



## Safeguarding and Child Protection Policy

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For the purpose of this policy Guildford Nursery School and Family Centre will be referred to as GNSFC.

GNSFC is committed to safeguarding and promoting the welfare of children and young people and expects all staff and volunteers to share this commitment.

### Contact Details

#### Surrey Children's SPA (single point of access):

**0300 470 9100**

[cspa@surreycc.gov.uk](mailto:cspa@surreycc.gov.uk)

#### Emergency Duty team (EDT)

Out of hours (5pm-9am - Mon – Fri, Sat/Sun and Bank Holidays)

Tel **01483 517898**

#### Local Authority designated officer (LADO)

0300 123 1650 option 3

Secure email address [lado@surreycc.gov.uk](mailto:lado@surreycc.gov.uk)

#### Early Years and Childcare Service Local Authority Named Person

01372 833826

#### Ofsted

Piccadilly Gate, Store Street, Manchester, M1 2WD,

#### General Helpline:

0300 123 1231

#### Allegations against a member of staff/volunteer:

0300 123 4666

**Governor Lead:**

Sue Heath

**Nominated Lead Member of Staff:**

Charlotte Bate

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## Safeguarding Statement 2022

'Safeguarding is Everyone's Business'.

We recognise our moral and statutory responsibility to safeguard and promote the welfare of all children.

We make every effort to provide an environment in which children and adults feel safe, secure, valued and respected, and feel confident to talk if they are worried, believing they will be effectively listened to.

The purpose of this policy is to provide staff, volunteers and Governors with the framework they need in order to keep children safe and secure in GNSFC. The policy also informs parents and carers how we will safeguard their children whilst they are in our care.

### Key Personnel

<b>The Designated Safeguarding Lead (DSL) is:</b>	<b>Contact details:</b>
<b>Charlotte Bate</b> , Family Centre Manager	<a href="mailto:charlotte.bate@guildfordnsc.surrey.sch.uk">charlotte.bate@guildfordnsc.surrey.sch.uk</a> Telephone: 01483 510 570
<b>The deputy DSL(s) are:</b>	<b>Contact details:</b>
<b>Sally Cave</b> , Headteacher <b>Helen Moyes</b> , Inclusion Lead <b>Wendy Howes</b> , Teacher <b>Amber Bossom</b> , Key Person	<a href="mailto:dsl@guildfordnsc.surrey.sch.uk">dsl@guildfordnsc.surrey.sch.uk</a> 01483 566 589
<b>Carina Edwards</b> , Teacher	<a href="mailto:dsl@guildfordnsc.surrey.sch.uk">dsl@guildfordnsc.surrey.sch.uk</a> 01483 561 652
<b>Beverley Evans</b> , Senior Family Support Worker <b>Faye Jackson</b> , Senior Family Support Worker	<a href="mailto:dsl@guildfordnsc.surrey.sch.uk">dsl@guildfordnsc.surrey.sch.uk</a> 01483 510 570
<b>The nominated child protection and safeguarding governor is:</b>	<b>Contact details:</b>
<b>Sue Heath</b>	Telephone: 01483 566589
<b>The Headteacher is:</b>	<b>Contact details:</b>
<b>Sally Cave</b>	<a href="mailto:head@guildfordnsc.surrey.sch.uk">head@guildfordnsc.surrey.sch.uk</a> Telephone: 01483 566 589
<b>The Chair of Governors is:</b>	<b>Contact details:</b>
<b>Sam Kubunavanua</b>	<a href="mailto:Kubunavanua.s@sky.com">Kubunavanua.s@sky.com</a> Telephone: 01483 566 589

## Terminology

Safeguarding and promoting the welfare of children is defined as:

- Protecting children from maltreatment.
- Preventing impairment of children's 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.
- Preventing impairment of children's mental or physical health or development.

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

Early help means providing support as soon as any needs emerge or are identified at any point in a child's life.

Staff refers to all those working for or on behalf of GNSFC, full or part time, temporary or permanent, in either a paid or voluntary capacity.

Child(ren) includes everyone under the age of 18. On the whole, this will apply to children of GNSFC; however, the policy will extend to visiting children and students from other establishments

Parents refers to birth parents and other adults who are in a parenting role, for example stepparents, foster carers and adoptive parents.

Social Care refers to Children's Services in the area in which the child is resident, unless a child is a Child Looked After then this will be the Children's Services in their home authority.

MAP refers to the Surrey Multi-Agency Partnership.

C-SPA refers to the Children's Single Point of Access.

DSL where appropriate also refers to Deputy Designated Safeguarding Lead (DDSL)

## Introduction

This policy has been developed in accordance with the principles established by the Children Acts 1989 and 2004; the Education Act 2002 (as amended), the Education (Independent School Standards) Regulations 2014, the Non-Maintained Special Schools (England) Regulations 2015 and the Apprenticeships, Skills, Children and Learning Act 2009 (as amended).

All action taken by GNSFC will be in accordance with:

Statutory, national, and local guidance – this includes:

- [Working Together to Safeguard Children \(2018\)](#) which sets out the multi-agency working arrangements to safeguard and promote the welfare of children and young people and protect them from harm; in addition, it sets out the statutory roles and responsibilities of settings.
- ['What to do if you are Worried a Child is Being Abused' 2015 - Advice for Practitioners](#)
- [Keeping Children Safe in Education \(KCSIE, 2022\)](#) is statutory guidance issued by the Department for Education (DfE) which all schools and colleges must have regard to when carrying out their duties to safeguard and promote the welfare of children.
- [Early Years Foundation Stage statutory framework \(2021\)](#) is statutory guidance which sets standards that school and childcare providers must meet for the learning, development, and care of children from birth to 5 years in Ofsted registered settings.

- [Local Guidance from the Local Safeguarding Partnership: Surrey Safeguarding Children Partnership \(SSCP\) including SSCP Procedures.](#)

This policy applies to all members of staff and Governors in GNSFC.

Guidance and documents referred to in this policy:

- [Surrey Safeguarding Children Partnership protocols, guidance and procedures](#)
- [Working Together to Safeguard Children 2018](#)
- [Keeping children safe in education 2022](#)
- [Disqualification under the Childcare Act 2006 \(updated 2019\)](#)
- [FGM Act 2003 Mandatory Reporting Guidance 2015 \(updated January 2020\)](#)
- [‘What to do if you are worried a child is being abused’ 2015](#)
- [Teachers' standards](#)
- [Information sharing advice for safeguarding practitioners](#)
- [The Equality Act 2010](#)
- [Early years foundation stage \(EYFS\) statutory framework](#)
- SCC Safeguarding Children Missing Education (CME) and Educated Other Than at School (EOTaS) – available on [Surrey Education Services \(Education Safeguarding Team Resources Hub\)](#)
- SCC Touch and The Use Of Physical Intervention When Working With Children And Young People – available on [Surrey Education Services \(Education Safeguarding Team Resources Hub\)](#)

This policy should be read in conjunction with the following policies:

- Attendance Management (Staff) Procedure
- Code of Conduct (Staff)
- E-Safety Policy for Staff
- Health & Safety Policy
- Promoting Positive Behaviour Policy
- Recruitment and Selection Policy
- Whistleblowing Policy

### **Equalities Statement**

With regards to safeguarding we will consider our duties under the [Equality Act 2010](#) and our general and specific duties under the [Public Sector Equality Duty](#). General duties include:

Eliminate discrimination, harassment, victimisation, and other conduct that is prohibited by the Equality Act 2010.

Advance equality of opportunity between people who share a protected characteristic and people who do not share it.

Foster good relations across all protected characteristics between people who share a protected characteristic and people who do not share it.

Details of our specific duties are published under GNSFC’s Equality and diversity policy and objectives. These are available on our website.

Staff are aware of the additional barriers to recognising abuse and neglect in children with Special Educational Needs and Disabilities (SEND). This will be in line with our Special Educational Needs and Disability Policy.

GNSFC also adheres to the principals of and promotes anti-oppressive practice in line of the [United Nations Convention of the Rights of the Child](#) and the [Human Rights Act 1998](#).

## Policy Aims

The aims of these procedures are:

- To provide staff and governors with the framework to promote and safeguard the wellbeing of children and in doing so ensure they meet their statutory responsibilities.
- To ensure consistent good practice across GNSFC and ensure that safeguarding follows a whole setting approach.
- Clarifying safeguarding expectations for members of GNSFC's community, staff, Governing Body, children, and their families.
- Contributing to the establishment of a safe, resilient, and robust safeguarding culture in GNSFC built on shared values; that children are treated with respect and dignity, taught to treat each other and staff with respect, feel safe, have a voice and are listened to.
- Supporting contextual safeguarding practice recognising that GNSFC's site can be a location where harm can occur.
- Setting expectations for developing knowledge and skills within GNSFC's community (staff, children, parents/carers) to the signs and indicators of safeguarding issues and how to respond to them.
- Early identification of need for vulnerable children and provision of proportionate interventions to promote their welfare and safety.
- Working in partnership with children, parents/carers, and other agencies in the Surrey Safeguarding Children Partnership.

## Policy Principles and Values

- The welfare of the child is paramount.
- Maintain an attitude of "It could happen here".
- Maintain a "zero-tolerance" approach to sexual violence and sexual harassment.
- Children have a right to feel safe and secure, they cannot learn effectively unless they do so.
- All children have a right to be protected from harm and abuse.
- All staff have a role in the prevention of harm and abuse and an equal responsibility to act immediately on any suspicion or disclosure that may indicate a child is at risk of harm, either in GNSFC or in the community, taking into account contextual safeguarding, in accordance with statutory guidance.
- We acknowledge that working in partnership with other agencies protects children and reduces risk and so we will engage in partnership working to protect and safeguard children.
- Whilst GNSFC will work openly with parents/carers as far as possible, it reserves the right to contact social care or the police, without notifying parents/carers if this is believed to be in the child's best interests.
- We will always act in the best interests of the child and ensure that our decisions around safeguarding take a child-centred and coordinated approach.

## Supporting Children

GNSFC will support all children.

GNSFC may provide a safe place and stability in the lives of children who have been abused or who are at risk of harm. GNSFC recognises that a child who is abused or witnesses abuse and/or violence may feel helpless and humiliated, may blame themselves, and find it difficult to develop and maintain a sense of self-worth. Research shows that the behaviour of a child in these circumstances may range from that which is perceived to be normal to aggressive or withdrawn.

GNSFC will:

Promote a caring, safe and positive environment within GNSFC.

Encourage self-esteem and self-assertiveness, through the curriculum and through positive relationships within the GNSFC community.

Ensure children are taught to understand and manage risk.

Respond sympathetically to any requests for time out to deal with distress and/or anxiety.

Offer details of helplines, counselling, or other avenues of external support.

Liaise and work in partnership with other support services and agencies involved in early help and the safeguarding of children.

Notify social care without delay if there is an immediate risk of significant harm.

Provide continuing support to children about whom there have concerns and who leave GNSFC by ensuring that information is shared confidentially with the child's new setting. GNSFC will ensure records are forwarded as a matter of priority and within statutory timescale.

GNSFC recognises it plays a significant part in the prevention of harm to our children by providing children with good lines of communication with trusted adults, supportive friends and an ethos of protection.

#### GNSFC will:

Establish and maintain an ethos where children feel safe and secure, are encouraged to talk and are always listened to.

Ensure that all children know they can access a trained adult in GNSFC whom they can approach if they are worried or in difficulty.

Include safeguarding across the curriculum in order to equip children with the skills they need to keep themselves and other safe, including online and to know to whom they should turn to for help. It is also recognised that effective education will be tailored to the specific needs and vulnerabilities of individual children, including children who are victims of abuse, and children with special education needs or disabilities.

Provide preventative education by creating a culture of zero tolerance for sexism, misogyny/misandry, homophobia, biphobia and sexual violence and sexual harassment, and racism.

Ensure all staff are aware of GNSFC's guidance for their use of mobile technology and have discussed safeguarding issues around the use of mobile technologies and their associated risks.

### **Professional expectations, roles, and responsibilities**

#### Role of GNSFC

GNSFC will ensure that:

GNSFC operates safer recruitment procedures in line with KCSIE 2022 which includes statutory checks on the suitability of staff to work with children.

All staff receive information about GNSFC's safeguarding arrangements, safeguarding statement, staff behaviour policy (code of conduct), Safeguarding and Child Protection policy, the role and names of the Designated Safeguarding Lead (DSL) and their deputy Designated Safeguarding Leads (DDSLs), and [Keeping Children Safe in Education 2022 part 1 and annex B](#). All staff will sign to say they have read and understood it. This applies to the Governing Body in relation to part 2 of the same guidance.

All staff receive safeguarding and child protection training (including online safety) at induction in line with advice from [SSCP](#). Training is regularly updated as required, and at least annually, to continue to provide them with relevant skills and knowledge to safeguard children effectively.

All members of staff are trained in and receive regular updates in online safety and reporting concerns.

All members of staff maintain a zero-tolerance approach to sexual violence and sexual harassment.

All staff and Governors have regular safeguarding and child protection awareness training, updated by the DSL as appropriate, to maintain their understanding of the signs and indicators of abuse.

The Safeguarding and Child Protection Policy is made available via GNSFC's website and a paper copy is available upon request for parents/carers.

All parents/carers are made aware of the responsibilities of staff members with regard to safeguarding and child protection procedures.

Provide a coordinated offer of early help when additional needs of children are identified and contribute to early help arrangements and inter-agency working and plans.

Any Community users organising activities for children are made aware of GNSFC's Safeguarding and Child Protection Policy, guidelines and procedures.

The names of the designated members of staff for safeguarding and child protection, the DSL and DDSL(s), are clearly advertised in GNSFC.

All staff will:

Maintain an attitude of "It could happen here" with regards to safeguarding.

Understand that safeguarding is "everyone's responsibility".

Maintain a "zero-tolerance" approach to sexual violence and sexual harassment.

Read and understand Part 1 of statutory guidance KCSIE (2022). Those working directly with children will also read Annex B.

In addition to this all staff will be aware of the systems in place which support safeguarding including reading this Safeguarding and Child Protection Policy; the Promoting Positive Behaviour Policy; the Staff Code of Conduct; safeguarding response to children who go missing from education; and the role of the DSL.

Know who and how to contact the DSL and DDSL(s), the Chair of Governors, and the Governor responsible for safeguarding.

Be aware of indicators of abuse and neglect understanding that children can be at risk of harm inside and outside of GNSFC, inside and outside of home and online. Exercising professional curiosity and knowing what to look for is vital for the early identification of abuse and neglect so that staff are able to identify cases of children who may be in need of help or protection.

Be able to identify vulnerable children and take action to keep them safe. Information or concerns about children will be shared with the DSL where it includes those:

- who may need a social worker and may be experiencing abuse or neglect
- requiring mental health support
- may benefit from early help
- where there is a radicalisation concern
- where a crime may have been committed.

Provide a safe environment in which children can learn.

Establish and maintain an environment where children feel secure, are encouraged to talk and are listened to.

Ensure children know that there are adults in GNSFC who they can approach if they are worried or have concerns.

All staff are 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.

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

Take immediate action if they have a mental health concern about a child that is also a safeguarding concern, following our Safeguarding and Child Protection Policy and procedures.

Plan opportunities within the curriculum for children to develop the skills they need to assess and manage risk appropriately and keep themselves safe.

Attend training in order to be aware of and alert to the signs of abuse and neglect.

Know how to respond to a child who discloses harm or abuse following training of 'Working Together to Safeguard Children' (2018), and 'What to do if you are worried a child is being abused' (2015).

Record their concerns if they are worried that a child is being abused and report these to the DSL immediately that day. If the DSL is not contactable immediately a DDSL should be informed.

Be prepared to refer directly to the Children's Single Point of Access (C-SPA), and the Police if appropriate, if there is a risk of significant harm and the DSL or their DDSL(s) are not available.

Follow the allegations procedures, as set out in this policy and KCSIE 2022, if the disclosure is an allegation against a member of staff, supply staff, volunteer or contactor.

Report low-level concerns (as defined in KCSIE 2022) about any member of staff/supply staff/volunteer/governor or contractor to the Headteacher.

Provide support for children subject to early help, child in need or child protection and be involved where appropriate, in the implementation of individual plans to further safeguard vulnerable children and understand their academic progress and attainment and maintain a culture of high aspirations for this cohort.

A member of staff who is approached by a child should listen actively and try to reassure them. They cannot promise complete confidentiality and should explain that they need to pass information to other professionals to help keep the child and/or other children safe. The degree of confidentiality should always be governed by the need to protect the child.

Notify the DSL or their DDSL(s) of any child on a child protection plan or child in need plan who has unexplained absence and/or repeated absences.

Understand early help and be prepared to identify and support children who may benefit from early help. Liaise with other agencies that support children and provide early help.

Be aware that children may not feel ready or know how to tell someone they are being abused, exploited, or neglected, and/or they may not recognise these experiences as harmful. This could be due to their vulnerability, disability and/or sexual orientation or language barriers.

Be mindful that the Teacher Standards states that teachers should safeguard children's wellbeing and maintain public trust in the teaching profession as part of their professional duties.

### The Headteacher

In addition to the role and responsibilities of all staff the Headteacher will ensure that:

GNSFC fully contributes to inter-agency working in line with Working Together to Safeguard Children (2018) guidance.

The Safeguarding and Child Protection Policy and procedures are implemented and followed by all staff.

That GNSFC has appropriate policies in place that make it clear that sexual harassment, online sexual abuse and sexual violence (including sexualised language) is unacceptable, with appropriate sanctions and support in place.

That GNSFC's staff have appropriate knowledge of KCSIE (2022) part 5.

That all children are supported to report concerns about harmful sexual behaviour freely. That concerns are taken seriously and dealt with swiftly and appropriately, and children are confident that this is the case.

Comprehensive records of all allegations are kept.

All staff are aware of the role of the DSL, including the identity of the DSL and any DDSL(s).

Sufficient time, training, support, funding, resources, including cover arrangements where necessary, is allocated to the DSL to carry out their role effectively, including the provision of advice and support to staff on safeguarding and child protection matters, to take part in strategy discussions/meetings and other inter-agency meetings and/or support other staff to do so; and to contribute to the assessment of children.

Opportunities are provided for a co-ordinated offer of early help when additional needs of children are identified.

That DDSL(s) are trained to the same standard as the DSL and the role is explicit in their job description.

Adequate and appropriate DSL cover arrangements are in place for any out of hours/out of term activities.

Where there is a safeguarding concern that the child's wishes and feelings are taken into account when determining what action to take and what services to provide.

Child-centred systems and processes are in place for children to express their views and give feedback.

All staff feel able to raise concerns about poor or unsafe practice and that such concerns are handled sensitively and in accordance with the whistle-blowing procedures.

Children are provided with opportunities throughout the curriculum to learn about safeguarding, including keeping themselves safe online

That allegations or concerns against staff and other adults are dealt with in accordance with guidance from the DfE, SSCP and Surrey County Council (SCC).

That statutory requirements are met to make a referral to the Disclosure and Barring Service, and additionally in the case of teaching staff the Teacher Regulation Agency, where they think an individual has engaged in conduct that harmed (or is likely to harm) a child; or if the person otherwise poses a risk of harm to a child.

Record low-level concerns in cases which concern a member of staff/supply staff/contractor or a volunteer. The record should include details of the concern, the context in which the concern arose, and action taken. The name of the individual sharing their concerns should also be noted, if the individual wishes to remain anonymous then that will be respected as far as reasonably possible.

## The Designated Safeguarding Lead

(Duties are further outlined in KCSIE (2022, Annex C).

Details of the DSL and DDSL(s) are available on GNSFC's website, our newsletter, and on notice boards around all our sites.

In addition to the role and responsibilities of all staff the DSL will:

Hold the lead responsibility for safeguarding and child protection (including online safety) in GNSFC, this responsibility is not able to be delegated.

Liaise with the Surrey Country Council and other local authorities as appropriate and work in partnership with other agencies in line with Working Together to Safeguard Children (2018).

Where necessary contact Surrey's Child Protection Consultation Line for advice and support (0300 470 9100 option 3).

Manage and submit a Request for Support Form for a child if there are concerns about suspected harm or abuse, to the C-SPA, and act as a point of contact and support for staff. Requests for support should be sent securely by email to [cspa@surreycc.gov.uk](mailto:cspa@surreycc.gov.uk) using the [Request for Support Form](#) urgent referrals should be made by telephone 0300 470 9100 (and ask for the priority line).

Report concerns that a child may be at risk of radicalisation or involvement in terrorism, use the [Prevent referral form](#) to refer cases by e-mail to [preventreferrals@surrey.pnn.police.uk](mailto:preventreferrals@surrey.pnn.police.uk). If the matter is urgent then Police must be contacted by dialling 999. In cases where further advice from the Police is sought dial 101 or 01483 632982 and ask to speak to the Prevent Supervisor for Surrey. The DfE has also set up a dedicated telephone helpline for staff and Governors to raise concerns around Prevent (020 7340 7264).

Refer cases where a crime may have been committed to the Police as required. NB: NPCC- [When to call the police](#) should help DSLs understand when they should consider calling the Police and what to expect when they do.

Liaise with the "case manager" and Local Authority Designated Officer (LADO) for child protection concerns in cases which concern a member of staff/supply staff/contractor or a volunteer.

Follow relevant DfE guidance and KCSIE 2022 on 'Child on Child abuse' when a concern is raised that there is an allegation of a child abusing another child within GNSFC.

When there has been a report of sexual violence, make an immediate risk and needs assessment. Additionally, where there has been a report of sexual harassment, the need for a risk assessment should be considered on a case-by-case basis and will be put in place as required.

Be available during term time (during opening hours) for staff to discuss any safeguarding concerns. Appropriate and adequate cover arrangements will be arranged by the DSL and GNSFC leadership for any out of hours/term activities.

Act as a source of support and expertise in carrying out safeguarding duties for the whole settings community.

Ensure that the names of the DSL and DDSL(s), are clearly advertised, with a statement explaining GNSFC's role in referring and monitoring cases of suspected abuse.

Encourage and promote a culture of listening to children and taking account of their wishes and feelings, amongst all staff.

Access training and support to ensure they have the knowledge and skills required to carry out the role.

Have a secure working knowledge of SSCP procedures and understand the assessment process for providing early help and statutory intervention, in line with [Surrey's Effective Family Resilience levels of need document](#).

Have a clear understanding of access and referral to the local early help offer and will support and advise members of staff where early help intervention is appropriate.

Have a working knowledge of how Surrey Country Council conduct an initial 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.

Understand the lasting impact that adversity and trauma can have, including on the children's behaviour, mental health and wellbeing, and what is needed in responding to this in promoting educational outcomes.

Understand and support GNSFC's delivery with regards to the requirements of the Prevent duty and provide advice and guidance to staff on protecting children from radicalisation.

Liaise with staff (especially pastoral support, behaviour leads, health colleagues and the Inclusion Lead) on matters of safety and safeguarding and consult Surrey's Effective Family Resilience document to inform decision making and liaison with relevant agencies.

Be alert to the specific needs of children in need, those with Special Educational Needs and Disability (SEND) and young carers.

Understand the risks associated with online activity and be confident that they have the up-to-date knowledge and capability to keep children safe whilst they are online at GNSFC; in particular understand the additional risks that children with SEND face online and the associated and appropriate support they require.

DSL training should be updated at least every two years and their knowledge and skills refreshed at regular intervals but at least annually.

Work with the Headteacher and relevant strategic leads, taking lead responsibility for promoting educational outcomes by knowing the welfare, safeguarding and child protection issues that children in need are experiencing, or have experienced, and identifying the impact that these issues might be having on children's attendance, engagement and achievement at GNSFC.

Keep up to date, detailed, accurate records (either written or using appropriate secure online software), that include all concerns about a child even if there is no need to make an immediate referral and record the rationale for decisions made and action taken.

Ensure that an indication of the existence of the additional safeguarding/child protection file is marked on the child's main file record.

Ensure that when a child transfers setting (including in-year), their safeguarding/child protection file is passed to the new setting as soon as possible, and within 5 days for an in-year transfer or within the first 5 days of the start of a new term. This should be transferred separately from the child's main file record, ensuring secure transit, and confirmation of receipt should be obtained.

If the transit method requires that a copy of the safeguarding/child protection file is retained until such a time that the new setting acknowledges receipt of the original file, the copy should be securely destroyed on confirmation of receipt.

Ensure that where a child transfers to a setting and is on a child protection plan, child in need plan or is a child looked after, their information is passed to the new setting immediately and that the child's social worker is informed. In addition, consideration should be given to a multi-agency settings transition meeting if the case is complex or on-going.

Ensure that all appropriate staff members have a working knowledge and understanding of their role in case conferences, core groups and other multi-agency planning meetings, to ensure that they attend and are able to effectively contribute when required to do so; where a report is required, this should be shared with the parents prior to the meeting.

Report to the Headteacher any significant issues for example, use of [Surrey's FaST Resolution Process](#) enquiries under section 47 of the Children Act 1989 and Police investigations. This should include being aware of the requirement for children to have an Appropriate Adult. Further information can be found in the [statutory guidance - PACE Code C 2019](#).

Ensure that the case holding social worker is informed of any child currently with a child protection plan who is absent without explanation.

Organise safeguarding and child protection induction, regularly updated training and a minimum of annual updates (including online safety) for all staff, keep a record of attendance and address any absences.

Ensure each member of staff has access to, and understands, GNSFC's Safeguarding and Child Protection policy procedures, especially new and part-time staff.

Ensure that in collaboration with GNSFC's leadership and Governors, the Safeguarding and Child Protection Policy is reviewed annually, and the procedures and implementation are updated and reviewed regularly.

Ensure that the Safeguarding and Child Protection Policy is available publicly and that parents/carers know that referrals about suspected abuse or neglect may be made and the role of GNSFC in this.

Promote supportive engagement with parents and/or carers in safeguarding and promoting the welfare of children, including where families may be facing challenging circumstances.

Help promote educational outcomes by sharing the information about the welfare, safeguarding and child protection issues that children who have or have had a social worker are experiencing with teachers and leadership staff.

Establish and maintain links with the SSCP to make sure staff are aware of training opportunities and the latest policies on local safeguarding arrangements.

Contribute to and provide, with the Headteacher and Chair of Governors, the biennial (s157 s175) Statutory Audit for Safeguarding Arrangements and Termly Safeguarding Data Collections via The Virtual College – ENABLE to Surrey County Council.

#### The Deputy Designated Safeguarding Leads(s)

In addition to the role and responsibilities of all staff the DDSL(s) will:

Be trained to the same standard as the DSL and the role is explicit in their job description.

Provide support and capacity to the DSL in carrying out delegated activities of the DSL; however, the lead responsibility of the DSL cannot be delegated.

In the absence of the DSL, carry out the activities necessary to ensure the ongoing safety and protection of children. In the event of the long-term absence of the DSL the DDSL(s) will assume all of the functions of the DSL.

## The Governing Body

All members of the Governing Body understand and fulfil their responsibilities to ensure that:

There is a whole setting approach to safeguarding, involving everyone in GNSFC and ensuring that safeguarding and child protection are at the forefront and underpin all relevant aspects of process and policy development.

A nominated governor for safeguarding is identified.

Governing bodies should ensure that all members receive appropriate safeguarding and child protection (including online) training at induction. This training should equip them with the knowledge to provide strategic challenge to test and assure themselves that the safeguarding policies and procedures in place in GNSFC are effective and support the delivery of a robust whole setting approach to safeguarding. Training should be regularly updated.

The child's wishes and feelings are considered when determining what action to take and what services to provide.

GNSFC has effective safeguarding policies and procedures including a Safeguarding and Child Protection Policy, a Staff Code of Conduct, a Behaviour Policy and a response to children who go missing from education.

Policies are consistent with SSCP and statutory requirements, are reviewed annually (as a minimum) and updated if needed, so that it is kept up to date with safeguarding issues as they emerge and evolve, including lessons learnt and that the Safeguarding and Child Protection policy is available on GNSFC's website.

The SSCP is informed in line with local requirements about the discharge of duties via the Biennial (s 157 s 175) Statutory Audit for Safeguarding Arrangements and Termly Safeguarding Data Collections via The Virtual College – ENABLE to Surrey County Council.

Ensure recruitment, selection and induction follow safer recruitment practice including all appropriate checks.

Staff have been trained appropriately and this is updated in line with guidance and all staff have read KCSIE (2022) part 1 and Annex B. Additionally, there are mechanisms in place to assist staff in understanding and discharging their roles and responsibilities as set out in the guidance.

Ensure that, as part of the requirement for staff to undergo regular updated safeguarding training, including online safety and the requirement to ensure children are taught about safeguarding, is integrated, aligned, and considered as part of the whole setting safeguarding approach and wider staff training and curriculum planning.

Considering the above training requirements, Governing bodies should have regard to the Teachers' Standards which set out the expectation that all teachers manage behaviour effectively to ensure a good and safe educational environment and requires teachers to have a clear understanding of the needs of all children.

All staff including temporary staff/supply staff, volunteers and contractors are provided with GNSFC's Safeguarding and Child Protection policy and if applicable the staff code of conduct.

Take a proportionate risk-based approach to the level of information that is provided to temporary staff, volunteers and contractors.

GNSFC has procedures for dealing with allegations of abuse against staff (including the Headteacher), volunteers and against other children and that a referral is made to the DBS and/or the Teaching Regulation Agency (as applicable) if a person in regulated activity has been dismissed or removed due to safeguarding concerns or would have, had they not resigned.

Policies and processes are in place to deal with concerns (including allegations) which do not meet the harm threshold or low-level concerns as defined in KCSIE 2022.

A member of the senior leadership team has been appointed by the Governing Body as the DSL who will take lead responsibility for safeguarding and child protection and that the role is explicit in the role holder's job description.

That on appointment, the DSL and DDSL(s) undertake interagency training (SSCP Foundation Modules 1 and 2) and also initially undertake DSL 'New to Role' with 'Refresher' training at least every two years as well as attending DSL network events, to refresh knowledge and skills.

Children are taught about safeguarding (including online safety) as part of a broad and balanced curriculum covering relevant issues at an age appropriate level.

Alongside GNSFC, Governors will regularly review the effectiveness of filtering and monitoring systems in place to safeguard children online.

Ensure that the leadership team and relevant staff have an awareness and understanding of the provisions in place and manage them effectively and know how to escalate concerns when identified.

GNSFC will comply with DfE and the Surrey County Council Policy Guidance for Safeguarding Children Missing Education and Education Other Than At School.

Clear systems and processes are in place for identifying possible mental health concerns, including routes to escalate and clear referral and accountability systems.

Ensure that safeguarding and child protection files are maintained as set out in KCSIE 2022 Annex C.

Enhanced DBS checks (without barred list checks unless the governor is also a volunteer at GNSFC) are in place for all Governors.

Ensure section 128 checks are undertaken as defined in KCSIE 2022.

Ensure where Governing bodies hire or rent out GNSFC facilities/premises to organisations or individuals (for example to community groups, sports associations, and service providers to run community or extra-curricular activities) they should ensure that appropriate arrangements are in place to keep children safe.

### **Confidentiality, Sharing and Withholding Information**

All matters relating to safeguarding and child protection will be treated as confidential and only shared as per the ['Information Sharing Advice for Practitioners' \(DfE 2018\) guidance](#). GNSFC will refer to the guidance in the [Data protection: toolkit for schools](#) to support GNSFC with data protection activity, including compliance with UK General Data Protection Regulation (UK GDPR).

Information will be shared with staff within GNSFC who 'need to know'.

Relevant staff have due regard to GDPR principles which allow them to share (and withhold) information.

All staff must be aware that they have a professional responsibility to share information with other agencies in order to safeguard children and that the [Data Protection Act 1998](#) and GDPR are not a barrier to sharing information where a failure to do so would place a child at risk of harm. There is a lawful basis for child protection concerns to be shared with agencies who have a statutory duty for child protection.

All staff will always endeavour to gain parent/carers consent to refer a child to social care unless to do so could put the child at greater risk of harm or impede a criminal investigation.

## **Reporting and responding to safeguarding concerns**

The following procedures apply to all staff working in GNSFC and will be covered in training to enable staff to understand their role and responsibility.

The aim of the procedures is to provide a robust framework which enables staff to take appropriate action when they are concerned that a child is being harmed or abused or is at risk of harm or abuse.

The prime concern at all stages must be the interests and safety of the child. Where there is a conflict of interest between the child and an adult, the interests of the child must be paramount.

All staff are aware that very young children and those with disabilities, special needs or with language delay may be more likely to communicate concerns with behaviours rather than words. Additionally, staff will question the cause of knocks and bumps in children who have limited mobility.

If a member of staff suspects abuse, spots signs or indicators of abuse, or they have a disclosure of abuse made to them they must:

Make an initial record of the information related to the concern as soon as possible on the online system CPOMS including accurate, non-judgemental details of:

- Date
- Time
- Place
- Who was present
- Context
- Details of disclosure/concern (using the child's words)
- Demeanour/non-verbal behaviours of the child
- Any injuries
- Rationale for decision making
- Actions taken

Report it to the DSL immediately.

The DSL will consider if there is a requirement for immediate medical intervention, however urgent medical attention should not be delayed if the DSL is not immediately available.

The records must be signed and dated by the author or / equivalent on electronic based records.

In the absence of the DSL or DDSL(s), staff must be prepared to refer directly to C-SPA (and the Police if appropriate) if there is the potential for immediate significant harm or contact the consultation line at the C-SPA for support and advice.

Following a report of concerns the DSL must:

Using the Effective Family Resilience of Levels of Need document decide whether or not there are sufficient grounds for suspecting harm, in which case a request for support must be made to the C-SPA and the Police if it is appropriate.

GNSFC should try to discuss any concerns about a child's welfare with the parent/carer and where possible obtain their agreement before making a referral to the C-SPA. However, this should only be done when it will not place the child at increased risk or could impede a Police investigation. Where there are doubts or reservations about involving the child's family, the DSL should clarify with the C-SPA or the Police whether the parents/carers should be told about the referral and, if so, when and by whom. This is important in cases where the Police may need to conduct a criminal investigation. The child's views should also be considered.

If it is suspected that a child is suffering, or is likely to suffer, harm or abuse the DSL must contact the C-SPA. If the DSL feels unsure about whether a referral is necessary, they can phone the C-SPA consultation line to discuss concerns.

When a child needs urgent medical attention and there is suspicion of abuse the DSL should take the child to the accident and emergency unit at the nearest hospital, having first notified the C-SPA. The DSL should seek advice about what action the C-SPA will take and about informing the parents/carers, remembering that parents/carers should normally be informed that a child requires urgent hospital attention.

The exception to this process will be in those cases of known FGM where there is a [mandatory reporting duty](#) for the teacher to report directly to the Police where they either:

- Are informed by a girl under 18 that an act of FGM has been carried out on her; or
- Observe physical signs which appear to show that an act of FGM has been carried out on a girl under 18 and they have no reason to believe that the act was necessary for the girl's physical or mental health or for the purposes connected with labour or birth.

The DSL should also be made aware.

### **Dealing with safeguarding concerns**

All staff:

A member of staff who is approached by a child should listen actively and try to reassure them. They cannot promise complete confidentiality and should explain that they need to pass information to other professionals to help keep the child and/or other children safe. The degree of confidentiality should always be governed by the need to protect the child.

Additional consideration needs to be given to children with communication difficulties and for those whose preferred language is not English. It is important to communicate with them in a way that is appropriate to their age, understanding and preference.

All staff should know who the DSL is and who to approach if the DSL is unavailable. All staff have the right to make a referral to the C-SPA or Police directly and should do this if, for whatever reason, there are difficulties following the agreed protocol, for example, they are the only adult on GNSFC premises at the time and have concerns about sending a child home.

#### Guiding principles

- Receive
- Reassure
- Respond
- Report
- Record
- Remember
- Review (by the DSL)

#### What happens next?

It is important that concerns are followed up and it is everyone's responsibility to ensure that they are. The member of staff should be informed by the DSL what has happened following a report being made. If they do not receive this information, they should seek it out.

If they believe that the concern has not been acted upon appropriately, they should inform the Headteacher or Safeguarding Governor or contact the C-SPA for advice.

## **Safeguarding concerns and allegations made about staff, including supply teachers, volunteer and contractors**

[Surrey's LADO procedure](#) will be followed where it is alleged that anyone working in GNSFC that provides education for children under 18 years of age, including supply staff, volunteers and contractors or another adult who works with children has:

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

The last bullet point above includes behaviour that may have happened outside of GNSFC, that might make an individual unsuitable to work with children, this is known as transferable risk.

In dealing with allegations or concerns against an adult, staff must without delay:

Report any concerns to the Headteacher immediately.

If an allegation is made against the Headteacher, the concerns need to be raised with the Chair of Governors as soon as possible. If the Chair of Governors is not available, then the LADO should be contacted directly.

There may be situations when the Headteacher or Chair of Governors will want to involve the Police immediately if the person is deemed to be an immediate risk to children or there is evidence of a possible criminal offence.

Once an allegation has been received by the Headteacher or Chair of Governors they will contact the LADO (as part of their mandatory duty) on 0300123 1650 option 3 LADO or Email: [LADO@surreycc.gov.uk](mailto:LADO@surreycc.gov.uk) immediately and before taking any action or investigation.

Following consultation with the LADO inform the parents/carers of the allegation unless there is a good reason not to.

In liaison with the LADO, GNSFC will determine how to proceed and if necessary, the LADO will refer the matter to Social Care and/or the Police.

If the matter is investigated internally, the LADO will advise GNSFC to seek guidance in following procedures set out in part 4 of KCSIE (2022) and the SSCP procedures.

### Low-level concerns

The term low-level concern does not mean that it is insignificant. A low-level concern is any concern – no matter how small, and even if no more than causing a sense of unease or a 'nagging doubt' - that an adult working in or on behalf of GNSFC may have acted in a way that:

- is inconsistent with the staff code of conduct, including inappropriate conduct outside of work and
- does not meet the harm threshold or is otherwise not serious enough to consider a referral to the LADO.

The purpose of reporting low-level concerns is to create and embed a culture of openness, trust and transparency in which GNSFC's values and expected behaviour set out in the staff code of conduct are lived, monitored and reinforced constantly by all staff.

GNSFC creates an environment where staff are encouraged and feel confident to self-refer where they have found themselves in a situation.

Reports should be made to the Headteacher in a timely manner. If the Headteacher has any doubt as to whether the information which has been shared about the individual as a low-level concern in fact meets the harm threshold, they will consult with the LADO.

### **What is child abuse?**

The following definitions are taken from Working Together to Safeguard Children (2018). In addition to these definitions, it should be understood that children can also be abused by being sexually exploited, honour-based violence, forced marriage or female genital mutilation. To support the local context, all staff have access to Surrey's [Effective Family Resilience and Levels of Need document](#).

#### Forms of abuse and neglect

*Abuse:* a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Harm can include ill treatment that is not physical as well as the impact of witnessing ill treatment of others. This can be particularly relevant, for example, in relation to the impact on children of all forms of domestic abuse. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Children may be abused by an adult or adults or by another child or children.

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

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

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

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

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

GNSFC use the [Graded Care Profile 2](#) tool to support better identification and intervention in cases of neglect. The Surrey [Neglect Risk Assessment Tool](#) is used to support with the initial identification of neglect.

For further information on indicators of abuse can be accessed via [NSPCC](#).

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

### Child-on-Child Abuse

Sexual violence and sexual harassment can occur between children of any age and sex. It can occur through a single child or a group of children sexually assaulting or sexually harassing a single child or group of children.

Children who are victims of sexual violence and sexual harassment will find the experience stressful and distressing. This will, in all likelihood, adversely affect their education attainment as well as their emotional well-being. Sexual violence and sexual harassment exist on a continuum and may overlap; they can occur online and offline (both physically and verbally) and are never acceptable. It is important that all victims are reassured that they are being taken seriously and that they will be supported and kept safe.

Reports of sexual violence and sexual harassment are extremely complex to manage. It is essential that victims are protected, offered appropriate support and every effort is made to ensure their education is not disrupted. It is also important that other children, adults, and staff are supported and protected as appropriate.

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

- bullying (including cyberbullying, prejudice-based and discriminatory bullying) abuse in intimate personal relationships between children (sometimes known as 'teenage relationship abuse')
- physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (this may include an online element which facilitates, threatens and/or encourages physical abuse)
- sexual violence, such as rape, assault by penetration and sexual assault; (this may include an online element which facilitates, threatens and/or encourages sexual violence)
- sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment, which may be standalone or part of a broader pattern of abuse
- causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party
- consensual and non-consensual sharing of nude and semi-nude images and/or videos (also known as sexting or youth produced sexual imagery) [UKCIS guidance: Sharing nudes and semi-nudes advice for education settings](#)
- upskirting, which typically involves taking a picture under a person's clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress, or alarm, and
- initiation/hazing type violence and rituals (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element).

See appendix one for detailed definitions.

We believe that all children have a right to attend GNSFC and learn in a safe environment. Children should be free from harm by adults and other children in GNSFC.

We recognise that children are capable of abusing other children and their peers and this will be dealt with under our child protection policy and in line with KCSiE (2022).

We are clear that sexual violence and sexual harassment is not acceptable.

We will minimise the risk of child-on-child abuse by:

- making clear that there is a zero-tolerance approach to sexual violence and sexual harassment, that it is never acceptable, and it will not be tolerated. It will never be passed off as “banter”, “just having a laugh”, “a part of growing up” or “boys being boys”. We believe that failure to do so can lead to a culture of unacceptable behaviour, an unsafe environment and in worst case scenarios a culture that normalises abuse, leading to children accepting it as normal and not coming forward to report it.
- recognising, acknowledging, and understanding the scale of harassment and abuse and that even if there are no reports it does not mean it is not happening, it may be the case that it is just not being reported.
- challenging physical behaviour (potentially criminal in nature) such as grabbing bottoms, breasts and genitalia, pulling down trousers, flicking bras and lifting up skirts. As we believe that dismissing or tolerating such behaviours risks normalising them.

### Prevention

- Taking a whole setting approach to safeguarding and child protection.
- Providing training to staff.
- Providing a clear set of values and standards, underpinned by GNSFC’s behaviour policy and pastoral support; and by a planned programme of evidence-based content delivered through the curriculum.
- Engaging with specialist support and interventions.

### Responding robustly to reports of sexual violence and sexual harassment

Children making any report of sexual violence or sexual harassment including “upskirting” (The Voyeurism Offences Act 2019) will be taken seriously, kept safe and be well supported.

If the report includes an online element staff will be mindful of the [Searching, screening and confiscation at school](#) guidance.

The key consideration is for staff not to view or forward illegal images of a child. The guidance provides more details on what to do when viewing an image is unavoidable. In some cases, it may be more appropriate to confiscate any devices to preserve any evidence and hand them to the police for inspection

### Risk Assessment

Following a report, the DSL will make an immediate risk and needs assessment on a case-by-case basis.

The risk assessment will consider:

- The victim, especially their protection and support.
- The alleged perpetrator, their support needs and any discipline action.
- All other children at GNSFC.
- The victim and the alleged perpetrator sharing classes and space at GNSFC.
- The risk assessment will be recorded and kept under review.

Where there has been other professional intervention and/or other specialist risk assessments, these professional assessments will be used to inform GNSFC's approach to supporting and protecting children.

Support regarding risk assessments can be accessed from the [Surrey Education Services](#) Education Safeguarding Team Resources Hub.

Action:

It is essential that all victims are reassured that they are being taken seriously, regardless of how long it has taken them to come forward, and that they will be supported and kept safe. Abuse that occurs online or outside of GNSFC should not be downplayed and should be treated equally seriously. A victim should never be given the impression that they are creating a problem by reporting sexual violence or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report. It is important to explain that the law is in place to protect children rather than criminalise them, and this should be explained in such a way that avoids alarming or distressing them.

The DSL will consider:

- The wishes of the victim.
- The nature of the incident including whether a crime has been committed and the harm caused.
- Ages of the children involved.
- Developmental stages of the children.
- Any power imbalance between the children.
- Any previous incidents.
- That sexual violence and sexual harassment can take place within intimate personal relationships between children.
- Importance of understanding intra familiar harms and any necessary support for siblings following incidents
- Ongoing risks to victim, other children, adult students, or staff.
- Other related issues or wider context.

Confidentiality:

The victim may ask GNSFC not to tell anyone about the sexual violence or sexual harassment. If the victim does not give consent to share information, staff may still lawfully share it, if there is another legal basis under the UK GDPR that applies. The DSL should consider:

- parents or carers should normally be informed (unless this would put the victim at greater risk),
- the basic safeguarding principle is: if a child is at risk of harm, is in immediate danger, or has been harmed, a referral should be made to local authority children's social care, and
- rape, assault by penetration and sexual assaults are crimes. Where a report of rape, assault by penetration or sexual assault is made, this should be referred to the police. Whilst the age of criminal responsibility is ten, if the alleged perpetrator is under ten, the starting principle of referring to the police remains. The police will take a welfare, rather than a criminal justice approach, in these cases.

The DSL will have to balance the victim's wishes against their duty to protect the victim and other children.

Options:

- Manage internally
- Early help intervention
- Request for support to the C-SPA
- Report to the Police (generally in parallel with a request for support to the C-SPA)

All concerns, discussions, decisions and reasons for decision will be recorded on CPOMS.

## Ongoing Response:

- The DSL will manage each case individually and will ensure the risk assessment is reviewed regularly with relevant partner agencies, for example the Police and social care.
- Where an allegation of sexual violence or sexual harassment is progressing through the criminal justice system, settings should be aware of anonymity, witness support, and the criminal process in general so they can offer support and act appropriately.
- Where there is a criminal investigation into a rape, assault by penetration or sexual assault, the alleged perpetrator should be removed from any classes they share with the victim.
- The DSL will consider how best to keep the victim and perpetrator a reasonable distance apart on GNSFC premises and on transport where appropriate.
- Where a criminal investigation into a rape or assault by penetration leads to a conviction or caution, GNSFC will take suitable action. In all but the most exceptional of circumstances, the rape or assault is likely to constitute a serious breach of discipline and may lead to the view that allowing the perpetrator to remain in the same setting would seriously harm the education or welfare of the victim (and potentially themselves and other children).
- Where a criminal investigation into sexual assault leads to a conviction or caution, GNSFC will, if it has not already, consider any suitable sanctions in light of their behaviour policy, which may include consideration of permanent exclusion. Where the perpetrator is going to remain at GNSFC, the Headteacher should continue keeping the victim and perpetrator in separate classes and continue to consider the most appropriate way to manage potential contact on GNSFC premises and transport. The nature of the conviction or caution and wishes of the victim will be especially important in determining how to proceed in such cases.
- The victim, alleged perpetrator and any other children and adults affected will receive appropriate support and safeguards on a case-by-case basis.
- GNSFC will take any disciplinary action against the alleged perpetrator in accordance with GNSFC's behaviour policy.
- GNSFC recognises that taking disciplinary action and providing appropriate support are not mutually exclusive actions and will occur at the same time if necessary.
- GNSFC will consider the potential impact of social media in facilitating the spreading of rumours and exposing victims' identities.
- GNSFC recognises that children who have experienced sexual violence display a wide range of responses to their experiences including clear signs of trauma, physical and emotional responses, or no overt signs at all.

## Physical Abuse

While a clear focus of child-on-child abuse is around sexual abuse and harassment, physical assaults and initiation violence and rituals from children to children can also be abusive.

These are equally not tolerated and if it is believed that a crime has been committed, will be reported to the Police.

The principles from the anti-bullying policy will be applied in these cases, with recognition that any Police investigation will need to take priority.

## **Harmful Sexual Behaviour (HSB)**

Children's sexual behaviour exists on a wide continuum, ranging from normal and developmentally expected to inappropriate, problematic, abusive and violent. Problematic, abusive and violent sexual

behaviour is developmentally inappropriate and may cause developmental damage. HSB can occur online and/or face-to-face and can also occur simultaneously between the two. HSB will be considered in a child protection context.

GNSFC uses the Brook Traffic Light Tool to assess HSB.

The [Brook Traffic Light Tool](#) uses a traffic light system to categorise the sexual behaviours of children it can be used to help professionals:

- Make decisions about safeguarding children and young people.
- Assess and respond appropriately to sexual behaviour in children and young people.
- Understand healthy sexual development and distinguish it from harmful behaviour.

By categorising sexual behaviours, GNSFC can work with other agencies to the same standardised criteria when making decisions and can protect children with a multi-agency approach.

GNSFC recognises that it is vital that professionals agree on how behaviours should be categorised regardless of culture, faith, beliefs, and their own experiences or values.

### **Anti-Bullying/Cyberbullying**

GNSFC's policy on anti-bullying is set out in our Anti-bullying and Harassment Policy which includes measures to prevent bullying (including cyberbullying, prejudice-based and discriminatory bullying).

We keep a record of known bullying incidents which is shared with and analysed by the Governing Body. All staff are aware that children with SEND and/or children who identify as Lesbian, Gay, Bisexual or Transgender (LGBT) are more susceptible to being bullied/victims of child abuse.

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.

When there is 'reasonable cause to suspect that a child is suffering, or is likely to suffer, significant harm' a bullying incident should be addressed as a child protection concern. If the anti-bullying procedures are seen to be ineffective, the Headteacher and the DSL will also consider child protection procedures.

PSED education regularly provides opportunities for children to understand bullying is wrong, its impact and how to deal with it at an age appropriate level.

LGBT inclusion is part of the statutory Relationships Education, Relationship and Sex Education and Health Education curriculum and there is a range of support available to help settings counter homophobic, biphobic and transphobic bullying and abuse.

### **E-Safety/Cybercrime**

GNSFC has an e-safety policy for staff which empowers us to protect and educate staff in their use of technology and establishes mechanisms to identify, intervene in, and escalate any concerns where appropriate. GNSFC also has a clear policy on the use of mobile and smart technology (Mobile Phone Policy).

The breadth of issues classified within online safety is considerable and ever evolving, but can be categorised into four areas of risk, content, contact, conduct and commerce.

Children are taught about online safety throughout the curriculum and all staff receive online safety training and advice which is regularly updated. GNSFC's online safety co-ordinators are Charlotte Bate and Sally Cave.

GNSFC will follow the guidance around [harmful online challenges and online hoaxes](#) when supporting children and sharing information with parents/carers.

Children with particular skill and interest in computing and technology may inadvertently or deliberately stray into cyber-dependent crime. If there are concerns about a child in this area, the DSL will consider a referral into the [Cyber Choices](#) programme.

This programme aims to intervene where young people are at risk of committing, or being drawn into, low level cyber-dependent offences and divert them to a more positive use of their skills and interests.

### **Racist Incidents**

GNSFC acknowledges that repeated racist incidents or a single serious incident may lead to consideration under child protection procedures. We keep a record of racist incidents.

### **Radicalisation, Extremism and Terrorism**

[The Prevent Duty for England and Wales \(2015\)](#) under section 26 of the Counter Terrorism and Security Act 2015 places a duty on education and other children's services to have due regard to the need to prevent people from being drawn into terrorism.

Extremism is defined as 'the vocal or active opposition to our fundamental values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs. This also includes calling for the death of members of the armed forces'.

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

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

Some children are at risk of being radicalised; adopting beliefs and engaging in activities which are harmful, criminal or dangerous. This can happen both online and offline.

GNSFC is clear that exploitation of vulnerable children and radicalisation should be viewed as a safeguarding concern and follows the DfE guidance for settings and childcare providers on preventing children and young people from being drawn into terrorism.

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

The DSL should report concerns that a child may be at risk of radicalisation or involvement in terrorism, use the [Prevent referral form](#) to refer cases by e-mail to [preventreferrals@surrey.pnn.police.uk](mailto:preventreferrals@surrey.pnn.police.uk). If the matter is urgent then Police must be contacted by dialling 999. In cases where further advice from the Police is sought dial 101 or 01483 632982 and ask to speak to the Prevent Supervisor for Surrey. The DfE has also set up a dedicated telephone helpline for staff and Governors to raise concerns around Prevent (020 7340 7264).

GNSFC staff receive training to help identify early signs of radicalisation and extremism.

Opportunities are provided in the curriculum to enable children to discuss issues of religion, ethnicity and culture and GNSFC follows the [Promoting fundamental British values through SMSC](#).

GNSFC's Governors, the Headteacher and the DSL will assess the level of risk within GNSFC and put actions in place to reduce that risk. Risk assessment may include due diligence checks for external speakers and private hire of facilities, anti-bullying policy and other issues specific to GNSFC's profile, community and philosophy.

Although not a cause for concern on their own, possible indicators when taken into consideration alongside other factors or context may be a sign of being radicalised.

Further information and a list of such indicators can be found at [Radicalisation and Extremism - Examples and Behavioural Traits \(educateagainsthate.com\)](#)

### **Domestic Abuse**

Domestic abuse can encompass a wide range of behaviours and may be a single incident or a pattern of incidents. That abuse can be, but is not limited to, psychological, physical, sexual, financial or emotional. It occurs regardless of race, ethnicity, gender, class, sexuality, age, religion, mental or physical ability. Children can be victims of domestic abuse. They may see, hear, or experience the effects of abuse at home and/or suffer domestic abuse in their own intimate relationships (teenage relationship abuse). All of which can have a detrimental and long-term impact on their health, well-being, development, and ability to learn.

[Domestic Abuse Act](#) received Royal Assent on 29 April 2021. The Act introduces the first ever statutory definition of domestic abuse and recognises the impact of domestic abuse on children, as victims in their own right, if they see, hear or experience the effects of abuse. The statutory definition of domestic abuse, based on the previous cross-government definition, ensures that different types of relationships are captured, including ex-partners and family members. The definition captures a range of different abusive behaviours, including physical, emotional and economic abuse and coercive and controlling behaviour. Both the person who is carrying out the behaviour and the person to whom the behaviour is directed towards must be aged 16 or over and they must be "personally connected" (as defined in section 2 of the 2021 Act).

All children can witness and be adversely affected by domestic abuse in the context of their home life where domestic abuse occurs between family members. Experiencing domestic abuse 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.

GNSFC is enrolled onto the Operation Encompass scheme, a joint project between Surrey Police, Surrey Domestic Abuse Service and Surrey settings. The system ensures that when the police are called to an incident of domestic abuse, where there are children in the household who have experienced the domestic incident, the police will inform the DSL in GNSFC before the child or children arrive at GNSFC the following day. This ensures that GNSFC has up to date relevant information about the child's circumstances and can enable immediate support to be put in place, according to the child's needs.

### **Homelessness**

Being homeless or being at risk of becoming homeless presents a real risk to a child's welfare. The DSL is aware of contact details and referral routes into the Local Housing Authority so they can raise/progress concerns at the earliest opportunity.

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

Both CSE and CCE are forms of abuse that occur where an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a child into taking part in sexual or criminal activity, in exchange for something the victim needs or wants, and/or for the financial advantage or increased status of the perpetrator or facilitator and/or through violence or the threat of violence. CSE and CCE can affect children, both male and female, and can include children who have been moved (commonly referred to as trafficking) for the purpose of exploitation.

### Child Sexual Exploitation (CSE)

CSE is a form of child sexual abuse. CSE can occur over time or be a one-off occurrence and may happen without the child's immediate knowledge, for example 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. It can involve force and/or enticement-based methods of compliance and may, or may not, be accompanied by violence or threats of violence.

Any concerns that a child is being or is at risk of being sexually exploited should be passed immediately to the DSL.

GNSFC is aware there is a clear link between regular non-attendance and CSE. Staff will consider a child to be at potential CSE risk in the case of regular non-attendance at GNSFC and make reasonable enquiries with the child and parents/carers to assess this risk.

All staff are aware that safeguarding incidents and/or behaviours can be associated with factors outside GNSFC and/or can occur between children outside of these environments. All staff, but especially the DSL will 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.

In all cases if the DSL identifies any level of concern the DSL should contact the C-SPA and if a child is in immediate danger the Police should be called on 999.

GNSFC is aware that often a child is not able to recognise the coercive nature of the abuse and does not see themselves as a victim. As a consequence, the child may resent what they perceive as interference by staff. However, staff must act on their concerns as they would for any other type of abuse. Children also rarely self-report CSE so staff must be particularly vigilant to potential indicators of risk.

GNSFC includes the risks of sexual exploitation in the curriculum in an age appropriate manner.

### Child Criminal Exploitation (CCE)

Some specific forms of CCE can include children being forced or manipulated into transporting drugs or money through county lines, working in cannabis factories, shoplifting, or pickpocketing. They can also be forced or manipulated into committing vehicle crime or threatening/committing serious violence to others.

County lines is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs using dedicated mobile phone lines or other form of "deal line". Children are exploited to move, store and sell drugs and money. Offenders will often use coercion, intimidation, violence (including sexual violence) and weapons to ensure compliance of victims.

Children can become trapped by this type of exploitation, as perpetrators can threaten victims (and their families) with violence or entrap and coerce them into debt.

Any concerns that a child is being or is at risk of being criminally exploited will be passed without delay to the DSL. The DSL will then contact the C-SPA and if there is concern about a child's immediate safety, the Police will be contacted on 999.

GNSFC is aware there is a clear link between regular non-attendance at GNSFC and exploitation. Staff will consider a child to be at potential risk in the case of regular non-attendance at GNSFC and make reasonable enquiries with the child and parents/carers to assess this risk.

## **Serious Violence**

There are a number of indicators, which may signal children are at risk from, or are involved with, serious violent crime. These may include:

- increased absence from GNSFC;
- 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.

Staff are aware that violence can often peak in the house just before and after the children attend GNSFC which includes travelling to and from GNSFC.

## **Modern Slavery**

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

## **Female Genital Mutilation (FGM)**

FGM is illegal in England and Wales under the FGM Act (2003). It is a form of child abuse and violence against women. [A mandatory reporting duty](#), requires teachers to report directly and immediately to the Police 101 where they either:

- Are informed by a girl under 18 that an act of FGM has been carried out on her; or
- Observe physical signs which appear to show that an act of FGM has been carried out on a girl under 18 and they have no reason to believe that the act was necessary for the girl's physical or mental health or for the purposes connected with labour or birth.

The duty applies to all persons who are employed or engaged to carry out 'teaching work' whether or not they have qualified teacher status.

The duty applies to the individual who becomes aware of the case to make a report. It should not be transferred to the DSL; however, the DSL should be informed.

GNSFC staff are trained to be aware of risk indicators of FGM.

Concerns about FGM outside of the mandatory reporting duty should be reported using GNSFC's Safeguarding and Child protection procedures. Staff should be particularly alert to suspicions or concerns expressed by female children about going on a long holiday during the summer holiday.

There should also be consideration of potential risk to other girls in the family and the wider community. Where there is a risk to life or likelihood of serious immediate harm the teacher should report the case immediately to the Police by calling 999.

There are no circumstances in which a member of staff should examine a girl.

## **Forced Marriage**

A forced marriage is a marriage in which one or both people do not (or in cases of people with learning disabilities cannot) consent to the marriage but are coerced into it. Coercion may include physical, psychological, financial, sexual, and emotional pressure. It may also involve physical or sexual violence and abuse.

Forced marriage is recognised in the UK as a form of violence against women and men, domestic/child abuse and a serious abuse of human rights. Since June 2014, forcing someone to marry has become a criminal offence in England and Wales under the Anti-Social Behaviour, Crime and Policing Act 2014.

A forced marriage is not the same as an arranged marriage which is common in many cultures. The families of both spouses take a leading role in arranging the marriage but the choice of whether or not to accept the arrangement remains with the prospective spouses.

Staff should never attempt to intervene directly as a setting or through a third party. Contact should be made with the C-SPA and/or the Forced Marriage Unit 200 7008 0151.

### **So-called 'Honour'-based abuse (HBA)**

HBA can be described as a collection of practices, which are used to control behaviour within families or other social groups to protect perceived cultural and religious beliefs and/or honour. Such abuse can occur when perpetrators perceive that a relative has shamed the family and/or community by breaking their honour code.

HBA might be committed against people who:

- become involved with a boyfriend or girlfriend from a different culture or religion.
- want to get out of an arranged marriage; become involved with a boyfriend or girlfriend from a different culture or religion.
- want to get out of an arranged marriage.
- want to get out of a forced marriage.
- wear clothes or take part in activities that might not be considered traditional within a particular culture.

It is considered a violation of human rights and may be a form of domestic and/or sexual abuse.

### **One Chance Rule**

All staff are aware of the 'One Chance' Rule' in relation to forced marriage, FGM and HBA. Staff recognise they may only have one chance' to speak to a child who is a potential victim and have just one chance to save a life.

GNSFC is aware that if the victim is not offered support following disclosure that the 'One Chance' opportunity may be lost. Therefore, all staff are aware of their responsibilities and obligations when they become aware of potential forced marriage, FGM and HBA cases.

### **Private Fostering Arrangements**

A private fostering arrangement occurs when someone other than a parent or close relative cares for a child for a period of 28 days or more, with the agreement of the child's parents. It applies to children under the age of 16 years old or 18 years old if the child is disabled.

Looked After Children by the local authority or those who are placed in residential settings, children's homes or hospitals are not considered to be privately fostered.

Private fostering occurs in all cultures and children may be privately fostered at any age.

GNSFC recognises that most privately fostered children remain safe and well but are aware that safeguarding concerns have been raised in some cases. Therefore, all staff are alert to possible safeguarding issues, including the possibility that the child has been trafficked into the country.

By law, a parent, private foster carer or other persons involved in making a private fostering arrangement must notify Children's Social Care immediately. However, where a member of staff becomes aware that a child may be in a private fostering arrangement, they will raise this with the DSL and the DSL will notify the C-SPA immediately.

## **Looked After Children and Previously Looked After Children**

The most common reason for children becoming looked after is because of abuse and/or neglect.

Appropriate staff have information about a child's looked after legal status and care arrangements, including the level of authority delegated to the carer by the authority looking after the child and contact arrangements with birth parents or those with parental responsibility.

A previously looked after child potentially remains vulnerable and all staff should have the skills, knowledge and understanding to keep previously looked after children safe. When dealing with looked after children and previously looked after children, it is important that all agencies work together and prompt action is taken when necessary to safeguard these children, who are a particularly vulnerable group.

The designated teacher and governor for looked after children will have the appropriate level of training to equip them with the knowledge and skills to undertake their role.

The designated teacher will work with Surrey's Head of Virtual School for both looked after children and previously looked after children.

### **Children who are particularly vulnerable**

GNSFC recognises that some children are more vulnerable to abuse and neglect and that additional barriers exist when recognising abuse for some children.

We understand that this increase in risk is due more to societal attitudes and assumptions or child protection procedures which fail to acknowledge children's diverse circumstances, rather than the individual child's personality, impairment or circumstances.

In some cases possible indicators of abuse such as a child's mood, behaviour or injury might be assumed to relate to the child's impairment or disability rather than giving a cause for concern.

Or a focus may be on the child's disability, special educational needs or situation without consideration of the full picture. In other cases, such as bullying, the child may be disproportionately impacted by the behaviour without outwardly showing any signs that they are experiencing it.

Some children may also find it harder to disclose abuse due to communication barriers, lack of access to a trusted adult or not being aware that what they are experiencing is abuse.

To ensure that all of our children receive equal protection we will give special consideration to children who are:

- Disabled or have special educational needs
- Young carers
- Affected by parental substance misuse, domestic abuse or parental mental health needs
- Asylum seekers
- Living away from home
- Vulnerable to being bullied or engaged in bullying
- Already viewed as a 'problem'
- Living in temporary accommodation
- Living transient lifestyles
- Living in chaotic and unsupportive home situations
- Vulnerable to discrimination on the grounds of race, ethnicity, religion, disability or sexuality
- At risk of sexual exploitation
- Do not have English as a first language
- At risk of female genital mutilation
- At risk of forced marriage
- At risk of being drawn into extremism.

## **Children with special educational needs and disabilities or health issues**

Children with SEND or certain medical or physical health conditions can face additional safeguarding challenges both online and offline. 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 settings or the consequences of doing so

Children with SEND are protected in exactly the same way as children without SEND but staff need to have additional knowledge and awareness of the extra challenges involved in safeguarding children with SEND.

The DfE guidance on safeguarding children with SEN and disabilities explains that signs of abuse could be masked by the child's disability, and so a heightened awareness of possible indicators of abuse or neglect is needed. Professionals must always take into account the nature of a child's disability when determining whether they have been abused or neglected.

Indicators of possible abuse or neglect include:

- A bruise in a site that might not be of concern on an ambulant child, such as the shin, might be of concern on a non-mobile child
- Not getting enough help with feeding leading to malnourishment
- Poor toileting arrangements
- Lack of stimulation
- Unjustified and/or excessive use of restraint
- Rough handling, extreme behaviour modification e.g. deprivation of liquid, medication, food or clothing
- Unwillingness to try to learn a child's means of communication
- Ill-fitting equipment e.g. callipers, sleep boards, inappropriate splinting
- Misappropriation of a child's finances
- Invasive procedures which are unnecessary or are carried out against the child's will.

Any reports of abuse will require close liaison with the DSL and the Inclusion Lead. GNSFC will consider extra pastoral support and attention for these children, along with ensuring any appropriate support for communication is in place.

### ***Children who need a social worker (Child in Need and Child Protection Plans)***

Children may need a social worker due to safeguarding or welfare needs. 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 designated safeguarding lead 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).

### **Children Missing Education**

All children are entitled to an efficient, full-time education which is suitable to their age, ability, aptitude, and any SEND they may have.

GNSFC recognises that children missing education, can be a vital warning sign of a range of safeguarding possibilities. They are also at significant risk of underachieving, being victims of abuse and harm, exploitation, radicalisation, and not being in education, employment or training (NEET) later in life.

Where possible GNSFC will hold more than one emergency contact number for each child.

GNSFC will ensure that there is a record of joiners and leavers as defined in [The Education \(Pupil Registration\) \(England\) 2006 \(amended 2016\)](#). All joiners and leavers are recorded on SIMS.

When a child leaves GNSFC, a CTF containing all the child's information is sent to their next setting/school.

If a child leaves without any notification, GNSFC does its best to make contact with the family to find out where the child is and will make a referral to the C-SPA if it is felt that the child is at risk of harm.

GNSFC will:

- Enter children on the admissions register on the first day on which GNSFC has agreed, or has been notified, that the child will attend GNSFC.
- Complete the termly census with details of every child attending GNSFC.
- Monitor each child's attendance through their daily register and follow Surrey County Council procedure in cases of unauthorised absence.
- Remove a child's name from the admissions register on the date that the child leaves GNSFC.

Where parents/carers notify GNSFC, in writing, of their intention to Electively Home Educate (EHE) GNSFC will forward a copy of the letter to the Surrey County Council Inclusion Team.

Where parents/carers orally indicate that they intend to withdraw their child to EHE and no letter has been received, GNSFC will not remove the child from roll and will notify the Inclusion Team at the earliest opportunity.

### **Pupils Missing Out on Education (PMOOE)**

Most children engage positively with GNSFC and attend regularly. However, to flourish, some children require an alternative education provision or may require a modified timetable to support a return to full time education provision. It is recognised that children accessing alternative provision, or a reduced/modified timetable may have additional vulnerabilities. Ofsted refer to these as PMOOE because they are not accessing their education in setting in the 'usual way'.

GNSFC will gain consent (if required in statute) from parents/carers to put in place alternative provision and/or a reduced or modified timetable

GNSFC will ensure that parents/carers (and the Local Authority where the child has an Education Health Care Plan (EHCP)) are given clear information about alternative provision placements and reduced/modified timetables: why, when, where, and how they will be reviewed.

GNSFC will keep the placement and timetable under review and involve parents/carers in the review. Reviews will be frequent enough to provide assurance that the off-site education and/or modified timetable is achieving its objectives and that the child is benefitting from it.

GNSFC will monitor and track children attending alternative provision to ensure that the provision meets the needs of the child. GNSFC continues to be responsible for the safeguarding of that child. GNSFC will obtain written confirmation from the alternative provision provider that appropriate safeguarding checks have been carried out on individuals working at the establishment,

GNSFC will comply with regular data returns requested by the Surrey County Council, regarding all children, of statutory setting age, attending alternative provision and/or on a reduced/modified timetable.

GNSFC leadership will report to Governors information regarding the use and effectiveness of alternative provision and modified/reduced timetables. GNSFC will also report to Governors any formal direction of a child to alternative provision to improve behaviour.

### **Attendance and Behaviour**

Additional policies and procedures are in place regarding attendance and behaviour.

GNSFC recognises that absence from and exclusion from education may be indicators of abuse and neglect, including the exploitation of children. The DSL will regularly liaise with members of staff with responsibility for behaviour and attendance to ensure risk is identified and appropriate intervention is in place to protect children from harm.

GNSFC will work in partnership with Surrey Police and other partners for reporting children that go missing from GNSFC sites during GNSFC day. Staff will be alert to signs of children at risk of travelling to conflict zones, female genital mutilation and forced marriage.

### **Restrictive Physical Intervention**

We acknowledge that staff must only ever use physical intervention as a last resort, when a child is at immediate risk of harming themselves or others, and that at all times it must be the minimal force necessary to prevent injury to another person. Such events should be fully recorded and signed by a witness.

Staff understand that physical intervention of a nature which causes injury or distress to a child may be considered under child protection and/or disciplinary procedures.

We recognise that sometimes touch is appropriate in the context of working with children, and all staff have been given safe practice guidance to ensure they are clear about their professional boundaries.

When applying disciplinary measures such as physical intervention or isolation for children with SEND GNSFC will consider the risks, given the additional vulnerabilities of these children.

### **Whistleblowing**

We recognise that children cannot be expected to raise concerns in an environment where staff fail to do so.

All staff, including temporary staff/supply staff and volunteers, should be aware of their duty to raise concerns, where they exist, about the management of safeguarding and child protection, which may include the attitude or actions of colleagues, poor or unsafe practice and potential failures in GNSFC's safeguarding arrangements.

If it becomes necessary to consult outside GNSFC, they should speak in the first instance, to the Area Schools Officer or LADO in accordance with the Whistleblowing Policy.

Staff are encouraged to use an external, independent and confidential service provided by Navex Global, who can be contacted on their freephone helpline number 0800 069 8180 and through the [Navex Global web pages](#)

[The NSPCC whistleblowing helpline](#) is also available 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 GNSFC. Staff can call: 0800 028 0285 – line is available from 8:00 AM to 8:00 PM, Monday to Friday and Email: [help@nspcc.org.uk](mailto:help@nspcc.org.uk).

Whistleblowing regarding the Headteacher should be made to the Chair of the Governing Body whose contact details should be available to staff.

Links with other GNSFC policies:

- Allegations of abuse made against staff
- Anti-bullying and Harassment Policy
- Complaints Policy
- Equality Policy
- E-Safety Policy for Staff
- Health & Safety Policy
- Intimate Care Policy
- Low level concerns policy
- Medical Needs Policy
- Mobile Phone Policy
- Promoting Positive Behaviour Policy
- Recruitment and Selection Policy
- Risk Assessment Policy
- Staff Code of Conduct
- Whistleblowing

#### **Additional Resources**

[Surrey Safeguarding Children Partnership webpages](#)

[Surrey Education Services \(surreycc.gov.uk\)](http://surreycc.gov.uk) – Education Safeguarding Resources Hub

[Graded Care Profile 2](#)

[NSPCC | The UK children's charity | NSPCC](#)

[CEOP ThinkuKnow webpages](#)

[Anti Bullying Alliance webpages](#)

[Childnet International](#)

[Safer Internet Centre webpages](#)

[Contextual Safeguarding Network webpages](#)

[Lucy Faithfull Foundation webpages](#)

## Appendix one:

### Sexual violence

It is important that settings are aware of sexual violence and the fact children can, and sometimes do, abuse other children in this way and that it can happen both inside and outside of GNSFC. When referring to sexual violence in this advice, we do so in the context of child-on-child sexual violence.

When referring to sexual violence we are referring to sexual offences under the Sexual Offences Act 2003 as described below:

*Rape:* A person (A) commits an offence of rape if: he intentionally penetrates the vagina, anus or mouth of another person (B) with his penis, B does not consent to the penetration and A does not reasonably believe that B consents.

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

*Sexual Assault:* A person (A) commits an offence of sexual assault if: s/he intentionally touches another person (B), the touching is sexual, B does not consent to the touching and A does not reasonably believe that B consents. (NOTE- Settings should be aware that sexual assault covers a very wide range of behaviour so a single act of kissing someone without consent, or touching someone's bottom/breasts/genitalia without consent, can still constitute sexual assault.)

*Causing someone to engage in sexual activity without consent:* A person (A) commits an offence if: s/he intentionally causes another person (B) to engage in an activity, the activity is sexual, B does not consent to engaging in the activity, and A does not reasonably believe that B consents. (NOTE – this could include forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party.)

What is consent?

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

- a child under the age of 13 can never consent to any sexual activity
- the age of consent is 16
- sexual intercourse without consent is rape.

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

### Sexual harassment

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

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

- sexual comments, such as: telling sexual stories, making lewd comments, making sexual remarks about clothes and appearance and calling someone sexualised names
- sexual "jokes" or taunting

- physical behaviour, such as: deliberately brushing against someone, interfering with someone's clothes. Settings should be considering when any of this crosses a line into sexual violence – it is important to talk to and consider the experience of the victim.
- displaying pictures, photos or drawings of a sexual nature
- upskirting (this is a criminal offence), and
- online sexual harassment. This may be standalone, or part of a wider pattern of sexual harassment and/or sexual violence. It may include:
  - consensual and non-consensual sharing of nude and semi-nude images and/or videos. Taking and sharing nude photographs of U18s is a criminal offence. UKCIS Sharing nudes and semi-nudes: advice for education settings
  - sharing of unwanted explicit content
  - sexualised online bullying
  - unwanted sexual comments and messages, including, on social media
  - sexual exploitation; coercion and threats, and
  - coercing others into sharing images of themselves or performing acts they're not comfortable with online.

It is important that settings consider sexual harassment in broad terms. Sexual harassment (as set out above) creates a culture that, if not challenged, can normalise inappropriate behaviours and provide an environment that may lead to sexual violence.

## **Appendix two:**

### **Indicators of abuse**

#### ***Neglect***

##### The nature of neglect

Neglect is a lack of parental care but poverty and lack of information or adequate services can be contributory factors.

Far more children are registered to the category of neglect on Child in Need and Child Protection plans than to the other categories. As with abuse, the number of children experiencing neglect is likely to be much higher than the numbers on the plans.

Neglect can include parents or carers failing to:

- provide adequate food, clothing and shelter
- protect a child from physical and emotional harm or danger
- ensure adequate supervision or stimulation
- ensure access to appropriate medical care or treatment
- Failure to bring the child to school
- Regular lateness

NSPCC research has highlighted the following examples of the neglect of children under 12 years old:

- frequently going hungry
- frequently having to go to school in dirty clothes
- regularly having to look after themselves because of parents being away or having problems such as drug or alcohol misuse
- being abandoned or deserted
- living at home in dangerous physical conditions
- not being taken to the doctor when ill
- not receiving dental care.

Neglect is a difficult form of abuse to recognise and is often seen as less serious than other categories. This is not the case, it is very damaging: children who are neglected often develop more slowly than others and may find it hard to make friends and fit in with their peer group.

Neglect is often noticed at a stage when it does not pose a risk to the child. The duty to safeguard and promote the welfare of children (What to do if You're Worried a Child is Being Abused DfE 2015) would suggest that an appropriate intervention or conversation at this early stage can address the issue and prevent a child continuing to suffer until it reaches a point when they are at risk of harm or in significant need.

Neglect is often linked to other forms of abuse, so any concerns should be discussed with the DSL.

##### Indicators of neglect

The following is a summary of some of the indicators that may suggest a child is being abused or is at risk of harm.

It is important to recognise that indicators alone cannot confirm whether a child is being abused. Each child should be seen in the context of their family and wider community and a proper assessment carried out by appropriate persons. What is important to keep in mind is that if you feel unsure or concerned, do something about it. Don't keep it to yourself. The Neglect Risk Assessment Tool provides staff with a resource to identify and act on concerns regarding neglect.

### Physical indicators of neglect

- Constant hunger and stealing food
- Poor personal hygiene - unkempt, dirty or smelly
- Underweight
- Dress unsuitable for weather
- Poor state of clothing
- Illness or injury untreated

### Behavioural indicators of neglect

- Constant tiredness
- Frequent absence from school or lateness
- Missing medical appointments
- Isolated among peers
- Frequently unsupervised
- Stealing or scavenging, especially food
- Destructive tendencies

### ***Emotional abuse***

#### The nature of emotional abuse

- Most harm is produced in low warmth, high criticism homes, not from single incidents.
- Emotional abuse is difficult to define, identify/recognise and/or prove.
- Emotional abuse is chronic and cumulative and has a long-term impact.
- All kinds of abuse and neglect have emotional effects although emotional abuse can occur by itself.
- Children can be harmed by witnessing someone harming another person – as in domestic abuse.

It is sometimes possible to spot emotionally abusive behaviour from parents and carers to their children, by the way that the adults are speaking to, or behaving towards children. An appropriate challenge or intervention could affect positive change and prevent more intensive work being carried out later on.

#### Indicators of emotional abuse

##### *Developmental issues*

- Delays in physical, mental and emotional development
- Poor school performance
- Speech disorders, particularly sudden disorders or changes.

##### *Behaviour*

- Acceptance of punishment which appears excessive
- Over-reaction to mistakes
- Continual self-deprecation (I'm stupid, ugly, worthless etc)
- Neurotic behaviour (such as rocking, hair-twisting, thumb-sucking)
- Self-mutilation
- Suicide attempts
- Drug/solvent abuse
- Running away
- Compulsive stealing, scavenging
- Acting out
- Poor trust in significant adults
- Regressive behaviour – e.g., wetting
- Eating disorders

- Destructive tendencies
- Neurotic behaviour
- Arriving early at school, leaving late

#### *Social issues*

- Withdrawal from physical contact
- Withdrawal from social interaction
- Over-compliant behaviour
- Insecure, clinging behaviour
- Poor social relationships

#### *Emotional responses*

- Extreme fear of new situations
- Inappropriate emotional responses to painful situations (“I deserve this”)
- Fear of parents being contacted
- Self-disgust
- Low self-esteem
- Unusually fearful with adults
- Lack of concentration, restlessness, aimlessness
- Extremes of passivity or aggression

### ***Physical abuse***

#### The nature of physical abuse

Most children collect cuts and bruises quite routinely as part of the rough and tumble of daily life. Clearly, it is not necessary to be concerned about most of these minor injuries. But accidental injuries normally occur on the bony prominences – e.g. knees, shins.

Injuries on the soft areas of the body are more likely to be inflicted intentionally and should therefore make us more alert to other concerning factors that may be present.

A body map can assist in the clear recording and reporting of physical abuse. The body map should only be used to record observed injuries and no child should be asked to remove clothing by a member of staff.

#### Indicators of physical abuse / factors that should increase concern

- Multiple bruising or bruises and scratches (especially on the head and face)
- Clusters of bruises – e.g., fingertip bruising (caused by being grasped)
- Bruises around the neck and behind the ears – the most common abusive injuries are to the head
- Bruises on the back, chest, buttocks, or on the inside of the thighs
- Marks indicating injury by an instrument – e.g., linear bruising (stick), parallel bruising (belt), marks of a buckle
- Bite marks
- Deliberate burning may also be indicated by the pattern of an instrument or object – e.g., electric fire, cooker, cigarette
- Scalds with upward splash marks or tide marks
- Untreated injuries
- Recurrent injuries or burns
- Bald patches.

In the context of GNSFC, it is normal to ask about a noticeable injury. The response to such an enquiry is generally light-hearted and detailed. So, most of all, concern should be increased when:

- the explanation given does not match the injury
- the explanation uses words or phrases that do not match the vocabulary of the child (adults words)

- no explanation is forthcoming
- the child (or the parent/carer) is secretive or evasive
- the injury is accompanied by allegations of abuse or assault

You should be concerned if a child:

- is reluctant to have parents/carers contacted
- runs away or shows fear of going home
- is aggressive towards themselves or others
- flinches when approached or touched
- is reluctant to undress to change clothing for sport
- wears long sleeves during hot weather
- is unnaturally compliant in the presence of parents/carers.
- has a fear of medical help or attention
- admits to a punishment that appears excessive.

### Bruising

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

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

### Bite Marks

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

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

### Burns and Scalds

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

- Circular burns from cigarettes (but may be friction burns if along the bony protuberance of the spine)
- Linear burns from hot metal rods or electrical fire elements
- Burns of uniform depth over a large area
- Scalds that have a line indicating immersion or poured liquid (a child getting into hot water of their own accord will struggle to get out and cause splash marks)
- Old scars indicating previous burns/scalds which did not have appropriate treatment or adequate explanation
- Scalds to the buttocks of a small child, particularly in the absence of burns to the feet, are indicative of dipping into a hot liquid or bath.

## Fractures

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

Non-mobile children rarely sustain fractures.

There are grounds for concern if:

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

## Scars

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

## **Sexual abuse**

### The nature of sexual abuse

Sexual abuse is often perpetrated by people who are known and trusted by the child – e.g., relatives, family friends, neighbours, babysitters, and people working with the child in GNSFC, faith settings, clubs or activities. Children can also be subject to child sexual exploitation.

Sexual exploitation is seen as a separate category of sexual abuse. The SCCP Screening Tool and guidance provides staff with information regarding indicators of CSE.

### Characteristics of child sexual abuse:

- it is often 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 may occur online)
- grooming the child's environment – abusers try to ensure that potential adult protectors (parents and other carers especially) are not suspicious of their motives.

Most people who sexually abuse children are men, but some women sexually abuse too.

### Indicators of sexual abuse

#### *Physical observations:*

- Damage to genitalia, anus or mouth
- Sexually transmitted diseases
- Unexpected pregnancy, especially in very young girls
- Soreness in genital area, anus or mouth and other medical problems such as chronic itching
- Unexplained recurrent urinary tract infections and discharges or abdominal pain

#### *Behavioural observations:*

- Sexual knowledge inappropriate for age
- Sexualised behaviour or affection inappropriate for age
- Sexually inappropriate behaviour
- Hinting at sexual activity
- Inexplicable decline in education progress
- Depression or other sudden apparent changes in personality such as becoming insecure
- Lack of concentration, restlessness, aimlessness

- Socially isolated or withdrawn
- Overly-compliant behaviour
- Acting out, aggressive behaviour
- Poor trust or fear concerning significant adults
- Regressive behaviour
- Onset of wetting, by day or night; nightmares
- Arriving early at school, leaving late, running away from home
- Suicide attempts, self-mutilation,
- Suddenly drawing sexually explicit pictures
- Eating disorders or sudden loss of appetite or compulsive eating
- Regressing to younger behaviour patterns such as thumb sucking or bringing out discarded cuddly toys
- Becomes worried about clothing being removed
- Trying to be 'ultra-good' or perfect; overreacting to criticism.

## **Mental Health**

We are 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.

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

Where children have suffered abuse and neglect, 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 the child protection policy and speaking to the designated safeguarding lead or a deputy.

## **Sharing Nude and Semi-Nude images and/or videos**

The practice of children sharing images and videos via text message, email, social media or mobile messaging apps has become commonplace. However, this online technology has also given children the opportunity to produce and distribute sexual imagery in the form of photos and videos. Such imagery involving anyone under the age of 18 is unlawful.

Sharing Nudes/Semi-Nudes refers to both images and videos where:

- A person under the age of 18 creates and shares sexual imagery of themselves with a peer under the age of 18.
- A person under the age of 18 shares sexual imagery created by another person under the age of 18 with a peer under the age of 18 or an adult.
- A person under the age of 18 is in possession of sexual imagery created by another person under the age of 18.

All incidents of this nature should be treated as a safeguarding concern and in line with the UKCCIS guidance '[Sharing nudes and semi-nudes advice for education settings](#)'.

Cases where sexual imagery of people under 18 has been shared by adults and where sexual imagery of a person of any age has been shared by an adult to a child is child sexual abuse and should be responded to.

If a member of staff becomes aware of an incident involving making or sharing nudes/semi-nudes they should follow the child protection procedures and refer to the DSL immediately.

The member of staff should confiscate the device involved and set it to flight mode or, if this is not possible, turn it off. Staff must not view, copy or print the youth produced sexual imagery.

The DSL should hold an initial review meeting with appropriate staff and subsequent interviews with the children involved (if appropriate).

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

At any point in the process if there is concern a young person has been harmed or is at risk of harm a referral should be made to the SPA or the Police as appropriate.

Immediate referral at the initial review stage should be made to Children's Social Care/Police if:

- The incident involves an adult.
- There is good reason to believe that a young person has been coerced, blackmailed or groomed or if there are concerns about their capacity to consent (for example, owing to special education needs).
- What you know about the imagery suggests the content depicts sexual acts which are unusual for the child's development stage or are violent.
- The imagery involves sexual acts.
- The imagery involves anyone aged 12 or under.
- There is reason to believe a child is at immediate risk of harm owing to the sharing of the imagery, for example the child is presenting as suicidal or self-harming.

If none of the above apply then the DSL will use their professional judgement to assess the risk to children involved and may decide, with input from the Headteacher, to respond to the incident without referral to the C-SPA or the Police.

During the decision making the DSL will consider if:

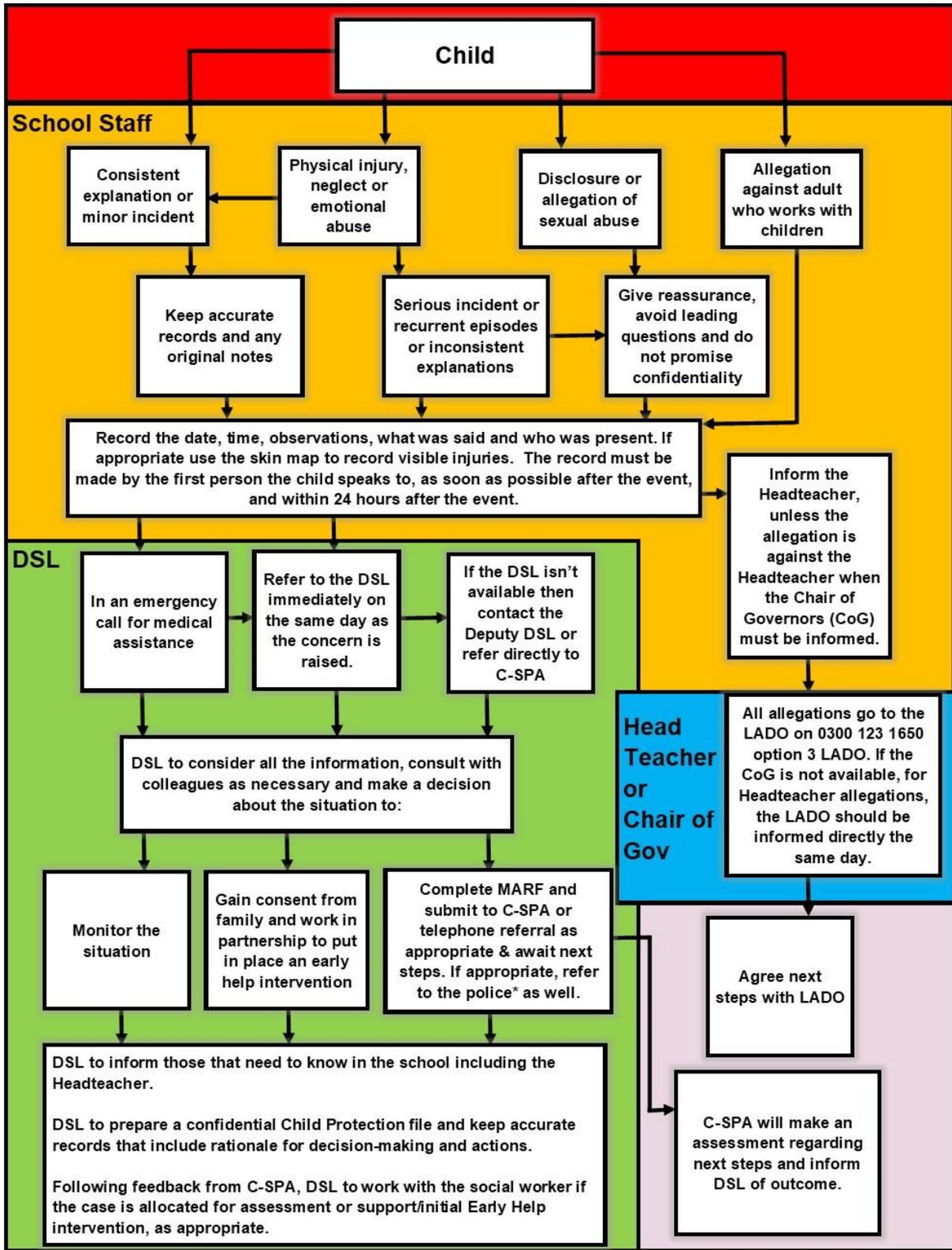
- There is a significant age difference between the sender/receiver.
- There is any coercion or encouragement beyond the sender/receiver.
- The imagery was shared and received with the knowledge of the child in the imagery.
- The child is vulnerable, for example subject to Child in Need, Child Protection or Early Help plans, Looked After, SEND.
- There is a significant impact on the children involved.
- The image is of a severe or extreme nature.
- The child involved understands consent.
- The situation is isolated or if the image been more widely distributed.
- There other circumstances relating to either the sender or recipient that may add cause for concern.
- The children have been involved in incidents relating to youth produced imagery before.

If any of these circumstances are present the situation will be referred according to our child protection procedures, including referral to the C-SPA or the Police.

The DSL will record all incidents of youth produced sexual imagery, including the actions taken, rationale for actions and the outcome.

Appendix three:

Flowchart of actions to take



*\* In the cases of known FGM, the teacher who was made aware will also make contact with police.*