



# **Safeguarding Children Policy (Including Child Protection Policy)**

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Policy Author:	Designated Safeguarding Lead
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## **Safeguarding Children Policy (Including Child Protection Policy)**

This guidance supports governing bodies, proprietors and senior leadership teams and designated safeguarding leads to continue to have appropriate regard to KCSIE and keeping their children safe and in line with DfE guidance. Since September 2022 children returned to school without any COVID-19 measures in place. However, the School recognises that in the future we may well need to return to working from home and as such Appendix 10 has been adapted and will remain in place to provide information for when pupils and staff have to work from home, even for a short period, and for any future need for school closure.

### School Details September 2024

Safeguarding Governor and Lead Governor for Prevent: Sally Mills

Governor's committee responsible for ratifying: Full board

Deputy Head Pastoral: Miss Juliana Atyeo

Designated Safeguarding Lead (DSL) **RGS Worcester**, Prevent Single Point of Contact (SPOC), Child Sexual Exploitation (CSE) and GETSAFE Lead, Designated Senior Mental Health Lead and member of the Senior Leadership Team: Mrs Sofia Nicholls (Assistant Head DSL)

DSL **RGS Dodderhill**: Mrs Sarah Clay (Deputy Head at RGS Dodderhill)

DSL **RGS The Grange**: Mrs Wendy Wreghitt (Deputy Head at RGS The Grange, Designated Senior Mental Health Lead)

DSL **RGS Springfield**: Mr Ian Griffin (Deputy Head, RGS Springfield)

Deputy DSLs **RGS Worcester**: Miss Juliana Atyeo, Mr John Jones and Mrs Angela Newport

Deputy DSLs **RGS Dodderhill**: Mr Tom Banyard and Mrs Caroline Vinson

Deputy DSLs **RGS The Grange**: Mr Gareth Hughes, Mrs Katie Bradley, Mrs Marie-Claire Egginton, Mr Tom McCallion and Miss Clare Mullins

Deputy DSL **RGS Springfield**: Miss Naomi Cambray

EYFS DSL at **RGS The Grange**: Mrs Phenice Fletcher

EYFS DSL and member of the Senior Leadership Team at **RGS Springfield**: Miss Naomi Cambray

EYFS DSL and member of the Senior Leadership Team at **RGS Dodderhill**: Mrs Hannah Fewtrell-Bolton

DSL (Holiday Club): Miss Clare Mullins

This policy will be made available to parents on request and is available on the School website.

In addition, the following documents are available in the staff handbook and copies can be obtained from the Designated Safeguarding Leads at all schools: -

- [Working Together to Safeguard Children 2018 \(updated February 2024\)](#)
- [Keeping Children Safe in Education, Department for Education September \(KCSIE\) 2024](#)

**Next Review Date:** By at least 1 September 2025

**There are Ten Appendices that form part of this policy and they can be found at the end of the policy.**

## **1. Introduction**

**The four RGS schools fully recognise their moral and statutory responsibilities for safeguarding and promoting the welfare of children.**

The School's duty is to ensure that safeguarding permeates all activity and functions. This policy therefore complements and supports many other policies (including our Staff Code of Conduct, Whistleblowing Policy, Mobile Phone Policy (RGS Springfield, RGS The Grange and RGS Dodderhill only), Risk Assessment Policy, Complaints Policy, Rewards Behaviour and Sanctions Policy, Anti-Bullying Policy, Child on Child Abuse Policy, Special Educational Needs and Disabilities Policy, Educational Visits Policy, Medical and First Aid Policy, Health and Safety Policy, Sex and Relationships Policy, Images Policy, Equal Opportunities in Education and Online Safety & Acceptable Use of Smart Devices Policy) and adheres to the statutory guidance Keeping Children Safe in Education issued by the Department of Education and with the most recent update in September 2024. This list of relevant policies is not exhaustive, but it is accepted that when undertaking development or planning of any kind the School will consider safeguarding matters as part of this process. This policy has been developed in accordance with the principles established by the Children Acts 1989 and 2004; the Human Rights Act 1998; the Education Act 2002; the Equality Act 2010 (including the Public Sector Equality Duty); the Education and Training (Welfare of Children) Act 2021; and in line with government publications the Teachers' Standards 2012, Working Together to Safeguard Children 2018 (updated February 2024) 'Keeping Children Safe in Education' (KCSIE) September 2024. Please note that the School's Radicalisation and Extremism Self Risk Assessment is available in the Staff Handbook or can be requested from the DSL.

**There are five main elements to our policy:**

- Ensuring we practise safe recruitment in checking the suitability of staff and volunteers to work with children;
- Raising awareness of child protection issues and equipping children with the skills needed to keep them safe;
- Developing and then implementing procedures for identifying and reporting cases, or suspected cases, of abuse;
- Supporting pupils who have been identified as in need of early help or at risk of harm in accordance with his/her agreed Child Protection, Child in Need or Early Help plan;
- Establishing a safe environment in which children can learn and develop.

Our policy applies to all staff, part time and full time, permanent or temporary, governors and volunteers working in the four RGS schools, hereafter referred to as 'the School' or 'RGSW' or 'We'. The School believes that safeguarding and promoting the welfare of children is **everyone's responsibility**. Everyone that comes into contact with children has a role to play in identifying concerns, sharing information and taking prompt action. In order to fulfil this responsibility effectively, everyone should make sure that their approach is child centred and that they consider at all times what is in the best interests of the child.

Safeguarding and promoting the welfare of children is defined for the purposes of this guidance as:

- providing help and support to meet the needs of children as soon as problems emerge
- protecting children from maltreatment, whether that is within or outside the home, including online preventing the impairment of children's mental and physical health or development

- ensuring that children grow up in circumstances consistent with the provision of safe and effective care
- taking action to enable all children to have the best outcomes

We recognise that because of the day-to-day contact with children, school staff are well placed to identify concerns early and to observe the outward signs of abuse. The School will therefore:

- Establish and maintain an environment where children feel safe, secure, valued and respected and encouraged to talk, believing they will be listened to;
- Ensure children know that there are adults in the School whom they can approach if they are worried;
- Have regard to the DfE statutory guidance 'Relationships education, relationships and sex education (RSE) and health education' (Published June 2019, last updated Sept 2021) by including opportunities in the curriculum, specifically through PSHCE, Computing and IT for children to develop the skills they need to recognise and stay safe from abuse and to know who they should turn to for help.

- We are committed to ensuring that children are taught about safeguarding in our schools. The following areas are among those addressed in our PSHCE lessons, Assemblies and the wider curriculum:

Bullying (Including Cyberbullying, Prejudice-based and Discriminatory Bullying), Drugs, Alcohol and Substance Abuse, Online Safety and the safe use of Mobile Technology, Stranger Danger, Fire and Water Safety, Child on Child Abuse, Sexual Violence and Sexual Harassment and appropriate child-on-child sexual conduct, Road Safety, Domestic Abuse, Healthy Relationships and Consent, Preventing Radicalisation and Extremism, So-called 'Honour-based' Abuse Issues (HBA) e.g. Forced Marriage, Female Genital Mutilation (FGM) and Child Exploitation

- We seek to ensure that the child's wishes and feelings are taken into account when determining what action to take and what services to provide to protect children from harm. To this end we will ensure:
  - there are systems in place for children to express their views and give feedback e.g. through school/class councils, safety questionnaires, participation in anti-bullying and e-safety events;
  - that the child's thoughts/wishes and feelings are sought and recorded on all referrals.
- The School has an important role to play in supporting the mental health and wellbeing of its pupils. 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.

Staff can access a range of advice to help them identify children in need of extra mental health support, as well as working with external agencies as required. More information can be found in the DfE Mental Health and Behaviour in Schools guidance. Public Health England has produced a range of resources, to support teachers to promote positive mental health, wellbeing and resilience among young people. Each of the Schools has a qualified School Counsellor, with three based at RGS Worcester, and one at each of the other RGS schools, who works closely with the DSLs and can provide advice and guidance with any concerns about children that may need extra mental health support. If there is a mental health concern about a child that is also a safeguarding concern, immediate action should be taken, in accordance with that outlined in this policy, by speaking to a DSL or a Deputy DSL.

- We will continue to work closely with our local Police partners to ensure that we understand any local trends in crime that may result in our pupils being at risk of becoming involved in crimes, including criminal exploitation (including the risk of drug dealing/use and associated criminal behaviour and possible Child Sexual Exploitation. Current crime statistics (<https://www.police.uk/your-area/metropolitan-police-service/worcester-park-south/?yourlocalpolicingteam=about-us>) (June 2024) for the area local to all four of the RGS schools can be found in the previous link.

## 2. Procedures

RGSW will follow the procedures set out by the [West Midlands Safeguarding Procedures](#) as required by the [Worcestershire Safeguarding Children Partnership \(WSCP\)](#) and take account of guidance issued by the Department for Education (DfE).

### The School will:

- Ensure it has a Senior Leader nominated as a Designated Safeguarding Lead (DSL) who will undertake regular, appropriate training and support for this role;
- Ensure that there is a designated member of staff with responsibility for safeguarding children within the Foundation Stage (EYFS);
- Ensure it has a member of staff who will act in the absence of the DSL;
- Ensure it has a nominated governor who will take leadership responsibility for the School's safeguarding arrangements;
- Ensure the SLT at each of our Schools are fully aware of all safeguarding requirements and appropriately trained in safeguarding children.

### **The names of the individuals currently undertaking these roles can be found in the [School Details](#) section of this document, above;**

- Ensure every member of staff (including temporary and supply staff and volunteers) and the governing body knows the name of the DSL and any deputies and understands their role;
- Ensure that the DSL and/or a deputy DSL (dDSL) are always available to speak to during school hours and has made adequate and appropriate cover arrangements for any out of hours/out of term time activities;
- Ensure all staff and volunteers are alert to the potential need for early help and aware of those children whose vulnerabilities may indicate a greater need and are aware of the role they may play in supporting other agencies and professionals in an early help assessment;
- Ensure all staff and volunteers understand their responsibilities in being alert to the signs of abuse, neglect and exploitation, including the specific issues of Female Genital Mutilation (FGM), child sexual exploitation (CSE), children missing education (CME), Radicalisation and Extremism (Prevent), Serious Crime, Child on Child abuse and Sexual Violence & Sexual Harassment, and maintain an attitude of "it could happen here". Please refer to [Appendix 2 'Recognition and Identification of Abuse'](#) for guidance. All staff must always act in the best interest of the child;
- Ensure all staff and volunteers understand their responsibility for referring any concerns to the DSL or other members of the senior leadership team in a timely manner and are aware that they may raise concerns directly with Children's Social Care Services if they believe their concerns have not been listened to or acted upon;
- The School will report immediately to Children's Social Care Services any children who have suffered or are likely to suffer significant harm. The School will work with external agencies in-line with procedures set out by the Worcestershire Safeguarding Children Partnership (WSCP) and take account of guidance issued by the Department of Education (DfE) to support children who are in need of additional support. The School will act to promote the welfare of a child in need of additional support, even if they are not suffering harm or are not at immediate risk;
- Ensure that parents have an understanding of the responsibility placed on the School and staff for child protection by setting out its obligations and publishing the policy on the School's website;
- Notify Worcestershire Children First if there is an unexplained absence of more than two days of a pupil who is subject to a child protection plan;
- Operate a lettings policy which ensures the suitability of adults working with children on school

sites at any time; ensure that community users organising activities for children are aware of, and understand the need for compliance with, the School's child protection guidelines and procedures;

- Develop effective links with relevant agencies and co-operate as required with their enquiries regarding safeguarding matters including attendance at strategy meetings, initial case conference, core groups and child in need review meetings;
- Ensure that the duty of care towards its pupils and staff is promoted by raising awareness of illegal, unsafe and unwise behaviour and assist staff to monitor their own standards and practice;
- Ensure that all staff and volunteers feel able to raise concerns about poor or unsafe practice and are aware of whistleblowing procedures and helplines;
- Be aware of and follow procedures set out by the Department for Education, Children's Services and the WSCP where an allegation of abuse is made against a member of staff or volunteer, including making a referral to the Local Authority Designated Officer (LADO);
- Ensure that a referral is made to DBS and/or Teacher Regulation Agency if a person in regulated activity has been dismissed or suspended or removed from regulated activity where the harm criteria is met, due to safeguarding concerns, or would have been had they not resigned. Such referrals will always be given priority and will be done promptly and made within at least one month of the person leaving our employment;
- Operate safer recruitment practice, ensuring that at least one member on every recruitment panel has completed safer recruitment training and make sure that all appropriate checks are carried out on new staff and volunteers who will work with children. Full details of the School's safer recruitment procedures for checking the suitability of staff, Governors and volunteers to work with children and young people is set out in the School's Safer Recruitment Policy;
- As Education Safeguarding Practitioners we will liaise with the three safeguarding partners in-line with Working Together to Safeguard Children;
- Ensure that the appropriate training in Safeguarding is provided to the Governing Body and all members of staff, including volunteers and contracted staff, within all four schools;
- Ensure that the Governing Body undertake an annual review of the School's child protection policies and procedures and of the efficiency with which the related duties have been discharged in accordance with current legislation;

Our procedures will be reviewed and updated at least annually unless an incident or new legislation or guidance requires the need for an interim review. We recognise the expertise our staff builds by undertaking safeguarding training and managing safeguarding concerns on a daily basis. We therefore invite staff to contribute to and shape this policy and associated safeguarding arrangements.

### **3. Training**

When staff and volunteers join RGSW they will be informed of the safeguarding children arrangements in place. This policy will be referred to and they will be told who the DSL in each part of the School is and who acts in their absence and what this role includes.

Staff are required to read the staff handbook which includes copies of this Policy including its Appendices and the School's safeguarding response to children who go missing from education, the Rewards, Behaviour and Sanctions policy, the current Keeping Children Safe in Education Part 1 (or Annex A and Annex B for school leaders and those who work directly with children), the School Staff Code of Conduct which includes the Guidance for Safer Working Practice. Additionally, all Governors are required to read part 2 KCSIE.

All staff, volunteers and Governors will receive induction in Safeguarding Children. The induction programme will include comprehensive safeguarding information and training (including the Prevent initiative, LGBTQ+ and on-line safety) relating to signs and symptoms of abuse, how to manage a



disclosure from a child and when and how to record a concern about the welfare of a child, advice on safe working practice, the School's Safeguarding Children Policy, the School's Child on Child Abuse Policy, the Staff Code of Conduct Policy and the identity of the DSLs.

As part of this training programme:

- In addition, all staff will receive safeguarding and child protection (including online safety) updates (for example, via email, e-bulletins, and staff meetings), as required, and at least annually, to continue to provide them with relevant skills and knowledge to safeguard children effectively.

As part of this induction programme, and as updates for existing staff, In-line with the statutory requirement, RGSW requires that:

- **Gardeners, Grounds Staff, Caterers and Cleaners** to acknowledge that they have **read and understood** Annex A of KCSIE September 2024.
- Catering staff also have to read a document from the school detailing the School's expectations from them with regard to safeguarding and safer working practice, but as contracted staff they are not required to read our Safeguarding Children Policy or Staff Code of Conduct. Gardeners, Grounds Staff and Cleaning Staff will be expected to acknowledge that they have read and understood the School's Safeguarding Children Policy and the Staff Code of Conduct.
- **All other staff, including Governors, Members of the Senior Leadership Team (SLT), Teachers, Caretaking Staff, Administrators and Support Staff Managers**, are required to acknowledge that they have **read and understood** Part 1 and Annex B of KCSIE September 2024 and other key policies as directed by the School, as they either work directly with children or are likely to be required to do so, as and when the need arises.
- In addition, all Governors, Heads, members of SLT, DSLs and Deputy DSLs and other staff with positions of responsibility will be directed to read either all or other relevant sections of KCSIE September 2024.

All volunteers, supply staff, peripatetic staff and regular visitors to the School will be told where this policy is kept and given the name of the DSL and deputy/ies and informed of the School's procedures in reporting concerns. In addition, Volunteers on school residential trips will be appropriately trained by the DSL at each school to ensure that the safety of all children and staff is maintained.

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

In addition, staff will receive safeguarding and child protection updates from the DSL as required, but at least annually.

Staff with specific responsibility for safeguarding children will undertake both single and inter-agency training at a level suitable to their role and responsibility, updated every two years. In addition to formal training the DSL and deputy/ies will update their knowledge and skills via WSCP newsletters, briefings, network meetings and seminars, at regular intervals, and at least annually.

Staff with leadership responsibilities will undertake further relevant training in safeguarding related issues such as CSE, FGM, Radicalisation, Sexual Violence and Sexual Harassment, Mental Health,

Management of Allegations of Abuse and cascade the learning from this training to the rest of the staff.

#### 4. Responsibilities

The RGSW Governing Body has nominated a member to take leadership responsibility for safeguarding children, Mrs Sally Mills, who will liaise with the DSL and/or Head in matters relating to safeguarding.

#### **The Governing Body, in accordance with the Statutory Guidance “Keeping Children Safe in Education” September 2024, will ensure that:**

- The School has Safeguarding policy, procedures and training in place, which are effective and comply with the law at all times. The policy is made available publicly (and therefore including to parents) on the School website and reviewed at least annually or more often, for example in the event of new guidance or a significant incident;
- The Chair of the Governing body must ensure that enhanced DBS checks are undertaken, for the other members of the body and that where such a check has been undertaken, an enhanced DBS certificate is obtained, and that identity checks are completed before, or as soon as practicable after, any individual takes up their position. The Chair must also ensure that other members are not subject to a section 128 direction that would prevent them from taking part in the management of an independent school. Further checks, as the chair considers appropriate, should be undertaken where, by reason of the individual’s living or having lived overseas, obtaining an enhanced DBS certificate is not sufficient to establish his or her suitability to work in a school.
- The School operates safer recruitment practices, including appropriate use of references and checks on new staff and volunteers. Furthermore, the Head, a nominated Governor and all other staff involved in the recruitment process have undertaken Safer Recruitment Training;
- There are procedures for dealing with allegations of abuse against members of staff and volunteers/people in a position of trust; these procedures include concerns and allegations that may meet the harms test as well as those that are considered low-level concerns, as set out in Part 4 of Keeping Children Safe in Education September 2024.
- There is a Designated Safeguarding Lead (DSL) who is a senior member of the School’s leadership team to take the lead responsibility for dealing with child protection and there is always cover for this role (at least one deputy) with appropriate arrangements for before/after school and out of term activities;
- The DSL takes lead responsibility for safeguarding and child protection and does not delegate this responsibility;
- The DSL and Deputy DSL (dDSL) role is explicit in the role holders’ job descriptions;
- The DSL and Deputies undertake effective safeguarding training (in addition to basic child protection training) and this is refreshed every two years. In addition to this formal training, their knowledge and skills are updated at regular intervals (at least annually) via, for example, safeguarding e-briefings etc;
- The Head, the Governing Body and all other staff and volunteers who work with children (including early years practitioners within settings on the School site), undertake appropriate training which is regularly updated (at least every year); and that new staff and volunteers who work with children are made aware of the School’s arrangements for child protection and their responsibilities (including this Policy and Part 1 or Annex A of KCSIE September 2024. Training will include, but not be limited to, FGM, Prevent, Child Exploitation, Child on Child abuse, LGBTQ+, on-line safety and sexual violence and sexual harassment between children;
- Children are taught about safeguarding, including online safety, and we recognise that a one size fits all approach may not be appropriate for all children, and a more personalised or

contextualised approach for more vulnerable children, victims of abuse and some SEND children might be needed.

- Safeguarding responses are put in place in cases where children go missing from education;
- Mechanisms are in place to assist staff to understand and discharge their role and responsibilities as set out in Part one (or Annex A) of Keeping Children Safe in Education;
- The School contributes to inter-agency working in line with statutory guidance Working Together to Safeguard Children including providing a co-ordinated offer of Early Help for children who require this. This Early Help may be offered directly through school provision or via referral to an external support agency. Details of our provision for Early Help can be found on the [Safeguarding](#) and [Additional Care](#) sections of the School website through the Supporting Families document. Safeguarding arrangements take into account the procedures and practice of the local authority and the Worcestershire Safeguarding Children Partnership (WCSP);
- Governors are aware that among other obligations, the Data Protection Act 2018 and the GDPR place duties on organisations and individuals to process personal information fairly and lawfully and to keep the information they hold safe and secure in [Data protection: toolkit for schools](#) - (updated 2024) Guidance to support schools with data protection activity, including compliance with the GDPR;
- Termly reports on the effectiveness of the School's safeguarding procedures are presented to the governing body and submitted to WCSP, if requested;
- Any returns requested by the LAWSCP (e.g. s175/157 audit, CSE audit) are completed in a timely manner to enable the WCSP to meet its statutory duties;
- Any deficiencies or weaknesses brought to its attention relating to safeguarding are remedied without delay;
- It complies with all legislative duties, including the duty to report suspected or known cases of FGM and the duty to prevent young children from being drawn into terrorism.
- Governors are aware of the [Charity Commission guidance](#) on charity and trustee duties to safeguard children.
- Governors are aware of their obligations under the Human Rights Act 1998, the Equality Act 2010 (including the Public Sector Equality Duty) and their local multi-agency safeguarding arrangements.

#### **The Heads will ensure that:**

- The Safeguarding policies and procedures are fully implemented and followed by all staff and particularly concerning referrals of cases of suspected abuse, neglect and exploitation;
- Sufficient funding, support, time and resources are allocated to enable the DSL and other staff to discharge their responsibilities with regard to child protection, including taking part in strategy discussion and other inter-agency meetings, and contributing to the assessment of children;
- All staff feel able to raise concerns about poor or unsafe practice and that these are handled sensitively and in accordance with the whistleblowing procedures effectively and in a timely manner and that The NSPCC whistleblowing helpline number is available (0800 0280285);
- All staff are made aware that they have an individual responsibility to pass on safeguarding concerns and that if all else fails to report these directly to Children's Social Care (Children's Services) or the Police.
- All allegations of abuse against staff are reported to the Local Authority Designated Officer (LADO) in a timely manner.

#### **The Role and Responsibilities of the Designated Safeguarding Lead (DSL):**

The Governing body will ensure that an appropriate senior member of staff from the School's leadership team is appointed to the role of DSL at each of the four RGS Schools.

The DSL will co-ordinate action on safeguarding and promoting the welfare of children within the School setting. The DSL will take **lead responsibility** for safeguarding and child protection (including online safety) and this is explicit in the role-holder's job description. The DSL should have the appropriate status and authority within the School to carry out the duties of the post.

The DSL and any deputies will liaise with the three safeguarding partners as required and work with other agencies in-line with Working Together to Safeguard Children. The DSL may consult the document [NSPCC- When to call the police](#) to understand when they should consider calling the police and what to expect when they do.

### **The DSL is responsible for:**

#### **1. Managing Referrals**

- refer cases of suspected abuse to the local authority children's social care as required making use of the Levels of Need guidance when making a decision about whether or not the threshold for Early Help or Children's Social Care intervention is met. Informal advice on borderline cases and as required will be sought from an adviser at the Family Front Door;
- Refer a child to the Family Front Door when there are concerns about possible abuse, neglect and exploitation. The DSL will contact the Police in the case of serious harm;
- support staff who make referrals to local authority children's social care;
- Refer a child to the Channel programme promptly when there are concerns about possible radicalisation or involvement in extremist groups;
- support staff who make referrals to the Channel programme;
- refer cases where a person is dismissed or left due to risk/harm to a child to the Disclosure and Barring Service as required; and
- refer cases where a crime may have been committed to the Police as required.
- Liaising with other staff (for example pastoral support staff, school nurses or counsellors, IT technicians, Head of Learning Development) on matters of safety and safeguarding and when deciding whether to make a referral by liaising with relevant agencies;
- Keeping written records of concerns about children, including the use of body maps, even where there is no need to refer the matter immediately. Note staff must only view parts of a child's body which are normally visible;
- Notifying the key worker if there is an unexplained absence of more than two days of a pupil who is subject to a child protection plan;
- Monitoring unauthorised absence, particularly where children go missing on repeated occasions, reporting concerns in-line with the Schools' Missing Child Policies;
- Co-ordinating a programme of safety, health and well-being through the curriculum, including issues of protective behaviours, healthy relationships, staying safe on-line, and the active promotion of fundamental British Values.

#### **2. Work with others**

The DSL is expected to:

- act as a point of contact with the three safeguarding partners. Developing effective links with relevant agencies and other professionals and co-operate as required with their enquiries regarding safeguarding matters including co-operation with serious case reviews, attendance at strategy meetings, initial and review child protection conferences, core group and child in need review meetings;
- Contributing to assessments and providing a report to initial and review conferences, if requested, which has been shared with parents first, whenever possible;

- liaise with the Head to inform him or her of all child protection issues, especially ongoing enquiries under section 47 of the Children Act 1989 and police investigations;
- Undertaking, in conjunction with the Head and Safeguarding Governor, an annual audit of safeguarding procedures, using the County s175/157 audit or similar;
- as required, liaise with the “case manager” (as detailed in Section 21, Allegations Against Staff, of this document, and Part four of KCSIE and usually the Head) and the LADO for child protection concerns in cases which concern a staff member;
- liaise with staff (especially pastoral support staff, school nurses, IT Technicians, and SENCOs, and Senior Mental Health Leads) on matters of safety and safeguarding (including online and digital safety) and when deciding whether to make a referral by liaising with relevant agencies; and
- act as a source of support, advice and expertise for all staff.

### **3. Training**

The DSL and any deputies should undergo appropriate formal training to provide them with the knowledge and skills required to carry out the role. The training should be updated every two years. In addition to their formal training, their knowledge and skills should be updated (for example via e-bulletins, meeting other designated safeguarding leads, or taking time to read and digest safeguarding developments), at regular intervals, and at least annually, to keep up with any developments relevant to their role.

The DSL should also undertake Prevent awareness training, Mental Health Awareness training and Online Safety Training.

Training should provide DSLs with a good understanding of their own role, and the processes, procedures and responsibilities of other agencies, particularly children’s social care, so they:

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

#### **4. Raise Awareness**

The DSL should:

- ensure the School's child protection policies are known, understood and used appropriately;
- organise child protection induction training for all newly appointed staff, volunteers and Governors and whole staff training, with regular updates, at least annually to ensure that all staff understand and are able to discharge their role and responsibilities as set out in Part one or Annex A of Keeping Children Safe in Education;
- ensure the School's child protection policy is reviewed annually (as a minimum) and the procedures and implementation are updated and reviewed regularly, and work with governing bodies or proprietors regarding this;
- ensure the child protection policy is available publicly and parents are aware of the fact that referrals about suspected abuse or neglect may be made and the role of the School in this;
- link with the safeguarding partner arrangements to make sure staff are aware of any training opportunities and the latest local policies on local safeguarding arrangements.
- help promote educational outcomes by sharing the information about the welfare, safeguarding and child protection issues that children, including children with a social worker, are experiencing, or have experienced, with teachers and school leadership staff. Their role includes ensuring that the School, and their staff, know who these children are, understand their academic progress and attainment and maintain a culture of high aspirations for this cohort; supporting teaching staff to identify the challenges that children in this group might face and the additional academic support and adjustments that they could make to best support these children.

#### **5. Child protection file**

Ensuring all child protection records are kept securely, separate from the main pupil file, and in locked/password protected locations;

Ensuring that all child protection files are transferred to the new school or college in a safe and timely manner when a child moves settings (including for in-year transfers), both between and across phases, within and out of County and that a receipt of transfer is obtained;

This should be transferred separately from the main pupil file, ensuring secure transit, and confirmation of receipt should be obtained. Receiving schools and colleges should ensure key staff such as DSLs and SENCOs or the named person with oversight for SEN in colleges, are aware as required. In addition to the child protection file, the DSL should also consider if it would be appropriate to share any information with the new school or college in advance of a child leaving. For example, information that would allow the new school or college to continue supporting victims of abuse and have that support in place for when the child arrives.

#### **6. Availability**

During term time, the DSL and/or Deputy DSL should always be available (during school hours) for staff in the School to discuss any safeguarding concerns. If required, in exceptional circumstances, this may necessitate the DSL and/or deputy being available by phone and/or remotely e.g. via Google Meet and the School will ensure that a senior member of staff is on-site and will assume responsibility for co-ordinating safeguarding on-site. This will include liaising with the offsite DSL as required. Appropriate cover arrangements will be in place for any out of hours/out of term activities. In addition to this, there is a DSL Duty Rota in place which ensures that a DSL or DDSL from one of our four schools is available to deal with any safeguarding concerns during holiday periods.

### **5. Procedures for Managing Concerns**

Teachers and other staff in schools are in a unique position to observe children's behaviour over time and often develop close and trusting relationships with pupils. If a child discloses directly to a member of staff, the following advice to staff will be followed:

- Listen carefully to what is said.
- Do not promise confidentiality.
- Ask only open questions such as:  
'Could you tell me what happened?'  
'Please explain what you mean when you say....?'  
'Can you describe the person? or Can you describe the place?'
- Do not ask questions which may be considered to suggest what might have happened, or who has perpetrated the abuse, e.g. 'Did your Dad hit you?'
- Do not force the child to repeat what he/she said in front of another person.

Do not begin an investigation – for example by asking the child to record what happened in writing or taking a photograph of any injuries.

Our School adheres to child protection procedures that have been agreed locally through the Worcestershire Safeguarding Children Partnership (WSCP). Where we identify children and families in need of support, we will carry out our responsibilities in accordance with the West Midlands Safeguarding Children Procedures and the WSCP Levels of Need Guidance.

Every member of staff, including volunteers working with children at our School, is advised to maintain an attitude of 'it could happen here' where safeguarding is concerned. When concerned about the welfare of a child, staff members should always act in the interests of the child and have a responsibility to take action as outlined in this policy. They should not assume a colleague or another professional will take action and share information that might be critical in keeping children safe.

All staff are encouraged to report any concerns that they have and not see these as insignificant. On occasions, a referral is justified by a single incident such as an injury or disclosure of abuse. More often however, concerns accumulate over a period of time and are evidenced by building up a picture of harm over time; this is particularly true in cases of emotional abuse, neglect and exploitation. In these circumstances, it is crucial that staff record and pass on concerns in accordance with this policy to allow the DSL to build up a picture and access support for the child at the earliest opportunity. A reliance on memory without accurate and contemporaneous records of concern could lead to a failure to protect.

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

Any child may benefit from early help, but all staff should be particularly 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 care or from home
- is at risk of modern slavery, trafficking, sexual and/or criminal exploitation
- is at risk of being radicalised
- 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 themselves
- is suffering from mental ill health
- has returned home to their family from care
- is a privately fostered child
- has a parent or carer in custody
- is missing education, or persistently absent from school, or not in receipt of fulltime education
- has experienced multiple suspensions and is at risk of, or has been permanently excluded

As defined in 'Working Together to Safeguard Children' (Section 124)

All staff, but especially the designated safeguarding lead (and deputies) should consider whether children are at risk of abuse or exploitation in situations outside their families. Extra-familial harms take a variety of different forms and children can be vulnerable to multiple harms including (but not limited to) sexual exploitation, criminal exploitation, sexual abuse, serious youth violence and county lines.

All staff should be aware that technology is a significant component in many safeguarding and wellbeing issues. Children are at risk of abuse online as well as face to face. In many cases abuse will take place concurrently via online channels and in daily life.

It is *not* the responsibility of school staff to investigate welfare concerns or determine the truth of any disclosure or allegation. All staff, however, have a duty to recognise concerns and pass the information on in accordance with the procedures outlined in this policy.

The Designated Safeguarding Lead (DSL) should be used as a first point of contact for concerns and queries regarding any safeguarding concern in our School. Any member of staff or visitor to the School who receives a disclosure of abuse or suspects that a child is at risk of harm must report it immediately to the DSL or, if unavailable, to the deputy designated lead. In the absence of either of the above, the matter should be brought to the attention of the most senior member of the Senior Leadership Team that is on duty or Children's Social Care.

All concerns about a child or young person should be reported without delay and a written record should be made as soon after the disclosure as possible, using the child's words as far as possible, and on the pro-forma given in [Appendix 1](#) of this policy. Members of staff are also able to log a concern via the School's electronic safeguarding system, called 'myconcern'. This can be accessed via the link on Schoolweb (click login in the top left corner and select the 'Myconcern Safeguarding' tab from the Staff area on the portal dropdown menu) or via this [Myconcern login page](#). Use body maps to record any observed injuries. Following receipt of any information raising concern, the DSL will consider what



action to take and seek advice from Children's Services Community Social Workers as required. All information and actions taken, including the reasons for any decisions made, will be fully documented.

Options for action include:

- Managing any support for the child internally via the School's own pastoral support process;
- An early help assessment
- A referral for statutory services, for example as the child might be in need, is in need or suffering or likely to suffer harm.

All referrals will be made in line with local procedures detailed on the Worcestershire Children First Website.

If, at any point, there is a risk of immediate serious harm to a child a referral should be made to Worcestershire Children First immediately. Anybody can make a referral. If the child's situation does not appear to be improving the staff member with concerns should press for re-consideration by raising concerns again with the DSL and/or the Head. Concerns should always lead to help for the child at some point.

Staff should always follow the reporting procedures outlined in this policy in the first instance. However, they may also share information directly with Children's Services, or the police if:

- the situation is an emergency and the designated senior person, their deputy and the Head are all unavailable;
- they are convinced that a direct report is the only way to ensure the pupil's safety.

Any member of staff who does not feel that concerns about a child have been responded to appropriately and in accordance with the procedures outlined in this policy should raise their concerns with the Head, Safeguarding Governor or the Chair of Governors. If any member of staff does not feel the situation has been addressed appropriately at this point, they should contact Children's Services directly with their concerns.

School staff should expect to support social workers and other agencies following any referral and the DSL will oversee this.

## **6. Specific Safeguarding Issues**

### **6.1. Children Missing Education (CME)**

We recognise that when a child going missing from education, particularly repeatedly, it can act as a vital warning sign of a range of safeguarding possibilities. This may include abuse, neglect and exploitation, which may include sexual abuse or exploitation and can also be a sign of child criminal exploitation including involvement in county lines. It may indicate mental health problems, risk of substance abuse, risk of travelling to conflict zones, risk of female genital mutilation or risk of forced marriage. Early intervention is necessary to identify the existence of any underlying safeguarding risk and to help prevent the risks of a child going missing in future.

Our procedures for dealing with children that go missing from education are based on the Worcestershire children first children missing from education guidance (June 2022) and West Midlands Safeguarding Children procedures. Staff are made aware of these procedures at induction and through our Attendance Policy. We will obtain more than one emergency contact number for each child registered at the School to ensure we are able to make contact with a responsible adult when a child

missing education is also identified as a welfare and/or safeguarding concern. We will ensure that we report children missing education to the LA CME officer, in-line with statutory requirements.

Where a parent has expressed their intention to remove a child from school with a view to educating at home, we will attempt to work with other key professionals to coordinate a meeting with parents where possible. Ideally, this will be before a final decision has been made, to ensure the parents have considered what is in the best interests of each child. This is particularly important where a child has SEND, is vulnerable, and/or has a social worker.

We will ensure that we inform the local authority when removing a child from the School role at standard and non-standard transition points in line with the [DfE guidance on Children Missing Education](#).

## **6.2. Child Abduction and Community Safety Incidents**

We recognise that Child abduction is the unauthorised removal or retention of a minor from a parent or anyone with legal responsibility for the child. Child abduction can be committed by parents or other family members; by people known but not related to the victim (such as neighbours, friends and acquaintances); and by strangers.

Other community safety incidents in the vicinity of a school can raise concerns amongst children and parents, for example, people loitering nearby or unknown adults engaging children in conversation.

As children get older and are granted more independence (for example, as they start travelling to school independently) it is important we provide practical advice on how to keep themselves safe. As a School we provide this information through assemblies that are delivered by our staff as well as by local police staff. Lessons focus on building children's confidence and abilities rather than simply warning them about all strangers. Further information is available at: [www.actionagainstabduction.org](http://www.actionagainstabduction.org) and [www.clevernevergoes.org](http://www.clevernevergoes.org).

## **6.3. Serious Violence including Child Criminal Exploitation (CCE), Child Sexual Exploitation (CSE) and County Lines. see Appendix 3 and Appendix 4**

All staff should be aware of the indicators, which may signal children are at risk from, or are involved with serious violent crime. These may include increased absence from school, a change in friendships or relationships with older individuals or groups, a significant decline in performance, signs of self-harm or a significant change in wellbeing, or signs of assault or unexplained injuries. Unexplained gifts or new possessions could also indicate that children have been approached by, or are involved with, individuals associated with criminal networks or gangs and may be at risk of criminal exploitation. All staff should be aware of the range of risk factors which increase the likelihood of involvement in serious violence, such as being male, having been frequently absent or permanently excluded from school, having experienced child maltreatment and having been involved in offending, such as theft or robbery.

We recognise that CCE is where an individual or group takes advantage of an imbalance in power to coerce, control, manipulate or deceive a child into any criminal activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial or other advantage of the perpetrator or facilitator and/or (c) through violence or the threat of violence. As children involved in criminal exploitation often commit crimes themselves, their vulnerability as victims is not always recognised by adults and professionals, (particularly older children), and they are not treated as victims despite the harm they have experienced. The victim may have been criminally exploited even if the activity appears consensual. CCE does not always involve physical contact: it can also occur through the use of technology. CCE can

include children being forced to work in cannabis factories, being coerced into moving drugs or money across the country (county lines), forced to shoplift or pickpocket, or to threaten other young people. They can also be forced or manipulated into committing vehicle crime or threatening/committing serious violence to others. It is important to note that the experience of girls who are criminally exploited can be very different to that of boys. The indicators may not be the same, however professionals should be aware that girls are at risk of criminal exploitation too. It is also important to note that both boys and girls being criminally exploited may be at higher risk of sexual exploitation.

Sexual exploitation involves an individual or group of adults taking advantage of the vulnerability of an individual or groups of children or young people. Victims can be boys or girls. Children and young people are often unwittingly drawn into sexual exploitation through the offer of friendship and care, gifts, drugs and alcohol, and sometimes accommodation. It may also be linked to child trafficking. CSE can occur over time or be a one-off occurrence and may happen without the child's immediate knowledge e.g. through others sharing videos or images of them on social media. CSE can affect any child, who has been coerced into engaging in sexual activities. This includes 16 and 17 year olds who can legally consent to have sex. Some children may not realise they are being exploited e.g. they believe they are in a genuine romantic relationship.

CSE is a form of child sexual abuse involving criminal behaviours against children and young people which can have a long-lasting adverse impact on a child's physical and emotional health. CSE occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into sexual activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial advantage or increased status of the perpetrator or facilitator. The victim may have been sexually exploited even if the sexual activity appears consensual.

Both CSE and CCE are forms of abuse and both occur whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including gender, sexual identity, cognitive ability, physical strength, status, and access to economic or other resources.

More information including definitions and indicators are included in KCSIE September 2024 and [Appendix 3](#) of this policy.

County Lines, is where children and young people are being exploited and drawn into drug related activity by criminal gangs, groups or individuals. County lines is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs (primarily crack cocaine and heroin) into one or more importing areas [within the UK], using dedicated mobile phone lines or other form of "deal line". Exploitation is an integral part of the county lines offending model with children and vulnerable adults exploited to move [and store] drugs and money. Offenders will often use coercion, intimidation, violence (including sexual violence) and weapons to ensure compliance of victims (see [Appendix 4](#)). There is a crossover between CSE and County Lines and young people are sometimes required to offer sex in order to pay off perceived debts. Concerns about young people being possibly involved should be passed to the DSL who will refer to the Police and Family Front Door.

The School addresses the risks of child sexual exploitation and child criminal exploitation in the PSHCE and [Relationships Education and Relationships and Sex Education \(RSE\)](#) and health education curriculum. A common feature of sexual exploitation is that the child often doesn't recognise the coercive nature of the relationship and doesn't see themselves as a victim. The child may initially resent what they perceive as interference by staff, but staff must act on their concerns, as they would for any other type of abuse.

When we identify a child that may be at risk of exploitation the Designated Safeguarding Lead will work with and support and consider completion of a GET SAFE risk assessment which will be referred to Worcestershire Children First GET SAFE team for further assessment and support. The Designated Safeguarding Lead will also consider referral to Worcestershire Children First Family Front Door as part of our schools and local safeguarding procedures. More information can be found: [Get Safe - keeping children and young people safe from criminal exploitation](#)

All staff, volunteers and governors are made aware of the indicators of child sexual exploitation and child criminal exploitation, the fact that the victim may have been sexually exploited even if the sexual activity appears consensual and that it does not always involve physical contact but can occur through the use of technology. All concerns of child sexual exploitation or child criminal exploitation must be reported immediately to the DSL.

#### **6.4. Domestic Abuse – See Appendix 5**

We recognise that exposure to domestic abuse and/or violence can have a serious, long lasting emotional and psychological impact on children. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result. Domestic abuse affecting young people can also occur within their personal relationships as well as in the context of their home life.

We will ensure that our pupils are educated to ensure they understand what a healthy relationship looks like, to include using resources from the [WCC Domestic Abuse and Sexual Violence](#) website and the Worcestershire Safeguarding Children Board website.

If we identify a victim of domestic abuse being high risk, we will consider a referral to MARAC (Multi Agency Risk Assessment Conference). The purpose of MARAC is to share information and establish a multi-agency action plan to support the victim and to make links with other public protection procedures, particularly safeguarding children, vulnerable adults and the management of offenders. We will continue to provide help and support in order to safeguard children. This will usually be led by the DSL. We recognise that MARAC does not replace a referral to children's social care.

[Worcestershire children first Domestic abuse guidance](#)

All concerns regarding Domestic Abuse will be reported to the DSL, who will ensure that appropriate support is available to the young person and make referrals to the Family Front Door where the threshold for social care intervention is met.

In addition, Worcestershire is part of Operation Encompass, the police and education early information sharing partnership enabling schools to offer immediate support for children and young people experiencing domestic abuse. Information is shared by the police with a school's trained Key Adult (usually the Designated Safeguarding Lead) prior to the start of the next school day after officers have attended a domestic abuse incident thus enabling appropriate support to be given, dependent upon the needs and wishes of the child.

#### **Operation Encompass Early Years**

Worcestershire Children First now send DA notifications to early years settings, and they receive Operation Encompass notifications, in order that we can support those children and their families via our Early Help offer (Supporting Families).

#### **6.5. Radicalisation and Extremism – see Appendix 6**

We recognise that children are vulnerable to extremist ideology and radicalisation. We recognise that safeguarding against radicalisation and extremism is no different to safeguarding against any other vulnerability in today's society. We will ensure that:

- Through training, staff, volunteers and governors have an understanding of what radicalisation and extremism is, why we need to be vigilant in school and how to respond when concerns arise.
- There are systems in place for keeping pupils safe from extremist material when accessing the internet in our School by using effective filtering and usage policies.
- The DSL has received Prevent training and will act as the point of contact within our School for any concerns relating to radicalisation and extremism.
- Senior Leaders have familiarised themselves with the revised [Prevent duty guidance: for England and Wales](#), (updated 2024), which are specifically concerned with schools.
- The DSL will make referrals in accordance with [West Midlands Safeguarding Children Procedures](#) and will represent our School at Channel meetings as required.
- Through our curriculum, we will promote the spiritual, moral, social and cultural development of pupils. We encourage pupils to respect the fundamental British values of democracy, the rule of law, individual liberty and mutual respect, and tolerance of those with different faiths and beliefs.
- We will use relevant information, tools and resources to help our staff and parents to recognise and address extremism and radicalisation in young people, (in line with the DfE Guidance Promoting Fundamental British values through SMSC (spiritual, moral, social and cultural education) in Schools 2014). Using, for example, the [Educate Against Hate website](#).

#### **6.6. So-called 'Honour-Based' Abuse (HBA): Including Female Genital Mutilation (FGM), Breast Ironing and Forced Marriage – See [Appendix 7](#)**

'Honour-Based' abuse (HBA) encompasses incidents or crimes which have been committed to protect or defend the honour of the family and/or the community, including female genital mutilation (FGM), forced marriage, and practices such as breast ironing. Abuse committed in the context of preserving "honour" often involves a wider network of family or community pressure and can include multiple perpetrators. We are aware of this dynamic and additional risk factors when deciding what form of safeguarding action to take. All forms of HBA are abuse (regardless of the motivation) and are handled and escalated as such. Professionals in all agencies, and individuals and groups in relevant communities, need to be alert to the possibility of a child being at risk of HBA, or already having suffered HBA.

We recognise that our staff are well placed to identify concerns and take action to prevent children from becoming victims of HBA and we provide guidance on these issues through our safeguarding training. We also recognise that our staff can identify and raise a concern if they believe a child has been subjected to HBA, so that appropriate support and action can be made.

If staff have a concern regarding a child that might be at risk of HBA they should inform the DSL (or deputy) who will activate local safeguarding procedures, using existing national and local protocols for multiagency liaison with police and children's social care.

Whilst **all** staff should speak to the DSL (or Deputy) with regard to any concerns about FGM, there is a specific legal duty on teachers (under Education Act 2002, persons employed or engaged to carry out teaching work at schools). If a teacher, in the course of their work in the profession, discovers that an act of FGM appears to have been carried out on a girl under the age of 18, the teacher **must** report this to the police. See [Appendix 8](#) for further details.

Where FGM has taken place, since 31 October 2015 there has been a mandatory reporting duty placed on teachers (persons employed or engaged to carry out teaching work). Section 5B of the Female Genital Mutilation Act 2003 (as inserted by section 74 of the Serious Crime Act 2015) places a statutory duty upon teachers in England and Wales, to personally report to the police where they discover (either through disclosure by the victim or visual evidence) that FGM appears to have been carried out on a girl under 18. Those failing to report such cases will face disciplinary sanctions. We will provide guidance and support to our teachers on this requirement and further information on when and how to make a report can be found in the following Home Office guidance: '[Mandatory Reporting of Female Genital Mutilation - procedural information](#)' (October 2015, updated January 2020).

### **6.7. Modern Slavery**

The Modern Slavery Act 2015 places a new statutory duty on public authorities, including schools, to notify the National Crime Agency (NCA) (section 52 of the Act) on observing signs or receiving intelligence relating to modern slavery. The public authority (including schools) bears this obligation where it has 'reasonable grounds to believe that a person may be a victim of modern slavery or human trafficking'. Staff need to be aware of this duty and inform the DSL should they suspect or receive information that either parents or their children may be victims of modern slavery. The DSL will then contact the NCA.

### **6.8. Child on Child abuse including sexual violence and sexual harassment:**

Please also refer to our Child on Child Abuse policy.

We recognise that children are also vulnerable to physical, sexual and emotional abuse by their peers or siblings. This is generally referred to as Child on Child abuse. This can include, but is not limited to: abuse within intimate partner relationships; bullying (including cyber bullying, prejudice-based and discriminatory bullying), physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm: sexual violence (such as rape, assault by penetration and sexual assault) and sexual harassment (such as sexual comments, remarks, jokes and online sexual harassment, which may be stand-alone 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 nudes and semi nudes images and or videos (also known as sexting or youth produced sexual imagery) – see Appendix 8; upskirting, (See [Section 6.9](#) below and further information can be found here: [Upskirting: know your rights](#)); and initiation/hazing type violence and rituals.

Abuse perpetrated by children can be just as harmful as that perpetrated by an adult, so it is important to remember the impact on the victim of the abuse as well as to focus on the support for the child or young person exhibiting the harmful behaviour. Such abuse will always be taken as seriously as abuse perpetrated by an adult and the same [West Midlands Safeguarding Children Procedures](#) will apply in respect of any child who is suffering or likely to suffer significant harm; staff must never tolerate or dismiss concerns relating to Child on Child abuse, must not pass it off as 'banter', 'just having a laugh' or 'part of growing up'.

We recognise and acknowledge that even if there are no reported cases of Child on Child abuse, such abuse may still be taking place and is simply not being reported. We therefore understand how important it is to foster a culture in which staff are fully informed of the School's and wider societal expectations. We also acknowledge the school's responsibility to educate pupils so that they can recognise abuse and to engender confidence in pupils so that they will feel able to speak to a trusted adult in School if they have any concerns.

We will ensure, through training, that staff, volunteers and governors will have an understanding of the range of Child on Child abuse, including sexual violence and sexual harassment, and will be made aware of how to recognise and manage such issues. Staff will be given the skills to identify and manage harmful sexual behaviour using specific resources. Staff should be aware that some groups are potentially more at risk, for example girls, children with SEND and lesbian, gay, bisexual or transgender (LGBTQ+) children or children perceived as LGBTQ+ by their peers. The School will take positive action, where proportionate, to deal with the disadvantages these pupils face.

Staff should be aware that such incidents and/or behaviours can be associated with factors outside the School and can occur between children outside the School. Staff, and particularly the DSL, should always consider the context in which such incidents and/or behaviours occur – this is known as ‘contextual safeguarding’. Staff should also consider the importance of understanding intra-familial harms and be aware of any support needed for siblings following incidents.

Where the abuse is physical, verbal, bullying or cyber-bullying, recording of such incidents and sanctions will be applied in line with our Behaviour and Anti-Bullying policies. It should be noted in accordance with our Anti-Bullying Policy the School will not tolerate the use of the term ‘banter’ to in any way excuse what it deems to be inappropriate references to any person or persons. Where a child discloses safeguarding allegations of a sexual nature against another pupil in the same setting, the DSL should refer to the West Midlands Safeguarding Children procedures website (section 3.3) and seek advice from the Family Front Door or Community Social Worker before commencing its own investigation or contacting parents. This may mean, on occasions, that the School is unable to conduct its own investigation into such incidents. All such incidents will be recorded using our child protection recording forms.

RGS Worcester will always take seriously and respond accordingly to any reports of Child on Child abuse, including reports of sexual harassment or sexual violence. The response will take the form of listening to the pupil(s) and acting in accordance with all of the safeguarding procedures described throughout this Safeguarding Children Policy, other related policies (listed at the beginning of this document) including the Child on Child Abuse Policy, Working Together to Safeguard Children and KCSIE. Reports of incidents of sexual violence or sexual harassment will be responded to in line with Part 5 of KCSIE and further details about procedures are provided in our Child on Child Abuse Policy.

Staff are aware that there is detailed information available on what sexual violence and sexual harassment constitutes, important context to be aware of, related legal responsibilities for schools, advice on a whole school approach to preventing child on child sexual violence and sexual harassment and more detailed advice on responding to concerns raised in Part 5 of KCSIE.

Support for the victims of abuse will be in line with support outlined in the School’s Child on Child Abuse policy and our Behaviour and Anti-Bullying policies. For victims of sexual abuse, the School will follow advice given by Children’s Social Care and consider using external agencies, such as Early Help or [West Mercia Rape and Sexual Abuse Support Centre](#) to support any strategies that they may be able to provide within school.

Depending on the nature of abuse, the School may need to consider providing measures to protect and support the victim, the alleged perpetrator and other pupils and/or staff in the School by means of a risk assessment and this will include consideration by the DSL as to whether the victim and alleged perpetrator should share classes and share space at school, in accordance with the guidance and consideration given in KCSIE September 2024. The risk assessment should be recorded and kept under review.

### **6.9. Upskirting**

The Voyeurism (Offences) Act, which is commonly known as the Upskirting Act, came into force on 12 April 2019. 'Upskirting' is where someone takes a picture under a person's clothing (not necessarily a skirt) without their permission and or knowledge, with the intention of viewing their genitals or buttocks (with or without underwear) to obtain sexual gratification, or cause the victim humiliation, distress or alarm. It is a criminal offence. Anyone of any gender, can be a victim.

### **6.10. Children with Family Members in Prison**

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

### **6.11. Mental Health**

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

Staff are well placed to observe children day-to-day and identify those whose behaviour suggests that they may be experiencing a mental health problem or be at risk of developing one.

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

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

## **7. Racist Incidents**

Our policy on racist incidents is set out within our separate Anti-Bullying Policy and acknowledges that repeated racist incidents or a single serious incident may lead to consideration under child protection procedures. We maintain a log of racist incidents in School.

## **8. Anti-Bullying**

Our policy on anti-bullying is set out in our separate Anti-Bullying Policy. To allow or condone bullying may lead to consideration under child protection procedures. All incidences of bullying, including cyber-bullying, prejudice-based and discriminatory bullying, will be dealt with in accordance with the School's Anti-Bullying policy. We recognise that children with special needs and/or disabilities are more susceptible to being bullied. We maintain a log of bullying incidents in School.

We recognise that there will be occasions when bullying incidents will fall within child protection procedures or may be deemed criminal activity and that it may be necessary to report the concerns to the Family Front Door or to the Police.

## **9. Online Safety or E-Safety**

The breadth of issues classified within online safety is considerable and ever evolving, but can be categorised into four areas of risk:



**Content:** being exposed to illegal, inappropriate, or harmful content, for example: pornography, fake news, racism, misogyny, self-harm, suicide, anti-Semitism, radicalisation, and extremism.

**Contact:** being subjected to harmful online interaction with other users; for example: 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:** online behaviour that increases the likelihood of, or causes, harm; for example, 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. If you feel your pupils, students or staff are at risk, please report it to the Anti-Phishing Working Group (<https://apwg.org/>).

Considering the 4Cs (above) provides the basis of an effective online policy. As a school, we are directly responsible for ensuring our pupils have the appropriate level of security protection procedures in place in order to safeguard their systems, staff and learners and review the effectiveness of these procedures periodically to keep up with evolving cyber-crime technologies. We use national guidelines and guidance to inform our practice and policies, including, but not exclusive to, Guidance on e-security is available from the [National Education Network](#) and guidance on cyber security including considerations for governors and trustees can be found at [Cyber security training for school staff - NCSC.GOV.UK](#).

- The DSL understands the unique risks associated with online safety and has the relevant knowledge and up to date capability required to keep children safe whilst they are online at school.
- The DSL is able to recognise the additional risks that children with SEN and disabilities face online, for example from online bullying, grooming and radicalisation and has the capability to support SEND children to stay safe online.
- All members of staff are trained in and receive regular updates in e-safety which, amongst other things, includes an understanding of the expectations, applicable roles and responsibilities in relation to filtering and monitoring.
- The Online Safety & Acceptable Use of Smart Devices Policy recognises that Internet safety is a whole school responsibility, involving staff, pupils, governors and parents. It also takes into account unrestricted access to the internet via 3G, 4G and 5G and how we manage this on school premises and when pupils are under the supervision of school staff.
- Children and young people may expose themselves to danger, whether knowingly or unknowingly, when using the Internet and other technologies. Additionally, some young people may find themselves involved in activities which are inappropriate or possibly illegal.
- The School therefore recognises its responsibility to educate its pupils, teaching them the appropriate behaviours and critical thinking skills to enable them to remain both safe and legal when using the Internet and related technologies. These issues are addressed within the curriculum, in the PSHCE programme and in assemblies. Parents will also be invited to attend talks on e-safety.
- Various on-line resources are utilised to teach and raise awareness of online safety, including, but not limited to: [Be Internet Legends](#), [DISRESPECTNOBODY](#), [Education for a connected world framework](#), [Teaching online safety in schools](#), [Thinkuknow](#) and [UK Safer Internet Centre](#).
- Education at Home – Where children are being asked to learn online at home the School directs pupils to do so safely in-line with DfE advice to support schools to do so safely: [safeguarding-in-schools-colleges-and-other-providers](#) and [safeguarding-and-remote-education](#)

## 9.1 Filter and Monitoring

We will ensure that filters are in place to prevent access to unsuitable sites, and we will monitor the use of the School network and internet to ensure that any pupil or staff member attempting to

access inappropriate, abusive or harmful material is appropriately advised and/or supported. The appropriateness of any filtering and monitoring systems are a matter for individual schools and colleges and will be informed in part, by the risk assessment required by the Prevent Duty.

To support schools and colleges to meet this duty, the Department for Education has published [filtering and monitoring standards](#) which set out that schools and colleges should:

- Identify and assign roles and responsibilities to manage filtering and monitoring systems.
- Review filtering and monitoring provision at least annually.
- Block harmful and inappropriate content without unreasonably impacting teaching and learning.
- Have effective monitoring strategies in place that meet their safeguarding needs

We review the standards and discuss with IT staff and service providers what more needs to be done to support schools and colleges in meeting this standard.

## 10. Relationships and Sex Education

The School takes seriously its responsibility to educate pupils so that they can recognise and enjoy healthy relationships and so that they feel able to speak to someone in school if they have any concerns. We cover relevant issues through Relationships Education (for all primary pupils) and Relationships and Sex Education (for all secondary pupils) and Health Education (which was made compulsory from September 2020). This is delivered in accordance with the following statutory guidance: Statutory guidance: [relationships and sex education \(RSE\) and health education](#).

This content is delivered through PSHCE lessons, Tutorials, Assemblies and, where appropriate, as part of some academic teaching. Teachers are made aware of and utilise a variety of resources including but not limited to:

[Teaching about relationships sex and health](#). This is DfE guidance which includes teacher training modules on the RSHE topics and non-statutory implementation guidance.

- [DfE advice for schools: teaching online safety in schools](#)
- [UK Council for Internet Safety \(UKCIS\)30 guidance: Education for a connected- world](#)
- National Crime Agency's CEOP education programme: [Thinkuknow](#)
- Public Health England: [Rise Above](#)

## 11. Supporting Children

- We recognise that children who are abused or witness violence may find it difficult to develop a sense of self-worth. They may feel helplessness, humiliation and some sense of blame.
- We acknowledge that school may be the only stable, secure and predictable element in the lives of children who have been abused or who are at risk of harm.
- We are aware that research shows that at school their behaviour may be challenging and defiant or they may be withdrawn.
- There is a School Senior Counsellor who is based at the RGS Worcester and supported by two other qualified counsellors and each of the Junior schools has a school counsellor that works specifically with their pupils and sessions are organised for pupils as required.
- Children disclosing abuse should always be taken seriously, kept safe and never be made to feel like they are creating a problem for reporting abuse, sexual violence or sexual harassment. Nor should they be made to feel ashamed for reporting abuse. Staff supporting children will explain that the law is in place to protect children, not criminalise them.

- The fact that a child or a young person may be LGBT is not in itself an inherent risk factor for harm. However, children who are LGBT can be targeted by other children. In some cases, a child who is perceived by other children to be LGBT (whether they are or not) can be just as vulnerable as children who identify as LGBT. Risks can be compounded where children who are LGBT lack a trusted adult with whom they can be open. It is therefore vital that staff endeavour to reduce the additional barriers faced, and provide a safe space for them to speak out or share their concerns with members of staff
- The School will endeavour to support all children by:

	<ul style="list-style-type: none"> <li>● Encouraging self-esteem and self-assertiveness through the curriculum specifically through PSHCE and Computing and IT, as well as promoting respectful relationships, challenging bullying and humiliating behaviour;</li> </ul>
	<ul style="list-style-type: none"> <li>● The School ethos which promotes a positive, supportive and secure environment giving pupils a sense of being valued;</li> </ul>
	<ul style="list-style-type: none"> <li>● A consistently applied Behaviour Policy that is aimed at supporting vulnerable pupils in school including those with protected characteristics. The School will ensure that the pupil knows that some behaviour is unacceptable, but they are valued and not to be blamed for any abuse which has occurred;</li> </ul>
	<ul style="list-style-type: none"> <li>● Liaison with other agencies that support the pupil such as Children’s Services, Child and Adolescent Mental Health Service (CAMHS), education welfare service and educational psychology service and those agencies involved in the safeguarding of children;</li> </ul>
	<ul style="list-style-type: none"> <li>● The use of Early Help Services, through the Family Front Door, when appropriate;</li> </ul>
	<ul style="list-style-type: none"> <li>● Notifying Children’s Social Care Services immediately there is a significant concern.</li> </ul>
	<ul style="list-style-type: none"> <li>● Providing continuing support to a pupil about whom there have been concerns who leaves the School by ensuring that appropriate information is forwarded under confidential cover to the pupil’s new setting.</li> </ul>

## 12. Looked after Children and previously looked after children

The most common reason for children becoming looked after is a result of abuse or neglect. The School will ensure that appropriate staff have necessary skills, knowledge and understanding to keep looked after children safe. Appropriate staff will have the information about a looked after child’s legal status and contact arrangements with birth parents or those with parental responsibility. They will also have information about the child’s care arrangements, including the level of authority delegated to the carer by the authority looking after the child. There will be a designated teacher assigned for overseeing the care of any such child and this teacher (usually the DSL) and the DSL will have details of the child’s social worker and the name and contact details of the Local Authority’s Virtual Head for children in care and previously looked after children.

We recognise that a previously looked after child potentially remains vulnerable and therefore will ensure that all staff have the skills, knowledge and understanding to keep previously looked after children safe. We will ensure that our designated teacher for looked after children and previously looked after children, will have had the appropriate training and the relevant qualifications and experience of working with this group of children.

The DSL will obtain details of the local authority Personal Adviser appointed to guide and support each care leaver and will liaise with them as necessary regarding any issues of concern affecting the care leaver.

### **13. What staff should do if a child needs a social worker (Children in Need and Child Protection Plans)**

- Children may need a social worker due to safeguarding or welfare needs. If any member of staff believes that a child needs a social worker, they must speak to the DSL. Children may need this help due to abuse, neglect and complex family circumstances. A child's experiences of adversity and trauma can leave them vulnerable to further harm, as well as educationally disadvantaged in facing barriers to attendance, learning, behaviour and mental health.
- Local authorities should share the fact a child has a social worker, and the DSL should hold and use this information so that decisions can be made in the best interests of the child's safety, welfare and educational outcomes. This should be considered as a matter of routine.
- Where children need a social worker, this should inform decisions about safeguarding (for example, responding to unauthorised absence or missing education where there are known safeguarding risks) and about promoting welfare (for example, considering the provision of pastoral and/or academic support, alongside action by statutory services). RGSW has Early Help provision in place, as outlined in the [Safeguarding](#) and [Additional Care](#) sections of the School website.

### **14. Special Educational Needs, Disability and Health Issues (SEND)**

Children with special educational needs or disabilities (SEND) or certain medical or physical health conditions can face additional safeguarding challenges both online and offline. We ensure their child protection policy reflects the fact that additional barriers can exist when recognising abuse, neglect and exploitation in this group of children

These can include:

- Assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's condition without further exploration
- These children being more prone to peer group isolation or bullying (including prejudice-based bullying) than other children
- The potential for children with SEND or certain medical conditions being disproportionately impacted by behaviours such as bullying, without outwardly showing any signs, and
- 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.

Any reports of abuse involving children with SEND will therefore require close liaison with the Designated Safeguarding Lead (or a Deputy) and the SENCO or the named person with oversight for SEND in a college.

We consider extra pastoral support and attention for these children, along with ensuring any appropriate support for communication is in place.

- [SEND Code of Practice 0 to 25 years](#), and
- [Supporting Pupils at School with Medical Conditions](#) and from specialist organisations such as:
  - The Special Educational Needs and Disabilities Information and Support Services (SENDIASS). SENDIASS offer information, advice and support for parents and carers of children and young people with SEND. All local authorities have such a service: [Find your local IAS service \(councilfordisabledchildren.org.uk\)](http://councilfordisabledchildren.org.uk)

- o Mencap - Represents people with learning disabilities, with specific advice and information for people who work with children and young people

## 15. Positive Physical Intervention/Use of reasonable force

- The School's policy on positive handling is set out in our Care and Control of Pupil Policy at the RGS Worcester and our Positive Handling Policies at RGS Dodderhill, RGS The Grange and RGS Springfield and these policies acknowledge that staff must only ever use physical intervention as a last resort, and that at all times it must be the minimal force necessary to prevent injury or damage to property.
- The School acknowledges that when applying reasonable force in response to risks presented by incidents involving children with SEN or disabilities or with medical conditions, it is important to recognise their additional vulnerability and make every effort to reduce the occurrence of challenging behaviour and the need to use reasonable force.
- The School understands that physical intervention of a nature that causes injury or distress to a child may be considered under safeguarding children or disciplinary procedures.
- Staff that are likely to need to use physical intervention will be appropriately trained in accordance with the Team Teach technique, or equivalent.
- A record of all incidents of physical intervention that occur at RGS Worcester will be maintained by the DSL. A record of all incidents of physical intervention that occur at RGS Dodderhill, RGS The Grange and RGS Springfield will be maintained by the respective DSLs (Sarah Clay at RGS Dodderhill, Wendy Wreghitt at RGS The Grange and Ian Griffin at RGS Springfield).
- The School recognises that touch is appropriate in the context of working with children and all staff are given 'safe working practice guidance' to ensure that they are clear about their professional boundaries.
- The School recognises that the adoption of a 'no contact' policy could leave staff unable to fully support and protect pupils.

## 16. Record Keeping

- Any member of staff receiving a disclosure of abuse from a child or noticing signs or symptoms of possible abuse, should make notes as soon as possible (within the hour, if possible) writing down exactly what was said, using the child's own words as far as possible. All notes should be timed, dated and signed, with name printed alongside the signature.
- The form for logging a concern about a child's safety or welfare ([Appendix 1](#)) should be completed or via the School's electronic safeguarding system, called 'myconcern'.
- All records of a child protection nature should be passed to the relevant DSL including case conference minutes, child protection plans and written records of any concerns. Individual child protection records are kept securely under lock and key or password protected on the 'myconcern' system, with only appropriate persons having access to them. Sensitive safeguarding information about a child is also stored away from their main pupil file using this same system.
- Normal main pupil files have markers to indicate that there is sensitive material stored securely elsewhere. This is to protect individuals from accidental access to sensitive material by those who do not need to know.
- Any referrals made to other agencies, including referrals to Children's Social Care, will be copied prior to sending and stored in the child's child protection file.
- The DSL will maintain and regularly audit the School's child protection records and ensure that each stand-alone file includes a chronology of significant events, and that information and contact details are accurate and up to date.

- The DSL will transfer the child protection record in a safe and timely manner when a child moves school, ensuring receipt of transfer is obtained.
- The DSL may copy child protection records generated by the School prior to transfer and retain for as long as is necessary (normally D.O.B. + 25 years), where there is justification for believing that the records may be required as evidence of the School's involvement with the child for statutory purposes (e.g. court cases or serious case reviews). When the records are no longer required, they will be securely disposed of.

## 17. Information Sharing and Confidentiality

- Information sharing is vital in identifying and tackling all forms of abuse, neglect and exploitation, and in promoting children's welfare, including their educational outcomes Schools have clear powers to share, hold and use information for these purposes.
- RGS Worcester and the governing body are aware that among other obligations, the Data Protection Act 2018, and the UK General Data Protection Regulation (UK GDPR) place duties on organisations and individuals to process personal information fairly and lawfully and to keep the information they hold safe and secure.
- The Privacy and Compliance Officer (PCO) appointed by RGSW is The Director of Finance and Operations. The Deputy PCO is the Assistant Head (Director of Innovation), Mr J Jones. Further information about Data Protection at the School can be found in our Data Protection Policy.
- All personal information will be processed fairly and lawfully in line with our duties under the Data Protection Act 2018 and GDPR and will be held safely and securely. **However, we recognise that this is not a barrier to sharing information where the failure to do so would result in a child being placed at risk of harm.**
- We recognise that all matters relating to Child Protection are confidential.
- The Head or DSL will disclose any information about a pupil to other members of staff on a need to know basis only.
- All staff must be aware that they have a professional responsibility to share information with other agencies in order to safeguard children.
- All staff must be aware that they cannot promise a child to keep secrets that might compromise a child's safety or well-being.
- When a child about whom concerns have been raised and recorded leaves the School, the DSL will consider if it would be appropriate to share information with the new school in advance of the child leaving to ensure that support is in place for when the child arrives.

## 18. Communication with Parents

- We recognise that good communication with parents is crucial in order to safeguard and promote the welfare of children effectively.
- We will always undertake appropriate discussion with parents prior to involvement of another agency **unless to do so might place the child or an adult at further risk of harm or would impede a criminal investigation.**
- We will ensure that parents have an understanding of the responsibilities placed on the School and staff to safeguard children and their duty to co-operate with other agencies in this respect.
- The School is aware of the additional risk of harm that pupils may be vulnerable to if they can no longer access mainstream educational provision for reasons of ill health or for any other reason, and we will direct parents to seek appropriate guidance from their Local Authority where appropriate.

## 19. Supporting Staff and Supervision of Staff

- We recognise that staff working in the School who have become involved with a child who has suffered harm, or appears to be likely to suffer harm, may find the situation stressful and upsetting. We will support such staff by providing an opportunity to talk through their anxieties with the relevant DSL and to seek further support such as counselling or regular supervision, as appropriate.
- We will enable supervision for the DSL through network meetings, direct consultation with the Safeguarding in Education Advisor, Safeguarding Governor or advanced social work practitioners in order to promote best practice and challenge unsatisfactory or poor practice.
- In order to reduce the risk of allegations being made against staff, and ensure that staff are competent, confident and safe to work with children, they will be made aware of safer working practice guidance and will be given opportunities in training to develop their understanding of what constitutes safe and unsafe behaviour.

## **20. Safer Recruitment and Selection of Staff**

- The School has a written recruitment policy statement and procedures linking explicitly to this policy. The statement is included in all job advertisements, publicity material, recruitment websites, and candidate information packs.
- The recruitment process is robust in seeking to establish the commitment of candidates to support the School's measures to safeguard children and to deter, identify, reject or identify people who might pose a risk of harm to children or are otherwise unsuited to work with them.
- All applicants will be required to complete an Application Form; Curriculum Vitae will only be accepted alongside the Application Form.
- References are requested and scrutinised for all candidates prior to interview and any discrepancies or concerns are raised and discussed during interview, including for any volunteers and internal candidates. References are always requested directly from the referee and verified as being from a senior person with appropriate authority; electronic references are checked to ensure they originate from a legitimate source. Where specific questions have not been answered satisfactorily or insufficient information is provided, the referee will be contacted directly for further clarification. Where references are not forthcoming, despite reminders, the candidate will be asked to provide an alternative referee.
- All staff working within our school who have substantial access to children have been checked as to their suitability, including verification of their identity, qualifications, a satisfactory barred list check, an enhanced DBS check and a right to work in the UK.
- In addition, as part of our shortlisting process we will consider carrying out an online search as part of complying with due diligence on the shortlisted candidates. This may help identify any incidents or issues that have happened, and are publicly available online, which the school or college might want to explore with the applicant at interview. We will inform shortlisted candidates that online searches may be done as part of due diligence checks.
- All teachers working within our school have been checked using the [Teaching Regulation Agency website](#) to ensure they have been awarded QTS, they have completed their teacher induction and that there are no prohibitions, sanctions or restrictions in place that might prevent them from taking part in certain activities or working in specific positions, e.g. management posts.
- The School seeks written assurance from supply and third-party agencies, alternative providers, initial teacher training providers and contractors that they have undertaken all appropriate checks on any of their staff that work with or have regular contact with our pupils.
- All staff who are employed to and/or provide early years childcare to children of younger years (up to the 1 September following the child's fifth birthday) or who outside of normal school hours at the School, provide childcare to children above this age but under the age of eight years are required to complete a self-declaration form in compliance with The Childcare Act 2006 and supporting the [Disqualification](#)

under the Childcare Act 2009, updated August 2018. This includes those that are directly concerned in the management of such provision.

- Individuals who have lived or worked outside the UK must undergo the same checks as all other staff that we recruit, as outlined above. This includes obtaining (via the applicant) an enhanced DBS certificate (including barred list information, for those who will be engaging in regulated activity) even if the individual has never been to the UK. In addition, the School will make any further checks they think appropriate so that any relevant events that occurred outside the UK can be considered. Following the UK's exit from the EU, schools should apply the same approach for any individuals who have lived or worked outside the UK regardless of whether or not it was an EEA country or the rest of the world.
- An Enhanced DBS check with barred list check is undertaken for all School Governors and they have been checked to ensure that they are not disqualified from holding office under a section 128 direction.
- The School maintains a single central record of recruitment checks for audit purposes, and this is checked and updated regularly and records all the recruitment checks undertaken by the School.
- Any member of staff working in regulated activity prior to verification by RGS of their satisfactory DBS Certificate will not be left unsupervised and will be subject to a risk assessment.
- Volunteers who are not working in regulated activity, will be supervised at all times. A risk assessment will be undertaken to help decide whether or not an enhanced DBS check, without barred list check, is required.

## **21. Safeguarding Concerns or Allegations of Abuse Made Against Staff, Including Supply Teachers, Volunteers and Contractors**

The School's procedures for managing allegations against staff (including volunteers, contractors and supply staff) who are currently working in the School follow DfE statutory guidance (see Part 4 of Keeping Children Safe in Education September 2024), the West Mercia Consortium inter-agency procedures and the WSCP Levels of Need Guidance and applies when staff (including volunteers, contractors or supply teachers) have (or are alleged to have):

- behaved in a way that has harmed a pupil, or may have harmed a pupil;
- possibly committed a criminal offence against or related to a pupil;
- behaved towards a pupil in a way that indicated that they may pose a risk of harm if they were to work regularly or closely with children; or
- behaved or may have behaved in a way that indicates they may not be suitable to work with children.

Allegations which appear to meet the above reporting criteria, are to be reported immediately to the Head(s) of the RGS School(s) where the member of staff works and the Executive Head of The RGS Worcester Family of Schools and Head of RGS Worcester, Mr John Pitt (unless the concern is about him) or in his absence the Chair of Governors (Upper Tything, Worcester WR1 1HP) and they will discuss the allegation immediately with the LADO, without informing the member of staff about whom the allegation has been made. If the allegation is against any Head, it should be reported immediately to the Chair of Governors (Upper Tything, Worcester, WR1 1HP), who should discuss the allegation immediately with the LADO, without informing the Head about whom the allegation has been made.

If an allegation is made against a Governor, including the Governor with responsibility for Safeguarding, then this should be immediately reported directly to Mr John Pitt, Executive Head of The RGS Worcester Family of Schools and Headmaster of RGS Worcester, and he will liaise with the LADO. Mr John Pitt will also liaise with the Director of Finance and Operations and Clerk to Governors and, if the allegation is not against them, the Chair of Governors and/or the Safeguarding Governor. Where an allegation against a Governor is substantiated, we will follow the procedures to consider removing them from office.



All unnecessary delays to the process should be eradicated and the LADO will be contacted within one working day of all allegations that come to the School's attention or that are made directly to the police.

In all cases of an allegation being made, and prior to undertaking any investigation, the School will immediately contact the LADO to discuss the allegation, consider the nature, content and context of the allegation and agree a course of action including any involvement of the Police. Discussions will be recorded in writing, and communication with both the individual and the parents of the child/children agreed. The School will consult West Midlands Safeguarding Children and Local Authority procedures for managing allegations against staff and due weight to the views of the LADO and the Police will be taken when making a decision about suspension and all action to be taken.

In accordance with the above procedure, the person who is designated to contact the LADO is deemed the "case manager". The case manager:

- will ensure that parents are informed as soon as possible and kept informed about progress of the case, subject to any advice from children's social care or the Police.
- will ensure that the individual who is the subject of the allegation is informed as soon as possible and given an explanation of the likely course or action, unless there is an objection by children's social care or the Police.
- will appoint a named representative to keep the individual informed of the progress of the case and will consider what other support is appropriate for the individual.

The DSL will, as required, liaise with the case manager and the LADO for child protection concerns in cases which concern a staff member.

In borderline cases informal discussions with the LADO may take place to seek advice on how to proceed. If an allegation does not meet the threshold, we will manage appropriately to safeguard young people in-line with any advice from the LADO.

Allegations against a teacher who is no longer teaching should be referred to the Police. Where an adult makes an allegation to a school or college that they were abused as a child, the individual should be advised to report the allegation to the police. Non-recent allegations made by a child, should be reported to the LADO in line with the local authority's procedures for dealing with non-recent allegations. The LADO will coordinate with Children's Social Care and the Police. Abuse can be reported no matter how long ago it happened.

The School's procedures for managing allegations against staff above also apply to staff not directly employed by the School, for example, supply teachers provided by an employment agency or business ('the agency'). The School will usually take the lead, but agencies should be fully involved and co-operate in any enquiries from the LADO, police and/or children's social services.

In no circumstances will the School decide to cease to use a supply teacher due to safeguarding concerns, without finding out the facts and liaising with the LADO to determine a suitable outcome. The School will discuss with the agency whether it is appropriate to suspend the supply teacher, or redeploy them to another part of the school, whilst they carry out their investigation.

The School will advise supply teachers being investigated to contact their trade union representative if they have one, or a colleague for support. The allegations management meeting which is often arranged by the LADO should address issues such as information sharing, to ensure that any previous concerns or allegations known to the agency are taken into account by the School during the investigation.

When using an agency, the School should inform the agency of its process for managing allegations. This should include inviting the agency's human resource manager or equivalent to meetings and keeping them up to date with information about its policies.

The Disclosure and Barring Service will be informed of any person whose services are no longer used because he/she is considered unsuitable to work with children. Ceasing to use a person's services includes: dismissal, non-renewal of a fixed term contract, no longer engaging/refusing to engage a supply teacher provided by an employment agency, terminating the placement of a student teacher or other trainee, no longer using staff employed by contractors, no longer using volunteers, resignation and voluntary withdrawal from supply teaching, contract working, a course of initial teacher training, or volunteering. Reports will include as much evidence about the circumstances of the case as possible. Compromise Agreements or Settlement Agreements cannot apply in this connection, or where the individual refuses to co-operate with an investigation.

When a report is made to the Disclosure and Barring Service about a teacher then The Teaching and Regulation Agency will also be contacted and this includes where a teacher has been dismissed or would have been dismissed had he/she not resigned.

RGSW will make every effort to maintain confidentiality and guard against unwanted publicity. In the event of an allegation made against a member of staff, RGSW is aware of its legal obligations to do its utmost to protect the anonymity of the member of staff during the investigative stage. This legislation is to protect staff in the event that an allegation is found to be unfounded or malicious.

On conclusion of the case, the case manager should review the circumstances of the case with the designated officer to determine whether there are any improvements to be made to RGSW's safeguarding procedures or practices to help prevent similar events in the future. In all cases where there are concerns or allegations of abuse, RGSW will make a serious incident report to the Charity Commission whenever the Commission's guidelines deem it appropriate to do so.

A record of any proven allegations made against staff will be kept in a confidential file and held securely in the safeguarding safe by the Headmaster of RGS Worcester and the RGS Worcester DSL. A system is in place to ensure that the normal staff file indicates that there is sensitive material stored elsewhere, to protect individuals from accidental access to sensitive material by those who do not need to know. This information and secure storage of it will comply with the Data Protection Act 2018 and the UK General Data Protection Regulation (UK GDPR).

Allegations proven to be false, unsubstantiated, unfounded or malicious will not be included in employer references. If an allegation is shown to be deliberately invented or malicious, the Head will consider whether any disciplinary action is appropriate against a pupil who made it; or whether the Police should be asked to consider if action might be appropriate against the person responsible even if they are not a pupil.

#### Managing Professional Disagreements

On occasions there will be disagreements between professionals as to how concerns are handled, and these can impact on effective working relationships. The School will support staff to promote positive partnerships within school and with other agencies and will ensure that staff are aware of how to escalate concerns and disagreements if appropriate and use the WSCP escalation procedures if necessary.

## **22. Safeguarding Concerns that do Not Meet the Harm Threshold, also known as 'Low Level Concerns'**

The School acknowledges that there will be concerns raised (including allegations) which do not meet the harm threshold set out in Section 21 of this policy. Concerns may arise in several ways and from a number of sources. For example: suspicion; complaint; or disclosure made by a child, parent or other adult within or outside of the organisation; or as a result of vetting checks undertaken. How RGSW manage and record any such concerns and take appropriate action to safeguard children is detailed below and further information is also provided in our Staff Code of Conduct.

### **Low Level Concerns**

As part of our whole school approach to safeguarding, The RGS Worcester Family of Schools will ensure that we promote an open and transparent culture in which all concerns about all adults working in or on behalf of the school (including supply teachers, volunteers and contractors) are dealt with promptly and appropriately. The Schools work to create a culture in which all concerns about adults (including allegations that do not meet the harms threshold) are shared responsibly and with the right person, recorded and dealt with appropriately. If implemented correctly, this should encourage an open and transparent culture; enable the School to identify concerning, problematic or inappropriate behaviour early; minimise the risk of abuse; and ensure that adults working in or on behalf of the schools are clear about professional boundaries and act within these boundaries, and in accordance with the ethos and values of our schools.

### **What is a Low Level Concern?**

The term 'low level' concern does not mean that it is insignificant, it means that the behaviour towards a child does not meet the threshold as outlined in above (in Section 21 of this policy). A low level concern is any concern, no matter how small, and even if no more than causing a sense of unease or a 'nagging doubt' that an adult working in or on behalf of the School may have acted in a way that:

- is inconsistent with the Staff Code of Conduct, including inappropriate conduct outside of work, and
- does not meet the allegations threshold or is otherwise not considered serious enough to consider a referral to the LADO.

Examples of such behaviour could include, but are not limited to:

- being over 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; or,
- using inappropriate sexualised, intimidating or offensive language.

Such behaviour can exist on a wide spectrum, from the inadvertent or thoughtless, or behaviour that may look to be inappropriate, but might not be in specific circumstances, through to that which is ultimately intended to enable abuse.

It is crucial that any such concerns, including those which do not meet the allegation/harm threshold (as outlined in Section 21 of this policy), are shared responsibly and with the right person, and recorded and dealt with appropriately. Ensuring they are dealt with effectively should also protect those working in or on behalf of schools and colleges from potential false allegations or misunderstandings.

The RGS Worcester Family of Schools works to create and embed a culture of openness, trust and transparency in which the values and expected behaviour which are set out in this Safeguarding Children Policy and the Staff Code of Conduct are constantly lived, monitored and reinforced by all staff.

The Governing body will ensure that our Staff Code of Conduct, Safeguarding Children Policy and other relevant policies and procedures are implemented effectively, and ensure appropriate action is taken in a timely manner to safeguard children and facilitate a whole school approach to dealing with any concerns.

The RGS Worcester Family of Schools will:

- ensure 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;
- empower staff to share any low-level safeguarding concerns with one of the Schools' DSLs (or a deputy);
- address unprofessional behaviour and support the individual to correct it at an early stage;
- provide a responsive, sensitive and proportionate handling of such concerns when they are raised; and,
- reflect on low level concerns raised and use these to help identify and address any weakness in the schools' safeguarding system.

### **Sharing Low-Level Concerns:**

Low-level concerns about a member of staff should be reported to the relevant Head. Staff do not need to be able to determine in each case whether their concern is a low-level concern, or if it is in fact serious enough to consider a referral to the LADO, or meets the threshold of an allegation. Once staff share what they believe to be a low-level concern, that determination should be made by the Head. Where a low-level concern is raised is about a Head or Governor it should be shared with Mr John Pitt, Executive Head of The RGS Worcester Family of Schools. If the concern is about Mr John Pitt, it should be raised with the Chair of Governors.

The School will ensure they create an environment where staff are encouraged and feel confident to self-refer, where, for example, they have found themselves in a situation which could be misinterpreted, might appear compromising to others, and/or on reflection they believe they have behaved in such a way that they consider falls below the expected professional standards. Where a low-level concern relates to a person employed by a supply agency or a contractor working at the RGS Schools, that concern should be shared with the relevant Head, and recorded in accordance with the low-level concern protocol which is given in Staff Code of Conduct, and their employer notified about the concern, so that any potential patterns of inappropriate behaviour can be identified.

### **Recording Low-Level Concerns**

All low-level concerns should be recorded on Confide (electronic confidential recording tool) in writing by either DSL or the relevant Head. The record should include details of the concern, the context in which the concern arose, and action taken alongside any pertinent documents as these can be stored entirely confidentially within the programme. The name of the individual sharing their concerns should also be noted, if the individual wishes to remain anonymous then that should be respected as far as reasonably possible. The software programme "Confide" has been implemented in order to streamline the recording process and ensure procedural robustness; previously logged Low Level Concerns (occurring before the implementation of Confide) remain in hard-copy format, kept securely at each RGS School.

These records are reviewed regularly by the relevant Head and reviewed with the DSL so that potential patterns of concerning, problematic or inappropriate behaviour can be identified. When the concern raised is about the Executive Head then the review would be by the Chair of Governors. Where a pattern of such behaviour is identified, the school will decide on a course of action, either through its disciplinary procedures or where a pattern of behaviour moves from a concern to meeting the harms threshold, in which case it should be referred to the LADO. Consideration should also be given to whether there are wider cultural issues within the school or that enabled the behaviour to occur and where appropriate policies will be revised or extra training delivered to minimise the risk of it happening again.

The School will retain these records at least until the individual leaves their employment.

## References

Part Three of KCSIE 2024 is clear that schools should only provide substantiated safeguarding allegations in references. Low level concerns should not be included in references unless they relate to issues which would normally be included in a reference, for example, misconduct or poor performance. It follows that a low-level concern which relates exclusively to safeguarding (and not to misconduct or poor performance) should not be referred to in a reference. However, where a low-level concern (or group of concerns) has met the threshold for referral to the LADO and found to be substantiated, it should be referred to in a reference.

## Responding to Low-Level Concerns

Concerns about safeguarding should be reported to the relevant DSL or their deputy. If the concern has been raised via a third party, the DSL should collect as much evidence as possible by speaking:

- directly to the person who raised the concern, unless it has been raised anonymously;
- to the individual involved and any witnesses.

The information collected will help them to categorise the type of behaviour and determine what further action may need to be taken. All of this needs to be recorded along with the rationale for their decisions and action taken.

The School's policy for dealing with low level concerns is in-line with and a reflection and extension of the school's wider Staff Code of Conduct.

There is also useful further information, guidance and case studies on low-level concerns, which can be found in '[Developing and implementing a low-level concerns policy \(farrer.co.uk\)](http://farrer.co.uk)'.

## 23. Abuse of Position of Trust

- We recognise that as adults working in the School we are in a relationship of trust with the pupils in our care and acknowledge that it could be considered a criminal offence to abuse that trust.
- We acknowledge that the principle of equality embedded in the legislation of the Sexual Offenders Act 2003 applies irrespective of sexual orientation.
- We recognise that the legislation is intended to protect young people in education who are over the age of consent but under 18 years of age.

## 24. Complaints or Concerns expressed by Pupils, Parents, Staff or Volunteers

- We recognise that listening to children is an important and essential part of safeguarding them against abuse, neglect and exploitation. To this end any expression of dissatisfaction or disquiet in relation to an individual child will be listened to and acted upon in order to safeguard his/her welfare.
- We will also seek to ensure that the child or adult who makes a complaint is informed not only about the action the School will take but also be given an indication of the length of time that will be required to resolve the complaint. The School will also endeavour to keep the child or adult regularly informed as to the progress of his/her complaint. The School's Complaints Policy is readily available on the School's website ([RGSW Policies](#)).

## 25. Whistleblowing

- The School has a Confidential Reporting (Whistleblowing Policy) that staff should refer to. We recognise that children cannot be expected to raise concerns in an environment where staff fail to do so. Thus, all staff should be aware of their duty to raise concerns about the attitude or actions of others. Any member of staff may make a referral to external agencies. Staff should report concerns about poor or

unsafe practice and potential failures in the School's safeguarding regime. Such concerns can be raised directly with the Head, Director of Finance and Operations and Clerk to Governors or Chair of Governors.

- Whistleblowing concerns about any Head should be immediately reported to the Chairman of Governors directly or via the Director of Finance and Operations and Clerk to Governors.
- Staff will be made aware that if they feel unable to raise a child protection failure internally, they can contact the [NSPCC Whistleblowing Advice Line](#). This is a dedicated helpline available as an alternative route for staff who do not feel able to raise concerns regarding child protection failures internally or have concerns about the way a concern is being handled by the School. Staff can call 0800 028 0285 between 8.00 am and 8.00 pm, Monday to Friday inclusive or they can email: [help@nspcc.org.uk](mailto:help@nspcc.org.uk)

## **26. Photography and use of images (including hand held devices)**

- The welfare and protection of children is paramount and consideration should always be given to whether the use of photography will place children at risk. Images may be used to harm children, for example as a preliminary to 'grooming' or by displaying them inappropriately on the Internet, particularly social networking sites.
- For this reason, consent is always sought when photographing children using any means and including iPads, smart phones or cameras and additional consideration given to photographing vulnerable children, particularly Looked After Children or those known to be fleeing domestic violence. Consent must be sought from those with parental responsibility (this may include the Local Authority in the case of Looked After Children).
- Many pupils own or have access to hand held devices and parents are encouraged to consider measures to keep their children safe when using the internet and social media at home and in the community.
- Please also note guidance regarding use of mobile phones and other electronic devices for EYFS is detailed in section 32 below and in the relative Mobile Phone Policies available on the staff handbook at RGS Springfield, RGS The Grange and RGS Dodderhill.
- The safe and appropriate taking, using and storage of images is outlined in the School's Images Policy.

## **27. Staff/Pupil Relationships**

- Further guidance for staff is given in the Staff Code of Conduct, which should be read in conjunction with this Safeguarding policy.
- The School provides advice to staff regarding their personal online activity and has strict rules regarding online contact and electronic communication with pupils. Staff found to be in breach of these rules may be subject to disciplinary action or child protection investigation.

## **28. Health and Safety**

- The School's Health and Safety Policy reflects the consideration we give to the safeguarding of our children both within the School environment and when away from school, for example when undertaking school trips and visits.
- Risk Assessments are undertaken and reviewed regularly, in respect of site security, risk of children being drawn into terrorism or exposed to extremist behaviour, risk to and from children displaying harmful behaviour.
- [Appendix 9](#) of this Policy provides information and guidance on Home School Safeguarding Guidance for Work Related Experience.

## **29. Safe Environment**

- The School undertakes appropriate risk assessments and checks in respect of all equipment and of the building and grounds in line with local and national guidance and regulations concerning health and

safety.

- The School has adequate security arrangements in place in respect of the use of its grounds and buildings by visitors both in and out of school hours.

Use of School Premises for Non-School Activities - RGSW will ensure that when we hire out our school facilities and/or premises to organisations or individuals (for example to community groups, sports associations and service providers to run community or extra-curricular activities) we will ensure that appropriate arrangements are in place to keep children safe.

When services or activities are provided by RGSW under the direct supervision or management of our school the arrangements for child protection will apply.

Where an external body is providing community or extra-curricular activities RGSW will ensure it seeks assurance that appropriate safeguarding and child protection policies and procedures in place (including inspecting these as needed); and ensure that there are arrangements to liaise with RGSW on these matters where appropriate. RGSW will ensure safeguarding requirements are included in any transfer of control agreement (i.e. lease or hire agreement), as a condition of use and occupation of the premises; and that failure to comply with this would lead to termination of the agreement.

- Visitors to the School, for example visiting speakers, theatre groups or curriculum specialists, will be appropriately checked and vetted, to ensure they are not linked to extremist groups or promoting extremist or other harmful material.

### **30. Private Fostering Arrangements**

- A private fostering arrangement occurs when someone other than a parent or a close relative cares for a child for a period of 28 days or more, with the agreement of the child's parents. It applies to children under the age of 16, or aged under 18 if the child is disabled. Children looked after by the local authority or who are placed in a residential school, children's home or hospital are not considered to be privately fostered.
- Private fostering occurs in all cultures, including British culture and children may be privately fostered at any age.
- Most privately fostered children remain safe and well but safeguarding concerns have been raised in some cases so it is important that schools are alert to possible safeguarding issues, including the possibility that a child has been trafficked into the country.
- By law, a parent, private foster carer or other persons involved in making a private fostering arrangement must notify Children's Services as soon as possible
- If we become aware of a privately fostering arrangement, we will check that Children's Services have been informed. (Comprehensive guidance is available in the DfE statutory guidance Children Act 1989: Private Fostering).

### **31. Staff Obligations**

- All staff, and this includes full time, part time, temporary and permanent members of staff, including supply teachers and volunteers must adhere to the School's Code of Conduct Policy and a copy of this Policy is available in the Staff Handbook. The Code of Conduct Policy provides details about obligations of staff for keeping the School informed of reasons why they should not work with children.
- Staff should be mindful of the need to consider safeguarding arrangements where children are engaged in close one to one teaching, particularly in performing arts and sports activities. Specific guidance can be provided on a case-by-case basis by consulting with the DSL or Head as required.

### **32. Challenge and Escalation**

- We recognise that professional disagreements may arise between any agencies and resolving problems

is an integral part of co-operation and joint working to safeguard children. As part of our responsibility for safeguarding children, we acknowledge that we must be prepared to challenge each other if we feel that responses to concerns, assessments or the way in which plans are implemented are not safeguarding the child and promoting their welfare.

- We are aware of the WSCP escalation procedures for raising concerns in respect of poor practice and our responsibility to utilise these as and when necessary, in the interests of safeguarding and promoting the welfare of children.

### **33. Monitoring and Evaluation**

Our Safeguarding Children Policy and procedures will be monitored and evaluated by:

- Completion and return to the LA/WSCP of the annual safeguarding report to the Governing Body;
- The DSL and DDSLs at each School meet on a regular basis to discuss and review any safeguarding concerns. This is done in conjunction with the Safeguarding Governor. The DSLs across the four schools discuss and share best practice;
- Consultations with the pupils;
- Discussions with pupils and staff;
- Scrutiny of data and risk assessments;
- Scrutiny of the School's single central record of recruitment checks;
- Monitoring of logs of bullying/racist/behaviour incidents and PPI records;
- Scrutiny of Governing Body minutes;
- Supervision of staff involved in child protection which includes the DSL providing the Governor with responsibility for Safeguarding with regular updates as required and termly reports to the Education Committee;
- Case file audits undertaken by the DSL and the WSCP.

### **34. Early Years Foundation Stage (EYFS)**

- Staff working within the EYFS must not use any personal electronic devices with imaging and sharing capabilities, **not just mobile phones and cameras**, in the Early Years Settings.
- More detailed directions regarding use of mobile phones and electronic devices with imaging and sharing capabilities within the EYFS setting at RGS The Grange, RGS Springfield and RGS Dodderhill can be found in their respective Electronic devices with imaging and sharing capabilities are in the Staff Handbook which must be read by all staff working at all these Schools.
- Please also see specific policies for Nappy Changing, Sleep, Supervision of children and Babysitting
- Staff have a termly Supervision meeting with their Line Manager, this is an opportunity to discuss and share any safeguarding concerns for children and staff members. However, staff are encouraged to share their concerns as they arise.

### **35. Holiday Club**

- The RGS Holiday club is a facility for children attending any of our four schools, as well as children that attend schools outside of our organisation. When attending the RGS Holiday Club this safeguarding policy will apply to all of the children attending the club.
- The Holiday Club staff will have completed safeguarding training at the School and the Holiday Club Manager is the trained DSL for the duration of the camps. In addition to this there is a DSL Duty Rota in place which ensures that a DSL or DDSL from one of our four schools is available to deal with any safeguarding concerns during holiday periods. Any safeguarding concern we have about a child attending the Holiday Club who is not a pupil at one of our schools, will be shared with the DSL at the



child's school in accordance with the normal procedures for transferring files and this will be done in a timely manner.

## CONTACTS

### INTERNAL

School	Role	Name	Email Address	Telephone
RGSW	Safeguarding Governor	Sally Mills	sally.mills@rgsw.org.uk	01905 613391
RGSW Headmaster and Executive Head to RGS Family of Schools	Headmaster	Mr John Pitt	headmaster@rgsw.org.uk	01905 613391
RGS Worcester	Senior Deputy Head	Mr Lloyd Beecham	llb@rgsw.org.uk	01905 613391
RGS Worcester	Deputy Head Pastoral	Mrs Juliana Atyeo	jha@rgsw.org.uk	01905 613391
RGS Worcester	Assistant Head DSL	Mrs Sofia Nicholls	sn@rgsw.org.uk	01905 613391
RGS Worcester	Deputy DSL	Mrs Angela Newport	ajn@rgsw.org.uk	01905 613391
RGS Worcester	Deputy DSL	Mr John Jones	jxj@rgsw.org.uk	01905 613391
RGS Worcester	Additional staff trained in DSL Duties	Mrs Deborah Harkness Mrs Elizabeth Kilburn Mrs Sarah Leeds	deh@rgsw.org.uk ewk@rgsw.org.uk sal@rgsw.org.uk	01905 613391
RGS Dodderhill	DSL	Mrs Sarah Clay	sac@rgsw.org.uk	01905 778290
RGS Dodderhill	Deputy DSL	Mrs Caroline Vinson	cmv@rgsw.org.uk	
RGS The Grange	Headmaster & Deputy DSL	Mr Gareth Hughes	gwh@rgsw.org.uk	01905 451205
RGS The Grange	Deputy Head, DSL	Mrs Wendy Wreghitt	ww@rgsw.org.uk	01905 451205
RGS The Grange	Deputy DSL	Mrs Marie-Claire Egginton	me@rgsw.org.uk	01905 451205
RGS The Grange	Deputy DSL	Mrs Katie Bradley	kmb@rgsw.org.uk	01905 451205
RGS The Grange	Deputy DSL EYFS	Mrs Phenice Fletcher	psf@rgsw.org.uk	01905 451205
RGS The Grange	Deputy DSL (Holiday Club)	Miss Clare Mullins	cem@rgsw.org.uk	01905 451205
RGS Springfield	Headmistress	Mrs Laura Brown	lab@rgsw.org.uk	01905 24999
RGS Springfield	Deputy Head & DSL	Mr Ian Griffin	irg@rgsw.org.uk	01905 24999
RGS Springfield	DSL for EYFS	Miss Naomi Cambray	noc@rgsw.org.uk	01905 24999
RGS Springfield	Deputy DSL EYFS	Mrs Camilla Williams	caw@rgsw.org.uk	01905 24999

### EXTERNAL

Agency/Role	Email Address	Telephone
Children's Services Family Front Door (FFD)	N/A	01905 822666
Emergency Duty Team (EDT), out of office hours		01905 768020
Community Social Work Team	Bromsgrove Team telephone: <u>01905 845154</u> Malvern Hills Team telephone: <u>01905 843961</u> Redditch Team telephone: <u>01905 846783</u> Worcester Team telephone: <u>01905 843339</u> Wychavon Team telephone: <u>01905 844229</u> Wyre Forest Team telephone: <u>01905 846210</u>	
Local Authority Designated Officer (LADO):	LADO@worcestershire.gov.uk	01905 846221
Education Adviser – Safeguarding: Denise Hannibal	dhannibal@worcestershire.gov.uk	01905 844436
Police – Prevent team	prevent@westmercia.pnn.police.uk	01386 591835

Childline		0800 1111
Women's Aid (24hr. Helpline)		0800 980 3331
West Mercia Rape & Sexual Abuse Support Centre (WMRSASC) / The Branch Project		01905 724514 01905 969777

### TRAINING AND INDEPENDENT SUPPORT

Agency	Email Address	Telephone Number
Chris and Eve Johnston Create Safer Organisations (CSO)	createsaferorgs@btinternet.com	07970 340846
Worcestershire Children First	Enquiries regarding this training provision are sent in the first instance to: <a href="mailto:WorkforceSupport@worcschildrenfirst.org.uk">WorkforceSupport@worcschildrenfirst.org.uk</a>	01905 844 420

Sponsor – Designated Safeguarding Lead

New Policy taking into account Keeping Children Safe in Education, Statutory Guidance for Schools and Colleges: 30 August 2016, Endorsed by the Chairman of Governors and Governor with Safeguarding responsibility on 30 August 2016

Amended and Endorsed by the Chairman of Governors on 4 November 2016 to include updated information regarding 'sexting'.

Reviewed, updated and Endorsed by the Governor with Safeguarding responsibility on 10 August 2017, 24 October 2017, November 2017, March 2018, August 2018 and March 2020 to include Mrs Diane Bennett as Deputy DSL, EYFS at RGS Springfield.

Reviewed, updated and Endorsed by the Governor with Safeguarding responsibility on 14 August 2020.

Updated to reflect need for EYFS DSL at RGS Dodderhill when Nursery was reopened from 6 January 2020

Updated to include Deputy DSL at RGS Dodderhill and to clarify RGS Worcester as 'Senior School' for the purposes of this Policy on 17 February 2020.

Updated and Endorsed by the Governor with Safeguarding responsibility to include Appendix 10 'COVID-19 School Arrangements for Safeguarding and Child Protection' (April 2020)

Reviewed, updated and Endorsed by the Governor with Safeguarding responsibility, August 2020

Updated and Endorsed by Governor with Safeguarding responsibility to include relevant updates to Appendix 10 'COVID-19 School Arrangements for Safeguarding and Child Protection' (January and February 2021)

Reviewed, updated and Endorsed by the Governor with Safeguarding responsibility, September 2021

Reviewed, updated and Endorsed by the Governor with Safeguarding responsibility, September 2021 (to remove Sam Salisbury and replace with Rachel Powell)

Reviewed, updated and Endorsed by the Governor with Safeguarding responsibility, February 2022 (to remove Dr Lee Andrew as DSL and replace with Mrs Sofia Nicholls)

Reviewed, updated by the DSL and Endorsed by the Governor with Safeguarding responsibility, September 2022

Reviewed, updated by the DSL and Endorsed by the Governor with Safeguarding responsibility, September 2023

Reviewed, updated by the DSL team at each of the four schools and Endorsed by the Governor with Safeguarding responsibility, September 2024





## APPENDIX 1

### Logging a Concern about a Child's Safety and Welfare For all staff and visitors

Which school is this child a pupil at? (Please circle)			
RGS Worcester	RGS Dodderhill	RGS The Grange	RGS Springfield
Pupil's name:		DOB:	Year Group:
Date:		Time:	
Your Name (please print):			
Your Role at the School:			
Please note the reason(s) for recording the incident:			
Details of concern/incident - record the who/what/where/when factually (continue on reverse of sheet if necessary):			
Any other relevant information including witnesses and any immediate action taken:			
Reporting staff signature ..... Date .....			
DSL – Response/Outcome:			
DSL signature ..... Date .....			

**Check to make sure your report is clear now - and that it will also be clear to a stranger reading it next year**

**PLEASE SUBMIT THIS FORM IN PERSON TO THE RELEVANT DSL**

**RGS Worcester DSL is Sofia Nicholls**  
**RGS Dodderhill DSL is Sarah Clay**  
**RGS The Grange DSL is Wendy Wreghitt**  
**RGS Springfield DSL is Ian Griffin**

**Continuation Sheet  
(Incident /Concern; other relevant information; Action Taken; Outcome)**

PUPIL NAME:

DATE

DETAILS

**Signature**

## APPENDIX 2

### Recognition and Identification of Abuse, Neglect and Exploitation

Definition taken from *Working Together to Safeguard Children 2018 (updated February 2024), Appendix A*

#### What is abuse?

Abuse, neglect and exploitation are forms of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm, or by failing to act to prevent harm. Children may be abused in a family or in an institutional or community setting, by those known to them or, more rarely, by a stranger for example, via the internet. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. They may be abused by an adult or adults, or another child or children.

From KCSIE: Knowing what to look for is vital to the early identification of abuse, neglect and exploitation. All staff should be aware of indicators of abuse, neglect and exploitation so that they are able to identify cases of children who may be in need of help or protection. If staff are unsure, they should always speak to the DSL (or deputy).

All school staff should be aware that abuse, neglect and safeguarding issues are rarely stand-alone events that can be covered by one definition or label. In most cases, multiple issues will overlap with one another. All staff should be aware that safeguarding incidents and/or behaviours can be associated with factors outside the School and/or can occur between children outside of these environments. All staff, but especially the DSL (and deputies) should consider whether children are at risk of abuse or exploitation in situations outside their families. Extra-familial harms take a variety of different forms and children can be vulnerable to multiple harms including (but not limited to) sexual exploitation, criminal exploitation, and serious youth violence.

#### Indicators of Abuse

Caution should be used when referring to lists of signs and symptoms of abuse. Although the signs and symptoms listed below may be indicative of abuse there may be alternative explanations. In assessing the circumstances of any child any of these indicators should be viewed within the overall context of the child's individual situation including any disability.

#### EMOTIONAL ABUSE

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

Emotional abuse is difficult to:

- define
- identify/recognise
- prove.

Emotional abuse is chronic and cumulative and has a long-term impact. Indicators may include:

- Physical, mental and emotional development lags

- Sudden speech disorders
- Continual self-depreciation ('I'm stupid, ugly, worthless, etc.')
- Overreaction to mistakes
- Extreme fear of any new situation
- Inappropriate response to pain ('I deserve this')
- Unusual physical behaviour (rocking, hair twisting, self-mutilation) - consider within the context of any form of disability such as autism
- Extremes of passivity or aggression
- Children suffering from emotional abuse may be withdrawn and emotionally flat. One reaction is for the child to seek attention constantly or to be over-familiar. Lack of self-esteem and developmental delay are again likely to be present
- Babies – feeding difficulties, crying, poor sleep patterns, delayed development, irritable, non-cuddly, apathetic, non-demanding
- Toddler/Pre-School – head banging, rocking, bad temper, 'violent', clingy. From overactive to apathetic, noisy to quiet. Developmental delay – especially language and social skills
- School age – Wetting and soiling, relationship difficulties, poor performance at school, non-attendance, antisocial behaviour. Feels worthless, unloved, inadequate, frightened, isolated, corrupted and terrorised
- Adolescent – depression, self-harm, substance abuse, eating disorder, poor self-esteem, oppositional, aggressive and delinquent behaviour
- Child may be underweight and/or stunted
- Child may fail to achieve milestones, fail to thrive, experience academic failure or under achievement
- Also consider a child's difficulties in expressing their emotions and what they are experiencing and whether this has been impacted on by factors such as age, language barriers or disability

## **NEGLECT**

Neglect is the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's mental and physical 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), failing to protect a child from physical and emotional harm or danger, failure to ensure adequate supervision (including the use of inadequate care-givers) or failure to ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

There are occasions when nearly all parents find it difficult to cope with the many demands of caring for children. But this does not mean that their children are being neglected. Neglect involves ongoing failure to meet a child's needs.

Neglect can often fit into six forms which are:

- Medical – the withholding of medical care including health and dental.
- Emotional – lack of emotional warmth, touch and nurture
- Nutritional – either through lack of access to a proper diet which can affect in their development.
- Educational – failing to ensure regular school attendance that prevents the child reaching their full potential academically
- Physical – failure to meet the child's physical needs
- Lack of supervision and guidance – meaning the child is in dangerous situations without the ability to risk assess the danger (*Source: Horwath, J (2007): Child neglect: identification and assessment: Palgrave Macmillan*)

### **Common Concerns:**

With regard to the child, some of the regular concerns are:

- The child's development in all areas including educational attainment



- Cleanliness
- Health
- Children left at home alone and accidents related to this
- Taking on unreasonable care for others
- Young carers

Neglect can often be an indicator of further maltreatment and is often identified as an issue in serious case reviews as being present in the lead up to the death of the child or young person. It is important to recognise that the most frequent issues and concerns regarding the family in relation to neglect relate to parental capability. This can be a consequence of:

- Poor health, including mental health or mental illness
- Disability, including learning difficulties
- Substance misuse and addiction
- Domestic violence

School staff need to consider both acts of commission (where a parent/carer deliberately neglects the child) and acts of omission (where a parent's failure to act is causing the neglect). This is a key consideration with regard to school attendance where parents are not ensuring their child attend school regularly.

Many of the signs of neglect are visible. However, school staff may not instinctively know how to recognise signs of neglect or know how to respond effectively when they suspect a pupil is being neglected. Children spend considerable time in school so staff have opportunities to identify patterns over time and recognise and respond to concerns about their safety and welfare. All concerns should be recorded and reflected upon, not simply placed in a file.

Here are some signs of possible neglect:

#### **Physical signs:**

- Constant hunger
- Poor personal hygiene
- Constant tiredness
- Emaciation
- Untreated medical problems
- The child seems underweight and is very small for their age
- The child is poorly clothed, with inadequate protection from the weather
- Neglect can lead to failure to thrive, manifest by a fall away from initial centile lines in weight, height and head circumference. Repeated growth measurements are crucially important
- Signs of malnutrition include wasted muscles and poor condition of skin and hair. It is important not to miss an organic cause of failure to thrive; if this is suspected, further investigations will be required
- Infants and children with neglect often show rapid growth catch-up and improved emotional response in a hospital environment
- Failure to thrive through lack of understanding of dietary needs of a child or inability to provide an appropriate diet; or may present with obesity through inadequate attention to the child's diet
- Being too hot or too cold – red, swollen and cold hands and feet or they may be dressed in inappropriate clothing
- Consequences arising from situations of danger – accidents, assaults, poisoning
- Unusually severe but preventable physical conditions owing to lack of awareness of preventative health care or failure to treat minor conditions
- Health problems associated with lack of basic facilities such as heating
- Neglect can also include failure to care for the individual needs of the child including any additional support the child may need as a result of any disability

#### **Behavioural signs:**

- No social relationships
- Compulsive scavenging
- Destructive tendencies

- If they are often absent from school for no apparent reason
- If they are regularly left alone, or in charge of younger brothers or sisters
- Lack of stimulation can result in developmental delay, for example, speech delay, and this may be picked up opportunistically or at formal development checks
- Craving attention or ambivalent towards adults, or may be very withdrawn
- Delayed development and failing at school (poor stimulation and opportunity to learn)
- Difficult or challenging behaviour

## **PHYSICAL ABUSE**

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.

When dealing with concerns regarding physical abuse, refer any suspected non-accidental injury to the Designated Safeguarding Lead without delay so that they are able to seek appropriate guidance from the police and/or Children's Services in order to safeguard the child.

Staff must be alert to:

- Unexplained recurrent injuries or burns; improbable excuses or refusal to explain injuries;
- Injuries that are not consistent with the story: too many, too severe, wrong place or pattern, child too young for the activity described.

Physical signs can include the following, but this is not an exhaustive list:

- Bald patches
- Bruises, black eyes and broken skin and/or bones
- Untreated or inadequately treated injuries
- Injuries to parts of the body where accidents are unlikely, such as thighs, back, abdomen
- Scalds and burns
- General appearance and behaviour of the child may include:
  - Concurrent failure to thrive: measure height, weight and, in the younger child, head circumference;
  - Frozen watchfulness: impassive facial appearance of the abused child who carefully tracks the examiner with his eyes.
- Bruising:
  - Bruising patterns can suggest gripping (finger marks), slapping or beating with an object.
  - Bruising on the cheeks, head or around the ear and black eyes can be the result of non-accidental injury.
- Other injuries:
  - Bite marks may be evident from an impression of teeth
  - Small circular burns on the skin suggest cigarette burns
  - Scalding inflicted by immersion in hot water often affects buttocks or feet and legs symmetrically
  - Red lines occur with ligature injuries
  - Retinal haemorrhages can occur with head injury and vigorous shaking of the baby
  - Tearing of the frenulum of the upper lip can occur with force-feeding. However, any injury of this type must be assessed in the context of the explanation given, the child's developmental stage, a full examination and other relevant investigations as appropriate.
  - Fractured ribs: rib fractures in a young child are suggestive of non-accidental injury
  - Other fractures: spiral fractures of the long bones are suggestive of non-accidental injury

Behavioural signs:

- Wearing clothes to cover injuries, even in hot weather
- Refusal to undress for gym
- Chronic running away
- Fear of medical help or examination

- Self-destructive tendencies
- Fear of physical contact - shrinking back if touched
- Admitting that they are punished, but the punishment is excessive (such as a child being beaten every night to 'make him study')
- Fear of suspected abuser being contacted
- Injuries that the child cannot explain or explains unconvincingly
- Become sad, withdrawn or depressed
- Having trouble sleeping
- Behaving aggressively or be disruptive
- Showing fear of certain adults
- Having a lack of confidence and low self-esteem
- Using drugs or alcohol
- Repetitive pattern of attendance: recurrent visits, repeated injuries
- Excessive compliance
- Hyper-vigilance

## **SEXUAL ABUSE**

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

Sexual abuse is usually perpetrated by people who are known to and trusted by the child – e.g. relatives, family friends, neighbours, people working with the child in school or through other activities.

Characteristics of child sexual abuse:

- It is usually planned and systematic – people do not sexually abuse children by accident, though sexual abuse can be opportunistic;
- Grooming the child – people who abuse children take care to choose a vulnerable child and often spend time making them dependent. This can be done in person or via the internet through chat-rooms and social networking sites;
- Grooming the child's environment – abusers try to ensure that potential adult protectors (parents and other carers especially) are not suspicious of their motives. Again, this can be done in person or via the internet through chat-rooms and social networking sites.

### **In young children behavioural changes may include:**

- Regressing to younger behaviour patterns such as thumb sucking or bringing out discarded cuddly toys
- Being overly affectionate - desiring high levels of physical contact and signs of affection such as hugs and kisses
- Lack of trust or fear of someone they know well, such as not wanting to be alone with a babysitter or child minder
- They may start using sexually explicit behaviour or language, particularly if the behaviour or language is not appropriate for their age
- Starting to wet again, day or night/nightmares

### **In older children behavioural changes may include:**

- Extreme reactions, such as depression, self-mutilation, suicide attempts, running away, overdoses, anorexia
- Personality changes such as becoming insecure or clinging
- Sudden loss of appetite or compulsive eating
- Being isolated or withdrawn
- Inability to concentrate
- Become worried about clothing being removed
- Suddenly drawing sexually explicit pictures
- Trying to be 'ultra-good' or perfect; overreacting to criticism
- Genital discharge or urinary tract infections
- Marked changes in the child's general behaviour. For example, they may become unusually quiet and withdrawn, or unusually aggressive. Or they may start suffering from what may seem to be physical ailments, but which can't be explained medically
- The child may refuse to attend school or start to have difficulty concentrating so that their schoolwork is affected
- They may show unexpected fear or distrust of a particular adult or refuse to continue with their usual social activities
- The child may describe receiving special attention from a particular adult, or refer to a new, "secret" friendship with an adult or young person
- Children who have been sexually abused may demonstrate inappropriate sexualised knowledge and behaviour
- Low self-esteem, depression and self-harm are all associated with sexual abuse

#### **Physical signs and symptoms for any age child could be:**

- Medical problems such as chronic itching, pain in the genitals, venereal diseases
- Stomach pains or discomfort walking or sitting
- Sexually transmitted infections
- Any features that suggest interference with the genitalia. These may include bruising, swelling, abrasions or tears
- Soreness, itching or unexplained bleeding from penis, vagina or anus
- Sexual abuse may lead to secondary enuresis or faecal soiling and retention
- Symptoms of a sexually transmitted disease such as vaginal discharge or genital warts, or pregnancy in adolescent girls

#### **Sexual Abuse by Young People**

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

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

Inappropriate Sexual Behaviour can be inappropriate socially, inappropriate to development, or both. In considering whether behaviour fits into this category, it is important to consider what negative effects it has on any of the parties involved and what concerns it raises about a child or young person. It should be recognised that some actions may be motivated by information seeking, but still cause significant upset,

confusion, worry, physical damage, etc. it may also be that the behaviour is “acting out” which may derive from other sexual situations to which the child or young person has been exposed.

If an act appears to have been inappropriate, there may still be a need for some form of behaviour management or intervention. For some children, educative inputs may be enough to address the behaviour.

Abusive sexual activity includes any behaviour involving coercion, threats, aggression together with secrecy, or where one participant relies on an unequal power base.

With any situation involving potential abuse by a young person the DSL will always seek guidance on the matter from the Worcestershire Children’s Family Front Door. The DSL will also follow the guidance in West Midlands Child Protection Safeguarding Children Procedures in particular section 2.18 ‘sexually active children and young people (including under-age sexual activity)’ and section 2.25 ‘Children who abuse others including child on child abuse / harmful sexual behaviour’.

### **Assessment**

In order to more fully determine the nature of the incident the following factors should be given consideration. The presence of exploitation in terms of:

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

In evaluating sexual behaviour of children and young people, the above information should be used only as a guide.

## APPENDIX 3

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

Both CSE and CCE are forms of abuse and both occur where an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a child into sexual or criminal activity. Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including gender, sexual identity, cognitive ability, physical strength, status, and access to economic or other resources. In some cases, the abuse will be in exchange for something the victim needs or wants and/or will be to the financial benefit or other advantage (such as increased status) of the perpetrator or facilitator. The abuse can be perpetrated by individuals or groups, males or females, and children or adults. The abuse can be a one-off occurrence or a series of incidents over time, and range from opportunistic to complex organised abuse. It can involve force and/or enticement-based methods of compliance and may, or may not, be accompanied by violence or threats of violence. Victims can be exploited even when activity appears consensual and it should be noted exploitation as well as being physical can be facilitated and/or take place online.

#### Child Criminal Exploitation (CCE)

CCE is where an individual or group takes advantage of power to coerce, control, manipulate or deceive a child into any criminal activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial or other advantage of the perpetrator or facilitator and/or (c) through violence or the threat of violence. The victim may have been criminally exploited even if the activity appears consensual. CCE does not always involve physical contact; it can also occur through the use of technology.

CCE can include children being forced to work in cannabis factories, being coerced into moving drugs or money across the country (County Lines, see [Section 6.3](#) and [Appendix 4](#) for more information), forced to shoplift or pickpocket, or to threaten other young people.

Some of the following can be indicators of CCE:

- children who appear with unexplained gifts or new possessions;
- children who associate with other young people involved in exploitation;
- children who suffer from changes in emotional well-being;
- children who misuse drugs and alcohol;
- children who go missing for periods of time or regularly come home late; and
- children who regularly miss school or education or do not take part in education.

#### Child Sexual Exploitation (CSE)

CSE is a form of abuse which involves children (male and female, of different ethnic origins and of different ages) receiving something in exchange for sexual activity.

Child sexual exploitation is a form of child sexual abuse. CSE occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into sexual activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial advantage or increased status of the perpetrator or facilitator. The victim may have been sexually exploited even if the sexual activity appears consensual. CSE does not always involve physical contact; it can also occur through the use of technology. CSE can affect any child or young person (male or female) under the age of 18 years, including 16- and 17-year olds who can legally consent to have sex. It can include both contact (penetrative and non-penetrative acts) and non-contact sexual activity and may occur without the child or young person's

immediate knowledge (e.g. through others copying videos or images they have created and posted on social media).

The above indicators for CCE can also be indicators of CSE, as can:

- children who have older boyfriends or girlfriends; and
- children who suffer from sexually transmitted infections or become pregnant

The definition and further guidelines can be found in the DfE document: [Child sexual exploitation - Definition and a guide for practitioners](#)

### **Who is at risk?**

Child sexual exploitation can happen to any young person from any background. Although the research suggests that the females are more vulnerable to CSE, boys and young men are also victims of this type of abuse.

The characteristics common to all victims of CSE are not those of age, ethnicity or gender, rather their powerlessness and vulnerability. Victims often do not recognise that they are being exploited because they will have been groomed by their abuser(s). As a result, victims do not make informed choices to enter into, or remain involved in, sexually exploitative situations but do so from coercion, enticement, manipulation or fear. Sexual exploitation can happen face to face and it can happen online. It can also occur between young people.

In all its forms, CSE is child abuse and should be treated as a child protection issue.

### **WARNING SIGNS AND VULNERABILITIES CHECKLIST** *(From The Office of the Children's Commissioner Inquiry into Child Sexual Exploitation in Groups and Gangs, Final Report November 2013)*

The evidence available points to several factors that can increase a child's vulnerability to being sexually exploited. The following are typical vulnerabilities in children prior to abuse:

- Living in a chaotic or dysfunctional household (including parental substance use, domestic violence, parental mental health issues, parental criminality)
- History of abuse (including familial child sexual abuse, risk of forced marriage, risk of 'honour'-based violence, physical and emotional abuse, neglect and exploitation)
- Recent bereavement or loss
- Gang association either through relatives, peers or intimate relationships (in cases of gang-associated CSE only)
- Attending school with young people who are sexually exploited
- Learning disabilities
- Unsure about their sexual orientation or unable to disclose sexual orientation to their families
- Friends with young people who are sexually exploited
- Homeless
- Lacking friends from the same age group
- Living in a gang neighbourhood
- Living in residential care
- Living in hostel, bed and breakfast accommodation or a foyer
- Low self-esteem or self-confidence
- Young carer

The following signs and behaviour are generally seen in children who **are already being sexually exploited**:

- Missing from home or care
- Physical injuries
- Drug or alcohol misuse

- Involvement in offending
- Repeat sexually-transmitted infections, pregnancy and terminations
- Absent from school
- Evidence of sexual bullying and/or vulnerability through the internet and/or social networking sites
- Estranged from their family
- Receipt of gifts from unknown sources
- Recruiting others into exploitative situations
- Poor mental health
- Self-harm
- Thoughts of or attempts at suicide

Evidence shows that any child displaying several vulnerabilities from the above lists should be considered to be at high risk of sexual exploitation.

The DSL is the lead person for implementing local guidance in respect of child sexual exploitation. The DSL must ensure they are aware of the guidance on Children affected by Exploitation and Trafficking (including Gangs) on the [West Midlands Safeguarding Children Procedures website](#).

The DSL must ensure that all staff are aware of signs and symptoms of CSE and know that these must be reported and recorded as child protection concerns. The DSL must follow the Worcestershire Pathway for dealing with issues of CSE, including completion of the screening tool.



## APPENDIX 4

### Criminal Exploitation – County Lines

#### What is County Lines?

County Lines is a very serious issue where criminal gangs set up a drug dealing operation in a place outside their usual operating area. Gangs will move their drug dealing from big cities (e.g. London, Manchester, Liverpool etc.) to smaller towns and rural areas in order to make more money. This can have a really big effect on the community who live there and bring with it serious criminal behaviour.

The UK Government defines County Lines as:

County Lines is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs (primarily crack cocaine and heroin) into one or more importing areas within the UK, using dedicated mobile phone lines or other form of “deal line”. They are likely to exploit children and vulnerable adults to move and store the drugs and money and they will often use coercion, intimidation, violence (including sexual violence) and weapons.

Exploitation is an integral part of the County Lines offending model with children and vulnerable adults exploited to move [and store] drugs and money. Offenders will often use coercion, intimidation, violence (including sexual violence) and weapons to ensure compliance of victims. Children can be targeted and recruited into county lines in a number of locations including schools. Children are often recruited to move drugs and money between locations and are known to be exposed to techniques such as ‘plugging’, where drugs are concealed internally to avoid detection. Children can easily become trapped by this type of exploitation as county lines gangs create drug debts and can threaten serious violence and kidnap towards victims (and their families) if they attempt to leave the county lines network. One of the ways of identifying potential involvement in county lines are missing episodes (both from home and school), when the victim may have been trafficked for the purpose of transporting drugs and a referral to the National Referral Mechanism (National Crime Agency – Modern Slavery and Human-Trafficking) should be considered. If a child is suspected to be at risk of or involved in county lines a safeguarding referral should be considered alongside consideration of availability of local services/third sector providers who offer support to victims of county lines exploitation.

Child criminal exploitation is increasingly used to describe this type of exploitation where children are involved, and is defined as:

Child Criminal Exploitation is common in County Lines and occurs where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child or young person under the age of 18. The victim may have been criminally exploited even if the activity appears consensual. Child Criminal Exploitation does not always involve physical contact; it can also occur through the use of technology (see [Section 6.2 above](#)).

Criminal exploitation of children is broader than just County Lines and includes, for instance, children forced to work on cannabis farms or to commit theft.

#### Crimes Associated with County Lines:

##### Drugs

County Lines commonly involves the illegal distribution and dealing of seriously dangerous drugs from one city/town to another. The most common drugs involved are heroin and cocaine (crack and powder), but also MDMA, cannabis, amphetamines and spice.

##### Violence

Gangs sometimes use violence to threaten children and young people when recruiting them. Gangs also violently assault children and young people working for them if they find their drugs or money to be missing. Weapons such as firearms, knives, bats, acid are sometimes used to make violent threats.

## **Exploitation**

Gangs recruit and use children and young people to move drugs and money for them. Children as young as 11 years old are recruited, often using social media. They are exploited and forced to carry drugs between locations, usually on trains or coaches. They are also forced to sell drugs to local users.

## **Sexual Exploitation**

Young girls are often groomed and forced into relationships with gang members and are made to perform sexual acts.

## **Signs to look out for:**

A young person's involvement in County Lines activity often leaves signs. A person might exhibit some of these signs, either as a member or as an associate of a gang dealing drugs.

- Are they always going missing from school or their home?
- Are they travelling alone to places far away from home?
- Do they suddenly have lots of money/lots of new clothes/new mobile phones?
- Are they receiving much more calls or texts than usual?
- Are they carrying or selling drugs?
- Are they carrying weapons or know people that have access to weapons?
- Are they in a relationship with or hanging out with someone/people that are older and controlling?
- Do they have unexplained injuries?
- Do they seem very reserved or seem like they have something to hide?
- Do they seem scared?
- Are they self-harming?

## **Terms associated with County Lines**

Here are some words/terms that are commonly used when describing County Lines activity. someone using these words might be involved in or might know of County Lines activity.

## **Cuckooing**

Cuckooing is when drug gangs take over the home of a vulnerable person through violence and intimidation, using it as their base for selling/manufacturing drugs.

### **Signs of cuckooing:**

- An increase in people coming and going
- An increase in cars or bikes outside
- Litter outside
- Signs of drugs use
- You haven't seen the person who lives there recently or when you have, they have been anxious or distracted.

## **Going Country**

This is the most popular term that describes County Lines activity. It can also mean the act of travelling to another city/town to deliver drugs or money.

## **Trapping**

The act of selling drugs. Trapping can refer to the act of moving drugs from one town to another or the act of selling drugs in one.

## **Trap House**

A building used as a base from where drugs are sold (or sometimes manufactured). These houses usually are occupied by someone (usually adult drug users) but sometimes young people are forced to stay in trap houses.

### **Trap line**

This refers to when someone owns a mobile phone specifically for the purpose of running and selling of drugs.

What to do if you have concerns that a young person is involved in County Lines?

Follow your normal safeguarding procedures and refer to your school's DSL. The DSL will refer on to Children's Social Care and/or the Police, if the young person is at immediate risk of harm.

Further information is available in the regional guidance of the [West Midlands Child Protection Procedures](#). Further guidance is available in the Home Office's publication '[County Lines: criminal exploitation of children and vulnerable adults](#)'.

## APPENDIX 5

### Effects of Domestic Abuse on Children and Young People

**The impact of domestic abuse on the quality of a child's or young person's life is very significant. Children and young people who live with domestic abuse are at increased risk of behavioural problems, emotional trauma, and mental health difficulties in adult life.**

#### Definition

The Domestic Abuse Act 2021 (Part 1) defines domestic abuse as any of the following behaviours, either as a pattern of behaviour, or as a single incident, between two people over the age of 16, who are 'personally connected' to each other:

- (a) physical or sexual abuse;
- (b) violent or threatening behaviour;
- (c) controlling or coercive behaviour;
- (d) economic abuse (adverse effect of the victim to acquire, use or maintain money or other property; or obtain goods or services); and
- (e) psychological, emotional or other abuse.

People are 'personally connected' when they are, or have been married to each other or civil partners; or have agreed to marry or become civil partners. If the two people have been in an intimate relationship with each other, have shared parental responsibility for the same child, or they are relatives.

The definition of Domestic Abuse applies to children if they see or hear, or experience the effects of, the abuse; and they are related to the abusive person.

(The definition can be found here: <https://www.legislation.gov.uk/ukpga/2021/17/part/1/enacted>)

Exposure to domestic abuse and/or violence can have a serious, long lasting emotional and psychological impact on children. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result. The impact of domestic abuse on children and young people can be wide-ranging and may include effects in any or all of the following areas:

**Physical:** Children and young people can be hurt either by trying to intervene and stopping the violence or by being injured themselves by the abuser. They may develop self-harming behaviour, or eating disorders. Their health could be affected, as they may not be being cared for appropriately. They may have suicidal thoughts or try to escape or blank out the abuse by using drugs, alcohol or by running away.

**Sexual:** There is a high risk that children and young people will be abused themselves where there is domestic abuse. In homes where living in fear is the norm, and situations are not discussed, an atmosphere of secrecy develops and this creates a climate in which sexual abuse could occur. In addition to this, children and young people may sometimes be forced to watch the sexual abuse of their mother/carer. This can have long-lasting effects on the sexual and emotional development of the child/young person.

**Economic:** The parent or carer of the child or young person may have limited control over the family finances. Therefore, there might be little or no money available for extra-curricular activities, clothing or even food, impacting on their health and development.

**Emotional:** Children and young people will often be very confused about their feelings – for example, loving both parents/carers but not wanting the abuse to continue. They may be given negative messages about their own worth, which may lead to them developing low self-esteem. Many children and young people feel guilty, believing that the abuse is their fault. They are often pessimistic about their basic needs being met and can develop suicidal thoughts. Some children and young people may internalise feelings and appear passive and withdrawn or externalise their feelings in a disruptive manner.

**Isolation:** Children and young people may become withdrawn and isolated; they may not be allowed out to play; and if there is abuse in the home, they are less likely to invite their friends round. Schooling may be disrupted in many ways, and this may contribute to their growing isolation. They may frequently be absent

from school as they may be too scared to leave their mother alone. They may have to move away from existing friends and family – e.g. into a refuge or other safe or temporary accommodation.

**Threats:** Children and young people are likely to have heard threats to harm their mother/father. They may have been directly threatened with harm or heard threats to harm their pet. They also live under the constant and unpredictable threat of violence, resulting in feelings of intimidation, fear and vulnerability, which can lead to high anxiety, tension, confusion and stress.

This clearly highlights that living with domestic abuse has a significant impact on a child's ability to achieve the five outcomes as outlined in the 'Every Child Matters' agenda:

- be healthy;
- stay safe;
- enjoy and achieve;
- make a positive contribution;
- achieve economic well-being.

### **What you might see in school:**

- Unexplained absences or lateness – either from staying at home to protect their parent or hide their injuries, or because they are prevented from attending school;
- Children and young people attending school when ill rather than staying at home;
- Children and young people not completing their homework, or making constant excuses, because of what is happening at home;
- Children and young people who are constantly tired, on edge and unable to concentrate through disturbed sleep or worrying about what is happening at home;
- Children and young people displaying difficulties in their cognitive and school performance;
- Children and young people whose behaviour and personality changes dramatically;
- Children and young people who become quiet and withdrawn and have difficulty in developing positive peer relations;
- Children and young people displaying disruptive behaviour or acting out violent thoughts with little empathy for victims;
- Children and young people who are no trouble at all.

This list is not exhaustive – this is intended to give you an idea of some of the types of behaviour that could be presented.

### **What schools can do**

Schools can create an environment which both promotes their belief and commitment that domestic abuse is not acceptable, and that they are willing to discuss and challenge it.

For many victims, the School might be the one place that they visit without their abusive partner.

It would help if schools displayed posters or had cards/pens available with information about domestic abuse and contact details for useful agencies: for example, NSPCC **0808 800 5000** and ChildLine **0800 11 11**; Parentline 0808 800 2222; Worcestershire's Forum Against Domestic Abuse and Sexual Violence (WFADSA) and West Mercia Women's Aid 24 hr. helpline: **0800 980 3331** and [Website](#) .

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

West Mercia Constabulary - Police Domestic Abuse Units 101.

Research shows that the repeated use of physical, sexual, psychological and financial abuse is one of the ways in which male power is used to control women. The underlying attitudes which legitimate and perpetuate violence against women should be challenged by schools as part of the whole school ethos.

### **Schools can support individual children and young people by:**

- Introducing a whole-school philosophy that domestic abuse is unacceptable;
- Responding to disclosures and potential child protection concerns; recognising that domestic abuse and forced marriage may be a child protection concern; policies and procedures must include domestic abuse;
- Giving emotional support – the child or young person might need referral to a more specialist service or need additional support to complete coursework, exams etc.;
- Facilitating a peer support network – children and young people can become isolated but often welcome talking to friends about their problems;
- Offering practical support – if children or young people are new to the School, they may not yet have a uniform, they may also need financial help with extra-curricular activities, or they may be unfamiliar with the syllabus, the area, where to hang out, etc.;
- Providing somewhere safe and quiet to do their homework or just to sit and think;
- Improving the self-esteem and confidence of children and young people by:
  - offering them opportunities to take on new roles and responsibilities;
  - offering tasks which are achievable and giving praise and encouragement;
  - monitoring their behaviour and setting clear limits;
  - criticising the action, not the person;
  - helping them to feel a sense of control in their school lives;
  - involving them in decision making;
  - helping them to be more assertive;
  - respecting them as individuals;
  - encouraging involvement in extra-curricular activities.

From The Expect Respect Education Toolkit – Women's Aid.

### **Operation Encompass**

Operation Encompass is a police and education early information sharing partnership enabling schools to offer immediate support for children and young people experiencing domestic abuse. Operation Encompass operates in Worcestershire and the School is part of this system which ensures that when police are called to an incident of domestic abuse, where there are children in the household who have experienced the domestic incident, the police will inform the key adult (usually the designated safeguarding lead) in school before the child or children arrive at school the following day. This ensures that the School has up to date relevant information about the child's circumstances and can enable support to be given to the child according to their needs.

Children experiencing domestic abuse are negatively impacted by this exposure; domestic abuse has been identified as an Adverse Childhood Experience and can lead to emotional, physical and psychological harm. Operation Encompass aims to mitigate this harm by enabling immediate support, making a child's day better and giving them a better tomorrow.

The DSL's responsibility – the DSL should:

- View the Operation Encompass website ([www.operationencompass.org](http://www.operationencompass.org)) for further information;
- Ensure the Safeguarding Education Adviser has up to date contact information;
- Ensure the Operation Encompass referral record document is retained in the same way as other child protection documents, in a secure place;
- Identify and brief a colleague who can deputise in his/her absence;
- Ensure that all teaching staff are aware of Operation Encompass and understand the confidential nature of any information passed to them and that this information must be treated in the same way as any other child protection information;
- Inform parents that the School is part of Operation Encompass (using the template letter supplied);

- Inform the Governing Body that the School is part of Operation Encompass and the Governor with responsibility for safeguarding should have a working knowledge of the principles;
- Include details of Operation Encompass in the School prospectus and on the School website to ensure that all new parents are informed of the School's involvement.
- Consider displaying Operation Encompass posters around the School.

On receiving a Domestic Abuse notification, the DSL should:

- complete the Operation Encompass referral record
- notify class teachers or year leaders
- If there's no change to the child's behaviour - just monitor and log the DA
- If the child displays poor behaviour choices /seems upset/withdrawn, offer the relevant support needed

Bear in mind

- Victim of incident may be anxious that the information will be shared inappropriately.
- Notification may not give details as to which parent is the perpetrator/victim – any disclosure to the 'wrong' parent could heighten risk.
- Need to be aware who is 'connected' to the child – e.g. TA/lunchtime supervisor may be child's relative / friend of the family.
- Inappropriate sharing of information could heighten the risk for the victim and/or the child.

If in doubt, consult with the Family Front Door (01905 822666)

## APPENDIX 6

### Radicalisation and Extremism

#### Preventing Radicalisation

**Children are vulnerable to extremist ideology and radicalisation. Similar to protecting children from other forms of harms and abuse, protecting children from this risk should be part of a schools' safeguarding approach.**

RGS is committed to ensuring that all members of the School community are treated with tolerance and respect and that our pupils are safeguarded from extremist views and radicalisation.

The School uses the following accepted Governmental definitions **of Extremism, Radicalisation and Terrorism:**

Extremism is the 'Vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs; and/or call for the death of members of our armed forces, whether in this country or overseas'.

**Radicalisation refers to the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups.**

**Terrorism** is an action that endangers or causes serious violence to a person/people; causes serious damage to property; or seriously interferes or disrupts an electronic system. The use of threat must be designed to influence the government or to intimidate the public and is made for the purpose of advancing a political, religious or ideological cause.

We understand that there is no single way of identifying whether a child is likely to be susceptible to an extremist ideology. Background factors combined with specific influences such as family and friends may contribute to a child's vulnerability. Similarly, radicalisation can occur through many different methods (such as social media or the internet) and settings (such as within the home). However, it is possible to protect vulnerable people from extremist ideology and intervene to prevent those at risk of radicalisation being radicalised.

Pupils should see their school as being a safe place where they can explore controversial issues safely and teachers have a duty to encourage and facilitate this. All adults working in school have a responsibility to safeguard children, including safeguarding children from extremism and radicalisation. This is because exposure to extremist materials and influences can lead to poor outcomes for children and as such, they are a safeguarding concern.

We encourage pupils to respect the fundamental British values of democracy, the rule of law, individual liberty and mutual respect, and tolerance of those with different faiths and beliefs. We ensure that partisan political views are not promoted in the teaching of any subject in the School and where political issues are brought to the attention of the pupils, reasonably practicable steps have been taken to offer a balanced presentation of opposing views to pupils.

We value freedom of speech and the expression of beliefs/ideology as fundamental rights underpinning our society's values. Both pupils and teachers have the right to speak freely and voice their opinions. However, freedom comes with responsibility and free speech that is designed to manipulate the vulnerable or that leads to violence and harm of others goes against the moral principles in which freedom of speech is valued. Free speech is not an unqualified privilege; it is subject to laws and policies governing equality,



human rights, community safety and community cohesion. We seek to ensure our pupils are aware of the dangers of radicalisation and we work to build their resilience to such dangers through Religious Studies lessons, assemblies and our PSHCE programme.

We seek to protect children and young people against the messages of all violent extremism including, but not restricted to, those linked to Islamist ideology, or to Far Right / Neo Nazi / White Supremacist ideology, Irish Nationalist and Loyalist paramilitary groups, and extremist Animal Rights movements. The Staff Code of Conduct Policy provides for monitoring the appropriateness of visiting speakers and states that visiting speakers must not have unsupervised contact with any pupils.

### **What is Prevent?**

Prevent is the Government's strategy to stop people becoming terrorists or supporting terrorism, in all its forms. Prevent works at the pre-criminal stage by using early intervention to encourage individuals and communities to challenge extremist and terrorist ideology and behaviour.

The Counter-Terrorism and Security Act (2015), places a duty on specified authorities, including schools and colleges, to have due regard to the need to prevent people from being drawn into terrorism ("the Prevent duty"). The Prevent duty reinforces existing duties placed upon educational establishments for keeping children safe by:

- Ensuring a broad and balanced curriculum is in place to promote the spiritual, moral, social and cultural development of pupils;
- Assessing the risk of pupils being drawn into extremist views;
- Ensuring safeguarding arrangements by working in partnership with local authorities, police and communities;
- Training staff to provide them with the knowledge and ability to identify pupils at risk;
- Keeping pupils safe online, using effective filtering and usage policies.

### **Warning Signs/Indicators of Concern**

There is no such thing as a "typical extremist": those who become involved in extremist actions come from a range of backgrounds and experiences, and most individuals, even those who hold radical views, do not become involved in violent extremist activity.

Pupils may become susceptible to radicalisation through a range of social, personal and environmental factors, such as social media or the internet, and in a range of settings, including the home. It is vital that school staff are able to recognise those vulnerabilities. However, this list is not exhaustive, nor does it mean that all young people experiencing the above are at risk of radicalisation for the purposes of violent extremism.

### **Factors which may make pupils more vulnerable may include:**

- Identity Crisis: the pupil is distanced from their cultural/religious heritage and experiences discomfort about their place in society.
- Personal Crisis: the pupil may be experiencing family tensions; a sense of isolation; low self-esteem; they may have dissociated from their existing friendship group and become involved with a new and different group of friends; they may be searching for answers to questions about identity, faith and belonging.
- Personal Circumstances: migration; local community tensions and events affecting the pupil's country or region of origin may contribute to a sense of grievance that is triggered by personal experience of racism or discrimination or aspects of Government policy.
- Unmet Aspirations: the pupil may have perceptions of injustice; a feeling of failure; rejection of civic life.
- Experiences of Criminality: involvement with criminal groups, imprisonment, poor resettlement or reintegration.

- Special Educational Need: pupils may experience difficulties with social interaction, empathy with others, understanding the consequences of their actions and awareness of the motivations of others.

**Pupils who are vulnerable to radicalisation may also be experiencing:**

- Substance and alcohol misuse
- Pressure
- Influence from older people or via the Internet
- Bullying
- Domestic violence
- Race/hate crime

**Behaviours which may indicate a child is at risk of being radicalised or exposed to extremist views could include:**

- Being in contact with extremist recruiters and/or spending increasing time in the company of other suspected extremists;
- Loss of interest in other friends and activities not associated with the extremist ideology, group or cause;
- Pupils accessing extremist material online, including through social networking sites;
- Possessing or accessing materials or symbols associated with an extremist cause;
- Using extremist narratives and a global ideology to explain personal disadvantage;
- Pupils voicing opinions drawn from extremist ideologies and narratives, this may include justifying the use of violence to solve societal issues;
- Graffiti symbols, writing or art work promoting extremist messages or images;
- Significant changes to appearance and/or behaviour increasingly centred on an extremist ideology, group or cause;
- Changing their style of dress or personal appearance to accord with the group;
- Attempts to recruit others to the group/cause;
- Using insulting to derogatory names for another group;
- Increase in prejudice-related incidents committed by that person – these may include:
  - physical or verbal assault
  - provocative behaviour
  - damage to property
  - derogatory name calling
  - possession of prejudice-related materials
  - prejudice related ridicule or name calling
  - inappropriate forms of address
  - refusal to co-operate
  - attempts to recruit to prejudice-related organisations
  - condoning or supporting violence towards others
  - Parental reports of changes in behaviour, friendship or actions and requests for assistance;
  - Partner schools, local authority services, and police reports of issues affecting pupils in other schools.

**Referral Process**

As with other safeguarding risks, staff should be alert to changes in children's behaviour, which could indicate that they may be in need of help or protection.

Staff should use their judgement in identifying children who might be at risk of radicalisation and act proportionately but this may include the need for the designated safeguarding lead (or deputy) making a Prevent referral.

The School's DSL and dDSLs are familiar with the [Prevent Duty Guidance](#) and [local procedures for making a Prevent referral](#).

In addition, they are familiar with and will utilise the [Channel Guidance](#) for the Channel programme (particularly pages 57 to 76, which give information for schools).

The Channel programme is a voluntary, confidential support programme which focuses on providing support at an early stage to those who are identified as being vulnerable to being drawn into terrorism. There is also Additional Support and further advice for schools on the [Prevent Duty](#), including the three e-learning modules ([introduction to the Prevent duty](#), [making Prevent referrals](#) and [Channel awareness](#)) and the [Educate Against Hate](#) government information website for schools.

All concerns about young people vulnerable to radicalisation should be referred to the DSL in the first instance. The DSL will follow safeguarding procedures including:

- Talking to the young person about their behaviour/views/on-line activity/friends etc.;
- Discussion with parents/carers about the concerns;
- Checking out on-line activity, including social media if possible;
- Providing in-house support, if available;
- Providing Early Help targeted support if necessary.

If concerns persist, then the DSL should make a referral to the Children's Social Care, usually with the knowledge and consent of the young person.

The referral will then be subject to a triage process to decide whether or not it meets the threshold for a referral to Channel. If it does, the DSL should be prepared to attend the Channel Panel meeting to share the concerns and help identify any intervention required. Further feedback to the Channel Panel will be expected following intervention to decide whether there are still concerns.

Further information can be found in the [West Midlands Safeguarding Children procedures](#).

## Appendix 7

### **So-called 'Honour-Based' Abuse Including: Female Genital Mutilation (FGM), Breast Ironing and Forced Marriage**

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

#### **1. Female Genital Mutilation (FGM):**

##### **What is FGM?**

FGM is a form of human rights abuse and includes procedures that intentionally alter or injure the female genital organs for non-medical reasons.

There are four known types of FGM, all of which have been found in the UK:

**Type 1** – clitoridectomy: partial or total removal of the clitoris and, in very rare cases, only the prepuce (the fold of skin surrounding the clitoris)

**Type 2** – excision: partial or total removal of the clitoris and the labia minora, with or without excision of the labia majora (the labia are the 'lips' that surround the vagina)

**Type 3** – infibulation: narrowing of the vaginal opening through the creation of a covering seal. The seal is formed by cutting and repositioning the inner, or outer, labia, with or without removal of the clitoris

**Type 4** – other: all other harmful procedures to the female genitalia for non-medical purposes, e.g., pricking, piercing, incising, scraping and cauterising the genital area.

FGM is sometimes known as 'female genital cutting' or female circumcision. Communities tend to use local names for this practice, including 'Sunna'.

##### **Why is FGM carried out?**

It is believed that:

- It brings status and respect to the girl and that it gives a girl social acceptance, especially for marriage.
- It preserves a girl's virginity/chastity.
- It is part of being a woman as a rite of passage.
- It upholds the family honour.
- It cleanses and purifies the girl.
- It gives the girl and her family a sense of belonging to the community.
- It fulfils a religious requirement believed to exist.
- It perpetuates a custom/tradition.
- It helps girls and women to be clean and hygienic.
- It is cosmetically desirable.
- It is mistakenly believed to make childbirth safer for the infant.

Religion is sometimes given as a justification for FGM. For example, some people from Muslim communities argue that the Sunna (traditions or practices undertaken or approved by the prophet Mohammed) recommends that women undergo FGM, and some women have been told that having FGM will make them 'a better Muslim'. However, senior Muslim clerics at an international conference on FGM in Egypt in 2006 pronounced that FGM is not Islamic, and the London Central Mosque has spoken out against FGM on the grounds that it constitutes doing harm to oneself or to others, which is forbidden by Islam.

### **Within which communities is FGM known to be practised?**

According to the Home Office it is estimated that up to 24,000 girls under the age of 15 are at risk of FGM.

UK communities that are most at risk of FGM include Kenyan, Somali, Sudanese, Sierra Leonean, Egyptian, Nigerian and Eritrean, as well as non-African communities including Yemeni, Afghani, Kurdish, Indonesian and Pakistani.

Obviously, this not to say that all families from the communities listed above practise FGM, and many parents will refuse to have their daughters subjected to this procedure. However, in some communities a great deal of pressure can be put on parents to follow what is seen as a cultural or religious practice.

### **Is FGM harmful?**

FGM is extremely harmful and is often described as brutal because of the way it is carried out, and its short- and long-term effects on physical and psychological health.

FGM is carried out on children between the ages of 0 and 15, depending on the community in which they live. It is often carried out without any form of sedation and without sterile conditions. The girl or young woman is held down while the procedure of cutting takes place and survivors describe extreme pain, fear and feelings of abandonment.

Where the vagina is cut and then sewn up, only a very small opening may be left. This is often seen as a way to ensure that when the girl enters marriage, she is a virgin. In some communities the mother of the future husband and the girl's own mother will take the girl to be cut open before the wedding night.

Repeat urinary tract infections are a common problem for women who have undergone FGM, and for some, infections come from menstruation being restricted. Many women have problems during pregnancy and childbirth. The removal of the clitoris denies women physical pleasure during sexual activity and some groups will practise complete removal to ensure chastity.

### **Is it illegal?**

FGM is internationally recognised as a violation of the human rights of girls and women, and is illegal in most countries – including the UK. The Female Genital Mutilation Act 2003 came into force in 2004:

The act makes it illegal to:

- practise FGM in the UK
- take girls who are British nationals or permanent residents of the UK abroad for FGM, whether or not it is lawful in that country
- aid and abet, counsel or procure the carrying out of FGM abroad.

The offence carries a penalty of up to 14 years in prison, and/or a fine.

### **Signs, symptoms and indicators**

The following list of possible signs and indicators are not diagnostic, but are offered as a guide as to what kind of things should alert professionals to the possibility of FGM.

Things that may point to FGM happening:

- a child talking about getting ready for a special ceremony
- a family arranging a long break abroad
- a child's family being from one of the 'at-risk' communities for FGM (see above)
- knowledge that an older sibling has undergone FGM
- a young person talks of going abroad to be 'cut', or get ready for marriage.

Things that may indicate a child has undergone FGM:

- prolonged absence from school or other activities
- behaviour change on return from a holiday abroad, such as the child being withdrawn and appearing subdued
- bladder or menstrual problems
- finding it difficult to sit still, and looking uncomfortable
- complaining about pain between their legs
- mentioning something somebody did to them that they are not allowed to talk about
- secretive behaviour, including isolating themselves from the group
- reluctance to take part in physical activity
- repeated urinal tract infection
- disclosure.

### **What should schools do?**

Where schools have a concern about a child, they should contact Children's Social Care Services. If the concerns are based on more concrete indicators – i.e., the young person says this is going to happen to them, or disclosure that it has happened to them or to an older sister – schools should make a child protection referral. Schools should not:

- contact the parents before seeking advice from children's social care;
- make any attempt to mediate between the child/young person and parents.

It is important to keep in mind that the parents may not see FGM as a form of abuse; however, they may be under a great deal of pressure from their community and or family to subject their daughters to it. Some parents from identified communities may seek advice and support as to how to resist and prevent FGM for their daughters, and education about the harmful effects of FGM may help to make parents feel stronger in resisting the pressure of others in the community. Remember that religious teaching does not support FGM.

### **The 'one chance' rule**

In the same way that we talk about the 'one chance rule' in respect of young people coming forward with fears that they may be forced into marriage, young people disclosing fears that they are going to be sent abroad for FGM are taking the 'one chance', of seeking help.

It is essential that we take such concerns seriously and act without delay. Never underestimate the determination of parents who have decided that it is right for their daughter to undergo FGM. Attempts to mediate may place the child/young person at greater risk, and the family may feel so threatened at the news of their child's disclosure that they bring forward their plans or take action to silence her.

### **Mandatory Reporting Duty**

Where FGM has taken place, since 31 October 2015 there has been a mandatory reporting duty placed on teachers. Section 5B of the Female Genital Mutilation Act 2003 (as inserted by section 74 of the

Serious Crime Act 2015) places a statutory duty upon **teachers** in England and Wales, to personally report to the police where they discover (either through disclosure by the victim or visual evidence) that FGM appears to have been carried out on a girl under 18. Those failing to report such cases may face disciplinary sanctions. It will be rare for teachers to see visual evidence, and they should not be examining pupils or students, but the same definition of what is meant by ‘to discover that an act of FGM appears to have been carried out’ is used for all professionals to whom this mandatory reporting duty applies. Further information on when and how to make a report can be found in the following Home Office guidance: ['Mandatory Reporting of Female Genital Mutilation - procedural information'](#) (October 2015, updated January 2020).

Teachers must personally report to the police cases where they discover that an act of FGM appears to have been carried out. Unless the teacher has good reason not to, they should still consider and discuss any such case with the School's designated safeguarding lead (or deputy) and involve children's social care as appropriate (Female Genital Mutilation Act 2003 states teachers need not report a case to the police if they have reason to believe that another teacher has already reported the case). The duty does not apply in relation to at risk or suspected cases (i.e. where the teacher does not discover that an act of FGM appears to have been carried out, either through disclosure by the victim or visual evidence) or in cases where the woman is 18 or over. In these cases, teachers should follow local safeguarding procedures. The following is a useful summary of the FGM mandatory reporting duty: [FGM Fact Sheet](#).

## **2. Breast ironing**

### **What is breast ironing?**

Breast Ironing is practiced in some African countries, notably Cameroon. Girls aged between 9 and 15 have hot pestles, stones or other implements rubbed on their developing breast to stop them growing further. In the vast majority of cases breast ironing is carried out by mothers or grandmothers and the men in the family are unaware. Estimates range between 25% and 50% of girls in Cameroon are affected by breast ironing, affecting up to 3.8 million women across Africa.

### **Why does breast ironing happen?**

The practice of breast ironing is seen as a protection to girls by making them seem ‘child-like’ for longer and reduce the likelihood of pregnancy. Once girls' breasts have developed, they are at risk of sexual harassment, rape, forced marriage and kidnapping; consequently, breast ironing is more prevalent in cities. Cameroon has one of the highest rates of literacy in Africa and ensuring that girls remain in education is seen as an important outcome of breast ironing.

### **Breast ironing is physical abuse**

Breast ironing is a form of physical abuse that has been condemned by the United Nations and identified as Gender-based Violence. Although, countries where breast ironing is prevalent have ratified the African Charter on Human Rights to prevent harmful traditional practices, it is not against the law.

Breast ironing does not stop the breasts from growing, but development can be slowed down. Damage caused by the ‘ironing’ can leave women with malformed breasts, difficulty breastfeeding or producing milk, severe chest pains, infections and abscesses. In some cases, it may be related to the onset of breast cancer.

### **Breast Ironing in the UK**

Concerns have been raised that breast ironing is also to be found amongst African communities in the UK, with as many as 1000 girls at risk. Staff worried about the risk of breast ironing in their school should speak to the Designated Safeguarding Lead as soon as possible. Schools need to know the risk level within their communities and tackle the risk as appropriate.

### **What should schools do?**

Where schools have a concern about a child, they should contact Children's Social Care Services. If the concerns are based on more concrete indicators – i.e., the young person says this is going to happen to

them, or disclosure that it has happened to them or to an older sister – schools should make a child protection referral and inform the Police as required by the mandatory reporting duty. Schools should not:

- contact the parents before seeking advice from children's social care;
- make any attempt to mediate between the child/young person and parents.

It is important to keep in mind that the parents may not see FGM or Breast Ironing as a form of abuse; however, they may be under a great deal of pressure from their community and or family to subject their daughters to it. Some parents from identified communities may seek advice and support as to how to resist and prevent FGM for their daughters, and education about the harmful effects of FGM and Breast Ironing may help to make parents feel stronger in resisting the pressure of others in the community. Remember that religious teaching does not support FGM or Breast Ironing.

### **3. Forced Marriage:**

**Forced Marriage is a form of Domestic Abuse and a crime in England and Wales. It should be recognised as a human rights abuse – and should always invoke child protection procedures within the School.**

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

A lack of full and free consent can be where a person does not consent or where they cannot consent (if they have learning disabilities, for example). Nevertheless, some perpetrators use perceived cultural practices as a way to coerce a person into marriage. Staff in our school understand we could potentially play an important role in safeguarding children from forced marriage.

The Forced Marriage Unit has published [statutory guidance](#) and [Multi-agency guidelines](#), of which focus on the role of schools and colleges. Our staff can contact the Forced Marriage Unit if they need advice or information: Contact: 020 7008 0151 or email [fmufco.gov.uk](mailto:fmufco.gov.uk). In addition, since February 2023 it has also been a crime to carry out any conduct whose purpose is to cause a child to marry before their eighteenth birthday, even if violence threats or another form of coercion are not used. As with the existing forced marriage law, this applies to non-binding, unofficial 'marriages' as well as legal marriages.

### **Warning signs**

Warning signs can include a sudden drop in performance, truancy from lessons and conflicts with parents over continuation of the student's education.

There may be excessive parental restrictions and control, a history of domestic abuse within the family, or extended absence through sickness or overseas commitments. Students may also show signs of depression or self-harming, and there may be a history of older siblings leaving education early to get married.

### **The justifications**

Most cases of forced marriage in the UK involve South Asian families. This is partially a reflection of the fact that there is a large established South Asian population in the UK. It is clear, however, that forced marriage is not a solely South Asian phenomenon — there have been cases involving families from East Asia, the Middle East, Europe and Africa.

Some forced marriages take place in the UK with no overseas element, while others involve a partner coming from overseas, or a British citizen being sent abroad. Parents who force their children to marry often



justify it as protecting them, building stronger families and preserving cultural or religious traditions. They may not see it as wrong.

Forced marriage can never be justified on religious grounds: every major faith condemns it and freely given consent is a pre-requisite of Christian, Jewish, Hindu, Muslim and Sikh marriage.

### **Culture**

Often parents believe that they are upholding the cultural traditions of their home countries, when in fact practices and values there have changed. Some parents come under significant pressure from their extended families to get their children married.

### **The law**

Sexual intercourse without consent is rape, regardless of whether this occurs within the confines of a marriage. A girl who is forced into marriage is likely to be raped and may be raped until she becomes pregnant.

In addition, the Forced Marriage (Civil Protection) Act (2007) makes provision for protecting children, young people and adults from being forced into marriage without their full and free consent through Forced Marriage Protection Orders. Breaching a Forced Marriage Protection Order is a criminal offence.

The Anti-Social Behaviour, Crime and Policing Act 2014 makes it a criminal offence, with effect from 16 June 2014, to force someone to marry. This includes:

- Taking someone overseas to force them to marry (whether or not the marriage takes place);
- Marrying someone who lacks the mental capacity to consent to the marriage (whether they're pressured into it or not).

### **What to do if a student seeks help**

- The student should be seen immediately in a private place, where the conversation cannot be overheard.
- The student should be seen on her own, even if she attends with others.
- Develop a safety plan in case the student is seen i.e. prepare another reason why you are meeting.
- Guidance from the Forced Marriage Unit details that Forced Marriage issues must be treated automatically as a child protection procedure. If you take such action against the student's wishes you must inform the student.
- Explain all options to the student and recognise and respect her wishes. If the student does not want to be referred to Children's Services, you will need to consider whether to respect the student's wishes — or whether the student's safety requires further action to be taken. If you take action against the student's wishes you must inform the student.
- Establish whether there is a family history of forced marriage — i.e. siblings forced to marry.
- Advise the student not to travel overseas and discuss the difficulties she may face.
- Seek advice from the Forced Marriage Unit.
- Liaise with Police and Children's Services to establish if any incidents concerning the family have been reported.
- Refer to the local Police Child Protection Unit if there is any suspicion that there has been a crime or that one may be committed.
- Refer the student with her consent to the appropriate local and national support groups, and counselling services.

### **What to do if the student is going abroad imminently**

The Forced Marriage Unit advises education professionals to gather the following information if at all possible — it will help the unit to locate the student and to repatriate her:

- a photocopy of the student's passport for retention — encourage her to keep details of her passport number and the place and date of issue
- as much information as possible about the family (this may need to be gathered discretely)
- full name and date of birth of student under threat
- student's father's name
- any addresses where the student may be staying overseas
- potential spouse's name
- date of the proposed wedding
- the name of the potential spouse's father if known
- addresses of the extended family in the UK and overseas

### **Specific information**

It is also useful to take information that only the student would know, as this may be helpful during any interview at an embassy or British High Commission — in case another person of the same age is produced pretending to be the student.

Professionals should also take details of any travel plans and people likely to accompany the student. Note also the names and addresses of any close relatives remaining in the UK and a safe means to contact the student — a secret mobile telephone, for example, that will function abroad.

### **Forced marriage: what educators should NOT do**

- treat such allegations merely as domestic issues and send the student back to the family home
- ignore what the student has told you or dismiss the need for immediate protection
- approach the student's family or those with influence within the community, without the express consent of the student, as this will alert them to your concern and may place the student in danger
- contact the family in advance of any enquires by the Police, Children's Services or the Forced Marriage Unit, either by telephone or letter
- share information outside child protection information sharing protocols without the express consent of the student
- breach confidentiality except where necessary in order to ensure the student's safety
- attempt to be a mediator

Further guidance is available from The Forced Marriage Unit:

Tel: (+44) (0)20 7008 0151 between 9.00 a.m. and 5.00 p.m. Monday to Friday

Emergency Duty Officer (out of hours): (+44) (0)20 7008 1500

E-mail: [fm@fco.gov.uk](mailto:fm@fco.gov.uk)

Website: [www.fco.gov.uk/forcedmarriage](http://www.fco.gov.uk/forcedmarriage)

**FMU publications:** The Right to Choose: multi-agency statutory guidance for dealing with forced marriage – June 2014 and Multi-agency practice guidelines: Handling cases of Forced marriage – June 2014

**See also:** *DfE Guidance 'Forced Marriage – How to protect, advise and support victims of forced marriage – information and practice guidelines for professionals' June 2021*; and West Mercia regional procedures.

## APPENDIX 8

### **The Sharing of Nude and Semi-Nude Images (also known as sexting or youth produced sexual imagery)**

#### **What is sexting?**

Sexting is the exchange of self-generated sexually explicit images, through mobile picture messages or webcams over the internet.

Sexting is often seen as flirting by children and young people who think that it's part of normal life. Often, incidents of sexting are not clear-cut or isolated; schools may encounter a variety of scenarios. Sexting incidents can be divided into two categories – aggravated and experimental (Reprinted from Wolak and Finkelhor 'Sexting: A Typology' March 2011):

**Aggravated incidents of sexting** involve criminal or abusive elements beyond the creation of an image. These include further elements, adult involvement or criminal or abusive behaviour by minors such as sexual abuse, extortion, threats, malicious conduct arising from personal conflicts, or creation or sending or showing of images without the knowledge or against the will of a minor who is pictured.

**Experimental incidents of sexting** involve youths taking pictures of themselves to share with established boy or girlfriends, to create romantic interest in other youth, or for reasons such as attention seeking. There is no criminal element (and certainly no criminal intent) beyond the creation and sending of the images and no apparent malice or lack of willing participation.

The consequences of sexting can be devastating for young people. In extreme cases it can result in suicide or a criminal record, isolation and vulnerability. Young people can end up being criminalised for sharing an apparently innocently image which may have, in fact, been created for exploitative reasons.

Because of the prevalence of sexting, young people are not always aware that their actions are illegal. In fact, sexting as a term is not something that is recognised by young people and the 'cultural norms' for adults can be somewhat different. Some celebrities have made comments which appear to endorse sexting – 'it's okay, as long as you hide your face' - giving the impression that sexting is normal and acceptable. However, in the context of the law it is an illegal activity and young people must be made aware of this.

**The Law** - Much of the complexity in responding to youth produced sexual imagery is due to its legal status. Making, possessing and distributing any imagery of someone under 18 which is 'indecent' is illegal. This includes imagery of yourself if you are under 18. 'Indecent' is not defined in legislation. For most purposes, if imagery contains a naked young person, a topless girl, and/or displays genitals or sex acts, including masturbation, then it will be considered indecent. Indecent images may also include overtly sexual images of young people in their underwear.

The law criminalising indecent images of children was created long before mass adoption of the internet, mobiles and digital photography. It was also created to protect children and young people from adults seeking to sexually abuse them or gain pleasure from their sexual abuse. It was not intended to criminalise children. Despite this, young people who share sexual imagery of themselves, or peers, are breaking the law.

The National Police Chiefs Council (NPCC) has made clear that incidents involving youth produced sexual imagery should primarily be treated as safeguarding issues. Schools may respond to incidents without

involving the police. Where the police are notified of incidents of youth produced sexual imagery, they are obliged, under the Home Office Counting rules and National Crime Recording Standards, to record the incident on their crime systems. The incident will be listed as a 'crime' and the young person involved will be listed as a 'suspect.' **This is not the same as having a criminal record.**

Every 'crime' recorded on police systems has to be assigned an outcome from a predefined list of outcome codes. As of January 2016, the Home Office launched a new outcome code (outcome 21) to help formalise the discretion available to the police when handling crimes such as youth produced sexual imagery. This means that even though a young person has broken the law and the police could provide evidence that they have done so, the police can record that they chose not to take further action as it was not in the public interest.

The UK Council for Internet Safety (UKCIS) has produced useful advice for how to respond to an incident of nudes and semi-nudes being shared: [Sharing Nudes and Semi-Nudes: Advice for Education Settings Working with Children and Young People](#). (Updated March 2024)

## **Action to take in the case of an incident of sexting:**

### **Step 1 – Disclosure by a student**

Sexting disclosures should follow the normal safeguarding practices and protocols. A student is likely to be very distressed especially if the image has been circulated widely and if they don't know who has shared it, seen it or where it has ended up. They will need pastoral support during the disclosure and after the event. They may even need immediate protection or a referral to Social Care.

The following questions will help decide upon the best course of action:

- Is the student disclosing about themselves receiving an image, sending an image or sharing an image?
- What sort of image is it? Is it potentially illegal or is it inappropriate?
- Are the School child protection and safeguarding policies and practices being followed? For example, has the DSL been consulted and is their advice and support available?
- How widely has the image been shared and is the device in their possession?
- Is it a school device or a personal device?
- Does the student need immediate support and or protection?
- Are there other students and or young people involved?
- Do they know where the image has ended up?

This situation will need to be handled very sensitively. Whatever the nature of the incident, ensure school safeguarding and child protection policies and practices are adhered to.

### **Step 2 – Searching a device**

It is highly likely that the image will have been created and potentially shared through mobile devices. The image may not be on one single device, but may be on a website or on a multitude of devices; it may be on either a school-owned or personal device. It is important to establish the location of the image but be aware that this may be distressing for the young person involved, so be conscious of the support they may need.

When searching a mobile device, the following conditions should apply:

- The action is in accordance with the School's child protection and safeguarding policies
- The search is conducted by the head teacher or a person authorised by them
- A member of the safeguarding team is present
- The search is conducted by a member of the same sex

If any illegal images of a child are found you should consider whether to inform the police. As a general rule it will almost always be proportionate to refer any incident involving “aggravated” sharing of images to the police, whereas purely “experimental” conduct may proportionately be dealt with without such referral, most particularly if it involves the child sharing images of themselves.

Any conduct involving, or possibly involving, the knowledge or participation of adults should always be referred to the police.

If an “experimental” incident is not referred to the police the reasons for this should be recorded in writing. Always put the child first. Do not search the device if this will cause additional stress to the student/person whose image has been distributed.

If there is an indecent image of a child on a website or a social networking site then you should report the image to the site hosting it. In the case of a sexting incident involving a child or young person where you feel that they may be at risk of abuse then you should report the incident directly to CEOP, <https://www.ceop.police.uk/ceop-reporting/> so that law enforcement can make an assessment, expedite the case with the relevant provider and ensure that appropriate action is taken to safeguard the child.

### **Step 3 – What to do and not do with the image**

If the image has been shared across a personal mobile device:

- Confiscate and secure the device;
- Don't view the image unless there is a clear reason to do so;
- Don't send, share or save the image anywhere;
- Don't allow students to view images or send, share or save them anywhere.

If the image has been shared across a school network, a website or social network:

- Block the network to all users and isolate the image;
- Don't send or print the image;
- Don't move the material from one place to another;
- Don't view the image outside of the protocols of your safeguarding policies and procedures.

### **Step 4 – Who should deal with the incident?**

Whoever the initial disclosure is made to must act in accordance with the School safeguarding policy, ensuring that the DSL or a senior member of staff is involved in dealing with the incident.

The DSL should always record the incident. Senior management should also always be informed. There may be instances where the image needs to be viewed and this should be done in accordance with protocols. The best interests of the child should always come first; if viewing the image is likely to cause additional stress, staff should make a judgement about whether or not it is appropriate to do so.

### **Step 5 - Deciding on a response**

There may be a multitude of reasons why a student has engaged in sexting – it may be a romantic/sexual exploration scenario or it may be due to coercion.

It is important to remember that it won't always be appropriate to inform the police; this will depend on the nature of the incident. However, as a school it is important that incidents are consistently recorded. It may also be necessary to assist the young person in removing the image from a website or elsewhere.

If indecent images of a child are found:

- Act in accordance with your child protection and safeguarding policy, e.g. notify DSL
- Store the device securely
- Carry out a risk assessment in relation to the young person (see Appendix B of the Safeguarding Children in Education Guidance for a Sexting Risk Assessment pro-forma and flow chart)
- Make a referral if needed
- Contact the police (if appropriate)

- Put the necessary safeguards in place for the student, e.g. they may need counselling support, immediate protection and parents must also be informed.
- Inform parents and/or carers about the incident and how it is being managed.

### **Step 6 – Contacting other agencies (making a referral)**

If the nature of the incident is high-risk, consider contacting Children's Social Care. Depending on the nature of the incident and the response you may also consider contacting local police or referring the incident to CEOP.

Understanding the nature of the incident, whether experimental or aggravated, will help to determine the appropriate course of action.

### **Step 7 – Containing the incident and managing pupil reaction**

Sadly, there are cases in which victims of sexting have had to leave or change schools because of the impact the incident has had on them. The student will be anxious about who has seen the image and where it has ended up. They will seek reassurance regarding its removal from the platform on which it was shared. They are likely to need support from the School, their parents and their friends. Education programmes can reinforce to all students the impact and severe consequences that this behaviour can have. Consider engaging with your local police and asking them to talk to the students.

Other staff may need to be informed of incidents and should be prepared to act if the issue is continued or referred to by other students. The School, its students and parents should be on high alert, challenging

behaviour and ensuring that the victim is well cared for and protected. The students' parents should usually be told what has happened so that they can keep a watchful eye over their child, especially when they are online at home.

Creating a supportive environment for students in relation to the incident is very important.

### **Step 8 – Reviewing outcomes and procedures to prevent further incidences**

As with all incidents, a review process ensures that the matter has been managed effectively and that the School has the capacity to learn and improve its handling procedures. Incidents of sexting can be daunting for a school to manage, especially if the image has been widely shared between pupils in school.

Further information is available from the [NSPCC](#)

## Appendix 9

### Home School Safeguarding Guidance for Work Related Experience

#### 1. What are the School's responsibilities?

All providers have a duty of care for young people under their supervision, but the home school retains the primary and overarching responsibility for its learners in any educational setting. This remains the case with any provision set up for a young person by an off-site learning provider, e.g. a work placement as part of collaborative provision.

It is therefore vital that programmes and providers are chosen with care and in line with the County Provider Quality Standard Agreement, that learners and their parent/carer are properly and effectively advised, and that all those involved in providing for the learner have all the information they need to take proper and effective care.

In accordance with Keeping Children Safe in Education (September 2024), the School will consider whether or not a Barred List check by the DBS is required for people supervising a child under the age of 16 on a work experience placement. This will include consideration being given to: the specific circumstances of the work experience, the nature of the supervision and the frequency of the activity being supervised, to determine what, if any, checks are necessary. These considerations will include whether the person providing the teaching/training/instruction/supervision to the child on work experience will be:

- Unsupervised themselves; and
- Providing the teaching/training/instruction frequently (more than three days in a 30-day period, or overnight).

If the person working with the child is unsupervised and the same person is in frequent contact with the child, the work is likely to be regulated activity. If so, the School may ask the employer providing the work experience to ensure that the person providing the instruction or training is not a barred person.

The School is not able to request an enhanced DBS check with barred list information for staff supervising children aged 16 to 17 on work experience.

The School realises that if the activity undertaken by the child on work experience takes place in a 'specified place', such as a school or college, and gives the opportunity for contact with children, this may itself be considered to be regulated activity. In these cases, and where the child is 16 years or over, the work experience provider should consider whether a DBS enhanced check should be requested for the pupil in question.

#### 2. What should the home school do?

- a) Ensure that the School has a safeguarding policy and procedures in place to protect children from harm which reflects the requirements of the national guidance for 'Working Together to Safeguard Children 2018 (updated 2024), Keeping Children Safe in Education (September 2024) the local authority produced 'Model Safeguarding Children Policy', and taking into account the additional needs of 14-19 off-site learners.
- b) Ensure the relevant Service Level Agreement (SLA) is agreed and signed by both the Learning Provider and the Home School
- c) Provide Information, Advice and Guidance. During the referral/recruitment process, it is the home school's responsibility to ensure that both learner and parent/carer understands safeguarding issues surrounding the off-site provision, i.e. transport arrangements, undertaking learning in a different environment, learning alongside young people from other schools, different levels of supervision,

working with teachers that are unknown to the young person. The home school is responsible for making the judgement that a young person is able to cope with this kind of provision.

- d) Satisfy itself that the provision is safe and appropriate for the learner, and that it complies with the local authority's Provider Quality Standard Agreement. This will remain the case if a learning provider proposes arranging a third-party placement for a young person.
- e) Provide relevant information to the learning provider according to agreed consortium processes. In order for the home school to exercise its responsibility for its learners, it is vital that all relevant information pertaining to the learner is forwarded to the learning provider before the start of the provision, and in a way that is easily understood by the learning provider, e.g. jargon and acronym free. Information to be shared would include:
  - All relevant personal information, e.g. contact details, date of birth etc
  - All relevant learning information, e.g. target grades, SEN Codes of Practice, SEN assessments, barriers to learning etc
  - All relevant medical information
  - Flagging of the existence of relevant safeguarding/child protection issues. It will then be the responsibility of the home school's Designated Safeguarding Lead (DSL) to contact the learning provider's designated Child Protection Officer. Information will only be shared where it is deemed relevant and pertinent to the off-site provision.
  - All relevant behavioural issues (via a Behavioural Risk Assessment, if agreed within the consortium)
  - All relevant contact information for the home school
  - Ensure all relevant permissions are obtained from parent/carer, and copies shared with the learning provider
  - Ensure learner contract is signed, outlining the young person's responsibilities
- f) Update to the learning provider any of the above information if a learner's situation changes. The home school's DSL will again be responsible for making a judgement as to whether it is appropriate/relevant to share changes to safeguarding/child protection information with the learning provider.
- g) Ensure there is a named person in the home school, who is appropriately trained and competent to deal with learners' problems arising from off-site provision, and that all learners have contact details for that person.
- h) Ensure that the young person understands the detail of the transport plan
- i) Risk assesses the Learner Transport Plan against the individual learner's need and the off-site provision arrangements, and takes steps to provide support as appropriate.

**3. What action should be taken if a learner makes a disclosure to the learning provider at the learning provider's premises (this could also include a third party, e.g. an employer during a work placement)?**

- Ensure that learning providers have contact details for your Designated Safeguarding Lead (DSL), and those of the member of staff who will act in his/her absence. If you are able, please provide an out of hours contact number.
- Act on information according to the local authority's Safeguarding Children Guidance. It is vital that, once a concern has been referred to the home school, all parties are clear as to who is taking responsibility for progression of the issue. In the majority of cases, the home school will be responsible for following the national 'Keeping Children Safe in Education' guidance (September 2024), with regard to the Worcestershire Children's Services HR leaflet for Managing Allegations and dealing with disclosures.
- If the disclosure has been referred by the learning provider directly to the Children's Social Care Services Family Front Door, for example, if the disclosure was made out of normal school hours, the home school will follow the bulleted guidance above, once contact with the Family Front Door has



been made.

4. **What action should be taken if a learner makes an allegation against a member of staff to the learning provider at the learning provider's premises?**
  - We will ensure that the learning provider has the relevant home school contact details for dealing with allegations. This will usually be the Head, although the Chair of Governors will be contacted if the allegation relates specifically to the Head. The Family Front Door number will also be provided in case the Head (/Chair of Governors) or the designated deputy within the home school, is not available.
  - Using the information above, and following the 'Keeping Children Safe in Education' September 2024 national guidance for managing allegations, the learning provider will refer the issue to the home school's Head (Chair of Governors) who will follow the agreed national process.
  
5. **What action should be taken if a learner makes an allegation against the learning provider?**
  - You should not attempt to investigate the allegation yourself
  - Inform the home school Head or, in his/her absence, another senior member of staff
  - The home school Head or senior member of staff must inform the learning provider's most senior member of staff (contact details for whom will be provided by the Consortium), or if the allegation relates to them, the learning provider's Chair of Governors/Board of Directors
  - The learning provider will follow the 'Keeping Children Safe in Education' nationally published procedures.

NB: If you are unsure about what to do in any situation relating to a safeguarding issue, immediately contact the Children's Services Family Front Door for advice on 01905 822666

Please refer to the national guidance for [Working Together to Safeguard Children 2018 \(updated 2024\)](#), and the links to safer working practices that can be accessed via the [West Midlands Safeguarding Procedures](#) as required by the [Worcestershire Safeguarding Children Partnership \(WSCP\)](#) and take account of guidance issued by the Department for Education (DfE).

## **Appendix 10**

### **Working from Home - Arrangements for Safeguarding and Child Protection**

#### **Context**

Measures are in place to ensure that the School complies with current Government Guidance regarding risks at this time. The provision detailed in this Appendix will remain in place and be utilised in the event of parents and carers being asked to keep their children at home, even for a short period of time, or teachers being required to work from home during the academic year. The School will work in line with any guidance offered by the DfE.

This addendum of our School's Safeguarding Children Policy gives details of our safeguarding arrangements during this response period. This addendum applies to all four RGS Schools, referred to within this addendum as RGSW.

#### **Vulnerable Children**

Vulnerable children include those who have a social worker and those children and young people up to the age of 25 with Education, Health and Care (EHC) plans. Those who have a social worker include children who have a Child Protection Plan and those who are looked after by the Local Authority. A child may also be deemed to be vulnerable if they have been assessed as being in need or otherwise meet the definition in Section 17 of the Children Act 1989.

All CYP with EHCPs should be able to attend in school provision during the lockdown. However, parents and carers may choose for their child to remain at home during this period in which case they should receive remote learning.

Risk assessments should be updated for CYP with EHCPs whose parent carers do not choose to take up an onsite school place during the current lockdown. Schools should contact SEND casework if they have any concerns about making the provision outlined in a child's EHCP through the provision of remote learning.

Eligibility for free school meals will not be the determining factor in assessing vulnerability.

RGSW will aim to work with the family, any outside agencies in order to encourage and monitor our vulnerable children should they be presented with our remote learning provision.

#### **Attendance Monitoring**

We will continue to monitor attendance and identify, support and keep in contact with all pupils who have to isolate and work from home. Vulnerable pupils will be identified and suitably monitored and supported using our safeguarding systems and any concerns will be actioned accordingly.

In all circumstances, where a vulnerable child does not take up their place at school, or discontinues, and that pupil has a social worker, we will notify their social worker.

#### **Designated Safeguarding Leads**

Each RGSW school will ensure that a DSL or dDSL is contactable by telephone during term time. The RGSW Key Worker and RGSW Vulnerable Pupil provision will be based at RGS The Grange. Mrs S Nicholls (DSL at RGS Worcester) and Mrs Wendy Wreghitt (DSL at RGS The Grange) live local to this site and are available during term time, if required. During holiday periods there is a DSL responsible for the Holiday Club and in addition, as always, there will be a DSL and dDSL Duty Rota so that Holiday Club staff and the

Holiday Club DSL can consult with and inform the School's other DSLs, as required, about any concerns about RGS pupils

Where a trained DSL (or deputy) is not on site, in addition to the above, a senior member of staff will assume responsibility for co-ordinating safeguarding on site. This will include liaising with the offsite DSL as required.

During any period when the school is closed, but there is provision for pupils at RGS The Grange and RGS Dodderhill, RGSW staff working at RGS The Grange, RGS Dodderhill and volunteers will have access to a trained DSL (or deputy) and will be able to contact them via the senior member of staff on duty at RGS The Grange.

The DSLs will continue to engage with social workers, and attend all multi-agency meetings, which may be done remotely, as required.

During this period the School's main switchboard will be open and the Receptionist on duty will be able to contact the DSL on duty if required (Telephone: 01905 613391). A message directing callers to an Emergency out of hours contact number is also operational.

### **Reporting a concern**

Where staff have a concern about a child, they should continue to follow the process outlined in this Safeguarding Children Policy, and this includes making a report via My Concern.

In the unlikely event that a member of staff cannot access My Concern from home, they should contact the DSL on duty via the School's main switchboard (Telephone: 01905 613391) and email the Designated Safeguarding Lead and Deputy Safeguarding Leads.

Staff are reminded of the need to report any concern immediately and without delay.

Where staff are concerned about an adult working with children in the School, they should report the concern to the relevant Head and to the Executive Head of The RGS Worcester Family of Schools and Head of RGS Worcester, Mr John Pitt (unless the allegation is about him). If the concern is about the Head, they should report it to the Chair of Governors in-line with section 20 (above) of this document ([20. Safeguarding Concerns or Allegations of Abuse Made Against Staff, Including Supply Teachers](#)).

If there is a requirement to make a notification whilst away from School, this should be done by telephone call and followed up with an email to the relevant Head or, if they are unavailable one of the other Heads and if the concern is about a Head, to the Chair of Governors.

### **Safeguarding Training and Induction**

If safeguarding training is due to take place, this will be done remotely via Educare and our Google Meet provision. All of the DSLs and Deputy DSLs, across all four RGS Schools, completed their update training in November 2022 and this will be renewed in November 2024.

### **Safer Recruitment/Volunteers and Movement of Staff**

It remains essential that people who are unsuitable to do so are not allowed to work with or have access to children. When recruiting new staff, The RGS Worcester Family of Schools will continue to follow the relevant Safer Recruitment processes.

We will follow any guidance from the Disclosure and Barring Service (DBS) regarding recruitment and checks.

Where RGSW utilises volunteers, we will continue to follow the checking and risk assessment process as set out in paragraphs 287 to 294 of Keeping Children Safe in Education (KCSIE) September 2024. Under no circumstances will a volunteer who has not been checked be left unsupervised or allowed to work in regulated activity.

RGSW will continue to ensure the ongoing safeguarding of children and fulfil our legal reporting duties. This will include ongoing vigilance and we will follow the legal duty to refer to the DBS anyone who has harmed, or poses a risk of harm, to a child or vulnerable adult.

RGSW will continue to consider and make referrals to the Teaching Regulation Agency (TRA) as per KCSIE and the TRA's 'Teacher Misconduct Advice' for making a referral.

In case of remote working and minimal staff on site, RGSW acknowledges how essential it is, from a safeguarding perspective, that on any given day we know which staff and volunteers are on site, and that appropriate checks have been carried out for these people, and especially for anyone engaging in regulated activity. As such, RGSW keep the Single Central Record (SCR) up to date in line with KCSIE September 2024 and ISI Regulations.

#### **Online safety in schools**

RGSW will continue to provide a safe environment, including online. This includes the use of an online filtering system for users at all the RGSW sites.

Where pupils who are children of key workers or are deemed vulnerable children and are in school and are using computers in school, appropriate supervision will be in place.

#### **Children and Online Safety away from School**

It is important that all staff who interact with children, including online, continue to look out for signs a child may be at risk. Any such concerns should be dealt with in accordance with this Safeguarding Children Policy and, where appropriate, referrals must still be made to Children's Social Care and, as required, the police.

Online teaching will follow the same principles as set out in the School's Staff Code of Conduct and the guidance given in the RGSW Remote Teaching Support Guidelines. RGSW will ensure that any use of online learning tools and systems is in line with the privacy and Data Protection/GDPR requirements.