

## CYGNET SCHOOLS SAFEGUARDING POLICY

### KEY CONTACTS AT EXCEL AND EXCEED CENTRE - BURY

Designated Safeguarding Lead (DSL)  
Wendy Webster – Headteacher - 07436 293397  
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Deputy Designated Safeguarding Leads (DDSL):  
Chloe Young — Education Support Worker 0161 762 4733  
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[ChloeYoung@cygnethealth.co.uk](mailto:ChloeYoung@cygnethealth.co.uk)

Jayne Rowlands – School Manager & DDSL 0161 762 4358 (Wed/Fri)  
[JayneRowlands@cygnethealth.co.uk](mailto:JayneRowlands@cygnethealth.co.uk)

Cygnet Hospital Bury Safeguarding Lead (Forestwood):  
Ella Carley-jones – CAMHS Lead – 0161 763 8340  
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Link Governor (National Board) for Safeguarding:  
Phillip Winterbottom  
[Phillipwinterbottom@cygnethealth.co.uk](mailto:Phillipwinterbottom@cygnethealth.co.uk)

### BURY EDUCATION SAFEGUARDING

The LADO Team deal with allegations against staff who work with children either in education or the wider workforce. If you need to contact the LADO Team regarding an allegation against a member of staff please email them and your email will be responded to within one working day. For anything urgent, call MASH on 0161 253 5678 and they will advise and put any urgent call through to whichever LADO is covering.

[Email: lado@bury.gov.uk](mailto:lado@bury.gov.uk)

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**REFERRAL TO SOCIAL CARE SERVICES BURY**

The Multi-Agency Safeguarding Hub (MASH) service is a single point of access in Bury for all safeguarding concerns across all service areas for children and adults with support needs.

Contact the Bury **Multi-Agency Safeguarding Hub** - 0161-253-5811 during office hours - 8:45am - 5:00pm **childwellbeing@bury.gov.uk**

**EDT** - Contact the **Emergency Duty Team** - 0161- 253-6606 outside of working hours **childwellbeing@bury.gov.uk**

If a child is in immediate danger, you should contact the Police on **999**. If you require the Police for a non urgent matter please dial **101**.

**OTHER**

NSPCC helpline – 0808 800 5000

Teacher Extremism Helpline: 020 7340 7264

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**1. AIM**

- 1.1. The aim of the policy is to ensure that appropriate action is taken in a timely manner to safeguard and promote children's welfare; all staff are aware of their statutory responsibilities with respect to safeguarding; and staff are properly trained in recognising and reporting safeguarding issues.
- 1.2. It is the personal responsibility of every individual referring to this policy to ensure that they are viewing the latest version; this will always be published on Cygnet's online policy library, 'myPolicy/CAMHS'.

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**2. SCOPE**

- 2.1. This policy applies to all staff, volunteers and governors in the school and is consistent with the procedures of the 3 safeguarding partners.
- 2.2. Our policy and procedures also apply to extended school and off-site activities.
- 2.3. It is the agreed Policy and any deviation by staff from following this policy and supporting procedures and documents may be subject to disciplinary procedures.
- 2.4. Links to supporting Policy, documents and references are in **STANDARD FORMS, LETTERS AND REFERENCES**.

**3. LEGISLATION AND STATUTORY GUIDANCE**

- 3.1. This policy is based on the Department for Education's statutory guidance **Keeping Children Safe in Education (2024)** and **Working Together to Safeguard Children (2023)**, and the **Governance Handbook**. We comply with this guidance and the arrangements agreed and published by our 3 local safeguarding partners.
- 3.2. This policy is also based on the following legislation:
  - Part 3 of the schedule to the **Education (Independent School Standards) Regulations 2014**, which places a duty on academies and independent schools to safeguard and promote the welfare of children at the school
  - The **Children Act 1989** (and 2004 amendment), which provides a framework for the care and protection of children
  - Section 5B(11) of the Female Genital Mutilation Act 2003, as inserted by section 74 of the **Serious Crime Act 2015**, which places a statutory duty on teachers to report to the police where they discover that female genital mutilation (FGM) appears to have been carried out on a girl under 18

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- **Statutory guidance on FGM**, which sets out responsibilities with regards to safeguarding and supporting girls affected by FGM
- **The Rehabilitation of Offenders Act 1974**, which outlines when people with criminal convictions can work with children
- Schedule 4 of the <http://www.legislation.gov.uk/ukpga/2006/47/schedule/4>, which defines what 'regulated activity' is in relation to children.
- **Statutory guidance on the Prevent duty**, which explains schools' duties under the Counter-Terrorism and Security Act 2015 with respect to protecting people from the risk of radicalisation and extremism.
- **The Human Rights Act 1998**, which explains that being subjected to harassment, violence and/or abuse, including that of a sexual nature, may breach any or all of the rights which apply to individuals under the **European Convention on Human Rights** (ECHR).
- **The Equality Act 2010**, which makes it unlawful to discriminate against people regarding particular protected characteristics (including disability, sex, sexual orientation, gender reassignment and race). This means our governors and headteacher should carefully consider how they are supporting their children with regard to these characteristics. The Act allows our school to take positive action to deal with particular disadvantages affecting children (where we can show it's proportionate). This includes making reasonable adjustments for disabled children. For example, it could include taking positive action to support girls where there's evidence that they're being disproportionately subjected to sexual violence or harassment.
- **The Public Sector Equality Duty (PSED)**, which explains that we must have due regard to eliminating unlawful discrimination, harassment and victimisation. The PSED helps us to focus on key issues of concern and how to improve children outcomes. Some children may be more at risk of harm from issues such as sexual violence; homophobic, biphobic or transphobic bullying; or racial discrimination.

#### 4. DEFINITIONS

- 4.1. Safeguarding and promoting the welfare of children means:
- Protecting children from maltreatment.
  - Preventing impairment of children's mental and physical health or development.
  - Ensuring that children grow up in circumstances consistent with the provision of safe and effective care.
  - Taking action to enable all children to have the best outcomes.
- 4.2. **Child protection** is part of this definition and refers to activities undertaken to prevent children suffering, or being likely to suffer, significant harm.
- 4.3. **Abuse** is a form of maltreatment of a child, and may involve inflicting harm or failing to act to prevent harm. **Appendix 1** explains the different types of abuse.
- 4.4. **Neglect** is a form of abuse and is the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. **Appendix 1** defines neglect in more detail.
- 4.5. **Sharing of nudes and semi-nudes** (also known as sexting or youth-produced sexual imagery) is where children share nude or semi-nude images, videos or live

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streams. This also includes pseudo-images that are computer-generated images that otherwise appear to be a photograph or video.

- 4.6. **Children** includes everyone under the age of 18.
- 4.7. The following **3 safeguarding partners** are identified in Keeping Children Safe in Education (and defined in the Children Act 2004, as amended by chapter 2 of the Children and Social Work Act 2017). They will make arrangements to work together to safeguard and promote the welfare of local children, including identifying and responding to their needs:
- The local authority (LA).
  - Integrated care boards (previously known as clinical commissioning groups) for an area within the LA.
  - The chief officer of police for a police area in the LA area.
- 4.8. **Victim** is a widely understood and recognised term, but we understand that not everyone who has been subjected to abuse considers themselves a victim, or would want to be described that way. When managing an incident, we will be prepared to use any term that the child involved feels most comfortable with.
- 4.9. **Alleged perpetrator(s)** and **perpetrator(s)** are widely used and recognised terms. However, we will think carefully about what terminology we use (especially in front of children) as, in some cases, abusive behaviour can be harmful to the perpetrator too. We will decide what's appropriate and which terms to use on a case-by-case basis.

### 5. EQUALITY STATEMENT

- 5.1. Some children have an increased risk of abuse, both online and offline, and additional barriers can exist for some children with respect to recognising or disclosing it. We are committed to anti-discriminatory practice and recognise children's diverse circumstances. We ensure that all children have the same protection, regardless of any barriers they may face.
- 5.2. We give special consideration to children who:
- Have special educational needs (SEN) or disabilities or health conditions (see section on **Pupils with SEN, disabilities or health issues**).
  - Are young carers.
  - May experience discrimination due to their race, ethnicity, religion, gender identification or sexuality.
  - Have English as an additional language.
  - Are known to be living in difficult situations – for example, temporary accommodation or where there are issues such as substance abuse or domestic violence.
  - Are at risk of FGM, sexual exploitation, forced marriage, or radicalization.
  - Are asylum seekers.
  - Are at risk due to either their own or a family member's mental health needs.
  - Are looked after or previously looked after.
  - Are missing or absent from education for prolonged periods and/or repeat occasions.
  - Whose parent/carer has expressed an intention to remove them from school to be home educated.

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**6. ROLES AND RESPONSIBILITIES**

- 6.1. Safeguarding and child protection is **everyone's** responsibility. This policy applies to all staff, volunteers and governors in the school and is consistent with the procedures of the 3 safeguarding partners. Our policy and procedures also apply to extended school and off-site activities.
- 6.2. The school plays a crucial role in preventative education. This is in the context of a whole-school approach to preparing children for life in modern Britain, and a culture of zero tolerance of sexism, misogyny/misandry, homophobia, biphobia, transphobia, and sexual violence/harassment. This will be underpinned by our:
- Behaviour policy
  - Pastoral support system
  - Planned programme of relationships, sex and health education (RSHE), which is inclusive and delivered regularly, tackling issues such as:
    - Healthy and respectful relationships.
    - Boundaries and consent.
    - Stereotyping, prejudice and equality.
    - Body confidence and self-esteem.
    - How to recognise an abusive relationship (including coercive and controlling behaviour).
    - The concepts of, and laws relating to, sexual consent, sexual exploitation, abuse, grooming, coercion, harassment, rape, domestic abuse, so-called honour-based violence such as forced marriage and female genital mutilation (FGM) and how to access support.
    - What constitutes sexual harassment and sexual violence and why they're always unacceptable.

**All staff**

- 6.3. All staff working with children will read and understand part 1 and annex B of the Department for Education's statutory safeguarding guidance, **Keeping Children Safe in Education**, and review this guidance at least annually. Staff who do not work directly with children will read Annex A (condensed version of part 1), rather than the above.
- 6.4. All staff will sign a declaration at the beginning of each academic year to say that they have read and understood the guidance.
- 6.5. Reinforce the importance of online safety when communicating with parents. This includes making parents aware of what we ask children to do online (e.g. sites they need to visit or who they'll be interacting with online)
- 6.6. Provide a safe space for children who are LGBT to speak out and share their concerns
- 6.7. All staff will be aware of:
- Our systems which support safeguarding, including this child protection and safeguarding policy, the **staff code of conduct**, the role and identity of the designated safeguarding lead (DSL) and deputy, the behaviour policy, the CAMHS online safety policy (which includes the expectations, applicable roles and responsibilities in relation to filtering and monitoring) and the safeguarding response to children who go missing from education.

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- The early help process (sometimes known as the common assessment framework) and their role in it, including identifying emerging problems, liaising with the DSL, and sharing information with other professionals to support early identification and assessment.
- The process for making referrals to local authority children's social care and for statutory assessments that may follow a referral, including the role they might be expected to play.
- What to do if they identify a safeguarding issue or a child tells them they are being abused or neglected, including specific issues such as FGM, and how to maintain an appropriate level of confidentiality while liaising with relevant professionals.
- The signs of different types of abuse and neglect, as well as specific safeguarding issues, such as child-on-child abuse, child sexual exploitation (CSE), child criminal exploitation (CCE), indicators of being at risk from or involved with serious violent crime, FGM, radicalisation and serious violence (including that linked to county lines).
- The importance of reassuring victims that they are being taken seriously and that they will be supported and kept safe.
- The fact that children can be at risk of harm inside and outside of their home, at school and online.
- The fact that children who are (or who are perceived to be) lesbian, gay, bi or trans (LGBT) can be targeted by other children.
- What to look for to identify children who need help or protection.

6.8. Section on **Training** and **Appendix 4** of this policy outline in more detail how staff are supported to do this.

### **The Designated Safeguarding Lead (DSL)**

- 6.9. The DSL is a member of the senior leadership team within the school. Our DSL is Wendy Webster, Head Teacher. The DSL takes lead responsibility for child protection and wider safeguarding in the school, and acts as link professional to the overarching location safeguarding lead. Their work includes online safety, and understanding our filtering and monitoring processes on school devices and school networks to keep students safe online.
- 6.10. During term time, the DSL will be available during school hours for staff to discuss any safeguarding concerns.
- 6.11. When the DSL is absent, the deputies – Chloe Young and Jayne Rowlands – will act as cover.
- 6.12. If the DSL and deputies are not available, Ella Carley-Jones, Forestwood Safeguarding Lead must be contacted directly (for example, during out-of-hours/out-of-term activities) on the main hospital number. Should they not be available, the local clinical and/or hospital manager will act as cover.
- 6.13. The DSL will be given the time, funding, training, resources and support to:
- Provide advice and support to other staff on child welfare and child protection matters.
  - Take part in strategy discussions and inter-agency meetings and/or support other staff to do so.
  - Contribute to the assessment of children.



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- Refer suspected cases, as appropriate, to the relevant body (local authority children's social care, Channel programme, Disclosure and Barring Service, and/or police), and support staff who make such referrals directly.
- Have a good understanding of harmful sexual behaviour.
- Have a good understanding of the filtering and monitoring systems and processes in place at our school.

6.14. The DSL will also:

- Keep the head teacher informed of any issues.
- Liaise with local authority case managers and designated officers for child protection concerns as appropriate.
- Discuss the local response to sexual violence and sexual harassment with police and local authority children's social care colleagues to prepare the school's policies.
- Be confident that they know what local specialist support is available to support all children involved (including victims and alleged perpetrators) in sexual violence and sexual harassment, and be confident as to how to access this support.
- Be aware that children must have an 'appropriate adult' to support and help them in the case of a police investigation or search.

6.15. The full responsibilities of the DSL and deputy are set out in their job description.

### **The Governing Board**

6.16. The Governing board will:

- Facilitate a whole-school approach to safeguarding, ensuring that safeguarding and child protection are at the forefront and underpin all relevant aspects of process and policy development.
- Evaluate and approve this policy at each review, ensure it complies with the law, and hold the head teacher to account for its implementation.
- Be aware of its obligations under the Human Rights Act 1998, the Equality Act 2010 (including the Public Sector Equality Duty), and our school's local multi-agency safeguarding arrangements.
- Appoint a senior board level (or equivalent) lead to monitor the effectiveness of this policy in conjunction with the full governing board. This is always a different person from the DSL.
- Ensure all staff undergo safeguarding and child protection training, including online safety, and that such training is regularly updated and is in line with advice from the safeguarding partners.
- Ensure that the school has appropriate filtering and monitoring systems in place, and review their effectiveness. This includes:
  - Making sure that the leadership team and staff are aware of the provisions in place, and that they understand their expectations, roles and responsibilities around filtering and monitoring as part of safeguarding training.
  - Reviewing the DfE's filtering and monitoring standards, and discussing with IT staff and service providers what needs to be done to support the school in meeting these standards.
- Make sure:

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- The DSL has the appropriate status and authority to carry out their job, including additional time, funding, training, resources and support
- Online safety is a running and interrelated theme within the whole-school approach to safeguarding and related policies.
- The DSL has lead authority for safeguarding, including online safety and understanding the filtering and monitoring systems and processes in place.
- The school has procedures to manage any safeguarding concerns (no matter how small) or allegations that do not meet the harm threshold (low-level concerns) about staff members (including supply staff, volunteers and contractors). Appendix 3 of this policy covers this procedure.
- That this policy reflects that children with SEND, or certain medical or physical health conditions, can face additional barriers to any abuse or neglect being recognised.
- Where another body is providing services or activities (regardless of whether or not the children who attend these services/activities are children on the school roll):
  - Seek assurance that the other body has appropriate safeguarding and child protection policies/procedures in place, and inspect them if needed.
  - Make sure there are arrangements for the body to liaise with the school about safeguarding arrangements, where appropriate.
  - Make sure that safeguarding requirements are a condition of using the school premises, and that any agreement to use the premises would be terminated if the other body fails to comply.

6.17. All governors will read Keeping Children Safe in Education.

6.18. The **Training** section has information on how governors are supported to fulfil their role.

### **The Head Teacher**

- 6.19. The Head Teacher is responsible for the implementation of this policy, including:
- Ensuring that staff (including temporary staff) and volunteers;
    - Are informed of our systems which support safeguarding, including this policy, as part of their induction.
    - Understand and follow the procedures included in this policy, particularly those concerning referrals of cases of suspected abuse and neglect.
  - Communicating this policy to parents when their child joins the school and via the school website.
  - Ensuring that the DSL has appropriate time, funding, training and resources, and that there is always adequate cover if the DSL is absent.
  - Ensuring that all staff undertake appropriate safeguarding and child protection training (including online safety), and updating the content of the training regularly.
  - Making decisions regarding all low-level concerns, though they will collaborate with the location safeguarding lead.

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### 7. VIRTUAL SCHOOL HEADS

- 7.1. Virtual school heads have a non-statutory responsibility for the strategic oversight of the educational attendance, attainment and progress of children with a social worker.
- 7.2. They should also identify and engage with key professionals, e.g. DSLs, SENCOs, social workers, mental health leads and others.

### 8. CONFIDENTIALITY

- 8.1. Sharing information appropriately means that all Cygnet policies on Information Governance must be complied with (please refer to Cygnet's **Information governance policy family**). Cygnet Health Care follow national guidance on information governance, and all Cygnet units will ensure that when sharing information with others that this is shared using safe and acceptable media to relay information.
- 8.2. It should always be noted that:
  - Timely information sharing is essential to effective safeguarding.
  - 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.
  - The Data Protection Act (DPA) 2018 and GDPR do not prevent, or limit, the sharing of information for the purposes of keeping children safe.
  - If staff need to share 'special category personal data', the DPA 2018 contains 'safeguarding of children and individuals at risk' as a processing condition that allows practitioners to share information without consent if it is not possible to gain consent, it cannot be reasonably expected that a practitioner gains consent, or if to gain consent would place a child at risk.
  - Staff should never promise a child that they will not tell anyone about a report of abuse, as this may not be in the child's best interests.
  - If a victim asks the school not to tell anyone about sexual violence or sexual harassment experienced:
    - There's no definitive answer, because even if a victim doesn't consent to sharing information, staff may still lawfully share it if there's another legal basis under the UK GDPR that applies.
    - The DSL will have to balance the victim's wishes against their duty to protect the victim and other children.
  - The DSL should consider that:
    - Parents or carers should normally be informed (unless this would put the victim at greater risk).
    - The basic safeguarding principle is: if a child is at risk of harm, is in immediate danger, or has been harmed, a referral should be made to local authority children's social care.
    - Rape, assault by penetration and sexual assault are crimes. Where a report of rape, assault by penetration or sexual assault is made, this should be referred to the police. While the age of criminal responsibility is 10, if the alleged perpetrator is under 10, the starting principle of referring to the police remains.
  - Regarding anonymity, all staff will:
    - Be aware of anonymity, witness support and the criminal process in general where an allegation of sexual violence or sexual harassment is progressing through the criminal justice system.

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- Do all they reasonably can to protect the anonymity of any children involved in any report of sexual violence or sexual harassment, for example, carefully considering which staff should know about the report, and any support for children involved.
- Consider the potential impact of social media in facilitating the spreading of rumours and exposing victims' identities.
- *The government's **information sharing advice for safeguarding practitioners** includes 7 'golden rules' for sharing information, and will support staff who have to make decisions about sharing information.*
- If staff are in any doubt about sharing information, they should speak to the designated safeguarding lead (or deputy).
- Confidentiality is also addressed in this policy with respect to **record-keeping**, and allegations of abuse against staff.

### 9. RECOGNISING ABUSE AND TAKING ACTION

9.1. All staff are expected to be able to identify and recognise all forms of abuse, neglect and exploitation and shall be alert to the potential need for early help for a child who:

- Is disabled
- Has special educational needs (whether or not they have a statutory education health and care (EHC) plan)
- Is a young carer
- Is bereaved
- Is showing signs of being drawn into anti-social or criminal behaviour, including being affected by gangs and county lines and organised crime groups and/or serious violence, including knife crime
- Is frequently missing/goes missing from education, care or home
- Is at risk of modern slavery, trafficking, sexual and/or criminal exploitation
- Is at risk of being radicalised or exploited
- Is viewing problematic and/or inappropriate online content (for example, linked to violence), or developing inappropriate relationships online
- 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
- Is suffering from mental ill health
- Has returned home to their family from care
- Is at risk of so-called 'honour'-based abuse such as female genital mutilation (FGM) or forced marriage
- Is a privately fostered child
- Has a parent or carer in custody or is affected by parental offending
- Is missing education, or persistently absent from school, or not in receipt of full-time education
- Has experienced multiple suspensions and is at risk of, or has been permanently excluded
- Staff, volunteers and governors must follow the procedures set out below in the event of a safeguarding issue.
- Please note – in this and subsequent sections, you should take any references to the DSL to mean “the DSL (or deputy DSL)”.

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- 9.2. Staff, volunteers and governors must follow the procedures set out below in the event of a safeguarding issue.
- 9.3. Please note – in this and subsequent sections, you should take any references to the DSL to mean “the DSL (or deputy DSL)”.

### **If a child makes a disclosure to you**

- 9.4. If a child is suffering or likely to suffer harm, or in immediate danger make a referral to children's social care and/or the police immediately. Anyone can make a referral. Tell the DSL/location Safeguarding Lead or manager on call as soon as possible if you make a referral directly. You must follow the process outlined in the flow chart below.

Otherwise,

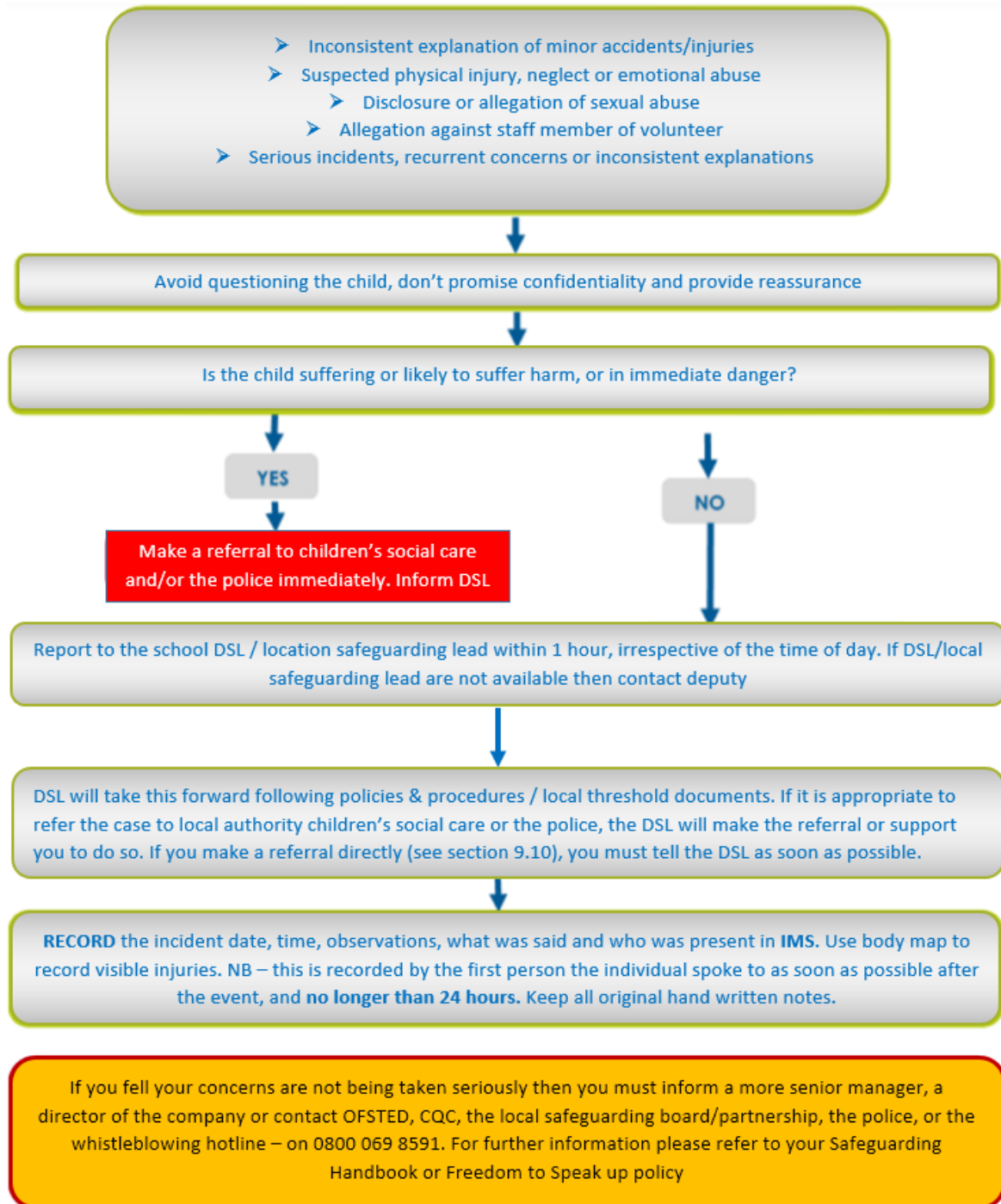
- 9.5. Report to the DSL/location Safeguarding Lead or manager on call as soon as possible (you must not leave your shift without informing the appropriate colleagues). You must follow the process outlined in the flow chart below.

### **How to handle the disclosure**

- 9.6. You must:
- Listen to and believe them. Allow them time to talk freely and do not ask leading questions.
  - Stay calm and do not show that you are shocked or upset.
  - Tell them they have done the right thing in telling you. Do not tell them they should have told you sooner.
  - Explain what will happen next and that you will have to pass this information on. Do not promise to keep it a secret.
- 9.7. Bear in mind that some children may:
- Not feel ready, or know how to tell someone that they are being abused, exploited or neglected.
  - Not recognise their experiences as harmful.
  - Feel embarrassed, humiliated or threatened. This could be due to their vulnerability, disability, sexual orientation and/or language barriers.

None of this should stop you from having a 'professional curiosity' and speaking to the DSL if you have concerns about a child.

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### **Making a referral**

- 9.8. All members of staff should be supported in making a referral to social care. The DSL/location Safeguarding Lead or manager on call can support a member of staff in this process – however, retrospective notification of DSL or location safeguarding lead by the staff member is acceptable if waiting would cause undue delay in the referral to social care being made.
- 9.9. The local authority will make a decision within 1 working day of a referral about what course of action to take and will let the person who made the referral know the outcome. If you have not heard an outcome of the referral within 3 working days you must follow up and request an outcome of the referral from social care.

### **Recording of**

- 9.10. Complete incident reporting processes as per organisational policy i.e. IMS/Datix Incident Report, SI etc.

### **Local childrens social care referral procedures**

- 9.11. [Set out your local procedures for making a referral, as per the arrangements put in place by the three safeguarding partners].

### **If you discover that FGM has taken place or a child is at risk of FGM**

- 9.12. The Department for Education's Keeping Children Safe in Education explains that FGM comprises "all procedures involving partial or total removal of the external female genitalia, or other injury to the female genital organs".
- 9.13. FGM is illegal in the UK and a form of child abuse with long-lasting, harmful consequences. It is also known as 'female genital cutting', 'circumcision' or 'initiation'.
- 9.14. Possible indicators that a child has already been subjected to FGM, and factors that suggest a child may be at risk, are set out in [appendix 4](#).
- 9.15. Any hospital or school staff who either:
- Is informed by a girl under 18 that an act of FGM has been carried out on her; or
  - Observes physical signs which appear to show that an act of FGM has been carried out on a girl under 18 and they have no reason to believe that the act was necessary for the girl's physical or mental health or for purposes connected with labour or birth.

Must immediately report this to the police, personally. This is a mandatory statutory duty, and employees will face disciplinary sanctions for failing to meet it.

- 9.16. Unless they have been specifically told not to disclose, they should also discuss the case with the DSL and involve children's social care as appropriate.
- 9.17. The duty for staff mentioned above does not apply in cases where a child is *at risk* of FGM or FGM is suspected but is not known to have been carried out. Staff should not examine children.

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9.18. **Any hospital or school staff** who suspects a child is *at risk* of FGM or suspects that FGM has been carried out should speak to the DSL and follow our local safeguarding procedures.

9.19. The School and Hospital will follow Bury LA notification procedures and also notify as a safeguarding concern as per 9.10 above.

### **Early help process**

9.20. If early help is appropriate, the DSL (alongside the location safeguarding lead) will generally lead on liaising with other agencies and setting up an inter-agency assessment as appropriate. Staff may be required to support other agencies and professionals in an early help assessment.

9.21. The school and hospital team will discuss and agree, with statutory safeguarding partners, levels for the different types of assessment, as part of local arrangements.

9.22. The DSL will keep the case under constant review and the school will consider a referral to local authority children's social care if the situation does not seem to be improving. Timelines of interventions will be monitored and reviewed.

9.23. The DSL will liaise with Hospital DSL/Lead Social Worker re: Early Help referrals. For Bury LA Contact 0161 253 5200

### **If you have concerns about extremism**

9.24. If a child is not suffering or likely to suffer from harm, or in immediate danger, where possible speak to the DSL first to agree a course of action.

9.25. If in exceptional circumstances the DSL is not available, speak to the location safeguarding lead and/or seek advice from local authority children's social care. Make a referral to local authority children's social care directly, if appropriate (see 'Referral' above). Inform the DSL or location safeguarding lead as soon as practically possible after the referral.

9.26. Where there is a concern, the DSL will follow procedures within **Prevent strategy and policy**, to consider the level of risk and decide which agency to make a referral to. This could include the police or **Channel**, the government's programme for identifying and supporting individuals at risk of becoming involved with or supporting terrorism, or the local authority children's social care team.

9.27. The Department for Education also has a dedicated telephone helpline, 020 7340 7264, which school staff and governors can call to raise concerns about extremism with respect to a child. You can also email [counter.extremism@education.gov.uk](mailto:counter.extremism@education.gov.uk). Note that this is not for use in emergency situations.

9.28. In an emergency, **call 999** or the confidential anti-terrorist hotline on **0800 789 321** if you:

- Think someone is in immediate danger
- Think someone may be planning to travel to join an extremist group
- See or hear something that may be terrorist-related



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### **Mental Health**

- 9.29. 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. Although our young people are currently living with a mental health condition when admitted, school staff must remain alert to, and report any, triggers of behavioural or presentation changes that may suggest abuse, neglect or exploitation. In any such cases, safeguarding procedures as above, must be followed (and recorded according to organisational policy).

### **Concerns about a staff member, supply teacher, volunteer or contractor**

- 9.30. If you have concerns about a member of staff member, supply teacher, volunteer or contractor, or an allegation is made about them posing a risk of harm to children, **Speak to the headteacher as soon as possible**. This protocol must be followed for all concerns/allegations irrespective of whether they may meet the harm threshold or not (see section 9.35).
- 9.31. The head teacher will then work with the location safeguarding lead/unit manager who will then follow processes outlined in **Allegations against Persons in a Position of Trust**.
- 9.32. If the concerns/allegations are about the headteacher, speak directly to the location safeguarding lead and/or the unit manager who will inform the head of education.
- 9.33. Any conflict of interest in carrying out the above, report directly to the LADO.
- 9.34. The location safeguarding lead and/or unit manager will then follow processes outlined in the named policy. In addition to this, further requirements specific to our schools are outlined in appendix 3 and these must also be followed.
- 9.35. The policy also sets out Cygnet's responsibility around making referrals to the DBS.
- 9.36. If you receive an allegation relating to an incident where an individual or organisation was using the school premises for running an activity for children, follow our school safeguarding policies and procedures, informing the LADO, as you would with any safeguarding allegation.

### **Allegations that may meet harms threshold**

- 9.37. This section applies to all cases in which it is alleged that a current member of staff, including a supply teacher, volunteer or contractor, has:
- Behaved in a way that has harmed a child, or may have harmed a child, and/or
  - Possibly committed a criminal offence against or related to a child, and/or
  - Behaved towards a child or children in a way that indicates they may pose a risk of harm to children, and/or
  - Behaved or may have behaved in a way that indicates they may not be suitable to work with children – this includes behaviour taking place both inside and outside of school
- 9.38. If we're in any doubt as to whether a concern meets the harm threshold, we will consult our local authority designated officer (LADO).

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### **Allegations that do not meet the harm threshold (“low-level concerns”)**

- 9.39. This section applies to all concerns and allegations about members of staff, including supply teachers, volunteers and contractors, which do not meet the harm threshold (outlined above). These are referred to as “low-level concerns.”
- 9.40. Low level concerns may arise through, for example:
- Suspicion
  - Complaint
  - Safeguarding concern or allegation from another member of staff
  - Disclosure made by a child, parent or other adult within or outside the school
  - Pre-employment vetting checks

### **Definition of low level concerns**

- 9.41. The term ‘low-level’ concern is any concern – no matter how small – that an adult working in or on behalf of the school may have acted in a way that:
- Is inconsistent with the staff code of conduct, including inappropriate conduct outside of work, and
  - Does not meet the allegations threshold or is otherwise not considered serious enough to consider a referral to the designated officer at the local authority
- 9.42. Examples of such behaviour could include, but are not limited to:
- Being overly friendly with children.
  - Having favourites.
  - Taking photographs of children on their mobile phone.
  - Engaging with a child on a one-to-one basis in a secluded area or behind a closed door.
  - Humiliating children.

### **Sharing low-level concerns**

- 9.43. We recognise the importance of creating a culture of openness, trust and transparency to encourage all staff to confidentially share low-level concerns so that they can be addressed appropriately.
- 9.44. We will create this culture by:
- Ensuring staff are clear about what appropriate behaviour is, and are confident in distinguishing expected and appropriate behaviour from concerning, problematic or inappropriate behaviour, in themselves and others.
  - Empowering staff to share any low-level concerns as per section 9.29 (**Concerns about a staff member, supply teacher, volunteer or contractor**) of this policy.
  - Empowering staff to self-refer.
  - Addressing unprofessional behaviour and supporting the individual to correct it at an early stage.
  - Providing a responsive, sensitive and proportionate handling of such concerns when they are raised.
  - Helping to identify any weakness in the school's safeguarding system
  - Contact with the head of education, and/or Cygnet freedom to speak up guardian can also be made if staff members feel more comfortable doing so. Further to this, Cygnet whistle blowing procedures are available and detailed in the relevant policy.

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### Responding to low-level concerns

- 9.45. If the concern is raised via a third party, the headteacher will collect evidence where necessary by speaking:
- Directly to the person who raised the concern, unless it has been raised anonymously.
  - To the individual involved and any witnesses.
- 9.46. The headteacher will use the information collected to categorise the type of behaviour and determine any further action, in line with the school's [staff behaviour policy/code of conduct]. The headteacher will be the ultimate decision-maker in respect of all low-level concerns, though they should collaborate with the location safeguarding lead.
- 9.47. Additional considerations for supply teachers and all contracted staff are outlined in [appendix 3](#)

### Allegations of abuse made against other children

- 9.48. We recognise that children are capable of abusing their peers. Abuse will never be tolerated or passed off as "banter", "just having a laugh" or "part of growing up", as this can lead to a culture of unacceptable behaviours and an unsafe environment for children.
- 9.49. We also recognise the gendered nature of child-on-child abuse (i.e. that it is more likely that girls will be victims and boys perpetrators). However, all child-on-child abuse is unacceptable and will be taken seriously.
- 9.50. Most cases of children hurting other children will be dealt with under our school's [Behaviour policy](#), and/or anti-bullying policy but this child protection and safeguarding policy will apply to any allegations that raise safeguarding concerns. This might include where the alleged behaviour:
- Is serious, and potentially a criminal offence
  - Could put children in the school at risk
  - Is violent
  - Involves children being forced to use drugs or alcohol
  - Involves sexual exploitation, sexual abuse or sexual harassment, such as indecent exposure, sexual assault, upskirting or sexually inappropriate pictures or videos (including the sharing of nudes and semi-nudes)

See [appendix 4](#) for more information about child-on-child abuse.

### Procedures for dealing with allegations of child-on-child abuse.

- 9.51. If a child makes an allegation of abuse against another child:
- You must record the details using appropriate documentation and tell the DSL and/or location safeguarding lead
  - The DSL and/or location safeguarding lead will contact the local authority children's social care team and follow its advice, as well as the police if the allegation involves a potential criminal offence
  - A risk assessment should be prepared along with a preventative, safeguarding care plan (refer to [Care planning policy](#) ). The safeguarding care plan should be monitored and a date set for a follow-up evaluation with everyone concerned. Any potentially vulnerable place for victim or

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alleged perpetrators are to be considered e.g. shared outside areas, shared transport.

- Community CAMHS teams will be kept informed where appropriate
- If the incident is a criminal offence and there are delays in the criminal process, the DSL will work closely with the police (and other agencies as required) while protecting children and/or taking any disciplinary measures against the alleged perpetrator. We will ask the police if we have any questions about the investigation.

Creating a supportive environment in school and minimizing the risk of child-on-child abuse.

9.52. We recognise the importance of taking proactive action to minimise the risk of child-on-child abuse, and of creating a supportive environment where victims feel confident in reporting incidents.

9.53. To achieve this we will:

- Challenge any form of derogatory or sexualised language or inappropriate behavior between peers, including requesting or sending sexual images
- Be vigilant to issues that particularly affect different genders – for example, sexualised or aggressive touching or grabbing towards female children, and initiation or hazing type violence with respect to boys
- Ensuring our curriculum helps to educate children about appropriate behaviour and consent
- Ensure children are able to easily and confidently report abuse using our reporting systems (as described in '**reporting systems for children**' section below).
- Ensure staff reassure victims that they are being taken seriously
- Be alert to reports of sexual violence and/or harassment that may point to environmental or systemic problems that could be addressed by updating policies, processes and the curriculum, or could reflect wider issues in the local area that should be shared with safeguarding partners
- Support children who have witnessed sexual violence, especially rape or assault by penetration. We will do all we can to make sure the victim, alleged perpetrator(s) and any witnesses are not bullied or harassed
- Consider intra familial harms and any necessary support for siblings following a report of sexual violence and/or harassment
- Ensure staff are trained to understand:
  - How to recognise the indicators and signs of child-on-child abuse, and know how to identify it and respond to reports
  - That even if there are no reports of child-on-child abuse in school, it does not mean it is not happening – staff should maintain an attitude of "it could happen here"
  - That if they have any concerns about a child's welfare, they should act on them immediately rather than wait to be told, and that victims may not always make a direct report. For example:
    - Children can show signs or act in ways they hope adults will notice and react to
    - A friend may make a report
    - A member of staff may overhear a conversation

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- A child's behaviour might indicate that something is wrong
- That certain children may face additional barriers to telling someone because of their vulnerability, disability, gender, ethnicity and/or sexual orientation
- That a child harming a peer could be a sign that the child is being abused themselves, and that this would fall under the scope of this policy
- The important role they have to play in preventing child-on-child abuse and responding where they believe a child may be at risk from it
- That they should speak to the DSL if they have any concerns
  - That social media is likely to play a role in the fall-out from any incident or alleged incident, including for potential contact between the victim, alleged perpetrator(s) and friends from either side
  
- The DSL will take the lead role in any disciplining of the alleged perpetrator(s). We will provide support at the same time as taking any disciplinary action.
- Disciplinary action can be taken while other investigations are going on, e.g. by the police. The fact that another body is investigating or has investigated an incident doesn't (in itself) prevent our school from coming to its own conclusion about what happened and imposing a penalty accordingly. We will consider these matters on a case-by-case basis, taking into account whether:
  - Taking action would prejudice an investigation and/or subsequent prosecution – we will liaise with the police and/or LA children's social care to determine this.
  - There are circumstances that make it unreasonable or irrational for us to reach our own view about what happened while an independent investigation is ongoing

### **Sharing of nudes and semi-nudes (“sexting”)**

- 9.54. This policy should be read in conjunction with the Cygnet IT policies and procedures such as Cygnet's **Use of mobile phones and recording devices** and **Information communication technology acceptable use policy** and **CAMHS online safety policy**.

### **Your responsibilities when responding to an incident.**

If you are made aware of an incident involving the consensual or non-consensual sharing of nude or semi-nude images/videos, including pseudo-images, which are computer-generated images that otherwise appear to be a photograph or video (also known as 'sexting' or 'youth produced sexual imagery'), you must report it to the DSL immediately.

- 9.55. You must **not**:
- View, copy, print, share, store or save the imagery yourself, or ask a child to share or download it (if you have already viewed the imagery by accident, you must report this to the DSL)
  - Delete the imagery or ask the child to delete it
  - Ask the child(s) who are involved in the incident to disclose information regarding the imagery (this is the DSL/location safeguarding lead's responsibility)

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- Share information about the incident with other members of staff, the child(s) it involves or their, or other, parents and/or carers
  - Say or do anything to blame or shame any young people involved
- 9.56. You should explain that you need to report the incident, and reassure the child/children that they will receive support and help from the DSL/location safeguarding lead.
- 9.57. **Initial review meeting.** Following a report of an incident, the DSL will hold an initial review meeting with appropriate school staff – this may include the staff member who reported the incident and the safeguarding or leadership team that deals with safeguarding concerns. This meeting will consider the initial evidence and aim to determine:
- Whether there is an immediate risk to child/children
  - If a referral needs to be made to the police and/or children's social care
  - If it is necessary to view the image(s) in order to safeguard the young person (in most cases, images or videos should not be viewed)
  - What further information is required to decide on the best response
  - Whether the image(s) has been shared widely and via what services and/or platforms (this may be unknown)
  - Whether immediate action should be taken to delete or remove images or videos from devices or online services
  - Any relevant facts about the children involved which would influence risk assessment
  - If there is a need to contact another school, college, setting or individual
  - Whether to contact parents or carers of the children involved (in most cases parents/carers should be involved)
- 9.58. The DSL will make an immediate referral to police and/or children's social care if:
- The incident involves an adult.
  - There is reason to believe that a young person has been coerced, blackmailed or groomed, or if there are concerns about their capacity to consent (for example owing to special educational needs).
  - What the DSL knows about the images or videos suggests the content depicts sexual acts which are unusual for the young person's developmental stage, or are violent.
  - The imagery involves sexual acts and any child in the images or videos is under 13.
  - The DSL has reason to believe a child is at immediate risk of harm owing to the sharing of nudes and semi-nudes (for example, the young person is presenting as suicidal or self-harming).
- 9.59. If none of the above apply then the DSL, in consultation with the headteacher and other members of staff as appropriate, may decide to respond to the incident without involving the police or children's social care. The decision will be made and recorded in line with the procedures set out in this policy.
- 9.60. **Further review by DSL.** If at the initial review stage a decision has been made not to refer to police and/or children's social care, the DSL will conduct a further review to establish the facts and assess the risks.

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- 9.61. They will hold interviews with the children involved (if appropriate).
- 9.62. If at any point in the process there is a concern that a child has been harmed or is at risk of harm, a referral will be made to children's social care and/or the police immediately.
- 9.63. **Informing parents/carers.** The DSL/location safeguarding lead will inform parents at an early stage and keep them involved in the process, unless there is a good reason to believe that involving them would put the child at risk of harm.
- 9.64. **Referring to the police.** If it is necessary to refer an incident to the police, this will be done through dialling 101.
- 9.65. **Recording incidents.** All incidents of sharing nudes and semi-nudes, and the decisions made in responding to them will be recorded. **The record-keeping arrangements** set out in this policy also apply to recording these incidents.
- 9.66. **Curriculum coverage.** Students are taught about the issues surrounding sharing of nudes/semi-nudes as part of our PSHCE and RSE programmes. Teaching covers the following in relation to the sharing of nudes and semi-nudes:
- What it is.
  - How it is most likely to be encountered.
  - The consequences of requesting, forwarding or providing such images, including when it is and is not abusive.
  - Issues of legality.
  - The risk of damage to people's feelings and reputation.
- 9.67. Students also learn the strategies and skills needed to manage:
- Specific requests or pressure to provide (or forward) such images.
  - The receipt of such images.
- 9.68. This policy on the sharing of nudes and semi-nudes is also shared with Children so they are aware of the processes the school will follow in the event of an incident.
- 9.69. Teaching follows best practice in delivering safe and effective education, including:
- Putting safeguarding first
  - Approaching from the perspective of the child
  - Promoting dialogue and understanding
  - Empowering and enabling children and young people
  - Never frightening or scare-mongering
  - Challenging victim-blaming attitudes

### **Reporting systems for our Children**

- 9.70. Where there is a safeguarding concern, we will take the child's wishes and feelings into account when determining what action to take and what services to provide.

We recognise the importance of ensuring children feel safe and comfortable to come forward and report any concerns and/or allegations.

- 9.71. To achieve this, we will:

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- Put systems in place for children to confidently report abuse.
- Ensure our reporting systems are well promoted, easily understood and easily accessible for children.
- Make it clear to children that their concerns will be taken seriously, and that they can safely express their views and give feedback.

9.72. Cygnet Bury has reporting systems in place for students. They are made aware of the reporting systems and processes through their curriculum, regular interactions with staff including key ward staff and students are always supported when submitting any concerns.

### 10. ONLINE SAFETY AND THE USE OF MOBILE TECHNOLOGY

10.1. We recognise the importance of safeguarding children from potentially harmful and inappropriate online material, and we understand that technology is a significant component in many safeguarding and wellbeing issues.

10.2. To address this, our school aims to:

- Have robust processes in place to ensure the online safety of children, staff, volunteers and governors.
- Protect and educate the whole school community in its safe and responsible use of technology, including mobile and smart technology (which we refer to as 'mobile phones').
- Set clear guidelines for the use of mobile phones for the whole school community.
- Establish clear mechanisms to identify, intervene in and escalate any incidents or concerns, where appropriate.

10.3. **The 4 key categories of risk.** Our approach to online safety is based on addressing the following categories of risk:

- Content – being exposed to illegal, inappropriate or harmful content, such as pornography, fake news, racism, misogyny, self-harm, suicide, anti-Semitism, radicalisation and extremism
- Contact – being subjected to harmful online interaction with other users, such as peer-to-peer pressure, commercial advertising and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes
- Conduct – personal online behaviour that increases the likelihood of, or causes, harm, such as making, sending and receiving explicit images (e.g. consensual and non-consensual sharing of nudes and semi-nudes and/or pornography), sharing other explicit images and online bullying; and
- Commerce – risks such as online gambling, inappropriate advertising, phishing and/or financial scams.

10.4. To meet our aims and address the risks above we will:

- Educate children about online safety as part of our curriculum. For example:
  - The safe use of social media, the internet and technology.
  - Keeping personal information private.
  - How to recognise unacceptable behaviour online.



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- How to report any incidents of cyber-bullying, ensuring children are encouraged to do so, including where they are a witness rather than a victim.
  - Train staff, as part of their induction, on safe internet use and online safeguarding issues including cyber-bullying and the risks of online radicalisation. All staff members will receive refresher training at least once each academic year.
- 10.5. Educate parents/carers about online safety via our website, communications sent directly to them, and during discussions at ward rounds/CPA meetings. We will also share clear procedures with them so they know how to raise concerns about online safety.
- 10.6. Make sure staff are aware of any restrictions placed on them with regards to the use of their mobile phone and cameras.
- 10.7. Make all children, volunteers and governors aware that they are expected to sign an agreement regarding the acceptable use of the internet in school, use of the school's ICT systems and use of their mobile and smart technology **Digital Services Acceptable Use Policy, Access to and use of mobile devices, IT and wifi**). Visiting parents are made to adhere to **Visits to Individuals (including children and solicitors)** and associated local protocols including a briefing on restricted items and activities.
- 10.8. Explain the sanctions we will use if a child is in breach of our policies on the acceptable use of the internet and mobile phones.
- 10.9. Make sure all staff, children and parents/carers are aware that staff have the power to search childrens' phones, as set out in the DfE's guidance on searching, screening and confiscation. This would be carried out in line with wider CAMHS service protocol (and as described in individual phone agreements).
- 10.10. Put in place robust filtering and monitoring systems to limit children's exposure to the 4 key categories of risk (described above) from the school's IT systems.
- 10.11. Carry out an annual review of our approach to online safety, supported by an annual risk assessment that considers and reflects the risks faced by our school community.
- 10.12. Provide regular safeguarding and children protection updates including online safety to all staff, at least annually, in order to continue to provide them with the relevant skills and knowledge to safeguard effectively
- 10.13. Review the child protection and safeguarding policy, including online safety, annually and ensure the procedures and implementation are updated and reviewed regularly
- 10.14. More information (including the use of artificial intelligence) is available in the **CAMHS Online Safety Policy**

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### **11. NOTIFYING PARENTS OR CARERS**

- 11.1. Where appropriate, we will discuss any concerns about a child with the child's parents or carers. The DSL/location safeguarding lead will normally do this in the event of a suspicion or disclosure.
- 11.2. Other staff will only talk to parents about any such concerns following consultation with the DSL/location safeguarding lead.
- 11.3. If we believe that notifying the parents would increase the risk to the child, we will discuss this with the local authority children's social care team before doing so.
- 11.4. In the case of allegations of abuse made against other children, we will normally notify the parents of all the children involved. We will think carefully about what information we provide about the other child involved, and when. We will work with the police and/or local authority children's social care to make sure our approach to information sharing is consistent.
- 11.5. The DSL/location safeguarding lead will, along with any relevant agencies (this will be decided on a case-by-case basis):
  - Meet with the victim's parents or carers, with the victim, to discuss what's being put in place to safeguard them, and understand their wishes in terms of what support they may need and how the report will be progressed.
  - Meet with the alleged perpetrator's parents or carers to discuss support for them, and what's being put in place that will impact them, e.g. moving them out of classes with the victim, and the reason(s) behind any decision(s)

### **12. CHILDREN WITH SPECIAL EDUCATION NEEDS, DISABILITIES OR HEALTH ISSUES**

- 12.1. We recognise that pupils with SEND or certain health conditions can face additional safeguarding challenges. Children with disabilities are more likely to be abused than their peers. Additional barriers can exist when recognising abuse, exploitation and neglect in this group, including:
  - Assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's disability without further exploration.
  - Children being more prone to peer group isolation or bullying (including prejudice-based bullying) than other children.
  - The potential for children with SEN and disabilities or certain health conditions being disproportionately impacted by behaviours such as bullying, without outwardly showing any signs.
  - Communication barriers and difficulties in managing or reporting these challenges.
  - Cognitive understanding – being unable to understand the difference between fact and fiction in online content and then repeating the content/behaviours in schools or colleges or the consequences of doing so
- 12.2. We offer extra pastoral support for children with SEN and disabilities. This includes:
  - Regular pastoral sessions with the school education officer.
- 12.3. Any abuse involving children with SEND will require close liaison between the DSL (or deputy) and the SENCO.

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### **13. CHILDREN WITH A SOCIAL WORKER**

- 13.1. Children may need a social worker due to safeguarding or welfare needs. We recognise that a child's experiences of adversity and trauma can leave them vulnerable to further harm as well as potentially creating barriers to attendance, learning, behaviour and mental health.
- 13.2. The DSL and all members of staff will work with and support social workers to help protect vulnerable children.
- 13.3. Where we are aware that a child has a social worker, the DSL will always consider this fact to ensure any decisions are made in the best interests of the children's safety, welfare and educational outcomes. For example, it will inform decisions about:
  - Responding to unauthorised absence or missing education where there are known safeguarding risks.
  - The provision of pastoral and/or academic support.

### **14. LOOKED-AFTER AND PREVIOUSLY LOOKED AFTER CHILDREN**

- 14.1. We will ensure that staff have the skills, knowledge and understanding to keep looked-after children and previously looked-after children safe. In particular, we will ensure that:
  - Appropriate staff have relevant information about children's looked after legal status, contact arrangements with birth parents or those with parental responsibility, and care arrangements.
  - The DSL has details of children's social workers and relevant virtual school heads.
- 14.2. We have appointed an appropriately trained teacher, Jayne Rowlands as the designated teacher for Children looked after, to take the lead on promoting the educational achievement of looked-after and previously looked-after children.
- 14.3. As part of their role, they will:
  - Work closely with the DSL to ensure that any safeguarding concerns regarding looked-after and previously looked-after children are quickly and effectively responded to.
  - Work with virtual school heads to promote the educational achievement of looked-after and previously looked-after children.

### **15. PUPILS WHO ARE LESBIAN, GAY, BISEXUAL OR GENDER QUESTIONING**

- 15.1. The section of KCSIE 2024 on gender questioning children remains under review, pending the outcome of the gender questioning children guidance consultation, and final gender questioning guidance documents being published.
- 15.2. We recognise that pupils who are (or who are perceived to be) lesbian, gay, bisexual or gender questioning (LGBTQ+) can be targeted by other children. See our behaviour policy for more detail on how we prevent bullying based on gender or sexuality.
- 15.3. We also recognise that LGBTQ+ children are more likely to experience poor mental health. Any concerns should be reported to the DSL.

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- 15.4. When supporting a gender questioning pupil, we will work together with parents and the hospital multi-disciplinary team (including clinical professionals).
- 15.5. We aim to create a culture of openness and trust, so that all students are able to share any concerns with members of our staff team.

### 16. COMPLAINTS AND CONCERNS ABOUT SCHOOL SAFEGUARDING POLICIES

- 16.1. Complaints against staff that are likely to require a child protection investigation will be handled in accordance with our procedures for dealing with allegations of abuse made against staff (**Allegations against persons in a position of trust**).

#### Other complaints

- 16.2. For any other safeguarding complaints (e.g. those related to children or premises) should be reported as an incident and notified to the DSL immediately, as per **Listening to service user complaints**.

#### Raising Concerns: Whistle-blowing

- 16.3. Please follow **Raising Concerns: Freedom to Speak Up (whistleblowing)**, which aims to provide a safety net for employees with genuine and serious concerns, regarding mistreatment or abuse of service users, financial malpractice, disregard for matters of health and safety, miscarriages of justice, or alleged management malpractice.

### 17. RECORD-KEEPING

- 17.1. We will hold records in line with **Records Management and Data Quality** policy and beyond this the Information and Records Management Society (IRMS) Information toolkit for schools.
- 17.2. All safeguarding concerns, discussions, decisions made and the reasons for those decisions, must be recorded using Cygnets' Information management system (IMS/Datix), in line with our **Incident Reporting and Management** policy. This should include instances where referrals were or were not made to another agency such as local authority children's social care or the Prevent programme, etc. If you are in any doubt about whether to record something, discuss it with the DSL.
- 17.3. Records will 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
  - Any other recording requirements specified in **Safeguarding Children & Young People**.
- 17.4. Non-confidential records will be easily accessible and available. Confidential information and records will be held securely and only available to those who have a right or professional need to see them.
- 17.5. Safeguarding records relating to individual children will be retained for the period specified in **Records Management and Data Quality** policy, after they have left the school.

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- 17.6. If a child for whom the school has, or has had, safeguarding concerns transitions back to community school (or moves to another school), the DSL will ensure that their child protection file is forwarded as soon as possible, securely, and separately from the main student file.
- 17.7. To allow the new school/college to have support in place when the child arrives, this should be within:
- 5 days for an in-year transfer, or within
  - The first 5 days of the start of a new term
- 17.8. In addition, if the concerns are significant or complex, and/or social services are involved, the DSL will speak to the DSL of the receiving school and provide information to enable them to have time to make any necessary preparations to ensure the safety of the child.
- 17.9. In addition:
- **Records management policy** sets out our policy on record keeping specifically with respect to recruitment and pre-employment checks.
  - **Allegations against Professionals** sets out our policy on record keeping with respect to allegations of abuse made against staff.

### 18. TRAINING

#### **All staff**

- 18.1. All staff members will undertake safeguarding and child protection training at induction, including on whistle-blowing procedures and online safety, to ensure they understand the school's safeguarding systems and their responsibilities, and can identify signs of possible abuse, exploitation or neglect.
- 18.2. This training will be regularly updated and will:
- Be integrated, aligned and considered as part of the whole-school safeguarding approach and wider staff training, and curriculum planning.
  - Be in line with advice from the 3 safeguarding partners.
  - Include online safety, including an understanding of the expectations, roles and responsibilities for staff around filtering and monitoring
  - Have regard to the Teachers' Standards to support the expectation that all teachers:
    - Manage behaviour effectively to ensure a good and safe environment.
    - Have a clear understanding of the needs of all students
- 18.3. All staff will have training on the government's anti-radicalisation strategy, Prevent, to enable them to identify children at risk of becoming involved with or supporting terrorism, and to challenge extremist ideas.
- 18.4. Staff will also receive regular safeguarding and child protection updates, including on online safety, as required but at least annually (for example, through emails, e-bulletins and staff meetings).
- 18.5. Visiting professionals will receive a safeguarding induction before they commence work in the school.
- 18.6. Volunteers will receive appropriate training, if applicable.

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### **The DSL and deputy**

- 18.7. The DSL and deputy will undertake child protection and safeguarding training at least every 2 years.
- 18.8. In addition, they will update their knowledge and skills at regular intervals and at least annually (for example, through e-bulletins, meeting other DSLs, or taking time to read and digest safeguarding developments).
- 18.9. They will also undertake Prevent awareness training.

### **Governors**

- 18.10. All governors receive training about safeguarding and child protection (including online safety) at induction, which is regularly updated. This is to make sure that they:
  - Have the knowledge and information needed to perform their functions and understand their responsibilities, such as providing strategic challenge.
  - Can be assured that safeguarding policies and procedures are effective and support the school to deliver a robust whole-school approach to safeguarding.

### **Recruitment – interview panels**

- 18.11. At least one person conducting any interview for a post at the school will have undertaken safer recruitment training. This will cover, as a minimum, the contents of the Department for Education's statutory guidance, Keeping Children Safe in Education, and will be in line with local safeguarding procedures.
- 18.12. See [appendix 2](#) for more information about safe recruitment processes.

### **Monitoring arrangements**

- 18.13. This policy will be reviewed **annually** by Edward Hall (Head of Education) and Philip Winterbottom (Head of Safeguarding) at every review, it will be approved by the National Education Board.

## **19. STANDARD FORMS, LETTERS AND REFERENCES**

### **Linked Policy**

- 19.1. Safeguarding Children & Young People (4-16)
- 19.2. Allegations against persons in a position of trust (4-18)
- 19.3. CAMHS Online Safety Policy (4-23)
- 19.4. Managing Individual's Care Records (2-10)
- 19.5. Use of Mobile Phones & Recording Devices (1-05)
- 19.6. Complaints and Compliments (6-01)
- 19.7. Prevent Strategy and Policy (4-21)
- 19.8. Equality and Diversity in respect of individuals (1-06)
- 19.9. Information Governance Policy (IG 01)
- 19.10. Digital Services Acceptable Use (IG 03)
- 19.11. CCTV and Electronic Monitoring (IG 13)
- 19.12. Records Management and Data Quality (IG 11)
- 19.13. Raising Concerns: Freedom to Speak Up (Whistleblowing) (HR 03)
- 19.14. Staff Code of Conduct/Code of Conduct in Schools (HR 02)
- 19.15. Health and Safety Policy (H&S 01)

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- 19.16. First Aid at Work (H&S 12)
- 19.17. Risk Assessment Procedure (H&S 18)
- 19.18. Behaviour Policy for Schools (8-06)

**These appendices supporting this policy are based on the Department for Education's statutory guidance, Keeping Children Safe in Education.**

## CYGNET SCHOOLS SAFEGUARDING POLICY

### Appendix 1: Types of Abuse

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

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

**Emotional abuse** is the persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.

Emotional abuse 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.
- Not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate.
- 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 participating in normal social interaction.
- Seeing or hearing the ill-treatment of another.
- Serious bullying (including cyberbullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children.

**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.
- Non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (including via the internet).

Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.

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

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

- Provide adequate food, clothing and shelter (including exclusion from home or abandonment).
- Protect a child from physical and emotional harm or danger.
- Ensure adequate supervision (including the use of inadequate care-givers).
- Ensure access to appropriate medical care or treatment.

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



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## Appendix 2: Safer Recruitment and DBS Checks – policy and procedures

For comprehensive overview of safe recruitment processes, please see [safe recruitment in schools](#).

### Pre-appointment vetting checks

We will record all information on the checks carried out in the school's single central record (SCR). Copies of these checks, where appropriate, will be held in individuals' personnel files. We follow requirements and best practice in retaining copies of these checks, as set out below.

### New staff

When appointing new staff, we will:

- Verify their identity
- Obtain (via the applicant) an enhanced Disclosure and Barring Service (DBS) certificate, including barred list information for those who will be engaging in regulated activity (see definition below). We will not keep a copy of this for longer than 6 months, but when the copy is destroyed we may still keep a record of the fact that vetting took place, the result of the check and recruitment decision taken.
- Obtain a separate barred list check if they will start work in regulated activity before the DBS certificate is available
- Verify their mental and physical fitness to carry out their work responsibilities
- Verify their right to work in the UK. We will keep a copy of this verification for the duration of the member of staff's employment and for 2 years afterwards
- Verify their professional qualifications, as appropriate
- Ensure they are not subject to a prohibition order if they are employed to be a teacher/instructor
- Carry out further additional checks, as appropriate, on candidates who have lived or worked outside of the UK. Where available, these could include:
  - For all staff, including teaching positions: **criminal records checks for overseas applicants**
  - For teaching positions: obtaining a letter from the professional regulating authority in the country where the applicant has worked, confirming that they have not imposed any sanctions or restrictions on that person, and/or are aware of any reason why that person may be unsuitable to teach
- Check that candidates taking up a management position are not subject to a prohibition from management (section 128) direction made by the secretary of state

We will ask for written information about previous employment history and check that information is not contradictory or incomplete.

We will seek references on all short-listed candidates, including internal candidates, before interview. We will scrutinise these and resolve any concerns before confirming appointments. The references requested will ask specific questions about the suitability of the applicant to work with children.

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**Regulated activity** means a person who will be:

- Responsible, on a regular basis in a school or college, for teaching, training, instructing, caring for or supervising children; or
- Carrying out paid, or unsupervised unpaid, work regularly in a school or college where that work provides an opportunity for contact with children; or
- Engaging in intimate or personal care or overnight activity, even if this happens only once and regardless of whether they are supervised or not

### **Existing staff**

If we have concerns about an existing member of staff's suitability to work with children, we will carry out all the relevant checks as if the individual was a new member of staff. We will also do this if an individual moves from a post that is not regulated activity to one that is.

We will refer to the DBS anyone who has harmed, or poses a risk of harm, to a child or vulnerable adult where:

- The 'harm test' is satisfied in respect of the individual (i.e. they may harm a child or vulnerable adult or put them at risk of harm)
- The individual has received a caution or conviction for a relevant offence, or if there is reason to believe that the individual has committed a listed relevant offence, under the **Safeguarding Vulnerable Groups Act 2006 (Prescribed Criteria and Miscellaneous Provisions) Regulations 2009**; and
- The individual has been removed from working in regulated activity (paid or unpaid) or would have been removed if they had not left

### **Agency and third-party staff**

We will obtain written notification from any agency or third-party organisation that it has carried out the necessary safer recruitment checks that we would otherwise perform. The school will request to see a copy of their DBS certificate before they start work. We will also check that the person presenting themselves for work is the same person on whom the checks have been made.

### **Contractors**

We will ensure that any contractor, or any employee of the contractor, who is to work at the school has had the appropriate level of DBS check (this includes contractors who are provided through a PFI or similar contract). This will be:

- An enhanced DBS check with barred list information for contractors engaging in regulated activity.
- An enhanced DBS check, not including barred list information, for all other contractors who are not in regulated activity but whose work provides them with an opportunity for regular contact with children.

We will obtain the DBS check for self-employed contractors.

We will not keep copies of such checks for longer than 6 months.

Contractors who have not had any checks will not be allowed to work unsupervised or engage in regulated activity under any circumstances.

We will check the identity of all contractors and their staff on arrival at the school.

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### **Trainee/student teachers**

Where applicants for initial teacher training are salaried by us, we will ensure that all necessary checks are carried out.

Where trainee teachers are fee-funded, we will obtain written confirmation from the training provider that necessary checks have been carried out and that the trainee has been judged by the provider to be suitable to work with children.

### **Volunteers**

We will:

- Never leave an unchecked volunteer unsupervised or allow them to work in regulated activity.
- Obtain an enhanced DBS check with barred list information for all volunteers who are new to working in regulated activity.
- Carry out a risk assessment when deciding whether to seek an enhanced DBS check without barred list information for any volunteers not engaging in regulated activity. We will retain a record of this risk assessment.

### **Governors**

All governors in regulated activity will have an enhanced DBS check with barred list information, those who are not, an enhanced DBS only. The proprietary chair will have their DBS check countersigned by the secretary of state. All proprietors, national governors and local governors will also have the following checks:

- A section 128 check (to check prohibition on participation in management under section 128 of the Education and Skills Act 2008).
- Identity.
- Right to work in the UK.
- Other checks deemed necessary if they have lived or worked outside the UK.

### **Staff working in alternative provision settings**

Where we place a child with an alternative provision provider, we obtain written confirmation from the provider that they have carried out the appropriate safeguarding checks on individuals working there that we would otherwise perform.

### **Adults who supervise children on work experience**

When organising work experience, we will ensure that policies and procedures are in place to protect children from harm.

We will also consider whether it is necessary for barred list checks to be carried out on the individuals who supervise a child under 16 on work experience. This will depend on the specific circumstances of the work experience, including the nature of the supervision, the frequency of the activity being supervised, and whether the work is regulated activity.

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### Appendix 3: Additional requirements to [Allegations against Persons in a Position of Trust](#).

#### Others using school premises:

- If we receive an allegation of an incident happening while an individual or organisation was using the school premises to run activities for children, we will follow our safeguarding policies and procedures and inform our LADO

#### Procedure:

- If initial enquiries (in line with local procedures) confirm foundation to an allegation, headteacher to ensure LADO has been contacted by nominated investigator.
- For additional details regarding suspension of employees, please see Cygnet Policy **HR15 Disciplinary procedure**
- Where the nominated investigator (or any other person involved) in the investigation is concerned about the welfare of other children in the community or the individual's family, they will discuss these concerns with the DSL/location safeguarding lead and make a risk assessment of the situation. If necessary, the DSL/location safeguarding lead may make a referral to children's social care.
- (Subject to agreement with children's social care services and/or the police, if applicable) the nominated investigator will also inform the parents or carers of the requirement to maintain confidentiality about any allegations made against teachers, where this applies, while investigations are ongoing. Any parent or carer who wishes to have the confidentiality restrictions removed in respect of a teacher will be advised to seek legal advice
- If the school is made aware that the secretary of state has made an interim prohibition order in respect of an individual, we will immediately suspend that individual from teaching, pending the findings of the investigation by the Teaching Regulation Agency (TRA).
- Where the police are involved, wherever possible the school will ask the police at the start of the investigation to obtain consent from the individuals involved to share their statements and evidence for use in the school's disciplinary process, should this be required at a later point.

#### Other specific actions:

- **Action following criminal investigation or prosecution.** The nominated investigator will discuss with the local authority's designated officer whether any further action, including disciplinary action, is appropriate and, if so, how to proceed, taking into account information provided by the police and/or children's social care services.
- **Conclusion of a case where the allegation is substantiated.** In addition to DBS referral obligations outlined in [Allegations against Persons in a Position of Trust](#), for substantiated allegations involving teachers/instructors, the school will consider whether to refer the matter to the Teaching Regulation Agency (TRA) to consider prohibiting the individual from teaching.
- **Return to work following suspension.** The school headteacher will oversee these, ensuring adequate management plans and support are in place.
- **If an allegation is determined to be unsubstantiated, unfounded, false or malicious.** The LADO and the case manager (Head/DSL if these are not involved) should consider whether the child and/or the person who has made the allegation is in need of help or may have been abused by someone else and this is a cry for help.

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In such circumstances, a referral to local authority children's social care may be appropriate. If an allegation is shown to be deliberately invented or malicious, the school or college, should consider whether any disciplinary action is appropriate against the individual who made it as per their own behaviour policy.

### **Record keeping:**

- The headteacher will oversee that all records outlined in policy are diligently kept
- The records of any allegation that, following an investigation, is found to be malicious or false will be deleted from the individual's personnel file (unless the individual consents for the records to be retained on the file).
- For all other allegations (which are not found to be malicious or false), a declaration must be kept on file as to whether the information will be referred to in any future reference and the school will provide a copy to the individual, in agreement with children's social care or the police as appropriate.
- In addition to this, the school will provide a copy to the individual, in agreement with children's social care or the police as appropriate.
- We will retain all other records at least until the individual has reached normal pension age, or for 10 years from the date of the allegation if that is longer.

### **References:**

- Will only include substantiated allegations, on the condition that the information is factual and does not include opinions

### **Non-recent allegations**

- Abuse can be reported, no matter how long ago it happened.
- We will report any non-recent allegations made by a child to the LADO in line with our local authority's procedures for dealing with non-recent allegations.
- Where an adult makes an allegation to the school that they were abused as a child, we will advise the individual to report the allegation to the police.

### **Other specific actions (low-level concerns only)**

- Record keeping
- All low-level concerns will be recorded in writing. In addition to details of the concern raised, records will include the context in which the concern arose, any action taken and the rationale for decisions and action taken.
- Records will be:
  - Kept confidential, held securely and comply with the DPA 2018 and UK GDPR
  - Reviewed so that potential patterns of concerning, problematic or inappropriate behaviour can be identified. Where a pattern of such behaviour is identified, we will decide on a course of action, either through our disciplinary procedures or, where a pattern of behaviour moves from a concern to meeting the harms threshold as described in section 1 of this appendix, we will refer it to the designated officer at the local authority
  - Retained at least until the individual leaves employment at the school
  - Where a low-level concern relates to a supply teacher or contractor, we will notify the individual's employer, so any potential patterns of inappropriate behaviour can be identified.
- References
- We will not include low-level concerns in references unless:

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- The concern (or group of concerns) has met the threshold for referral to the designated officer at the local authority and is found to be substantiated; and/or
- The concern (or group of concerns) relates to issues which would ordinarily be included in a reference, such as misconduct or poor performance

Additional considerations for supply teachers and all contracted staff

- If there are concerns or an allegation is made against someone not directly employed by the school, such as a supply teacher or contracted staff member provided by an agency, we will take the actions below in addition to our standard procedures.
- We will not decide to stop using an individual due to safeguarding concerns without finding out the facts and liaising with our LADO to determine a suitable outcome
- The governing board will discuss with the agency whether it is appropriate to suspend the individual, or redeploy them to another part of the school, while the school carries out the investigation
- We will involve the agency fully, but the school will take the lead in collecting the necessary information and providing it to the LADO as required
- We will address issues such as information sharing, to ensure any previous concerns or allegations known to the agency are taken into account (we will do this, for example, as part of the allegations management meeting or by liaising directly with the agency where necessary)
- When using an agency, we will inform them of our process for managing allegations, and keep them updated about our policies as necessary, and will invite the agency's HR manager or equivalent to meetings as appropriate.

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### Appendix 4: Specific Safeguarding Issues

#### Assessing adult-involved nude and semi-nude sharing incidents

This section is based on annex A of the UK Council of Internet Safety's [advice for education settings](#).

All adult-involved nude and semi-nude image sharing incidents are child sexual abuse offences and must immediately be referred to police/social care. However, as adult-involved incidents can present as child-on-child nude/semi-nude sharing, it may be difficult to initially assess adult involvement.

There are two types of common adult-involved incidents: sexually motivated incidents and financially motivated incidents.

#### Sexually motivated incidents

In this type of incident, an adult offender obtains nude and semi-nudes directly from a child or young person using online platforms.

To make initial contact, the offender may present as themselves or use a false identity on the platform, sometimes posing as a child or young person to encourage a response and build trust. The offender often grooms the child or young person on social media, in chatrooms or on gaming platforms, and may then move the conversation to a private messaging app or an end-to-end encrypted (E2EE) environment where a request for a nude or semi-nude is made. To encourage the child or young person to create and share nude or semi-nude, the offender may share pornography or child sexual abuse material (images of other young people), including AI-generated material.

Once a child or young person shares a nude or semi-nude, an offender may blackmail the child or young person into sending more images by threatening to release them online and/or send them to friends and family.

Potential signs of adult-involved grooming and coercion can include the child or young person being:

- Contacted by an online account that they do not know but appears to be another child or young person
- Quickly engaged in sexually explicit communications, which may include the offender sharing unsolicited images
- Moved from a public to a private/E2EE platform
- Coerced/pressured into doing sexual things, including creating nudes and semi-nudes
- Offered something of value such as money or gaming credits
- Threatened or blackmailed into carrying out further sexual activity. This may follow the child or young person initially sharing the image or the offender sharing a digitally manipulated image of the child or young person to extort 'real' images

#### Financially motivated incidents

Financially motivated sexual extortion (often known as 'sextortion') is an adult-involved incident in which an adult offender (or offenders) threatens to release nudes or semi-nudes of a child or young person unless they pay money or do something else to benefit them.

Unlike other adult-involved incidents, financially motivated sexual extortion is usually carried out by offenders working in sophisticated organised crime groups (OCGs) overseas and are only motivated by profit. Adults are usually targeted by these groups too.

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Offenders will often use a false identity, sometimes posing as a child or young person, or hack another young person's account to make initial contact. To financially blackmail the child or young person, they may:

- Groom or coerce the child or young person into sending nudes or semi-nudes and financially blackmail them
- Use images that have been stolen from the child or young person taken through hacking their account
- Use digitally manipulated images, including AI-generated images, of the child or young person

The offender may demand payment or the use of the victim's bank account for the purposes of money laundering.

Potential signs of adult-involved financially motivated sexual extortion can include the child or young person being:

- Contacted by an online account that they do not know but appears to be another child or young person. They may be contacted by a hacked account of a child or young person
- Quickly engaged in sexually explicit communications which may include the offender sharing an image first
- Moved from a public to a private/E2EE platform
- Pressured into taking nudes or semi-nudes
- Told they have been hacked and they have access to their images, personal information and contacts
- Blackmailed into sending money or sharing bank account details after sharing an image or the offender sharing hacked or digitally manipulated images of the child or young person

### **Children who are absent from education**

A child being absent from education, particularly repeatedly, can be a warning sign of a range of safeguarding issues. This might include abuse or neglect, such as sexual abuse or exploitation or child criminal exploitation, or issues such as mental health problems, substance abuse, radicalisation, FGM or forced marriage.

There are many circumstances where a child may be absent or become missing from education, but some children are particularly at risk. These include children who:

- Are at risk of harm or neglect
- Are at risk of forced marriage or FGM
- Come from Gypsy, Roma, or Traveller families
- Come from the families of service personnel
- Go missing or run away from home or care
- Are supervised by the youth justice system
- Cease to attend a school
- Come from new migrant families

We will follow our procedures for unauthorised absence and for dealing with children who are absent from education, particularly on repeat occasions, to help identify the risk of abuse, exploitation and neglect, including sexual exploitation, and to help



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prevent the risks of going missing in future. This includes informing the local authority if a child leaves the school without a new school being named, and adhering to requirements with respect to sharing information with the local authority, when applicable, when removing a child's name from the admission register at non-standard transition points.

Staff will be trained in signs to look out for and the individual triggers to be aware of when considering the risks of potential safeguarding concerns which may be related to being absent, such as travelling to conflict zones, FGM and forced marriage.

If a staff member suspects that a child is suffering from harm or neglect, we will follow local child protection procedures, including with respect to making reasonable enquiries. We will make an immediate referral to the local authority children's social care team, and the police, if the child is suffering or likely to suffer from harm, or in immediate danger.

### **Child Criminal Exploitation**

Child criminal exploitation (CCE) is a form of abuse where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child into criminal activity. It may involve an exchange for something the victim needs or wants, and/or for the financial or other advantage of the perpetrator or facilitator, and/or through violence or the threat of violence.

The abuse can be perpetrated by males or females, and children or adults. It can be a one-off occurrence or a series of incidents over time, and range from opportunistic to complex organised abuse.

The victim can be exploited even when the activity appears to be consensual. It does not always involve physical contact and can happen online. For example, young people may be forced to work in cannabis factories, coerced into moving drugs or money across the country (county lines), forced to shoplift or pickpocket, or to threaten other young people.

Indicators of CCE can include a child:

- Appearing with unexplained gifts or new possessions
- Associating with other young people involved in exploitation
- Suffering from changes in emotional wellbeing
- Misusing drugs and alcohol
- Going missing for periods of time or regularly coming home late (e.g. on local or home leave)
- Regularly missing school or education
- Not taking part in education

If a member of staff suspects CCE, they will discuss this with the DSL. The DSL will discuss with the location safeguarding lead and trigger the local safeguarding procedures, including a referral to the local authority's children's social care team and the police, if appropriate.

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### **Child Sexual Exploitation**

Child sexual exploitation (CSE) is a form of child sexual abuse where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into sexual activity. It may involve an exchange for something the victim needs or wants and/or for the financial advantage or increased status of the perpetrator or facilitator. It may, or may not, be accompanied by violence or threats of violence.

The abuse can be perpetrated by males or females, and children or adults. It can be a one-off occurrence or a series of incidents over time, and range from opportunistic to complex organised abuse.

The victim can be exploited even when the activity appears to be consensual. Children or young people who are being sexually exploited may not understand that they are being abused. They often trust their abuser and may be tricked into believing they are in a loving, consensual relationship.

CSE can include both physical contact (penetrative and non-penetrative acts) and non-contact sexual activity. It can also happen online. For example, young people may be persuaded or forced to share sexually explicit images of themselves, have sexual conversations by text, or take part in sexual activities using a webcam. CSE may also occur without the victim's immediate knowledge, for example through others copying videos or images.

In addition to the CCE indicators above, indicators of CSE can include a child:

- Having an older boyfriend or girlfriend
- Suffering from sexually transmitted infections or becoming pregnant

If a member of staff suspects CSE, they will discuss this with the DSL. The DSL will trigger the local safeguarding procedures, including a referral to the local authority's children's social care team and the police, if appropriate.

### **Child-on-child abuse**

Child-on-child abuse is when children abuse other children. This type of abuse can take place inside and outside of school. It can also take place both face-to-face and online, and can occur simultaneously between the two.

Our school has a zero-tolerance approach to sexual violence and sexual harassment. We recognise that even if there are there no reports, that doesn't mean that this kind of abuse isn't happening.

Child-on-child abuse is most likely to include, but may not be limited to:

- Bullying (including cyber-bullying, prejudice-based and discriminatory bullying)
- Abuse in intimate personal relationships between children (this is sometimes known as 'teenage relationship abuse').
- 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).

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- 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).
- Upskirting, 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.
- 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).

Where children abuse their peers online, this can take the form of, for example, abusive, harassing, and misogynistic messages; the non-consensual sharing of indecent images, especially around chat groups; and the sharing of abusive images and pornography, to those who don't want to receive such content.

If staff have any concerns about child-on-child abuse, or a child makes a report to them, they will follow the procedures set out in section 9 of this policy, as appropriate. In particular, sections 9.46-9.70 set out more detail about our school's approach to this type of abuse.

When considering instances of harmful sexual behaviour between children, we will consider their ages and stages of development. We recognise that children displaying harmful sexual behaviour have often experienced their own abuse and trauma, and will offer them appropriate support.

### **Domestic abuse**

Children can witness and be adversely affected by domestic abuse and/or violence at home where it occurs between family members. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result.

Types of domestic abuse include intimate partner violence, abuse by family members, teenage relationship abuse (abuse in intimate personal relationships between children) and child/adolescent to parent violence and abuse. It can be physical, sexual, financial, psychological or emotional. It can also include ill treatment that isn't physical, as well as witnessing the ill treatment of others. This can be particularly relevant, for example, in relation to the impact on children of all forms of domestic abuse, including where they see, hear or experience its effects.

Anyone can be a victim of domestic abuse, regardless of gender, age, ethnicity, socioeconomic status, sexuality or background, and domestic abuse can take place inside or outside of the home. Children who witness domestic abuse are also victims.

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Older children may also experience and/or be the perpetrators of domestic abuse and/or violence in their own personal relationships. This can include sexual harassment.

Exposure to domestic abuse and/or violence can have a serious, long-lasting emotional and psychological impact on children and affect their health, wellbeing, development and ability to learn.

The DSL will provide support according to the child's needs and update records about their circumstances

### **Homelessness**

Being homeless or being at risk of becoming homeless presents a real risk to a child's welfare.

The DSL and deputy will be aware of contact details and referral routes in to the local housing authority so they can raise/progress concerns at the earliest opportunity (where appropriate and in accordance with local procedures).

Where a child has been harmed or is at risk of harm, the DSL will also make a referral to children's social care.

### **So-called 'honour-based' abuse (including FGM and forced marriage)**

So-called 'honour-based' abuse (HBA) encompasses incidents or crimes committed to protect or defend the honour of the family and/or community, including FGM, forced marriage, and practices such as breast ironing.

Abuse committed in this context often involves a wider network of family or community pressure and can include multiple perpetrators.

All forms of HBA are abuse and will be handled and escalated as such. All staff will be alert to the possibility of a child being at risk of HBA or already having suffered it. If staff have a concern, they will speak to the DSL, who will activate local safeguarding procedures.

### **FGM**

The DSL will make sure that staff have access to appropriate training to equip them to be alert to children affected by FGM or at risk of FGM.

**Section 9** of this policy sets out the procedures to be followed if a staff member discovers that an act of FGM appears to have been carried out or suspects that a child is at risk of FGM.

Indicators that FGM has already occurred include:

- A child confiding in a professional that FGM has taken place
- A mother/family member disclosing that FGM has been carried out
- A family/child already being known to social services in relation to other safeguarding issues

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- A girl:
- Having difficulty walking, sitting or standing, or looking uncomfortable
- Finding it hard to sit still for long periods of time (where this was not a problem previously)
- Spending longer than normal in the bathroom or toilet due to difficulties urinating
- Having frequent urinary, menstrual or stomach problems
- Avoiding physical exercise or missing PE
- Being repeatedly absent from school, or absent for a prolonged period
- Demonstrating increased emotional and psychological needs – for example, withdrawal or depression, or significant change in behaviour
- Being reluctant to undergo any medical examinations
- Asking for help, but not being explicit about the problem
- Talking about pain or discomfort between her legs

Potential signs that a child may be at risk of FGM include:

- The girl's family having a history of practising FGM (this is the biggest risk factor to consider)
- FGM being known to be practised in the girl's community or country of origin
- A parent or family member expressing concern that FGM may be carried out
- A family not engaging with professionals (health, education or other) or already being known to social care in relation to other safeguarding issues
- A girl:
- Having a mother, older sibling or cousin who has undergone FGM
- Having limited level of integration within UK society
- Confiding to a professional that she is to have a "special procedure" or to attend a special occasion to "become a woman"
- Talking about a long holiday to her country of origin or another country where the practice is prevalent, or parents stating that they or a relative will take the girl out of the country for a prolonged period
- Requesting help from a teacher or another adult because she is aware or suspects that she is at immediate risk of FGM
- Talking about FGM in conversation – for example, a girl may tell other children about it (although it is important to take into account the context of the discussion)
- Being unexpectedly absent from school
- Having sections missing from her 'red book' (child health record) and/or attending a travel clinic or equivalent for vaccinations/anti-malarial medication

The above indicators and risk factors are not intended to be exhaustive.

### **Forced marriage**

Forcing a person into marriage is a crime. A forced marriage is one entered into without the full and free consent of one or both parties and where violence, threats, or any other form of coercion is used to cause a person to enter into a marriage. Threats can be physical or emotional and psychological.

It is also illegal to cause a child under the age of 18 to marry, even if violence, threats or coercion are not involved.

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Staff will receive training around forced marriage and the presenting symptoms. We are aware of the 'one chance' rule, i.e. we may only have one chance to speak to the potential victim and only one chance to save them.

If a member of staff suspects that a child is being forced into marriage, they will speak to the child about their concerns in a secure and private place. They will then report this to the DSL.

The DSL will:

- Speak to the child about the concerns in a secure and private place
- Activate the local safeguarding procedures and refer the case to the local authority's designated officer
- Seek advice from the Forced Marriage Unit on 020 7008 0151 or [fm@fco.gov.uk](mailto:fm@fco.gov.uk)
- Refer the child to an education welfare officer, pastoral tutor, learning mentor, or school counsellor, as appropriate

### Preventing radicalisation

- **Radicalisation** refers to the process of a person legitimising support for, or use of, terrorist violence
- **Extremism** is the promotion or advancement of an ideology based on violence, hatred or intolerance, that aims to:
  - Negate or destroy the fundamental rights and freedoms of others; or
  - Undermine, overturn or replace the UK's system of liberal parliamentary democracy and democratic rights; or
  - Intentionally create a permissive environment for others to achieve the results outlined in either of the above points
- **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 of terrorism 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.

Schools have a duty to prevent children from becoming involved with or supporting terrorism. The DSL will undertake Prevent awareness training and make sure that staff have access to appropriate training to equip them to identify children at risk.

We will assess the risk of children in our school becoming involved with or supporting terrorism. This assessment will be based on an understanding of the potential risk in our local area, in collaboration with our local safeguarding partners and local police force.

We will ensure that suitable internet filtering is in place, and equip our children to stay safe online at school and at home.

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There is no single way of identifying an individual who is likely to be susceptible to radicalisation into terrorism. Radicalisation can occur quickly or over a long period.

Staff will be alert to changes in children's behaviour.

The government website [Educate Against Hate](#) and charity [NSPCC](#) say that signs that a child is being radicalised can include:

- Refusal to engage with, or becoming abusive to, peers who are different from themselves
- Becoming susceptible to conspiracy theories and feelings of persecution
- Changes in friendship groups and appearance
- Rejecting activities they used to enjoy
- Converting to a new religion
- Isolating themselves from family and friends
- Talking as if from a scripted speech
- An unwillingness or inability to discuss their views
- A sudden disrespectful attitude towards others
- Increased levels of anger
- Increased secretiveness, especially around internet use
- Expressions of sympathy for extremist ideologies and groups, or justification of their actions
- Accessing extremist material online, including on Facebook or Twitter
- Possessing extremist literature
- Being in contact with extremist recruiters and joining, or seeking to join, extremist organisations

Children who are at risk of radicalisation may have low self-esteem, or be victims of bullying or discrimination. It is important to note that these signs can also be part of normal teenage behaviour – staff should have confidence in their instincts and seek advice if something feels wrong.

If staff are concerned about a child, they will follow our procedures set out in [section 9](#) of this policy, including discussing their concerns with the DSL.

Staff should **always** take action if they are worried.

Further information on the school's measures to prevent radicalisation are set out in other school policies and procedures, including curriculum policy, behaviour policy, [Prevent strategy and policy](#) and [CAMHS online safety policy](#).

### **Sexual violence and sexual harassment between children in schools**

Sexual violence and sexual harassment can occur:

- Between 2 children of any age and sex
- Through a group of children sexually assaulting or sexually harassing a single child or group of children
- Online and face to face (both physically and verbally)

Sexual violence and sexual harassment exist on a continuum and may overlap.

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Children who are victims of sexual violence and sexual harassment will likely find the experience stressful and distressing. This will, in all likelihood, adversely affect their educational attainment and will be exacerbated if the alleged perpetrator(s) attends the same school.

If a victim reports an incident, it is essential that staff make sure they are reassured that they are being taken seriously and that they will be supported and kept safe. A victim should never be given the impression that they are creating a problem by reporting any form of abuse or neglect. Nor should a victim ever be made to feel ashamed for making a report.

When supporting victims, staff will:

- Reassure victims that the law on child-on-child abuse is there to protect them, not criminalise them
- Regularly review decisions and actions, and update policies with lessons learnt
- Look out for potential patterns of concerning, problematic or inappropriate behaviour, and decide on a course of action where we identify any patterns
- Consider if there are wider cultural issues within the school that enabled inappropriate behaviour to occur and whether revising policies and/or providing extra staff training could minimise the risk of it happening again
- Remain alert to the possible challenges of detecting signs that a child has experienced sexual violence, and show sensitivity to their needs

Some groups are potentially more at risk. Evidence shows that girls, children with SEN and/or disabilities, and lesbian, gay, bisexual and transgender (LGBT) children are at greater risk.

Staff should be aware of the importance of:

- Challenging inappropriate behaviours
- Making clear that sexual violence and sexual harassment is not acceptable, will never be tolerated and is not an inevitable part of growing up
- Challenging physical behaviours (potentially criminal in nature), such as grabbing bottoms, breasts and genitalia, pulling down trousers, flicking bras and lifting up skirts. Dismissing or tolerating such behaviours risks normalising them

If staff have any concerns about sexual violence or sexual harassment, or a child makes a report to them, they will follow the procedures set out in section 9 of this policy, as appropriate. In particular, sections 9.46-9.70 set out more detail about our school's approach to this type of abuse.

### **Serious violence**

Indicators which may signal that a child is at risk from, or involved with, serious violent crime may include:

- Increased absence from school.
- Change in friendships or relationships with older individuals or groups.
- Significant decline in performance.
- Signs of self-harm or a significant change in wellbeing.
- Signs of assault or unexplained injuries.



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- Unexplained gifts or new possessions (this could indicate that the child has been approached by, or is involved with, individuals associated with criminal networks or gangs and may be at risk of criminal exploitation (see above)).

Risk factors which increase the likelihood of involvement in serious violence include:

- Being male.
- Having been frequently absent or permanently excluded from school.
- Having experienced child maltreatment.
- Having been involved in offending, such as theft or robbery.

Staff will be aware of these indicators and risk factors. If a member of staff has a concern about a child being involved in, or at risk of, serious violence, they will report this to the DSL.

### **Checking the identity and suitability of visitors**

Due to the nature of our provision, all visits to the school will be pre-arranged.

On arrival, visitors will be required to verify their identity to the satisfaction of staff and to leave their belongings, including their mobile phone(s), in a safe place during their visit.

Visitors are expected to sign the visitors' book and wear a visitor's badge, along with along with all further requirements set out in [Visits to Individuals \(including children and solicitors\)](#).

Visitors to the school who are visiting for a professional purpose, such as educational psychologists and school improvement officers, will be asked to do the above and:

- Will be asked to show their DBS certificate, which will be checked alongside their photo ID; or
- The organisation sending the professional, such as the LA or educational psychology service, will provide prior written confirmation that an appropriate level of DBS check has been carried out (if this is provided, we will not ask to see the DBS certificate).

All other visitors, including visiting speakers, will be accompanied by a member of staff at all times. We will not invite into the school any speaker who is known to disseminate extremist views, and will carry out appropriate checks to ensure that any individual or organisation using school facilities is not seeking to disseminate extremist views or radicalise children or staff.

### **Missing students**

All of our students are resident within the adjoined hospital service. The whereabouts of every student on roll will be established before the start of the school day at hospital daily risk assessment (DRA) meetings. In keeping with the school's role as multi-disciplinary team (MDT) members, we will support the team to implement wider hospital policies in the event a child is missing from the service. These procedures are detailed within the [Absent Without Leave and Missing Policy](#).