and the child's online presence.
- the potential complexity of child-on-child abuse and consider the interplay between power, choice and consent. While children may appear to be making choices, if those choices are limited, they may not be consenting,
- the views of the child/children affected. Unless it is considered unsafe to do so (for example, where a referral needs to be made immediately), the DSL should discuss the proposed action with the child/ children and their parents, and obtain consent to any referral before it is made.

It is particularly important to consider the wishes of any child who has allegedly been abused or experienced bullying behaviour, and to give that child as much control as is reasonably possible over decisions regarding how any investigation will be progressed and how they will be supported.

9. Reporting Child on child abuse

9.1 Any member of the school community should feel that they is able to report an incident of bullying or child on child abuse. Pupils should report an incident to any member of staff; while parents/carers should contact either their daughter's class teacher (Prep School) or form tutor (Senior School). If the allegation is particularly serious, they may feel the need to report the incident directly to the Deputy Head (Senior School) or Head of Prep (Prep School).

9.2 Any member of staff who has an incident of child on child abuse reported to them or thinks that a child may be at risk of or experiencing abuse by their peers, or that a child may be at risk of abusing or may be abusing their peers will refer the matter to the Deputy Head (Senior School) or Head of Prep (Prep School).

9.3 Where a child is suffering, or is likely to suffer from harm, it is important that a referral to the MARU (and, if appropriate, the police) is made immediately. Anyone can make a referral. Where referrals are not made by the DSL, the DSL should be informed as soon as possible that a referral has been made (see Section 2 of the child protection policy).

9.4 If a child speaks to a member of staff about child-on-child abuse that they have witnessed or are a part of, the member of staff should listen to the child and use open language that demonstrates understanding rather than judgement. For further details please see the procedures for dealing with a disclosure set out in the appendices of the child protection policy.

9.5 Every member of staff must adhere to these fundamental guidelines:

- Never ignore any suspicion of bullying or child on child abuse ;
- Do not make premature assumptions;
- Listen carefully to all accounts;
- Adopt a problem-solving approach.

10. Procedures for dealing with concerns or allegations of child-on-child abuse

10.1 When child on child abuse, in or out of school, is suspected by or reported to a member of staff, that person must take notes and immediately pass the information to the Deputy Head or the Head of Prep, as appropriate. The Deputy Head or the Head of Prep will decide on who should investigate the incident and will initiate an investigation.

10.2 The investigating member of staff will:

- Interview all the parties involved and maintain a record of these interviews, taking into consideration wider environmental factors;
- Report his/her findings to the Deputy Head or the Head of Prep;
- Recommend any immediate actions to be applied to protect all involved parties, including whether a referral to children's social care is necessary,
- Offer reassurance as part of a plan of action that will be devised to combat the abuse. This plan of action, which will address the requirement for counselling advice and general support, will have been discussed with the pupil in consultation with her parents/carers.

10.3 The Deputy Head or the Head of Prep will:

- Inform staff directly involved with the day-to-day care of the bullied pupil, including teachers, form tutors and pastoral staff, of any steps they need to take;
- In consultation with the investigating member of staff, determine an appropriate strategy and plan of action to combat the alleged child on child abuse;

- Consult with the parents/carers of both the child experiencing alleged abusive behaviours and those exhibiting them;
- If appropriate, conduct a staged discussion with the child experiencing alleged abusive behaviours and those exhibiting them to develop mutual understanding and empathy;
- To offer restorative justice to the child experiencing abusive behaviours, if possible.
- Consider whether a referral to the MARU or the police is appropriate or whether the incident can be appropriately managed internally.

10.4 The victim will be advised not to retaliate, and, in the case of online bullying, not to respond to messages. A victim of cyberbullying will be asked to preserve and record all evidence of the abuse, including saving phone messages, recording or saving and printing instant messenger conversations, and printing or producing screen-grabs of social network pages.

10.5 Pupils must not be asked to forward any nude or semi-nude images and staff must not deliberately view such images, as this could constitute a criminal offence.

10.6 Where any concerns or allegations indicate that indecent images of a child may have been shared online, the DSL should consider what urgent action can be taken in addition to the actions and referral duties set out in this policy, and in the School's youth involved sexual imagery guidance (Appendix F), to seek specialist help in preventing the images spreading further and removing the images from the internet.

10.7 DSLs should always use their professional judgement to assess the seriousness of the alleged behaviour, and determine whether it is appropriate for the alleged behaviour to be dealt with internally and, if so, whether any external specialist support is required.

10.8 Where the DSL considers or suspects that the alleged behaviour might be abusive or violent or where the needs and circumstances of the individual child in question might otherwise require it, the DSL should contact the MARU and/or the police immediately and, in any event, within 24 hours of the DSL becoming aware of the alleged behaviour.

10.9 For such cases, the DSL will discuss the concerns or allegations with the agency and agree on a course of action, which may include:

- Managing internally with help from external specialists where appropriate and possible.
- Undertake/contribute to an Early Help assessment, with targeted early help services provided to address the assessed needs of the child and their family.
- Referring the child to children's social care for a section 17/47 statutory assessment. Where a child is suffering, or is likely to suffer from harm, it is important that a referral to the MARU (and, if appropriate, a report to the police) is made immediately.
- Reporting alleged criminal behaviour to the police.

10.10 In borderline cases the DSL may wish to consult with the MARU (MAAT), and/or other relevant agencies in accordance with the Local Safeguarding Partnership's procedures on a no-names basis to determine the most appropriate response.

10.11 All concerns or allegations will be assessed on a case by case basis, and in light of the wider context.

11. Safety plans

11.1 The School will always carry out a safety plan in respect of:

- any child who is alleged to have behaved in a way that is considered to be abusive or violent,
- any child who has reportedly been abused or affected by the alleged abusive or violent behaviour by another child, or
- any child who may be at risk due to the alleged abusive or violent behaviour by another child.

11.2 Where it is alleged that a child has behaved in a way that is considered to be inappropriate or problematic (as opposed to abusive or violent), the DSL will use her professional judgment (based on the particular concerns or allegations raised, and the needs and circumstances of the individual child in question) to determine whether it would be appropriate to contact the MARU, and to carry out a safety plan.

Consultation is recommended with the MAAT if there is any doubt about this. Careful consideration should also be given to a range of factors, including the context, severity of the alleged behaviour, impact of the alleged behaviour on others, risk to others, and whether there are any patterns of behaviour occurring.

11.3 Further information on developing an appropriate safety plan can be found in Appendix C of this document.

12. Disciplinary action

12.1 Changing the attitude and behaviour of those involved in child on child abuse behaviour will form part of the plan of action. This plan is likely to include counselling advice, behaviour management and general support. However, the School recognises that appropriate sanctions will also have to be used against those involved in abusive behaviour.

12.2 Any of the School's formal punishments may be used, including a genuine apology, against those involved in bullying behaviour. Refer to the School's Rewards and Sanctions Policy.

12.3 However, if there are police proceedings underway, or there could be, it is critical that the School works in partnership with the police and/or children's social care.

12.4 Any disciplinary action must be balanced against the child's own potential unmet needs, and any action or intervention planned regarding safeguarding concerns.

12.5 The School will, where appropriate, consider the potential benefit, as well as challenge, of using exclusion as a response, and not as an intervention, recognising that even if this is ultimately deemed to be necessary, some of the measures referred to in this policy may still be required. For example, action may still need to be taken by the School in relation to other students who have been involved with or affected by child-on-child abuse. Exclusion will only be considered as a last resort and only where necessary to ensure the safety and wellbeing of the other children in the School.

12.6 Disciplinary interventions alone are rarely able to solve issues of child-on-child abuse, and the School will always consider the wider actions that may need to be taken, and any lessons that may need to be learnt going forwards, as set out above and below.

13. Record keeping and Information sharing

13.1 A record of any child on child abuse allegation is kept on My Concern If, after investigation, it is deemed a child on child abuse case, details are also kept in a central 'Child on child abuse File' in a closed area of the School Intranet.
The Deputy Head and the Head of Prep are responsible for recording allegations on My Concern. They keep detailed records which allow patterns to be identified and the effectiveness of the approaches to be evaluated. They also regularly review the 'Child on child abuse File'.

13.2 When responding to concerns or allegations of child-on-child abuse, the School will:

- always consider carefully, in consultation with children's social care, the police and other relevant agencies, how to share information about the concerns or allegations with the pupils affected, their parents, staff, and other students and individuals,
- record the information that is necessary for the School and other relevant agencies to respond to the concerns or allegations and safeguard everyone involved,
- keep a record of the legal purpose for sharing the information with any third party, including relevant authorities, and ensure that the third party has agreed to handle the information securely and to only use it for the agreed legal purpose, and
- be mindful of and act in accordance with its safeguarding and data protection duties, including those set out in Working Together to Safeguard Children (July 2024) and the HM Government advice on Information Sharing (updated in July 2018).

14. Learning from incidents of Child on child abuse

14.1 Following an incident of child on child abuse, the School conducts a review as part of its pro-active, Contextual safeguarding (extra-familial harms) approach to continuing the prevention and early identification of child on child abuse.

14.2 The review may include the School asking itself a series of questions about the context in which an incident of child-on-child abuse occurred in the School, the local community, and the wider physical and online environment. See Appendix G.

14.3 Answers to these questions can be developed into an action plan that is reviewed on a regular basis by the School's leadership team and the DSL.

15. Review

15.1 This policy is reviewed annually, and updated in the interim, as may be required, to ensure that it continually addresses the risks to which students may be exposed. This review involves an assessment of the effectiveness of this policy over the previous year,

15.2 The policy will be reviewed if new legislation or guidance is published or existing legislation or guidance is updated;

15.3 A review will also take place if an incident suggests that a review may be required.

15.4 The School surveys pupils and parents on bullying regularly and uses the results as part of its review of policy and procedures.

16. Sharing nudes and semi-nudes:

Definition: The term 'sharing nudes and semi-nudes' means the sending or posting of nude or semi-nude images, videos or live streams by young people under the age of 18 online. This could be via social media, gaming platforms, chat apps or forums. It could also involve sharing between devices via services like Apple's AirDrop which works offline.

The term 'nudes' is used as it is most commonly recognised by young people and more appropriately covers all types of image sharing incidents. Alternative terms used by children and young people may include 'dick pics' or 'pics'.

The motivations for taking and sharing nude and semi-nude images, videos and live streams are not always sexually or criminally motivated. Such images may be created and shared consensually by young people who are in relationships, as well as between those who are not in a relationship. It is also possible for a young person in a consensual relationship to be coerced into sharing an image with their partner. Incidents may also occur where:

- children and young people find nudes and semi-nudes online and share them claiming to be from a peer
- children and young people digitally manipulate an image of a young person into an existing nude online

- images created or shared are used to abuse peers e.g. by selling images online or obtaining images to share more widely without consent to publicly shame

The sharing of nudes and semi-nudes can happen publicly online, in 1:1 messaging or via group chats and closed social media accounts.

Nude or semi-nude images, videos or live streams may include more than one child or young person.

Creating and sharing nudes and semi-nudes of under-18s (including those created and shared with consent) is illegal which makes responding to incidents involving children and young people complex. There are also a range of risks which need careful management from those working in education settings.

Alternative definitions:

Many professionals may refer to 'nudes and semi-nudes' as:

- youth produced sexual imagery or 'youth involved' sexual imagery
- indecent imagery. This is the legal term used to define nude or semi-nude images and videos of children and young people under the age of 18. Further guidance on the law can be found in section 1.7
- 'sexting'. Many adults may use this term, however some young people interpret sexting as 'writing and sharing explicit messages with people they know' rather than sharing images
- image-based sexual abuse. This term may be used when referring to the non-consensual sharing of nudes and semi-nudes.

Terms such as 'revenge porn' and 'up skirting' are also used to refer to specific incidents of nudes and semi-nudes being shared. However, these terms are more often used in the context of adult-to-adult non-consensual image sharing offences outlined in s.33-35 of the Criminal Justice and Courts Act 2015, Voyeurism (Offences) Act 2019 and s.67A of the Sexual Offences Act 2003.

The types of incidents which this advice covers are:

- a person under the age of 18 creates and shares nudes and semi-nudes of themselves with a peer under the age of 18
- a person under the age of 18 shares nudes and semi-nudes created by another person under the age of 18 with a peer under the age of 18
- a person under the age of 18 is in possession of nudes and semi-nudes created by another person under the age of 18

This advice does not cover:

- the sharing of nudes and semi-nudes of under 18s by adults (18 and over) as this constitutes child sexual abuse and education settings should always inform their local police force as a matter of urgency[footnote 3]
- children and young people under the age of 18 sharing adult pornography or exchanging sexual texts which do not contain images

Disclosure

Disclosure about the sharing of nudes and semi-nudes can happen in a variety of ways. The child affected may inform a class teacher, the DSL in School, or any member of the School staff. They may report through an existing reporting structure, or a friend or parent may inform someone in School or a colleague or inform the police directly. There is also a possibility that a member of staff may be made aware of an image in circulation by other students not involved in either the production or initial transfer, but who have become exposed to the imagery as a result of wider distribution.

All members of staff (including non-teaching staff) should be aware of how to recognise and refer any disclosure of incidents. Staff should also be aware of the legalities around youth involved sexual imagery so they can best inform students in their care – messages such as "it's illegal" are not considered to be helpful (for reasons explained below).

The Law:

Indecent images of children

- Responding to incidents of sharing nudes and semi-nudes is complex because of its legal status. Making, possessing and distributing any imagery of someone under 18 which is 'indecent' is illegal. This includes imagery of yourself if you are under 18.
- The relevant legislation is contained in the Protection of Children Act 1978 (England and Wales) as amended in the Sexual Offences Act 2003 (England and Wales).

Specifically:

- it is an offence to possess, distribute, show and make indecent images of children
- the Sexual Offences Act 2003 (England and Wales) defines a child, for the purposes of indecent images, as anyone under the age of 18
- 'Indecent' is not defined in legislation. When cases are prosecuted, the question of whether any photograph of a child is indecent is for a jury, magistrate or district judge to decide based on what is the recognised standard of propriety.

Indecent imagery does not always mean nudity; however, images are likely to be defined as such if they meet one or more of the following criteria:

- nude or semi-nude sexual posing (e.g. displaying genitals and/or breasts or overtly sexual images of young people in their underwear)
- someone nude or semi-nude touching themselves in a sexual way
- any sexual activity involving a child
- someone hurting someone else sexually
- sexual activity that includes animals

Non-consensual image sharing

The non-consensual sharing of private sexual images or videos with the intent to cause distress is also illegal. The relevant legislation is contained in section 33 of the Criminal Justice and Courts Act 2015.

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

Handling incidents

All incidents of youth involved sexual imagery should be responded to in line with the School's child protection and child-on-child abuse policy.

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

• the incident should be referred to the DSL as soon as possible,

• the DSL should hold an initial review meeting with appropriate School staff. The DSL will follow the procedures and guidance set out in 'Sharing Nudes and Semi-Nudes; Advice for education settings working with children and young people', September 2021

• there should be subsequent interviews with the children involved,

• parents should be informed at an early stage and involved in the process unless there is good reason to believe that involving parents would put the child at risk of harm,

• where a child is suffering, or is likely to suffer from harm, it is important that a referral to children's social care (and, if appropriate, the police) is made immediately,

• any report to the police should be considered against the severity of the concerns or allegations, the impact on any child who has allegedly experienced the abuse, and broader context of the production and distribution of the image (for example: was production consensual or coerced? Was sharing consensual? Was production volunteered or requested? What are the ages of the children involved?),

• depending on the facts of the particular concern or allegation, a report to the police does not necessarily mean that the child will be criminalised. Since January 2016, the police are able to record an "Outcome 21" against a reported crime, meaning it is not in the public interest to pursue a charge. The majority of youth involved sexual imagery would fall into this category. However, in the event of coercion, exploitation, further harm or aggravated behaviours, it is valid for police involvement to result in criminal charge. The School should communicate with their police liaison to determine awareness of Outcome 21 recording and its appropriateness in any given incident.

- The following might be helpful in supporting the student:

If a young person tells you they've been involved in sexting it's important to be understanding and non-judgmental. Try to find out a bit more about what's happened, including who sent the image and who has seen it. ***Never view, share or save explicit images, videos or messages.***

- *You should take steps to get an explicit image or video removed if it's been posted online.*
- *Report the image to the site or network hosting it.*
- *Contact the Internet Watch Foundation (IWF).*
- *Children and young people under 18 who are worried that a sexual image or video of them may have been shared online can use Childline and IWF's Report Remove tool to see if it can be taken down. The tool can be used with the support from a trusted adult, and support is available from Childline.*
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Supporting the child

- *Children and young people who have been involved in sexting will need your help and support. Make sure they know they have someone to talk to and tell them they can contact Childline at any time for help and support.*
- *Children and young people under 18 who are worried that a sexual image or video of them may have been shared online can use Childline and IWF's Report Remove tool to see if it can be taken down.*

Safety Plans

1. In deciding whether a safety plan would be appropriate, and which children require a safety plan, the DSL team should consider:

(i) the extent to which a child may have experienced or otherwise been affected by the alleged behaviour, and the impact on them.

(ii) the importance of early intervention to address and to prevent escalation of inappropriate or problematic behaviours, and

(iii) whether there are any wider safeguarding concerns about a child – for example, where a child's behaviour may be considered to be inappropriate or problematic on Hackett's continuum, the DSL and/or external agencies may determine that a safety plan is required to prevent the behaviour from escalating.

2. In all cases where a safety plan is not considered to be appropriate, the school should nonetheless take steps to safeguard and support each child who is allegedly responsible for the behaviour, and any children affected by it, and should continue to monitor the situation. If risks increase consideration should again be given to developing a safety plan.

3. A safety plan should be developed in consultation with key statutory agencies to whom any referral or report is necessary. In developing a safety plan the school should:

(i) always have regard to Keeping Children Safe in Education (September 2023), and Working Together to Safeguard Children (July 2018),

(ii) consult with the MARU, police and/or other relevant agencies regarding the concerns or allegations and need to have a safety plan, and seek their agreement to the plan whenever possible,

(iii) if an agency is not, for whatever reason, engaging, then the school should advise the agency that it intends to develop a safety plan and share it with them when completed. The school should also consider escalating their referral if they believe children's social care or the police should be engaged.

(iv) be consistent with any risk assessments or plans made by the School, children's social care, the police, or any other professionals working with the child,

(v) consider consulting and involving the child and their parents about the development of their safety plan,

(vi) hold a safety planning meeting and careful consideration will need to be given to whether the child presenting the alleged behaviour, and/or their parents should attend. If not in attendance, their wishes and feelings should be sought in advance of the meeting – in the case of the child, with a designated trusted professional with whom they has a positive relationship. A version of the plan which is appropriate for the child's age and level of understanding should be provided to the child and their parents. Efforts should also be made to ensure that they understand what is proposed and to seek their agreement to the arrangements.

4. These steps will help to ensure that the safety plan is appropriately tailored to the child's needs

A safety plan should:

(i) be proportionate and not stigmatise the child/ children allegedly responsible for or affected by the behaviour

(ii) set out relevant background information – including an overview of the context, the specific concerns or allegations, any relevant detail about the relationships, and any power differentials between the child allegedly responsible for the behaviour, and any children affected by it, the frequency of the alleged behaviour and any changes in it over time. Details should also be shared of action taken regarding the alleged concerns or allegations, and any advice provided by the MARU, or other relevant agencies in accordance with the Local Safeguarding Partnership's procedures, or the police, or any other professional working with the child/children,

(iii) set out any relevant information regarding the child concerned. For example, any relevant medical information, any previous concerns about the child's behaviour, needs or harm that she may have been exposed to in the past. Information should be shared on their wishes and feelings regarding the proposed safety plan. Consideration may need to be given to having two or more separate but aligned safety plans for the child who is allegedly responsible for the behaviour, and the child or children affected by it,

(iv) identify and assess the nature and level of risk that is posed or faced by the child / children in school such or with transport arrangements to and from school; and contexts outside the school, including at home, in relationships with friends, peer groups, interactions in the neighbourhood or during online activity,

(v) set out the steps and controls that can be put in place to reduce or manage any risk. Issues that may be addressed include:

- how safety will be ensured in the classroom, out of the classroom, on transport, and during unstructured or extra-curricular activities, including trips and residential stays away from school. This may involve separating the child/ children who present risk from other children who may be affected by the alleged child-on-child abuse,
- how to ensure that the child/children reportedly affected by the alleged behaviour feel supported, including by appointing a trusted member of staff (a 'critical friend') with whom they can speak if they have existing concerns or if there are any future developments which cause them concern,
- how best to draw on any other trusting relationships where these exist, and create them where they do not, to provide the children concerned with support and a sense of belonging,
- where relevant, how to manage the child's/ children's behaviour – this can be done in a number of ways including, for example, by way of a de-escalation plan for staff which identifies any triggers, explains how their behaviour can escalate, sets out the function of the behaviour for the child /children, and proposes an appropriate action or response to it; identifying language that should be used and avoided; a positive handling plan; or implementing controls and measures to reduce or manage any risk,

- whether restorative action would be appropriate and, if so, how best to take such action, bearing in mind the specific needs of the child/children concerned, and the appropriateness of any such action given the nature and seriousness of the concerns or allegations,
- whether any targeted interventions are needed to address the underlying attitudes or behaviour of the child/children, any emotional and behavioural disorders, developmental disorders, or learning difficulties, or to meet the child's/ children's psychological, emotional or physical needs; drawing on local statutory, private or voluntary services as appropriate, and
- whether the behaviour is of such high risk that suitable controls cannot be put in place within the school setting which would enable it to be adequately managed. In this case consideration will need to be given to alternative plans for the child/children presenting the alleged behaviour. The principle that any child who is reported to have experienced child-on-child abuse should not have restrictions or controls placed on them as a result of another child's alleged behaviour should be given priority consideration.

(vi) identify and consider how to build on strengths and positive aspects that the child possesses or is exposed to, such as those emanating from activities or lessons that the child enjoys and engages with; positive characteristics and skills that the child possesses; or trusting relationships with the child's family, other students or staff,

(vii) assess any risks that are posed or faced by the wider school community (including all other students and, where appropriate, staff and parents) and identify any steps that the school can take to mitigate these risks. This may include:
- consideration of how to support any students (and, where appropriate, staff and parents) who know about or may be affected by the alleged behaviour, or who may be required to participate in any investigation
- consideration of work that can be undertaken with the wider staff or student population to help to protect children against child-on-child abuse in the future. Careful consideration will need to be given to managing confidentiality for children affected by the alleged behaviour or engaged themselves in any such behaviour.

(viii) set out the steps needed to implement the safety plan, including how to communicate with and what information should be shared with relevant staff members – in the strictest confidence – so that they are able to implement the actions set out in the plan and safeguard the children concerned appropriately, and

(ix) be reviewed at regular intervals, or if there is a change in perceived risks or circumstances. Reviews should be carried out in light of the children's ongoing needs to ensure that real progress is being made which

Referral Pathway.

If you are concerned about a child's welfare or worried they are being abused, in the first instance discuss your concerns with the DSL and record them on the Cause for Concern form.

If you are worried that a child is in risk of immediate harm, you can make a referral to MARU, multiagencyreferralunit@cornwall.gov.uk

- Multi-agency Referral Unit: 0300 123 1116
- Out of Hours Service: 01208 251300

Link for referral form: https://www.safechildren-cios.co.uk/health-and-social-care/childrens-services/cornwall-and-isles-of-scilly-safeguarding-children-partnership/policies-procedures-and-referrals/

The Local Safeguarding Partnership (OSCP) has a statutory duty to co-ordinate how agencies work together to safeguard and promote the wellbeing of children and young people in Cornwall and to ensure the effectiveness of the safeguarding arrangements.

OSCP: 01872 327225

ciosscp@cornwall.gov.uk

https://www.proceduresonline.com/swcpp/cornwall_scilly/index.html

Examples of further resources:

NSPCC guidance on the stages of normal sexual behaviour

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

Brook Sexual Behaviours Traffic Light Tool

https://www.brook.org.uk/our-work/the-sexual-behaviours-traffic-light-tool

Tender

http://tender.org.uk/

Works with schools providing educational programmes for children and staff training, aimed at preventing domestic abuse and sexual violence and promoting healthy relationships based on equality and respect

Childnet

http://www.childnet.com/ufiles/Cyberbullyingguidance2.pdf

Provides cyber bullying guidance

Digital Awareness UK

https://www.digitalawarenessuk.com/

Provides digital awareness training to educators, parents and students and has produced video resources for students and parents, in collaboration with the Girls Day School Trust

The NSPCC – has produced a range of resources aimed at educating children, staff, and parents about child -on-child abuse. This includes (but is not limited to)

• PANTS (The Underwear Rule) resources for parents, and staff

https://www.nspcc.org.uk/preventing-abuse/ keeping-children-safe/underwear-rule/

• Speak Out Stay Safe programme of assemblies and workshops which teaches children to speak out if they are worried

https://www.nspcc.org.uk/services-and-resources/ working-with-schools/speak-out-stay-safe-service/

• Share aware campaign

https://www.nspcc.org.uk/preventing-abuse/ keeping-children-safe/share-aware/

17. Education

Teaching about safeguarding issues in the classroom can prevent harm by providing children with skills, attributes and knowledge to help them navigate risks. The School will provide children with opportunities to learn about the issue of youth involved sexual imagery, as part of its commitment to ensure that they are taught about safeguarding, including online, through teaching and learning opportunities. Children will be encouraged to share concerns with staff and that there are ways of removing images from the internet if they are reported quickly.

Education should be inclusive, age appropriate, and provide children with the opportunity to discuss and ask questions. In general, an assembly where they are told youth involved sexual imagery is illegal, and they should not do it, is not

sufficient. If education does consider the legal issues associated with youth involved sexual imagery, it should consider the nature of the legislation and likely police responses, rather than simple declarations of illegality.

When considering the sharing of youth involved sexual images among peers, a lot of online safety messaging focuses on telling children that they should not produce images of themselves and send them to people because it is illegal, or in doing so they are placing themselves at risk. We find this approach problematic because:

i) pupils feel that they cannot ask for help or disclose abuse because they did something wrong and, therefore, they deserve what is happening to them; and

ii) the nature of this messaging can contribute to blaming the victim rather than all parties involved. The troubles around the sharing of youth involved sexual images does not lie with the initial generation of the image but the distribution, or threat to distribute the image to third parties. Therefore, the School tackles the subject by focusing on the non-consensual sharing and the potential punishment for those individuals, rather than suggesting that for anyone who creates and sends an image deserves the abuse they receive.

Government guidance 'Teaching Online Safety in Schools (2019) provides further guidance.

18. Reviewing Incidents of child on child abuse

1. What protective factors and influences exist within the School (such as positive peer influences, examples where child-on-child abuse has been challenged, etc.) and how can the School bolster these?

2. How (if at all) did the School's physical environment or the students' routes to and from the School contribute to the abuse, and how can the School address this going forwards, for example by improving the School's safety, security and supervision, or by working with local safeguarding partners to mitigate the risks to students' safety whilst travelling to and from the School?

3. How (if at all) did the online environment contribute to the abuse, and how can the School address this going forwards, for example by strengthening the way in which the School encourages positive and safe use of the internet by students?

4. Did wider gender norms, equality issues, and/or societal attitudes contribute to the abuse?

5. What was the relationship between the abuse and the cultural norms between staff and students, and how can these be addressed going forward?

6. Does the abuse indicate a need for staff training on, for example, underlying attitudes, a particular issue or the handling of particular types of abuse, or to address any victim-blaming narratives from staff?

7. How have similar cases been managed in the past and what effect has this had?

8. Does the case or any identified trends highlight areas for development in the way in which the School works with children to raise their awareness of and/or prevent child-on-child abuse, including by way of the School's PSHE curriculum and lessons that address underlying attitudes or behaviour such as gender and equalities work, respect, boundaries, consent, children's rights and critical thinking and/or avoiding victim-blaming narratives?

9. Are there any lessons to be learnt about the way in which the School engages with parents to address child-on-child abuse issues?

10. Are there underlying issues that affect other schools in the area and is there a need for a multi-agency response?

11. Does this case highlight a need to work with certain children to build their confidence, and teach them how to identify and manage abusive behaviour?

12. Were there opportunities to intervene earlier or differently and/or to address common themes amongst the behaviour of other children in the School?

APPENDIX L: GLOSSARY OF ACRONYMS

Acronym	*Meaning*	*Link to a website, if relevant*
CAMHS	Child and Adolescent Mental Health Service	
CEOP	Child Exploitation and On-Line Protection Command	https://ceop.police.uk/safety-centre/
CIC	Children in Care	
CIOSSCP	Cornwall and Isles of Scilly Safeguarding Children Partnership	https://www.safechildren-cios.co.uk/health-and-social-care/childrens-services/cornwall-and-isles-of-scilly-safeguarding-children-partnership/
CLA	Children Looked After	
CME	Children Missing from Education	
CSE	Child Sexual Exploitation	
DA	Domestic Abuse	
DSL	Designated Safeguarding Lead	
DDSL	Deputy Designated Safeguarding Lead	
EHH	Early Help Hub	https://www.cornwall.gov.uk/education-and-learning/schools-and-colleges/special-educational-needs-file/working-together-across-education-health-and-social-care/early-help-hub/
FGM	Female Genital Mutilation	
FII	Fabricated or Induced Illness	
HBA	Honour Based Abuse	
KCSiE	Keeping Children Safe in Education	https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/912592/Keeping_children_safe_in_education_Sep_2023.pdf
LAC	Looked After Child	
LADO	Local Authority Designated Officer	https://www.safechildren-cios.co.uk/health-and-social-care/childrens-services/cornwall-and-isles-of-scilly-safeguarding-children-partnership/
LSCB	Local Safeguarding Children's Board	Local Safeguarding Children Boards (LSCBs) were established by the Children Act 2004 which gives a statutory responsibility to each locality to have this mechanism in place. LSCBs will be replaced by Multi-agency Partnerships (MAPs) (also referred to in statutory guidance as 'the three partners') by 2019
MARU	Multi-Agency Referral Unit	https://www.cornwall.gov.uk/health-and-social-care/childrens-services/cornwall-childrens-trust/working-together/multi-agency-referral-unit-maru/
NFA	No Further Action	
PREVENT	Stage within the government's Counter terrorism strategy	http://safercornwall.co.uk/preventing-crime/preventing-violent-extremism/

SCR	Serious Case Review	A serious case review (SCR) takes place after a child dies or is seriously injured and abuse or neglect is thought to be involved. It looks at lessons than can help prevent similar incidents from happening in the future.
WTTSC or WT2018	Working Together to Safeguard Children	https://www.gov.uk/government/publications/working-together-to-safeguard-children--2