

# Safeguarding Policy



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## **1. DESIGNATED SAFEGUARDING LEADS**

Designated Safeguarding Lead/Deputy Head/CLA: Emma Sey (01274 425900)  
Deputy Designated Safeguarding Lead: Stuart Hacking (01274 425900)  
Trained Safeguarding Team: Andrea Whittle (SENCO); Samra Mirza (PSHE/Prevent); Emily Trotter (Youth Worker); Vicky Almond (Strategic Lead); Donna Stockdill (SLO); Rebecca Delaney (SLO); Lesley Riley (Welfare & Attendance officer); Steve Shearn (SLO); Jason Lundie (SLO); Daniel Homer (SLO); Emma Hext (Teaching staff).

Named Governor for Safeguarding: Mr John Watts (01274 425900)

Local Authority Designated Officer (LADO): Dawn Holt (01274 434339) or contact 01274 435600 and ask to be put through to the Duty LADO or the Safeguarding Duty Co-ordinator.

Email: [LADO@bradford.gov.uk](mailto:LADO@bradford.gov.uk)

For referral form and more advice guidance, visit: [Safer Bradford - Allegations Management and Safer Recruitment](#)

## **2. INTRODUCTION**

This policy is in response to the statutory guidance from the Department for Education ('the Department') issued under Section 175 of the Education Act 2002, the Education (Independent School Standards) Regulations 2014, the Non-Maintained Special Schools (England) Regulations 2015, and the Education and Training (Welfare of Children) Act 2021. Schools and colleges in England must have regard to it when carrying out their duties to safeguard and promote the welfare of children. For the purposes of this guidance children includes everyone under the age of 18.

It is in line with the 'Working Together to Safeguard Children' (DFE 2018) and 'Sexual violence and sexual harassment between children in schools and colleges' (revised Sept 2021) and the local Working Together to Safeguard Children - The Bradford Partnership as well as DfE guidance. This policy applies to all adults (including supply staff, contractors and volunteers) working in or on behalf of Immanuel College.

When the school building is hired/rented out to organisations (for example community groups, sports associations and service providers to run community or extra-curricular activities) the governors will ensure that appropriate arrangements are in place to keep children safe.

Immanuel, as a C of E College, fully recognises its responsibilities to provide a safe environment for children and young people; to identify children and young people who are suffering or are likely to suffer significant harm and to take appropriate action to ensure they are kept safe at home and at the college / college approved activities.

Safeguarding (as defined by KCSIE 2022) is about protecting children from maltreatment; preventing impairment of children's mental and physical health or development; ensuring that children grow up in circumstances consistent with the provision of safe and effective care; and taking action to enable all children to have the best outcomes. Children includes everyone under the age of 18.

Our policy applies to all staff (including supply staff, Senior Leadership Team and governors as well as contractors or volunteers who are either visiting or working in the college.

The school's Safeguarding procedures are inspected by OFSTED under their [Education Inspection Framework](#).

## **3. THE CHRISTIAN VISION OF IMMANUEL COLLEGE**

At Immanuel we believe that we are 'All God's Children'. This belief means that we recognise the unique status of children and our responsibility to safeguard them. The Lord Jesus valued children and reserved some of his most forthright words for those who led children astray. In the light of this we endeavour to foster relationships of the highest integrity

with our students in order to safeguard and promote their welfare. Each student's welfare is of paramount importance.

We recognise that some children may be especially vulnerable to abuse e.g. those with Special Educational Needs and Disabilities and those living in adverse circumstances. We recognise that children who are abused or neglected may find it difficult to develop a sense of self-worth and to view the world in a positive way. We will always take a considered and sensitive approach in order that we can support all our students. Safeguarding and promoting the welfare of children is everyone's responsibility. Everyone who comes into contact with children and their families and carers has a role to play in safeguarding children. In order to fulfil this responsibility effectively, all professionals should make sure their approach is child-centred. This means that they should consider, at all times, what is in the best interests of the child.

#### **4. PROVIDING A SAFE AND SUPPORTIVE ENVIRONMENT**

##### **4a Safer Recruitment and Selection**

- The College operates a strict recruitment procedure following the principles of Safer Recruitment Training. This includes: Clear and easily understood advertisements; Detailed personnel specifications for each post; Job descriptions for each post; Any further particulars of the post as described in an additional information document
- Applications are assessed against the personnel specification and other application information to create a short list of candidates. Safer recruitment checks undertaken on applications include qualifications, gaps in employment, 2 referees including most recent employer.
- Interviews are conducted fairly and consistently on a structured basis
- All interviewees provide evidence of qualifications (if applicable) and identification - including checking their name on their birth certificate, where this is available.
- All Interview Panels include a member of staff who is 'Safer Recruitment' trained, a Governor when appropriate and a member of the Senior Leadership Team.
- References are always taken for new employees and details are checked against other records for consistency.
- The advice provided in the DFE publication 'Keeping Children Safe in Education' 2022, is followed including the need for an application form to be fully completed (a CV will not be sufficient) as well as possible online searches of shortlisted candidates to identify issues that might need exploring at interview (para 220).
- Eligibility to work in the UK will be checked and recorded in line with guidelines current at the time of recruitment.

##### **4b Safe Practice**

Safe working practice ensures that students are safe and that all staff:

- Are responsible for their own action and behaviours and know how to avoid any conduct which could lead any reasonable person to question their motivation or intentions;
- Are to discuss with school any relationship or association (in the real world or online) they have which may affect their suitability to work with children ie where their relationships and associations both within and outside of the workplace (including online) may have implications on the school's ability to safeguard children in school. (Disqualification under the Childcare Act 2006 para 22 Regulations 2018).
  - In addition to the above, KCSIE requires volunteers to consider circumstances where there may constitute a transferable risk i.e. where a member of staff or volunteer is involved in an incident outside school which did not involve children but could have an impact on their suitability to work with children. All staff and volunteers need to be aware of this change and keep in mind that such behaviours outside of school could

result in a safeguarding investigation under Part 4 of Keeping Children Safe in Education 2022.

- Work in an open and transparent way;
  - Discuss and/or take advice from Immanuel's Senior Leadership Team over any incident which may give rise to concern;
  - Record any incidents or decisions made in relation to a child or young person;
  - Apply the same professional standards regardless of ethnicity, faith, gender or sexuality;
  - Are aware that breaches of the law and other professional guidelines could result in criminal or disciplinary action being taken against them.
  - Who are specifically involved in Behaviour Management (ie the Student Liaison Officers) are trained in 'Team Teach'<sup>1</sup>. On very rare occasions the SLO may need to prevent a disruptive or upset child from hurting themselves or another student or member of staff. This will be in line with the latest Government/Ofsted advice in 'Positive environments where children can flourish' (March 2018) where it states that 'restraint is permissible. There will be times when staff feel that they need to intervene physically to keep children safe (or to keep staff safe). ...We expect adults to be skilled and confident in finding the best ways to keep children safe; ways that promote their rights, respect their dignity and help equip them for the future.' Any such physical intervention will be recorded on a PI form (see appendix 7d and notes section)
  - Will allow a trained school First Aider to attend any medical or mental health incident. The First Aider will contact the DSL and/or Head or Deputy Headteachers to advise further action if needed;
  - Will respond immediately to any direction given by the Headteacher/Deputy Headteachers or DSL regarding an incident which is deemed 'critical' as outlined in the 'Managing Critical Incidents Procedure';
  - Will make themselves aware of the Fire Evacuation Policy/Procedure which are relevant to the space in which they teaching and will follow them.

#### **4b.i DBS Checks and Access to the College**

- Single Central Record (SCR)
- The details of all members of staff who work in the College are entered on the Single Central record. We also include on this record details of supply staff and volunteers, regular visitors and Governors. Individuals entered onto the SCR will complete an Immanuel College 'Self Declaration Form' that confirms they have no convictions since the date of their DBS annually.
- Those people not included on the SCR but who could be found in the College include Occasional Visitors and Building or Maintenance Contractors and these circumstances are described below.
- Employees: All appointments are made subject to satisfactory references and Enhanced DBS checks carried out by Immanuel College. Individuals who have lived or worked outside the UK undergo the same checks as all other staff. This includes obtaining (via the applicant) an enhanced DBS certificate (including barred list information, for those who will be engaging in regulated activity) even if the individual has never been to the UK. Further checks may be appropriate so that any relevant events that occurred outside the UK can be considered.
- DBS Checks Returned with a Disclosure: Immanuel College recognises that in some cases DBS checks will include disclosures of past criminal activity. This is not in itself a bar to inclusion on the Single Central Record. In all such cases, the Headteacher will assess the risk, taking advice as necessary, and decide if the individual is

considered appropriate to include on the SCR. It is the College's understanding that other Authorised Bodies that are recognised by the College, will complete similar risk assessments in the event of a DBS Check disclosure.

- Starting Employment without an Immanuel College DBS Check: In exceptional cases, a member of staff is authorised by the Headteacher to start work before the return of their Immanuel College DBS check, only if they sign a personal declaration stating that they have no criminal convictions, bind-over orders, cautions, reprimands or warnings recorded against them. Exceptional circumstances arise where a key role in College is vacant and the time taken to process a DBS check is extensive. In such cases a risk assessment is undertaken and members of staff are only allowed to work alongside other members of staff and never alone. An ISA Barred List Check is always completed.
  - Accepting DBSs Completed by Other Organisations: Immanuel College complete new DBS checks for all new employees on appointment. For those peripatetic teachers/coaches or volunteers working for shorter or infrequent times, the College recognises DBS checks completed by other organisations in the following circumstances: An employee of the Trust; Other Schools, Academies or Local Authorities; Recognised Supply Agencies; the Safer Schools Police (SSP) Officer employed in college as part of the Bradford SSP initiative; other Professionals working with children.  
In these cases the College will accept a letter of confirmation, from the employer, stating that they have a DBS policy/procedure in force and that all appropriate checks have been carried out for the named individual. This letter should be renewed annually. Any professionals who are self-employed will be required to produce a DBS update service reference number. If this is not available (ie they do not have a portable DBS) then a full enhanced DBS check must be undertaken by the College and the cost charged to the self-employed professional
  - Occasional Building or Maintenance Contractors: If the Contractor can provide a portable DBS this will be entered in the regular visitor's section of the SCR. If a DBS number is not available the contractor will be accompanied by a member of staff at all times. Contractors without a DBS number will not be left to work alone in areas of the site to which students have access. In any event where possible and in the majority of cases, maintenance is carried out outside the normal college day.
  - Regular, Voluntary Helpers: When determining whether to apply for a DBS check or check the update service for a volunteer, a decision must be made as to whether the individual will regularly be undertaking regulated activity on an unsupervised basis: 'Supervision' must be regular i.e. on-going and day-to-day; and be reasonable in all circumstances for the purpose of protecting the children concerned; and carried out by an individual who is engaging in regulated activity relating to children and has a DBS disclosure with barred list check. The definition of 'regulated activity' is "teach, train, instruct, care for or supervise children, or provide advice/guidance on well-being, or drive a vehicle only for children". The definition of 'regular' activity is where a regulated activity is undertaken by the same individual either once a week or more; on four or more days in a 30 day period; at least once, overnight and with the opportunity for face-to-face contact with children.
  - Governors: All governors require an enhanced DBS check. Governors are also subject to a Section 128 check.
  - Occasional Visitors: Occasional visitors do not need a DBS check when visiting, provided they are permanently in the presence of a member of the College's staff.

- Interview Candidates: Candidates on interview will not have verified DBS Checks but may be shown around the college by students and at least one adult. No candidate is ever left on his or her own with one student.

#### **4b.ii Updating DBS Checks**

- Every year each member of existing staff is required to sign an Annual Self Declaration form stating that they have nothing to declare since their latest DBS check. This form also reminds staff that it is expected that any member of staff who has a relationship or association (online or in the real world; in school or out of school) that might impact on the College's ability to safeguard the students should discuss this with a member of the SLT.
- Breaks in Service – Exam Invigilators: Exam invigilators should be asked to complete a declaration once each year at the training session run by the Examinations Office irrespective of how frequently they visit college. This will ensure we have an annual declaration in addition to the normal cycle of DBS renewal.

#### **4b.iii Visitor/Reception Practice**

- Definition of a Visitor is anyone not in possession of an Immanuel College Staff identity card.
- Regular Visitors (once a week or more, or 4 or more days in a 30 day period) or peripatetic teachers must not work in the college without being included on the SCR. Until they are included on the SCR they may only work when accompanied.
- Visitor Access Arrangements: All Visitors must 'sign-in' on the *Inventry* system at Reception. They will be given a Visitor Pass and instructed that it must be worn at all times. Unknown visitors will be required to show photographic ID. A check will be made by reception staff as to whether the visitor is included in the SCR. Visitors listed on the SCR can then move around the college and carry out their business without being accompanied. Visitors not listed on the SCR must all be announced to the member of staff that is responsible for the work they have come to complete. This member of staff must ensure that the visitor is accompanied at all times and signs out at reception on leaving the building.

#### **4b.iv Staff Training**

- Immanuel has undertaken Child Safeguarding training for all staff (including online safety) and updates this training annually to ensure that staff are safe and aware of behaviours which should be avoided. In addition Immanuel's Staff Code of Conduct outlines acceptable and unacceptable behaviour towards children and young people.
- Immanuel's Designated Safeguarding Lead and Deputy Safeguarding Leads with Responsibility for Child Protection undertake child protection and safeguarding training annually or at least on a 2 yearly basis, including PREVENT and disseminate this training to all staff. All other staff undertake appropriate induction training to equip them to carry out their responsibilities for child protection effectively, which is updated annually.
- All staff (including temporary staff and volunteers) are provided with 'Keeping Children Safe in Education Part 1' (2022) as well as Annex B as a minimum, as well as this Safeguarding Policy and a short flow-chart on how to identify and report concerns. For staff arriving after the beginning of term, this will be given to them during their induction Safeguarding training which will include online safety.
- Immanuel aims to provide training on specific and relevant Child Safeguarding issues as they arise.
- All staff will be made aware that both CSE and CCE are forms of abuse and both occur where an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a child into sexual or criminal activity. The victim may have been exploited even if the activity appears consensual.

- 'All staff will be made aware that children can abuse other children (often referred to as Child on Child abuse) and that it can happen both inside and outside of school or college and online. All staff should understand, that even if there are no reports in their schools or colleges it does not mean it is not happening, it may be the case that it is just not being reported. As such it is important if staff have any concerns regarding Child on Child abuse they should speak to their designated safeguarding lead (or deputy). It is essential that all staff understand the importance of challenging inappropriate behaviours between children that are actually abusive in nature. Downplaying certain behaviours, for example dismissing sexual harassment as "just banter", "just having a laugh", "part of growing up" or "boys being boys" can lead to a culture of unacceptable behaviours, an unsafe environment for children and in worst case scenarios a culture that normalises abuse leading to children accepting it as normal and not coming forward to report it.' (KCSIE 2022 para 446) It is important that all staff recognise the indicators and signs of Child on Child abuse and know how to identify it and respond to reports (see section 7b).
- All staff should be able to reassure victims 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. A victim should never be given the impression that they are creating a problem by reporting abuse, 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 and young people rather than criminalise them, and this should be explained in such a way that avoids alarming or distressing them (KCSIE 2022 para 468)***

- All staff will be made aware that children may not feel ready or know how to tell someone that they are being abused, exploited, or neglected, and/or they may not recognise their experiences as harmful. For example, children may feel embarrassed, humiliated, or being threatened. This could be due to their vulnerability, disability and/or sexual orientation or language barriers. This should not prevent staff from having a professional curiosity and speaking to the DSL if they have concerns about a child.

***It is important that staff determine how best to build trusted relationships with children and young people which facilitate communication (KCSIE 2022 para 19)***

- All staff will be made aware that mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation
- Staff will be supported by the Designated Safeguarding Lead and Deputy Designated Safeguarding Leads with Responsibility for Child Protection, who will provide guidance and training where appropriate. They will be supported by the Headteacher, Chair of Governors, Named Safeguarding Governor and the CEO at the Bradford Diocesan Academy Trust. Advice and support is also always available from Working Together to Safeguard Children – The Bradford Partnership and further advice is available from the Police (see NPCC document – [When to call the Police – guidance for schools and colleges document at NPCC - Child centred policing | Internet Matters](#))

#### **4c Sharing Safeguarding Information with Students**

Immanuel is committed to ensuring that students are aware of behaviour towards them that is not acceptable and how they can keep themselves safe. All students know that we have two senior members of staff with responsibility for child protection and safeguarding and know who they are. The wider Safeguarding Team at Immanuel is publicised to the children via posters at key areas throughout the school. We also inform students via assemblies and

form groups of whom they might talk to in Immanuel; their right to be listened to and heard and what steps can be taken to protect them from harm. PSHE through lessons, Form Tutor time, assemblies and drop-down days/activities as well as Collective Worship are used to teach students about Safeguarding including online safety. Immanuel believes it is important to give students a broad and balanced curriculum to help them recognise when they are at risk and how to get help when they need it. Information is made available to students via posters throughout the school, in particular NSPCC/Childline posters that show the Childline number of 0800 1111 and the web address of [childline.org.uk](http://childline.org.uk)

#### **4d Partnership with Parents**

- Immanuel shares a purpose with parents/carers to keep children safe from harm and to have their welfare promoted. All parents/carers and visitors are provided with the following statement on the Reception Desk by the signing in screen: "We at Immanuel College believe that our students and staff are 'All God's Children'. We believe that safeguarding all of the Immanuel family is our highest priority. If you have any concerns about the safety of any student please ask for one of our Safeguarding Officers."
- Immanuel is in regular contact with parents and carers. As necessary we will use those communications to reinforce the importance of children being safe online and explain to parents and carers what systems we use to filter and monitor online use. We will endeavour to make parents and carers aware of what their children are being asked to do online, including the sites they will be asked to access and be clear who from the school or college (if anyone) their child is going to be interacting with online.
- Immanuel is committed to working positively, open and honestly with parents/carers. We ensure that all parents/carers are treated with respect, dignity and courtesy. We respect parents/carers' rights to privacy and confidentiality and will not share sensitive information unless we have permission or it is necessary to do so to protect a child. Immanuel will share with parents/carers any concerns we may have about their child unless to do so may place the child at risk of harm.
- Immanuel College will follow the Working Together to Safeguard Children – The Bradford Partnership procedures when dealing with any matters of a child protection nature. Immanuel will endeavour to discuss all concerns with parents/carers about their child/ren. However, there may be exceptional circumstances when Immanuel will discuss concerns with Children's Social Care and/or the Police without parental knowledge (in accordance with Working Together to Safeguard Children – The Bradford Partnership Child Protection Procedures). Immanuel will, of course, always aim to maintain a positive relationship with all parents/carers. Immanuel's Child Safeguarding Policy is available to all parents/carers upon request and on the College's website.

#### **4e Partnerships with Others**

- No single professional can have a full picture of a child's needs and circumstances. If children and families are to receive the right help at the right time, everyone who comes into contact with them has a role to play in identifying concerns, sharing information and taking prompt action. Inter-agency working and information sharing are vital in identifying and tackling all forms of abuse.
- Immanuel recognises that it is essential to establish positive and effective working relationships with other agencies. These include the Local Authority, Children's Social Care, Early Help, Police, CAMHS, School Nursing service, and many other external and internal support and counselling services dependent on the need of the child. External agencies use consulting rooms which are connected to the Learning Mentors' room.
- Fears about sharing information cannot be allowed to stand in the way of the need to promote the welfare and protect the safety of children.

#### 4f. Online Safety

- All staff should be aware that technology is a significant component in many safeguarding and wellbeing issues. Children are at risk of abuse online as well as face to face. In many cases abuse will take place concurrently via online channels and in daily life. Children can also abuse their children online, this can take the form of abusive, harassing, and misogynistic messages, the non-consensual sharing of indecent images, especially around chat groups, and the sharing of abusive images and pornography, to those who do not want to receive such content. (KCSIE 2022 para 560). It may also involved online challenges and hoaxes – for more information see [Harmful online challenges and online hoaxes - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/consultations/harmful-online-challenges-and-online-hoaxes).
- It is essential that children are safeguarded from potentially harmful and inappropriate online material. The College has website filtering and monitoring software on all computers via Smoothwall. As part of a broad and balanced curriculum, the College offers a curriculum which covers the need for safeguarding, including online. This is covered through PSHE and the assembly programme. Immanuel also works alongside the Safer Schools Police Officer who offers advice and comes to the College to speak to students and parents/carers.
- The College has a zero tolerance policy towards mobile phones being used in school. Any phones being used in school are confiscated and only returned to the student at the end of school if they have willingly given up their phone to the member of staff.
- See e-safety policy for updated information/resources from KCSIE 2022 Annex B additional resources section. Also see Information and Communications Technology Acceptable Use Policy and the Acceptable Use Agreement which all members of staff must sign.
- **Education at home:** Where children are being asked to learn online at home the department for education has provided advice to support schools and colleges do so safely and [safeguarding-and-remote-education](#)

#### 4g. Related College Policies

- Safeguarding covers more than the contribution made to child protection in relation to individual children. It also encompasses issues such as student health and safety and bullying and a range of other issues, for example, arrangements for meeting the medical needs of children, providing first aid, school security, drugs and substance misuse etc. There may also be other safeguarding issues that are specific to the local area of population.
- Other related Policies and Protocols that should be referred to include: Mental Health Policy; Health and Safety Policy; Anti-Bullying Policy; Acceptable use of ICT Policy; e-safety policy; Social Media Policy (BDAT); Recruitment Policy; Staff Code of Conduct; Whistleblowing Policy; Dealing with Drug Incidents Policy & Procedure ; Educational Visits Procedure ; Equal Opportunities Policy ; Medical Conditions Policy (BDAT); Fire Evacuation Procedures; Critical Incidents Policy and BDAT's Safeguarding and Child Protection Policy.

#### 4h. Student Information

In order to keep children safe and provide appropriate care for them each Immanuel requires accurate and up to date information regarding:

- Names (including any previous names), address and date of birth of child;
- Names and contact details of persons with whom the child normally lives;
- Names and contact details of all persons with parental responsibility (if different from above);
- Whether the child is Looked After;
- Emergency contact details;
- Details of any persons authorised/not authorised contact with the child;

- Any relevant court orders in place including those which affect any person's access to the child;
- If the child is or has a Child Protection Plan;
- Name and contact details of any key persons from other agencies, including GP;
- Any other factors which may impact on the safety and welfare of the child.

#### **4i. Roles and Responsibilities**

##### **4i.i. The Governors will ensure that:**

- The College has a whole college approach to safeguarding. This means ensuring safeguarding and child protection are at the forefront and underpin all relevant aspects of process and policy development. Ultimately, all systems, processes and policies should operate with the best interests of the child at their heart.
- The College has a Child Safeguarding policy (that includes reference to Child on Child abuse) and the policy is available to parents/carers upon request;
- The College has procedures in place that are in accordance with the Working Together to Safeguard Children – The Bradford Partnership's guidance and locally agreed interagency procedures,
- The College operates safe recruitment procedures and makes sure that all appropriate checks are carried out on staff and volunteers who work with children;
- The College has procedures for dealing with allegations of abuse against staff (including supply staff) and contractors/volunteers that comply with guidance from the Local Authority and locally agreed inter-agency procedures;
- A senior member of the College's Leadership Team is designated and trained to take lead responsibility for Child Protection (and a deputy);
- Staff undertake appropriate child protection training,;
- They remedy, without delay, any deficiencies or weaknesses regarding child protection arrangements;
- Where services or activities are provided on Immanuel's premises by another body, the body concerned has appropriate policies and procedures in place in regard to safeguarding children and child protection and liaises with the College on these matters where appropriate;
- The Child Safeguarding Policy is updated and reviewed annually;
- They review their policies and procedures annually and provide information to the Academy Trust about them and about how the above duties have been discharged;
- Appropriate online filtering and monitoring is in place and is kept up to date, whilst not preventing access to online learning opportunities. Governing bodies should be doing all that they reasonably can to limit children's exposure to the above risks from the school's or college's IT system. They should 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. Governing bodies should consider the age range of their children, the number of children, how often they access the IT system and the proportionality of costs versus safeguarding risks.
- All governors and trustees 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 schools and colleges are effective and support the delivery of a robust whole school approach to safeguarding. Their training should be regularly updated.
- All governors are aware of their obligations under the Human Rights Act 1998, the Equality Act 2010, (including the Public Sector Equality Duty), and their local multi-agency safeguarding arrangements. [see Notes 4-6 at the end of this policy]

##### **4i.ii The Headteacher and Senior Leadership Team will ensure that:**

- The policies and procedures are fully implemented, and followed by all staff;

- Sufficient resources and time are allocated to enable the designated person and other staff to discharge their responsibilities; and
- All staff and volunteers feel able to raise concerns about poor or unsafe practice in regarding to children, and such concerns are addressed sensitively and effectively in a timely manner in accordance with the agreed Whistleblowing Policy.
- Where there is a safeguarding concern, governing bodies and college leaders will make sure that the child's wishes and feelings are taken into account when determining what action to take and what services to provide.

#### **4i.iii The Designated Safeguarding Leads with Responsibility for Child Protection will:**

- **Manage referrals.** The designated safeguarding lead is expected to:
  - refer cases of suspected abuse to the local authority children's social care as required and support staff who make referrals to local authority children's social care. Children's social care assessments should be considered where children are being harmed in contexts outside the home, so it is important that schools and colleges provide as much information as possible as part of the referral process. This will allow any assessment to consider all the available evidence and enable a contextual approach to address such harm
  - refer cases to the Channel programme where there is a radicalisation concern as required and support staff who make referrals to the Channel programme
  - refer cases where a person is dismissed or left due to risk/harm to a child to the Disclosure and Barring Service as required;
  - and refer cases where a crime may have been committed to the Police as required – see [NPCC - Child centred policing | Internet Matters](#)
- **Work with Others.** The designated safeguarding lead is expected to:
  - act as a point of contact with the three safeguarding partners;
  - liaise with the headteacher or principal to inform him or her of issues- especially ongoing 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 \(accessible\) - GOV.UK \(www.gov.uk\)](#)
  - as required, liaise with the "case manager and the designated officer(s) at the local authority for child protection concerns in cases which concern a staff member
  - liaise with staff (especially pastoral support staff, school nurses, IT Technicians, and SENCOs, or the named person with oversight for SEN in a college and Senior Mental Health Leads) on matters of safety and safeguarding (including online and digital safety) and when deciding whether to make a referral by liaising with relevant agencies;
  - act as a source of support, advice and expertise for all staff.
- **Utilise Training.** The designated safeguarding lead (and any deputies) should undergo training to provide them with the knowledge and skills required to carry out the role. This training should be updated at least every two years. The designated safeguarding lead should undertake Prevent awareness training. Training should provide designated safeguarding leads with a good understanding of their own role, and the processes, procedures and responsibilities of other agencies, particularly children's social care, so they:
  - understand the assessment process for providing early help and statutory intervention, including local criteria for action and local authority children's social care referral arrangements.
  - have a working knowledge of how local authorities conduct a child protection case conference and a child protection review conference and be able to attend and contribute to these effectively when required to do so;

- ensure each member of staff has access to, and understands, the school's or college's child protection policy and procedures, especially new and part time staff
- are alert to the specific needs of children in need, those with special educational needs and young carers
- understand relevant data protection legislation and regulations, especially the Data Protection Act 2018 and the General Data Protection Regulation;
- understand the importance of information sharing, both within the school and college, and with the three safeguarding partners, other agencies, organisations and practitioners
- are able to keep detailed, accurate, secure written records of concerns and referrals. All concerns, discussions and decisions made, and the reasons for those decisions, should be recorded in writing. Information should be kept confidential and stored securely in a separate child protection file for each child [CPOMS<sup>2</sup>]. Records should include: a clear and comprehensive summary of the concern; details of how the concern was followed up and resolved; a note of any action taken, decisions reached and the outcome. They should ensure the file is only accessed by those who need to see it and where the file or content within it is shared, this happens in line with information sharing advice as set out in Part one and Part two of KCSIE 2022
- understand and support the school or college with regards to the requirements of the Prevent duty and are able to provide advice and support to staff on protecting children from the risk of radicalisation
- are able to understand the unique risks associated with online safety and be confident that they have the relevant knowledge and up to date capability required to keep children safe whilst they are online at school or college
- can recognise the additional risks that children with SEN and disabilities (SEND) face online, for example, from online bullying, grooming and radicalisation and are confident they have the capability to support SEND children to stay safe online
- obtain access to resources and attend any relevant or refresher training courses
- encourage a culture of listening to children and taking account of their wishes and feelings, among all staff, in any measures the school or college may put in place to protect them. With the senior leaders and governors they will ensure that systems are in place, and are well promoted, easily understood and easily accessible for children to confidently report abuse, knowing their concerns will be treated seriously, and knowing they can safely express their views and give feedback.
- *In addition to the formal training set out above their knowledge and skills should be refreshed (this might be via e-bulletins, meeting other designated safeguarding leads, or simply taking time to read and digest safeguarding developments) at regular intervals, as required, and at least annually, to allow them to understand and keep up with any developments relevant to their role.*
- **Raise Awareness.** The designated safeguarding lead should:
  - ensure the school's or college's child protection policies are known, understood and used appropriately
  - ensure the school's or college's child protection policy is reviewed annually (as a minimum) and the procedures and implementation are updated and reviewed regularly, and work with governing bodies or proprietors regarding this
  - ensure the child protection policy is available publicly and parents are aware of the fact that referrals about suspected abuse or neglect may be made and the role of the school or college in this
  - link with the safeguarding partner arrangements to make sure staff are aware of any training opportunities and the latest local policies on local safeguarding arrangements

- help promote educational outcomes by sharing the information about the welfare, safeguarding and child protection issues that children, including children with a social worker, are experiencing, or have experienced, with teachers and school and college leadership staff. Their role could include ensuring that the school or college, and their staff, know who these children are, understand their academic progress and attainment and maintain a culture of high aspirations for this cohort; supporting teaching staff to identify the challenges that children in this group might face and the additional academic support and adjustments that they could make to best support these children.
- **Transfer the Child Protection File.** Where children leave the school or college (including in year transfers) the designated safeguarding lead should ensure their child protection file is transferred to the new school or college 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 main pupil file, ensuring secure transit, and confirmation of receipt should be obtained. Receiving schools and colleges should ensure key staff such as designated safeguarding leads and SENCOs or the named person with oversight for SEN in colleges, are aware as required. Lack of information about their circumstances can impact on the child's safety, welfare and educational outcomes. In addition to the child protection file, the designated safeguarding lead should also consider if it would be appropriate to share any additional information with the new school or college in advance of a child leaving to help them put in place the right support to safeguard this child and to help the child thrive in the school or college. For example, information that would allow the new school or college to continue supporting children who have had a social worker and been victims of abuse and have that support in place for when the child arrives.
- **Be Available.** During term time the designated safeguarding lead (or a deputy) should always be available (during school or college hours) for staff in the school or college to discuss any safeguarding concerns. Whilst generally speaking the designated safeguarding lead (or deputy) would be expected to be available in person, it is a matter for individual schools and colleges, working with the designated safeguarding lead, to define what "available" means and whether in exceptional circumstances availability via phone and or Skype or other such media is acceptable. It is a matter for individual schools and colleges and the designated safeguarding lead to arrange adequate and appropriate cover arrangements for any out of hours/out of term activities.
- **Hold information shared by the Local Authority regarding the fact that a child has a social worker.** The designated safeguarding lead should 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. For more info see: <https://www.gov.uk/government/publications/review-of-children-in-need/review-of-children-in-need>

*[All of the above from KCSIE 2022 Annex C]*

- **Ensure that appropriate staff have the information they need in relation to a child's looked after legal status** (whether they are looked after under voluntary arrangements with consent of parents or on an interim or full care order) and contact arrangements with birth parents or those with parental responsibility. They will also have information about the child's care arrangements and the levels of authority delegated to the carer by the authority looking after him/her. The designated LAC safeguarding lead will have details of the child's social worker and the name of the virtual school head in the authority that looks after the child.

*'The most common reason for children becoming looked after is as a result of abuse and/or neglect. Governing bodies and proprietors should ensure that staff have the skills, knowledge and understanding to keep looked after children safe.'* (KCSIE 2022 para 186)

#### **4i.iv All staff (including supply staff) contractors and volunteers will:**

- Fully comply with the College's policies and procedures;
- Attend appropriate training;
- Inform the Designated Safeguarding Lead of any concerns;
- Record any potential safeguarding incidents appropriately on CPOMS<sup>2</sup>.

### **5. IDENTIFYING CHILDREN AND YOUNG PEOPLE WHO MAY BE SUFFERING SIGNIFICANT HARM**

Teachers and other adults in Immanuel are well placed to observe children's mental and physical health or development which indicate that a child may be suffering significant harm. As in the Children's Acts 1989 and 2004, a child is defined as anyone who has not yet reached his/her 18th birthday. 'For the purposes of safeguarding, a child is anyone under the age of 18.' (KCSIE 2022 para 560)

#### **5a.The Definition of Safeguarding:**

Safeguarding and promoting the welfare of children is defined as:

- Protecting children from maltreatment.
- Preventing impairment of children's mental and physical health or development.
- Ensuring that children grow up in circumstances consistent with the provision of safe and effective care.
- Taking action to enable all children to have the best outcomes.

Safeguarding is not just about protecting children from deliberate harm. It also relates to aspects of school life including:

- Pupils' health and safety.
- The use of reasonable force.
- Meeting the needs of children with medical conditions.
- Providing first aid for physical and mental health.
- Educational visits
- Intimate care.
- Internet or e-safety.
- Appropriate arrangements to ensure school security, taking into account the local context.

Safeguarding can involve a range of potential issues such as: (see appendix for more information)

- Bullying, including cyber bullying (by text message, on social networking sites, etc) and prejudice based bullying.
- Racist homophobic or transphobic abuse.
- Extremist behaviour i.e. radicalisation.
- Child sexual exploitation.
- Sexting.
- Substance misuse.
- Issues which may be specific to a local area or population, for example gang activity and youth violence.
- Particular issues affecting children including domestic violence and honour based violence such as forced marriage or female genital mutilations (FGM).
- Child on Child abuse including sexual harassment, sexual violence and harmful sexual behaviour see section 7b).
- Contextual Safeguarding: All staff should be aware that safeguarding incidents and/or behaviours can be associated with factors outside the school or college and/or can occur between children outside of these environments. This is known as *contextual safeguarding*. All staff, but especially the designated safeguarding lead (and deputies) should consider whether children are at risk of abuse or exploitation in

situations outside their families. Extra-familial harms take a variety of different forms and children can be vulnerable to multiple harms including (but not limited to) sexual abuse (including harassment and exploitation), domestic abuse in their own intimate relationships (teenage relationship abuse), criminal exploitation, serious youth violence, county lines, and radicalisation. (KCSIE 2022 para 23)

### **5b. Definition of Harm**

Harm means ill treatment or impairment of health and development, including, for example, impairment suffered from seeing or hearing the ill-treatment of another; development means physical, intellectual, emotional, social or behavioural development; health includes physical and mental health; ill-treatment includes sexual abuse and other forms of ill-treatment which are not physical.

### **5c. Definition of Abuse**

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

There are four types of child abuse as defined in 'Keeping Children Safe in Education' and the signs to detect such abuse are found in the Appendix

#### **5c.i. Physical abuse:**

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

#### **5c.ii Emotional abuse:**

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

#### **5c. iii Sexual abuse:**

- involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example, rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the

production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse. Sexual abuse can take place online, and technology can be used to facilitate offline abuse. Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.

#### **5c. iv Neglect:**

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

Whilst the above are the legal definitions, staff must also be aware of other forms of harm including Child on Child Sexual Violence and Harassment [see Section 7b under Child on Child Abuse as well as <https://www.gov.uk/government/publications/sexual-violence-and-sexual-harassment-between-children-in-schools-and-colleges>]; Contextual Safeguarding; Child Sexual Exploitation, Child Criminal Exploitation, Serious Violence, Honour Based Violence Abuse (which includes forced marriage and Female Genital Mutilation), Upskirting and Radicalisation,. **See Appendices at end of policy for more information.**

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

***'All staff should be aware that children may not feel ready or know how to tell someone that they are being abused, exploited, or neglected, and/or they may not recognise their experiences as harmful....This should not prevent staff from having a professional curiosity and speaking to the DSL if they have concerns about a child....It is important that staff determine how best to build trusted relationships with children and young people which facilitate communication' (KCSIE 2022 Para 19)***

## **6. TAKING ACTION TO ENSURE THAT CHILDREN ARE SAFE AT SCHOOL AND AT HOME**

It is not the responsibility of Immanuel staff to investigate welfare concerns or determine the truth of any disclosure or allegation. All staff, however, have a duty to recognise concerns and maintain an open mind. Accordingly all concerns regarding the welfare of students will be recorded and discussed with the Designated Safeguarding Lead or deputies with responsibility for child protection prior to any discussion with parents/carers.

***'Staff working with children are advised to maintain an attitude of "it could happen here." When concerned about the welfare of a child, staff should always act in the best interests of the child....If staff have concerns about the welfare of a child, they should act on them immediately...Staff should not assume a colleague or another professional will take action and share information that might be critical in keeping children safe....Fears about sharing information **must not** be allowed to stand in the way of the need to promote the welfare, and protect the safety of children.'*** (KCSIE 2022 para 572-574 and para 57)

## 6a. Reporting

Staff will Immediately Report via CPOMS<sup>2</sup>

- Any suspicion that a child is injured, marked or bruised in a way which is not readily attributable to the normal knocks or scrapes received in play.
- Any explanation given which appears inconsistent or suspicious.
- Any behaviours which give rise to suspicions that a child may have suffered harm (e.g. worrying drawings, writing or acts).
- Any concerns that a child may be suffering from inadequate care, ill treatment or emotional maltreatment.
- Any concerns that a child is presenting signs or symptoms of abuse or neglect.
- Any significant changes in a child's presentation, including non-attendance.
- Any hint or disclosure of abuse from any person.
- Any concerns regarding person(s) who may pose a risk to children (e.g. living in a household with children present).
- Any children who they believe may benefit from early help - this includes identifying emerging problems, leading to sharing information with other professionals to support early identification and assessment

**STAFF MUST NOT:** take images of a child's injury, bruising or similar (e.g. following a disclosure of abuse) even if requested by children's social care OR make audio recordings of a child's disclosure.

Staff should be aware that children with **SEND** may face additional safeguarding challenges and should ensure that any potential barriers to them reporting concerns are removed. Additional barriers can exist when recognising abuse and neglect in this group of children.

These can include:

- assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's disability without further exploration;
- being more prone to peer group isolation than other children;
- the potential for children with SEND being disproportionately impacted by behaviours such as bullying, without outwardly showing any signs;
- and communication barriers and difficulties in overcoming these barriers.

## 6b Responding to Disclosure

Disclosures or information may be received from students, parents/carers or other members of the public. Immanuel recognises that those who disclose such information may do so with difficulty, having chosen carefully to whom they will speak. Accordingly staff will handle disclosures with sensitivity. **Such information cannot remain confidential** and staff will immediately communicate what they have been told to the Designated Safeguarding Lead or deputies using CPOMS<sup>2</sup> after making a contemporaneous written record that will need to be kept securely and, if necessary, scanned into the CPOMS<sup>2</sup> document vault later.

Staff will not investigate but will, wherever possible, elicit enough information to pass on to the designated person in order that s/he can make an informed decision of what to do next. Staff will:

- Listen to and take seriously any disclosure or information that a child may be at risk of harm.
- Try to keep questions to a minimum and of an 'open' nature e.g. 'can you tell me what happened?' rather than 'did X hit you?'
- Try not to show signs of shock, horror or surprise.

- Not express feelings or judgements regarding any person alleged to have harmed the child.
- Explain sensitively to the child that they have a responsibility to refer the information to the senior designated person.
- Reassure and support the child as far as possible.
- Explain that only those who 'need to know' will be told whilst not promising blanket confidentiality.
- Explain what will happen next and that the child will be involved as appropriate.
- STAFF MUST NOT: take images of a child's injury, bruising or similar (e.g. following a disclosure of abuse) even if requested by children's social care OR make audio recordings of a child's disclosure. ('Guidance for safer working practice for those working with children and young people in education settings' May 2019)

### **6c. Action by the Designated Safeguarding Lead (or deputy)**

The DSL will consider the following options:

- **managing any support for the child internally** via the school or college's own pastoral support processes; or
- **an early help assessment** (referral to Early Help is via the Multi-Agency Referral Form (MARF - see appendix at the end of this policy). The Early Help Gateway is 01274 432121). Early Help provides a coordinated offer of early help when additional needs of children are identified. Any child may benefit from early help, but all school and college staff should be particularly alert to the potential need for early help for a child who
  - is disabled and has specific additional needs;
  - has special educational needs (whether or not they have a statutory education, health and care plan);
  - is a young carer;
  - is frequently missing/goes missing from care or CME;
  - is misusing drugs or alcohol;
  - is in a family circumstance presenting challenges for the child, such as substance abuse, adult mental health problems or domestic abuse; and/or
  - has returned home to their family from care."
- **a referral for statutory services**, for example as the child is in need or suffering or likely to suffer harm." Children's social care assessments should consider where children are being harmed in contexts outside the home, so it is important that schools and colleges provide as much information as possible as part of the referral process. This will allow any assessment to consider all the available evidence and enable a contextual approach to address such harm.

Keeping Children Safe in Education (2022), paragraph 114:

*'Information sharing is vital in identifying and tackling all forms of abuse and neglect, and in promoting children's welfare, including their educational outcomes. Schools and colleges have clear powers to share, hold and use information for these purposes'*

'Governing Bodies and proprietors should ensure relevant staff have due regard to the relevant data protection principles, which allow them to share (and withhold) personal information, as provided for in the Data Protection Act 2018 and the GDPR. This includes being

- confident of the processing conditions which allow them to store and share information for safeguarding purposes, including information which is sensitive and personal, and should be treated as 'special category personal data'.
- understanding that 'safeguarding of children...allows practitioners to share special category personal data...without consent where there is good reason to

do so, and that the sharing of information will enhance the safeguarding of a child in a timely manner but it is not possible to gain consent, it cannot be reasonably expected that a practitioner gains consent, or if to gain consent would place a child at risk.

- for schools, not providing pupils' personal data where the serious harm test under the legislation is met. For example, in a situation where a child is in a refuge or another form of emergency accommodation, and the serious harms test is met, they must withhold providing the data in compliance with schools' obligations under the Data Protection Act 2018 and the UK GDPR. Where in doubt schools should seek independent legal advice'

Keeping Children Safe in Education (2022), paragraph 119:

**'The Data Protection Act 2018 and GDPR do not prevent the sharing of information for the purposes of keeping children safe. Fears about sharing information must not be allowed to stand in the way of the need to safeguard and promote the welfare and protect the safety of children.'**

**For more information/guidance on when and how to share information see:** <https://www.gov.uk/government/publications/safeguarding-practitioners-information-sharing-advice> and [toolkit for schools - Guidance to support schools with data protection activity, including compliance with the GDPR.](#)

**NB:** In the case of serious concern, the Chief Executive Officer (CEO) of the Academy Trust (BDAT) 'is to be informed of all issues/ concerns/ incidents. Where there is doubt about what constitutes a 'serious concern' the Trust should be informed.' (BDAT Safeguarding and Child Protection Policy)

When considering, the DSL must take into account:

- Any urgent medical need of the child.
- Making an enquiry to the Children's Social Services Initial Contact Point (01274 437500 in office hours or 01274 431010 outside of office hours – Emergency Duty Team). The DSL may contact the Early Help Gateway for advice. (01274 432121)
- Discussing the matter with other agencies involved with the family.
- Consulting with appropriate persons e.g. Police.
- The child's wishes.
- Any suspicion of female genital mutilation of a girl under 18 years of age must be reported to the Police and Children's Social Care.

Wherever possible, the DSL will talk to parents/carers, unless to do so may place a child at risk of significant harm; impede any Police investigation and/or place the member of staff or others at risk.

The case must be then kept under constant review and consideration given to a referral to children's social care if the child's situation doesn't appear to be improving.

- All information and actions taken, including the reasons for any decisions made, will be fully documented on CPOMS<sup>2</sup>. All referrals to Children's Social Care will be documented on CPOMS<sup>2</sup>

#### **6d. Action following a Child Protection referral**

The Designated Safeguarding Lead or other appropriate member of staff will:

- Make regular contact with Children's Social Care.
- Contribute to the Strategy Discussion and Initial Assessment
- Provide a report for, attend and contribute to any subsequent Child Protection Conference

- If the child or children have a Child Protection Plan, contribute to the Child Protection Plan and attend Core Group Meetings and Child Protection Conference Reviews.
- Where in disagreement with a decision made e.g. not to apply Child Protection Procedures or not to convene a child Protection Conference, discuss this with the Education Safeguarding Officers via Lead Officer on 01274 437155 or the office on 01274 437043. Working Together 2018: "If local authority children's social care decides not to proceed with a child protection conference then other practitioners involved with the child and family have the right to request that local authority children's social care convene a conference if they have serious concerns that a child's welfare may not be adequately safeguarded" (p45 2nd paragraph)
- Where a child on a Child Protection Plan moves from Immanuel or goes missing, immediately inform the key worker in Children's Social Care.

## 6e. Recording and Monitoring

Immanuel will record on CPOMS<sup>2</sup>:

- Information about the child: name, address, D.O.B, those with parental responsibility, primary carers, emergency contacts, names of persons authorised/not authorised to have access to the child whilst at the College, any court orders, if a child has been subject to a Child Protection Plan
- Key contacts in other agencies including GP details
- Any disclosures/accounts from child or others, including parents/carers (and keep original notes which will be scanned into CPOMS<sup>2</sup>)
- All concerns, discussions, decisions, actions taken (recorded on CPOMS<sup>2</sup>) and arrangements for monitoring/reviewing
- All records should be objective and include:
- Statements, facts and observable things (what was seen/heard)
- Diagram indicating position, size, colour of any injuries (using Body Map on CPOMS<sup>2</sup>)
- Words child uses (**not translated into 'proper' words**)
- Non-verbal behaviours
- **STAFF MUST NOT**: take images of a child's injury, bruising or similar (e.g. following a disclosure of abuse) even if requested by children's social care OR make audio recordings of a child's disclosure. ('Guidance for safer working practice for those working with children and young people in education settings' May 2019)

All child protection documents will be retained in the child's CPOMS<sup>2</sup> file, separate from the child's main file. Any paper copies will be locked away and only accessible to the Headteacher and Designated Safeguarding Leads and other Pastoral staff as and when only necessary.

- These records will be transferred electronically via CPOMS<sup>2</sup> to any school to which a child transfers (if the school is on CPOMS<sup>2</sup>) or via secure post if the school is not on CPOMS<sup>2</sup>, clearly marked 'Child Protection, Confidential, for the attention of the Designated Safeguarding Lead with Responsibility for Child Protection'.
- If the child goes missing from education or is removed from roll to be educated at home [Elective Home Education] then any Child Protection information should be sent to the Local Authority Inclusion Officer. (*From September 2016 the Education (Pupil Registration) (England) Regulations 2006 were amended so that schools must inform their LA of all deletions from their admission register when a child is taken off roll. Where a parent/carer has expressed their intention to remove a child from school with a view to educating at home it is recommended that LAs, schools, and other key professionals work together to coordinate a meeting with parents/carers where possible to ensure the parents/carers have considered what is in the best interests of each child. This is particularly important where a child has SEND, is vulnerable, and/or has a social worker.*)

Immanuel staff will monitor:

- Injuries/marks
- Attendance
- Changes e.g. mood/academic functioning
- Relationships
- Language
- Behaviour
- Demeanour and appearance
- Statements and comments
- Medicals
- Stories, 'news', drawings
- Response to PE/sport
- Family circumstances
- Parental behaviours/care of child

#### **6f. Supporting the Child and Partnership with Parents/Carers**

Immanuel recognises that the child's welfare is paramount, however, good child protection practice and outcomes rely on a positive, open and honest working partnership with parents/carers.

- Whilst we may, on occasion, need to make referrals without consultation with parents/carers, we will make every effort to maintain a positive working relationship with them whilst fulfilling our duties to protect any child.
- We will provide secure, caring, supportive and protective relationships for the child
- Children will be given a proper explanation (appropriate to age and understanding) of what action is being taken on their behalf and why.
- We will endeavour always to preserve the privacy, dignity and right to confidentiality of the child and parents/carers. The Designated Safeguarding Lead will determine which members of staff 'need to know' personal information and what they 'need to know' for the purpose of supporting and protecting the child.

#### **6g. Allegations regarding Person(s) working in or on behalf of Immanuel (including supply staff, contractors and volunteers)**

##### **6g.i Where allegations meet the 'Harms Threshold':**

Where an allegation is made against any person working in or on behalf of the College (including supply staff, contractors and volunteers) that he or she has:

- Behaved in a way that has harmed a child or may have harmed a child;
- Possibly committed a criminal offence against or related to a child; or
- Behaved towards a child or children in a way that indicates he or she may pose a risk of harm to children; or
- Behaved or may have behaved in a way that indicates they may not be suitable to work with children. [This refers to potential *transferable risk* where a member of staff or volunteer is involved in an incident outside of school/college which did not involve children but could have an impact on their suitability to work with children. For example, a member of staff is involved in domestic violence at home. No children were involved, but schools/colleges need to consider what triggered these actions and could a child in the school trigger the same reaction, therefore being put at risk]

Immanuel will contact the LADO for advice and follow the Working Together to Safeguard Children – The Bradford Partnership's Procedure for Dealing with Allegations against a Person who works with Children. Detailed records will be made to include decisions, action taken and the reasons for these. All records will be retained securely. Whilst we acknowledge that such allegations (as all others) may be false, malicious or misplaced, we also acknowledge that they may be founded. It is, therefore, essential that all allegations are investigated properly and in line with agreed procedures.

Where the allegation against an individual is not directly employed by BDAT/Immanuel and where its disciplinary procedures do not fully apply, for example, supply teachers provided by an employment agency or business, Immanuel will ensure that the allegations are dealt with properly ie by finding out the facts and liaising with the local authority designated officer (LADO) to determine a suitable outcome. After taking advice, Immanuel will share the evidence with the agency to allow the agency to decide whether it is appropriate for the supply teacher to be suspended, whilst they carry out their investigation. Agencies should be fully involved and co-operate in any enquiries from the LADO, police and/or children's social services [see KCSIE 2022 Part 4 for more detailed guidance].

#### Initial Action

- The person who has received the allegation or witnesses an event will immediately inform the Headteacher (or Chair of Governors if the allegation is against the Headteacher) and make a record
- The Headteacher will take steps, where necessary, to secure the immediate safety of children and any urgent medical needs
- The member of staff will not be approached at this stage unless it is necessary to address the immediate safety of children
- The Headteacher may need to clarify any information regarding the allegation, however, no person will be interviewed at this stage
- The Headteacher will consult with the Local Authority Designated Officer (LADO) in order to determine if it is appropriate for the allegation to be dealt with by the College or if there needs to be a referral to Children's Social Care and/or Police for investigation (see NPCC guidance to schools and colleges: [NPCC - Child centred policing | Internet Matters](#)). The LADO referral form can be found on the [Working Together to Safeguard Children – The Bradford Partnership website](#). Completed **LADO** referral forms should be attached as a word document and sent by email secured via Galaxkey to [LADO@bradford.gov.uk](mailto:LADO@bradford.gov.uk). Where a teacher's employer, including an agency, dismisses or ceases to use the services of a teacher because of serious misconduct, or might have dismissed them or ceased to use their services had they not left first, they must consider whether to refer the case to the Secretary of State (via the Teaching Regulation Agency)
- Consideration will be given throughout to the support and information needs of students, parents and staff
- The Headteacher will inform the Chair of Governors and Academy Trust CEO or supply agency (if applicable) of any allegation.

Where a staff member feels unable to raise an issue with the Headteacher, designated safeguarding lead or other senior colleague, or feels that their genuine concerns are not being addressed, they should refer to the College's Whistleblowing Policy. Also the NSPCC whistleblowing helpline is available for staff who do not feel able to raise concerns regarding child protection failures internally. Staff can call 0800 028 0285 (Whistleblowing Advice Line) 8:00 AM to 8:00 PM Monday to Friday or 0808 800 5000 if you are worried about a child – line is available from 8:00 AM to 10:00 PM midweek and 9:00 AM to 6:00 PM weekends. Email: [help@nspcc.org.uk](mailto:help@nspcc.org.uk) or register a concern online: <https://www.nspcc.org.uk/what-you-can-do/report-abuse/dedicated-helplines/>

#### **6g.ii Where allegations do not meet the 'Harms Threshold' (ie low level concerns):**

Where there are concerns that do not meet the 'harms threshold', the person who has raised the concern needs to share this with the DSL and/or the Head. They will be spoken to directly (if not anonymous or a self-referral), as well as the person involved and any witnesses. The concern will be recorded in writing and kept confidentially secure. The headteacher should be the ultimate decision maker in respect of all low-level concerns, although it is recognised that depending on the nature of some low-level concerns, the

headteacher may wish to consult with the DSL and take a more collaborative decision making approach. If it is regarding supply staff or contractors, the concern will be shared with the person's employer. (If there is any doubt as to whether the information which has been shared about a member of staff as a low-level concern in fact meets the harm threshold, they should consult with their LADO). These low level concerns records will be reviewed so that potential patterns of problematic or inappropriate behaviour can be identified. Part 3 of KCISE 2022 makes it clear that only substantiated safeguarding allegations should be provided in references unless they relate to issues which would normally be included in a reference, for example, misconduct or poor performance.

## **7. APPENDICES**

### **7a. Signs of Abuse**

Some of the following signs might be indicators of abuse or neglect:

- Children whose behaviour changes – they may become aggressive, challenging, disruptive, withdrawn or clingy, or they might have difficulty sleeping or start wetting the bed;
- Children with clothes which are ill-fitting and/or dirty;
- Children with consistently poor hygiene;
- Children who make strong efforts to avoid specific family members or friends, without an obvious reason;
- Children who don't want to change clothes in front of others or participate in physical activities;
- Children who are having problems at school, for example, a sudden lack of concentration and learning or they appear to be tired and hungry;
- Children who talk about being left home alone, with inappropriate carers or with strangers;
- Children who reach developmental milestones, such as learning to speak or walk, late, with no medical reason;
- Children who are regularly missing from school or education;
- Children who are reluctant to go home after school;
- Children with poor school attendance and punctuality, or who are consistently late being picked up;
- Parents who are dismissive and non-responsive to practitioners' concerns;
- Parents who collect their children from school when drunk, or under the influence of drugs;
- Children who drink alcohol regularly from an early age;
- Children who are concerned for younger siblings without explaining why;
- Children who talk about running away; and
- Children who shy away from being touched or flinch at sudden movements

For more information:

[Stat guidance template \(publishing.service.gov.uk\)](https://publishing.service.gov.uk)

### **Physical Abuse**

Most children will collect cuts and bruises and injuries, and these should always be interpreted in the context of the child's medical / social history, developmental stage and the explanation given. Most accidental bruises are seen over bony parts of the body, e.g. elbows, knees, shins, and are often on the front of the body. Some children, however, will have bruising that is more than likely inflicted rather than accidental.

Important indicators of physical abuse are bruises or injuries that are either unexplained or inconsistent with the explanation given; these can often be visible on the 'soft' parts of the body where accidental injuries are unlikely, e.g. cheeks, abdomen, back and buttocks. A

delay in seeking medical treatment when it is obviously necessary is also a cause for concern.

The physical signs of abuse may include:

- Unexplained bruising, marks or injuries on any part of the body.
- Multiple bruises- in clusters, often on the upper arm, outside of the thigh.
- Cigarette burns.
- Human bite marks.
- Broken bones.
- Scalds, with upward splash marks.
- Multiple burns with a clearly demarcated edge.

**STAFF MUST NOT:** take images of a child's injury, bruising or similar (e.g. following a disclosure of abuse) even if requested by children's social care OR make audio recordings of a child's disclosure.

Changes in behaviour that can also indicate physical abuse:

- Fear of parents being approached for an explanation.
- Aggressive behaviour or severe temper outbursts.
- Flinching when approached or touched.
- Reluctance to get changed, for example in hot weather.
- Depression.
- Withdrawn behaviour.
- Running away from home.

Physical abuse can happen in any family, but children may be more at risk if their parents have problems with drugs, alcohol and mental health or if they live in a home where domestic abuse happens. Babies and disabled children also have a higher risk of suffering physical abuse.

Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child. Physical abuse can also occur outside of the family environment.

Some of the following signs may be indicators of physical abuse:

- Children with frequent injuries;
- Children with unexplained or unusual fractures or broken bones; and
- Children with unexplained bruises or cuts; burns or scalds; or bite marks

### **Emotional Abuse**

Emotional abuse can be difficult to identify as there are often no outward physical signs. Indications may be a developmental delay due to a failure to thrive and grow, however, children who appear well-cared for may nevertheless be emotionally abused by being taunted, put down or belittled. They may receive little or no love, affection or attention from their parents or carers. Emotional abuse can also take the form of children not being allowed to mix or play with other children.

Changes in behaviour which can indicate emotional abuse include:

- Neurotic behaviour e.g. sulking, hair twisting, rocking.
- Being unable to play.
- Fear of making mistakes.
- Sudden speech disorders.
- Self-harm.
- Fear of parent being approached regarding their behaviour.
- Developmental delay in terms of emotional progress.

Although the effects of emotional abuse might take a long time to be recognisable, practitioners will be in a position to observe it, for example, in the way that a parent interacts with their child. Emotional abuse may involve deliberately telling a child that they are worthless, or unloved and inadequate. It may include not giving a child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate.

Emotional abuse may involve serious bullying – including online bullying through social networks, online games or mobile phones – by a child's peers.

Some of the following signs may be indicators of emotional abuse:

- Children who are excessively withdrawn, fearful, or anxious about doing something wrong;
- Parents or carers who withdraw their attention from their child, giving the child the 'cold shoulder';
- Parents or carers blaming their problems on their child; and
- Parents or carers who humiliate their child, for example, by name-calling or making negative comparisons

### **Sexual Abuse**

All Staff and Volunteers should be aware that adults, who may be men, women or other children, who use children to meet their own sexual needs abuse both girls and boys of all ages. Indications of sexual abuse may be physical or from the child's behaviour. In all cases, children who tell about sexual abuse do so because they want it to stop. It is important, therefore, that they are listened to and taken seriously.

The physical signs of sexual abuse may include:

- Pain or itching in the genital area.
- Bruising or bleeding near genital area.
- Sexually transmitted disease.
- Vaginal discharge or infection.
- Stomach pains.
- Discomfort when walking or sitting down.
- Pregnancy.

Changes in behaviour which can also indicate sexual abuse include:

- Sudden or unexplained changes in behaviour e.g. becoming aggressive or withdrawn.
- Fear of being left with a specific person or group of people.
- Having nightmares.
- Running away from home.
- Sexual knowledge which is beyond their age, or developmental level.
- Sexual drawings or language.
- Bedwetting.
- Eating problems such as overeating or anorexia.
- Self-harm or mutilation, sometimes leading to suicide attempts.
- Saying they have secrets they cannot tell anyone about.
- Substance or drug abuse.
- Suddenly having unexplained sources of money.
- Not allowed to have friends (particularly in adolescence).
- Acting in a sexually explicit way towards adults.

Sexual abuse is any sexual activity with a child. You should be aware that many children and young people who are victims of sexual abuse do not recognise themselves as such. A child

may not understand what is happening and may not even understand that it is wrong. Sexual abuse can have a long-term impact on mental health.

Sexual abuse 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 clothing. It may include non-contact activities, such as involving children in the production of sexual images, forcing children to look at sexual images or watch sexual activities, encouraging children to behave in sexually inappropriate ways or grooming a child in preparation for abuse (including via the internet). Sexual abuse is not solely perpetrated by adult males. Women can commit acts of sexual abuse, as can other children.

Some of the following signs may be indicators of sexual abuse:

- Children who display knowledge or interest in sexual acts inappropriate to their age;
- Children who use sexual language or have sexual knowledge that you wouldn't expect them to have;
- Children who ask others to behave sexually or play sexual games; and
- Children with physical sexual health problems, including soreness in the genital and anal areas, sexually transmitted infections or underage pregnancy.

For more information on responding to sexual abuse: [Supporting practice in tackling child sexual abuse - CSA Centre](#)

### **Child Exploitation**

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)** is a form of child sexual abuse. Sexual abuse may involve physical contact, including assault by penetration (for example, rape or oral sex) or nonpenetrative acts such as masturbation, kissing, rubbing, and touching outside clothing. It may include non-contact activities, such as involving children in the production of sexual images, forcing children to look at sexual images or watch sexual activities, encouraging children to behave in sexually inappropriate ways or grooming a child in preparation for abuse including via the internet.

CSE can occur over time or be a one-off occurrence, and may happen without the child's immediate knowledge e.g. through others sharing videos or images of them on social media. CSE can affect any child, who has been coerced into engaging in sexual activities. This includes 16 and 17 year olds who can legally consent to have sex. Some children may not realise they are being exploited e.g. they believe they are in a genuine romantic relationship.

CSE is where children are sexually exploited for money, power or status. It can involve violent, humiliating and degrading sexual assaults. In some cases, young people are persuaded or forced into exchanging sexual activity for money, drugs, gifts, affection or status. Consent cannot be given, even where a child may believe they are voluntarily engaging in sexual activity with the person who is exploiting them. Child sexual exploitation doesn't always involve physical contact and can happen online. A significant number of children who are victims of sexual exploitation go missing from home, care and education at some point.

Some of the following signs may be indicators of sexual exploitation:

- Children who appear with unexplained gifts or new possessions;
- Children who associate with other young people involved in exploitation;
- Children who have older boyfriends or girlfriends;
- Children who suffer from sexually transmitted infections or become pregnant;
- Children who suffer from changes in emotional well-being;
- Children who misuse drugs and alcohol;
- Children who go missing for periods of time or regularly come home late; and
- Children who regularly miss school or education or don't take part in education

See also <https://www.gov.uk/government/publications/what-to-do-if-you-suspect-a-child-is-being-sexually-exploited>

Children who are deemed in

danger of CSE can be referred to the CSE Hub using the CSE risk assessment and reporting form (see Referral Forms appendix)

### **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.

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. They may be coerced into carrying weapons such as knives or begin to carry a knife for a sense of protection from harm from others. As children involved in criminal exploitation often commit crimes themselves, their vulnerability as victims is not always recognised by adults and professionals, (particularly older children), and they are not treated as victims despite the harm they have experienced. They may still have been criminally exploited even if the activity appears to be something they have agreed or consented to.

It is important to note that the experience of girls who are criminally exploited can be very different to that of boys. The indicators may not be the same, however professionals should be aware that girls are at risk of criminal exploitation too. It is also important to note that both boys and girls being criminally exploited may be at higher risk of sexual exploitation

Gangs can deliberately target vulnerable children – those who are homeless, living in care homes or trapped in poverty. These children are unsafe, unloved, or unable to cope, and the gangs can take advantage of this. These gangs groom, threaten or trick children into trafficking their drugs for them.

See also: [Criminal Exploitation of children and vulnerable adults: County Lines guidance \(publishing.service.gov.uk\)](https://publishing.service.gov.uk)

Some of the following can be indicators of CCE:

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

### **Neglect**

It can be difficult to recognise neglect, however its effects can be long term and damaging for children.

The physical signs of neglect may include:

- Being constantly dirty or 'smelly'.

- Constant hunger, sometimes stealing food from other children.
- Losing weight, or being constantly underweight.
- Inappropriate or dirty clothing.

Neglect may be indicated by changes in behaviour which may include:

- Mentioning being left alone or unsupervised.
- Not having many friends.
- Complaining of being tired all the time.
- Not requesting medical assistance and/or failing to attend appointments.

Children who are neglected often also suffer from other types of abuse. It is important that practitioners remain alert and do not miss opportunities to take timely action. However, while you may be concerned about a child, neglect is not always straightforward to identify. Neglect may occur if a parent becomes physically or mentally unable to care for a child. A parent may also have an addiction to alcohol or drugs, which could impair their ability to keep a child safe or result in them prioritising buying drugs, or alcohol, over food, clothing or warmth for the child. Neglect may occur during pregnancy as a result of maternal drug or alcohol abuse.

Some of the following signs may be indicators of neglect:

- Children who are living in a home that is indisputably dirty or unsafe;
- Children who are left hungry or dirty;
- Children who are left without adequate clothing, e.g. not having a winter coat;
- Children who are living in dangerous conditions, i.e. around drugs, alcohol or violence;
- Children who are often angry, aggressive or self-harm;
- Children who fail to receive basic health care<sup>4</sup>; and
- Parents who fail to seek medical treatment when their children are ill or are injured

### **Serious Violence**

All staff should be aware of indicators, which may signal that children are at risk from, or are involved with serious violent crime. These may include:

- increased absence from school,
- a change in friendships or relationships with older individuals or groups,
- a significant decline in performance,
- signs of self-harm or a significant change in wellbeing, or
- signs of assault or unexplained injuries.
- unexplained gifts or new possessions could also indicate that children have been approached by, or are involved with, individuals associated with criminal networks or gangs and may be at risk of criminal exploitation.

All staff should be aware of the range of risk factors which increase the likelihood of involvement in serious violence, such as being male, having been frequently absent or permanently excluded from school, having experienced child maltreatment (ACES) and having been involved in offending, such as theft or robbery. Advice for schools and colleges is provided in the Home Office's <https://www.gov.uk/government/publications/advice-to-schools-and-colleges-on-gangs-and-youth-violence> and its <https://www.gov.uk/government/publications/criminal-exploitation-of-children-and-vulnerable-adults-county-lines> as well as the [Youth Endowment Fund Toolkit](#)

### **7b Extra Specific safeguarding issues**

All staff should have an awareness of safeguarding issues, some of which are listed below.

Staff should be aware that:

- Substance and alcohol misuse,

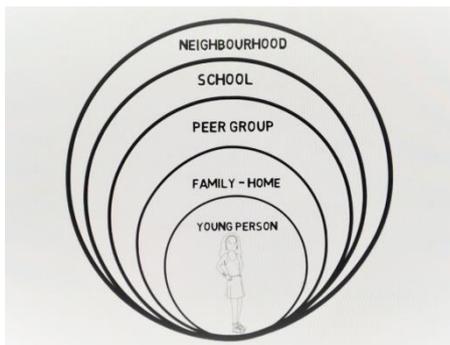
- domestic abuse/violence,
- children missing from education (CME) regularly or 10 consecutive days or more without permission (see CME statutory guidance 2016 section 17 at appendix 7c). CME referrals' local help: contact Education Safeguarding Team on 01274 439651. The referral forms should be sent to [cme@bradford.gov.uk](mailto:cme@bradford.gov.uk)
- homelessness;
- parent/carers in prison;
- SEND,
- truanting

can put children in increased danger and **should be reported**.

### Contextual Safeguarding

Working together to safeguard children' 2018 introduces a new concept of contextual safeguarding to describe the risks that children and young people face from their peers or in the wider community including:

- Online safety
- Sexual exploitation
- Criminal exploitation
- Radicalisation
- Trafficking



Contextual Safeguarding is an approach to understanding, and responding to, young people's experiences of significant harm beyond their families. It recognises that the different relationships that young people form in their neighbourhoods, schools and online can feature violence and abuse. Parents and carers have little influence over these contexts, and young people's experiences of extra-familial abuse can undermine parent-child relationships.

Children's social care practitioners need to engage with individuals and sectors who do have influence over/within extra-familial contexts, and recognise that assessment of, and intervention with, these spaces are a critical part of safeguarding practices. Contextual Safeguarding, therefore, expands the objectives of child protection systems in recognition that young people are vulnerable to abuse in a range of social contexts.

All staff should be aware that safeguarding incidents and/or behaviours can be associated with factors outside the school or college and/or can occur between children outside of these environments. This is known as *contextual safeguarding*. All staff, but especially the designated safeguarding lead (and deputies) should consider whether children are at risk of abuse or exploitation in situations outside their families. Extra-familial harms take a variety of different forms and children can be vulnerable to multiple harms including (but not limited to) sexual exploitation, criminal exploitation, sexual abuse, serious youth violence and county lines. (KCSIE 2022 para 23)

All staff concerned about a child experiencing harm beyond their families must report it in the usual way to the DSL via CPOMS

For more information: [About us | Contextual Safeguarding](#)

## Child on Child abuse

All staff should be aware that children can abuse other children (often referred to as Child on Child abuse). And that it can happen both inside and outside of school or college and online. It is important that all staff recognise the indicators and signs of Child on Child abuse and know how to identify it and respond to reports. All staff should understand, that even if there are no reports in their schools or colleges it does not mean it is not happening, it may be the case that it is just not being reported. All staff working with children are advised to maintain an attitude of 'it could happen here'. As such it is important if staff have any concerns regarding Child on Child abuse they should speak to their designated safeguarding lead (or deputy). It is essential that all staff understand the importance of challenging inappropriate behaviours between children, many of which are listed below, that are actually abusive in nature. Downplaying certain behaviours, for example dismissing sexual harassment as "just banter", "just having a laugh", "part of growing up" or "boys being boys" can lead to a culture of unacceptable behaviours, an unsafe environment for children and in worst case scenarios a culture that normalises abuse leading to children accepting it as normal and not coming forward to report it. 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;
- 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 nudes and semi nudes images and or videos (also known as sexting or youth produced sexual imagery) [*Consensual image sharing, especially between older children of the same age, may require a different response. It might not be abusive – but children still need to know it is illegal- whilst non-consensual is illegal and abusive. UKCIS <https://www.gov.uk/government/publications/sharing-nudes-and-semi-nudes-advice-for-education-settings-working-with-children-and-young-people> provides detailed advice about sharing of nudes and semi-nude images and videos.*]
- upskirting, which typically involves taking a picture under a person's clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm;
- initiation/hazing type violence and rituals (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element).

Abuse is abuse and should never be tolerated or passed off as 'banter' or 'just a laugh' or part of growing up. There should always be a zero tolerance approach to sexual violence and sexual harassment and it is never acceptable and it will not be tolerated. Recent DfE guidance situates sexual violence, sexual harassment and harmful sexual behaviour in the context of developing a whole-school safeguarding culture, where sexual misconduct is seen as unacceptable, and not 'banter' or an inevitable part of growing up. It should be recognised that these issues are likely to occur, and so schools should have procedures in place to deal with them. Groups at particular risk include girls, students who identify as Lesbian, Gay, Bisexual, Transgender+ (LGBT+), or are perceived by children to be LGBT+, and pupils with SEND.

***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 (KCSIE 2022 para 202-203)***

All staff should be able to reassure victims that they are being taken seriously and that they will be supported and kept safe. A victim should never be given the impression that they are creating a problem by reporting abuse, sexual violence or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report.

All such incidents should be immediately reported to the Designated Safeguarding Lead (DSL). See [Appendix 7e](#) for flow chart for initial action.

Victims of harm should be supported by the school's pastoral system. A bespoke helpline is available for children and young people who have experienced abuse at school, and for worried adults and professionals who may need support and guidance. If they are concerned about something, they can contact the NSPCC helpline Report Abuse in Education on 0800 136 663 or email [help@nspcc.org.uk](mailto:help@nspcc.org.uk).

All staff must use the reporting procedure as laid out in this policy above so that risk of Child on Child abuse can be minimised.

## **More information on responding to Child on Child Sexual Violence and Sexual Harassment**

### **Overview**

It is important that Child on Child Sexual Violence and Harassment are not downplayed as this could 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. It is important to note that children may not find it easy to tell staff about their abuse verbally. Children can show signs or act in ways that they hope adults will notice and react to. In some cases, the victim may not make a direct report. For example, a friend may make a report or a member of school or college staff may overhear a conversation that suggests a child has been harmed or a child's own behaviour might indicate that something is wrong. Reports of sexual violence and sexual harassment are likely to be complex and require difficult professional decisions to be made, often quickly and under pressure. An initial disclosure to a trusted adult may only be the first incident reported, rather than representative of a singular incident and that trauma can impact memory and so children may not be able to recall all details or timeline of abuse. A written record needs to be taken after the disclosure. Decisions will have to be made by the college on a case-by-case basis, with the designated safeguarding lead (or a deputy) taking a leading role and using their professional judgement, supported by other agencies, such as children's social care and the police as required.

### **Risk Assessment**

When there has been a report of sexual violence, the designated safeguarding lead should make an immediate risk and needs assessment. Where there has been a report of sexual harassment, the need for a risk assessment should be considered on a case-by-case basis. The risk and needs assessment should consider:

- the victim, especially their protection and support and wherever possible, enable them to continue in their normal routine so that the school or college is a safe space for them. It may be necessary for schools and colleges to maintain arrangements to protect and support the victim for a long time.;  
*(Any report of rape and assault by penetration are likely to be especially difficult with regard to the victim, and close proximity with the alleged perpetrator(s) is likely to be especially distressing. Whilst the school or college establishes the facts of the case and starts the process of liaising with children's social care and the police, the alleged perpetrator(s) should be removed from any classes they share with the victim. The school or college should also carefully consider how best to keep the victim and alleged perpetrator(s) a reasonable distance apart on school or college premises and on transport to and from the school or college. These actions are in the best interests of all children involved and should not be perceived to be a judgment on the guilt of the alleged perpetrator(s).  
For other reports of sexual violence and sexual harassment, the proximity of the victim and alleged perpetrator(s) and considerations regarding shared classes, sharing school or college premises and school or college transport, should be considered immediately)* KCSIE 2022 text box between para 483 and 484
- whether there may have been other victims,
- the alleged perpetrator(s);  
*(When to inform the alleged perpetrator(s) will be a decision that should be carefully considered. Where a report is going to be made to children's social care and/or the police, then, as a general rule, the school or college should speak to the relevant agency and discuss next steps and how the alleged perpetrator(s) will be informed of the allegations. However, as per general safeguarding principles, this does not and should not stop the school or college taking immediate action to safeguard their children, where required.)* KCSIE 2022 para 484
- all the other children, (and, if appropriate, adult students and staff) at the school or college, especially any actions that are appropriate to protect them from the alleged perpetrator(s), or from future harms.

Risk assessments should be recorded (written or electronic) and should be kept under review. At all times, the school or college should be actively considering the risks posed to all their pupils and students and put adequate measures in place to protect them and keep them safe. The designated safeguarding lead should ensure they are engaging with children's social care and specialist services as required. Where there has been a report of sexual violence, it is likely that professional risk assessments by social workers and or sexual violence specialists will be required. The above school or college risk assessment is not intended to replace the detailed assessments of expert professionals. Any such professional assessments should be used to inform the school's or college's approach to supporting and protecting their pupils and students and updating their own risk assessment.

### **Further Action**

Important considerations will include:

- the wishes of the victim in terms of how they want to proceed. This is especially important in the context of sexual violence and sexual harassment. Victims should be given as much control as is reasonably possible over decisions regarding how any investigation will be progressed and any support that they will be offered. This will however need to be balanced with the school's or college's duty and responsibilities to protect other children;
- the nature of the alleged incident(s), including whether a crime may have been committed and/or whether HSB has been displayed;

- the ages of the children involved;
- the developmental stages of the children involved;
- any power imbalance between the children. For example, is the alleged perpetrator(s) significantly older, more mature or more confident? Does the victim have a disability or learning difficulty?;
- if the alleged incident is a one-off or a sustained pattern of abuse (sexual abuse can be accompanied by other forms of abuse and a sustained pattern may not just be of a sexual nature);
- relationships between children;
- importance of understanding intra familial harms and any necessary support for siblings following incidents
- are there ongoing risks to the victim, other children, adult students or school or college staff; and,
- other related issues and wider context, including any links to child sexual exploitation and child criminal exploitation

As always when concerned about the welfare of a child, all staff should act in the best interests of the child.

According to KCSIE 2022 the school may decide to:

- Manage internally – for example in some one-off cases of sexual harassment
- Refer to Early Help
  - Schools and colleges, as relevant agencies, should be part of discussions with statutory safeguarding partners to agree the levels for the different types of assessment and services to be commissioned and delivered, as part of the local arrangements. Safeguarding partners should publish a local threshold document which includes the process for the local early help assessment and the type and level of early help services to be provided, and DSLs (and their deputies) will need to familiarise themselves with this document (KCSIE 2022 para 492)
- Refer to Children’s Social Care
- Report to the Police.
  - If as a result of a report to the Police, the perpetrator may have bail conditions or released under investigation. Particular regard should be given to: the additional stress and trauma that might be caused to a victim within the institution; the potential for the suspected person to intimidate the victim or a witness; the need to ensure that any risk management measures strike a balance between management of risk and the rights of an unconvicted person (e.g. rights to privacy, family life, etc). Careful liaison with the police investigators should help to develop a balanced set of arrangements. If there is a delay in the criminal process, schools and colleges should not wait for the outcome before protecting the victim, alleged perpetrator and other children.
  - If a child is convicted or receives a caution for a sexual offence, the school or college should update its risk assessment, ensure relevant protections are in place for all the children at the school or college. If the perpetrator(s) remains in the same school or college as the victim, the school or college should be very clear as to their expectations regarding the perpetrator(s) now they have been convicted or cautioned. In all but the most exceptional of circumstances, the rape or assault is likely to constitute a serious breach of discipline and lead to the view that allowing the perpetrator(s) to remain in the same school or college would seriously harm the education or welfare of the victim (and potentially other pupils or students). Where a criminal investigation into sexual assault leads to a conviction or caution, the school or college should, if it has not already, consider any suitable sanctions in light of their behaviour policy, including consideration of permanent exclusion. Where the perpetrator(s) is

going to remain at the school or college, the principle would be to continue keeping the victim and perpetrator(s) in separate classes and continue to consider the most appropriate way to manage potential contact on school and college 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.

- Where cases are classified as “no further action” (NFA’d) by the police or Crown Prosecution Service, or where there is a not guilty verdict, the school or college should continue to offer support to the victim and the alleged perpetrator(s) for as long as is necessary. A not guilty verdict or a decision not to progress with their case will likely be traumatic for the victim. The fact that an allegation cannot be substantiated or was withdrawn does not necessarily mean that it was unfounded.
- If a report is determined to be unsubstantiated, unfounded, false or malicious, the designated safeguarding lead should consider whether the child and/or the person who has made the allegation is in need of help or may have been abused by someone else and this is a cry for help. If a report is shown to be deliberately invented or malicious, the school or college, should consider whether any disciplinary action is appropriate against the individual who made it as per their own behaviour policy.

### **More Background information on Context:**

Sexual violence and sexual harassment can occur between two children of **any age and sex**. It can also occur through 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 likely find the experience stressful and distressing. This will, in all likelihood, adversely affect their educational attainment.

The initial response to a report from a child is important. All victims must be reassured that they are being taken seriously and that they will be supported and kept safe. All concerns must be taken to the DSL or Deputy DSL in the first instance.

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 taken seriously and offered appropriate support. Staff should be aware that some groups are potentially more at risk. Evidence shows girls, children with SEND and LGBT children are at greater risk.

Schools and colleges should be aware of the importance of:

- making clear that sexual violence and sexual harassment is not acceptable, will never be tolerated and is not an inevitable part of growing up;
- not tolerating or dismissing sexual violence or sexual harassment as “banter”, “part of growing up”, “just having a laugh” or “boys being boys”;
- challenging behaviour (potentially criminal in nature), such as grabbing bottoms, breasts and genitalia and flicking bras and lifting up skirts. Dismissing or tolerating such behaviours risks normalising them; and understanding that all of the above can be driven by wider societal factors beyond the school and college, such as everyday sexist stereotypes and everyday sexist language.

This is why a whole school/college approach (especially preventative education) is important.

This education should include:

- Healthy & respectful relationships (via statutory 'Relationships and Sex Education' - guidance: <https://www.gov.uk/government/publications/relationships-education-relationships-and-sex-education-rse-and-health-education>)
- Respectful behaviour
- Gender roles, stereotyping, equality
- Body confidence and self-esteem
- Prejudice
- Rights and responsibilities
- Consent
- Online safety
- Cultural and societal views of sexual harassment
- That sexual violence and harassment is always wrong

**What is sexual violence and sexual harassment?** It is important that school and college staff are aware of sexual violence and the fact children can, and sometimes do, abuse their children in this way. When referring to sexual violence, we are referring to sexual violence 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 his/her 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.

**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, eg 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 consent to vaginal, anal or oral penetration only if s/he agrees by choice to that penetration and has the freedom and the capacity to make that choice.

**Sexual Harassment** is 'unwanted conduct of a sexual nature' and can occur online and offline. In the context of child on child sexual harassment it may take the form of sexual comments; sexual 'jokes' or taunting; physical behaviour such as deliberately brushing against someone/ interfering with clothes/displaying pictures, photos or drawings of a sexual nature; online sexual harassment ie non-consensual sharing of sexual images/videos/comments/messages on social media. This would include 'Upskirting' (see separate section above).

- For further detailed information outlined below, please read the government publication: [Sexual violence and sexual harassment between children in schools and colleges \(Sept 2021\)](#)
- what sexual violence and sexual harassment constitutes,
- important context to be aware of, including; what is consent, power imbalances, and developmental stages,
- harmful sexual behaviour (HSB), including that a child displaying HSB may be an indication that they are a victim of abuse themselves,
- related legal responsibilities for schools and colleges,

- advice on a whole school or college approach to preventing child on child sexual violence and sexual harassment, and • more detailed advice on responding to reports of sexual violence and sexual harassment, including safeguarding and supporting both the victim(s) and alleged perpetrator(s).

### **Forced marriage**

Forcing a person into a marriage is a crime in England and Wales. A forced marriage is one entered into without the full and free consent of one or both parties and where violence, threats or any other form of coercion is used to cause a person to enter into a marriage. Threats can be physical or emotional and psychological. A lack of full and free consent can be where a person does not consent or where they cannot consent (if they have learning disabilities, for example). Nevertheless, some communities use religion and culture as a way to coerce a person into marriage. Schools and colleges can play an important role in safeguarding children from forced marriage. In particular suspicious absences whether planned or not planned should be investigated.

See [The right to choose: government guidance on forced marriage - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/guidance/the-right-to-choose)

School and college staff can contact the Forced Marriage Unit if they need advice or information: Contact: 020 7008 0151 or email [fm@fco.gov.uk](mailto:fm@fco.gov.uk).

### **Preventing Radicalisation.**

#### **Background**

Section 26 of the Counter Terrorism and Security Act 2015, places a statutory Prevent duty on specified authorities in the exercise of their functions, to have 'due regards to the need to prevent individuals from being drawn into terrorism'. This includes referring vulnerable individuals to Channel.<sup>3</sup>

More information on the Prevent duty for specific bodies can be found at:

<https://www.gov.uk/government/publications/prevent-duty-guidance>

Prevent in Bradford identifies and tackles all forms of extremism. The referral form can be found in Imm Teacher/Documents/General/Teacher/Safeguarding/Prevent.

#### **Vulnerability and risk indicators**

The Bradford Prevent Team work in partnership to address radicalisation concerns by identifying risk at the earliest possible opportunity, prior to safeguarding individuals through the Bradford Channel process. Channel is a Multi-Agency process, established in every local authority in England and Wales, and works to support vulnerable people from being drawn into terrorism, and provides a range of support including mentoring, counselling, theological support, and assistance with a range of other issues. Channel focuses on early intervention to try and protect vulnerable people from being drawn into Terrorism, and addresses all types of extremism.

If an individual is discussed at Channel and deemed vulnerable, they will be offered support. Participation is voluntary and it is up to the person, or their parents (for children aged 17 and under), to decide whether to take up the support the panel offers. Channel does not lead to a criminal record.

The Bradford Channel Panel recognises that the radicalisation process can be extremely complex, and that there is no single factor or indicator to identify an individual at risk of radicalisation. There are no academically proven checklists that exist which will accurately identify a person who is at risk of radicalisation, and who may, at a later date, progress to committing acts of terrorism.

A single comment or one off statement does not necessarily mean that an individual is at risk of radicalisation, and those involved in extremism can come from a range of backgrounds

and experience. All referrals should be based on sound reasoning and professional judgement with accurate recording at every stage.

The Channel process in Bradford District ensures that referrals made to Bradford Prevent are appropriate before they are discussed at the Channel Panel meeting and it is hoped that the information contained within this document will provide referrers with more support around the suitability of their Prevent related concern.

Additional information about the Channel process, including a description of the Vulnerability Assessment Framework (VAF) used by the Channel Panel to guide decisions about whether an individual needs support to address their vulnerability to radicalisation can be found on Page 28 of the Government's Channel Duty Guidance.

<https://www.gov.uk/government/publications/channel-guidance>.

### **Terminology**

Understanding the terminology associated with Prevent will assist you in your decision making process. The following definitions are commonly used within Prevent and Channel:

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

Extremism: "the vocal or active opposition to fundamental values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs. We also include in our definition of extremism calls for the death of members of our armed forces."

Terrorism: "is an action that endangers or causes serious violence to a person/people; causes serious damage to property; or seriously interferes or disrupts an electronic system. The use or threat must be designed to influence the government or to intimidate the public and is made for the purpose of advancing a political, religious or ideological cause." [KCSIE 2022 Annex B]

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 making a referral to the Channel programme

### **Making a Referral**

Referrals made to Prevent should contain concerns based on a person's vulnerability to radicalisation and should not be because of the person's faith or ethnic origin.

Ideally, the person considering making the referral will be the designated Safeguarding Lead within their organisation and have a good understanding of Safeguarding and Prevent. They should have attended the Home Office approved Workshop to Raise Awareness of Prevent (WRAP) and completed the Channel e-learning training course.

If the organisation's designated Safeguarding Lead is not available the referral should still be forwarded by the reporting person to the Police, so that a timely assessment can be made.

If the referring person or organisation has not completed the above referral then it is highly recommended that they speak with a member of the Bradford Prevent Team in the first instance, to discuss any concerns before making any referral.

### **Where to send referrals**

Completed referral forms (Imm Teacher/Documents/General/Teacher/Safeguarding/Prevent) should be sent, as soon as possible to the Police at the below email address:

[nectu.fimu@westyorkshire.pnn.police.uk](mailto:nectu.fimu@westyorkshire.pnn.police.uk)

If you need to speak to someone about your referral please contact 01274 376215.

## **What happens next?**

Following a referral, the information received will be assessed by the Police. Following this assessment a decision will be made regarding the suitability of the case for discussion at the Bradford Channel Panel. If the case is not suitable for Channel the Police will notify the referrer regarding the outcome of the assessment and if necessary make a referral to other agencies for support. Following assessment, if the case is deemed suitable for Channel support then the referrer may be invited to the next Bradford Channel Panel meeting.

The referrer should continue to monitor the case and keep Prevent updated with any additional information which could lead to an increase in vulnerabilities to radicalisation. For further training;

<https://www.elearning.prevent.homeoffice.gov.uk/>

## **Further information on so-called 'honour based violence' abuse**

So-called 'honour-based violence' abuse encompasses crimes which have been committed to protect or defend the honour of the family and/or the community, including Female Genital Mutilation (FGM), forced marriage, and practices such as breast ironing. All forms of so called HBV (Honour Based Violence) are abuse (regardless of the motivation) and should be handled and escalated as such. If in any doubt, staff should speak to the designated safeguarding lead. Professionals in all agencies, and individuals and groups in relevant communities, need to be alert to the possibility of a child being at risk of HBV, or already having suffered HBV.

Indicators

There are a range of potential indicators that a child may be at risk of HBV. Guidance on the warning signs that FGM or forced marriage may be about to take place, or may have already taken place, can be found in the Multi agency statutory guidance on FGM

<https://www.gov.uk/government/publications/multi-agency-statutory-guidance-on-female-genital-mutilation>

## **Actions**

If staff have a concern regarding a child that might be at risk of HBV, they should activate local safeguarding procedures, using existing national and local protocols for multi-agency liaison with police and children's social care. Where FGM has taken place, since 1 October 2015 there has been a mandatory reporting duty placed on teachers<sup>80</sup> that requires a different approach (see following section).

## **FGM mandatory reporting duty**

FGM comprises all procedures involving partial or total removal of the external female genitalia or other injury to the female genital organs. It is illegal in the UK and a form of child abuse with long-lasting harmful consequences. (more info:

<https://www.gov.uk/government/publications/multi-agency-statutory-guidance-on-female-genital-mutilation> )

Section 5B of the Female Genital Mutilation Act 2003 (as inserted by section 74 of the Serious Crime Act 2015) places a statutory duty upon teachers along with regulated health and social care professionals in England and Wales, to report to the police where they discover (either through disclosure by the victim or visual evidence) that FGM appears to have been carried out on a girl under 18. Those failing to report such cases will face disciplinary sanctions. It will be rare for teachers to see visual evidence, and they should not be examining pupils, but the same definition of what is meant by "to discover that an act of FGM appears to have been carried out" is used for all professionals to whom this mandatory reporting duty applies. Information on when and how to make a report can be found at

<https://www.gov.uk/government/publications/mandatory-reporting-of-female-genital-mutilation-procedural-information>

Teachers must personally report to the police cases where they discover that an act of FGM appears to have been carried out.<sup>81</sup> Unless the teacher has a good reason not to, they should also still consider and discuss any such case with the school or college's designated safeguarding lead and involve children's social care as appropriate. The duty does not apply in relation to at risk or suspected cases (i.e. where the teacher does not discover that an act of FGM appears to have been carried out, either through disclosure by the victim or visual evidence) or in cases where the woman is 18 or over. In these cases, teachers should follow local safeguarding procedures.

## **Mental Health**

*'Education staff are well placed to observe children day-to-day and identify those whose behaviour suggests that they may be experiencing a mental health problem or be at risk of developing one.'* KCSIE 2022 para 46

All staff should also be aware that mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation. Only appropriately trained professionals should attempt to make a diagnosis of a mental health problem. Staff however, are well placed to observe children day-to-day and identify those whose behaviour suggests that they may be experiencing a mental health problem or be at risk of developing one. Where children have suffered abuse and neglect, or other potentially traumatic adverse childhood experiences (ACEs), this can have a lasting impact throughout childhood, adolescence and into adulthood. It is key that staff are aware of how these children's experiences, can impact on their mental health, behaviour and education. If staff have a mental health concern about a child that is also a safeguarding concern, immediate action should be taken, following their child protection policy and speaking to the designated safeguarding lead or a deputy. See Immanuel's Mental Health Policy.

The DfE has published advice and guidance on:

<https://www.gov.uk/government/publications/preventing-and-tackling-bullying> and [Mental Health and Behaviour in Schools](#) (which may also be useful for colleges). In addition, Public Health England has produced a range of resources to support secondary school teachers to promote positive health, wellbeing and resilience among young people including its guidance [Promoting children and young people's emotional health and wellbeing](#). Its resources include social media, forming positive relationships, smoking and alcohol. See [Rise Above](#) for links to all materials and lesson plans

## **Sharing of Nude or Semi-Nude Images (Sexting)**

In the latest advice for schools and colleges (UKCIS, 2020), this is defined as the sending or posting of nude or semi-nude images, videos or live streams online by young people under the age of 18. This could be via social media, gaming platforms, chat apps or forums. It could also involve sharing between devices via services like Apple's AirDrop which works offline. Alternative terms used by children and young people may include 'dick pics' or 'pics'. The motivations for taking and sharing nude and semi-nude images, videos and live streams are not always sexually or criminally motivated.

**'Sharing of Nude or Semi-Nude images' does not include the sharing of sexual photos and videos of under-18 year olds with or by adults. This is a form of child sexual abuse and must be referred to the police.**

## **What to do if an incident comes to your attention**

**Report it to your Designated Safeguarding Lead (DSL) immediately.**

- **Never** view, download or share the imagery yourself, or ask a child to share or download – **this is illegal.**
- If you have already viewed the imagery by accident (e.g. if a young person has showed it to you before you could ask them not to), report this to the DSL.
- **Do not** delete the imagery or ask the young person to delete it.

- **Do not** ask the young person(s) who are involved in the incident to disclose information regarding the imagery. This is the responsibility of the DSL.
- **Do not** share information about the incident to other members of staff, the young person(s) it involves or their, or other, parents and/or carers.
- **Do not** say or do anything to blame or shame any young people involved.
- **Do** explain to them that you need to report it and reassure them that they will receive support and help from the DSL.

### **Advice for DSL**

The DSL should hold an initial review meeting with appropriate school staff. The initial review meeting should consider the initial evidence and aim to establish:

- Whether there is an immediate risk to a young person or young people. If a referral should be made to the police and/or children's social care
- If it is necessary to view the imagery in order to safeguard the young person – in most cases, imagery should not be viewed
- What further information is required to decide on the best response
- Whether the imagery has been shared widely and via what services and/or platforms. This may be unknown.
- Whether immediate action should be taken to delete or remove images from devices or online services
- Any relevant facts about the young people involved which would influence risk assessment
- If there is a need to contact another school, college, setting or individual
- Whether to contact parents or carers of the pupils involved - in most cases parents should be involved

### **An immediate referral to police and/or children's social care should be made if at this initial stage:**

1. The incident involves an adult
2. There is reason to believe that a young person has been coerced, blackmailed or groomed, or if there are concerns about their capacity to consent (for example owing to special educational needs)
3. What you know about the imagery suggests the content depicts sexual acts which are unusual for the young person's developmental stage, or are violent
4. The imagery involves sexual acts and any pupil in the imagery is under 13
5. You have reason to believe a pupil or pupil is at immediate risk of harm owing to the sharing of the imagery, for example, the young person is presenting as suicidal or self-harming

If none of the above apply then a school may decide to respond to the incident without involving the police or children's social care (a school can choose to escalate the incident at any time if further information/concerns come to light).

- The decision to respond to the incident without involving the police or children's social care would be made in cases when the DSL is confident that they have enough information to assess the risks to pupils involved and the risks can be managed within the school's pastoral support and disciplinary framework and if appropriate local network of support. The decision should be made by the DSL with input from the Headteacher and input from other members of staff if appropriate. The decision should be recorded in line with school policy. The decision should be in line with the school's child protection procedures and should be based on consideration of the best interests of the young people involved. This should take into account proportionality as well as the welfare and protection of the young people. The decision should be reviewed throughout the process of responding to the incident.

*If a young person has shared imagery consensually, such as when in a romantic relationship, or as a joke, and there is no intended malice, it is usually appropriate for the school to manage the incident directly. In contrast any incidents with aggravating factors, for example, a young person sharing someone else's imagery without consent and with malicious intent, should generally be referred to police and/or children's social care. If you have any doubts about whether to involve other agencies, you should make a referral to the police.*

### **Assessing the risks**

There should be subsequent interviews with the young people involved (if appropriate) The circumstances of incidents can vary widely. **If at the initial review stage a decision has been made not to refer to police and/or children's social care, the DSL should conduct a further review** (including an interview with the young people involved) to establish the facts and assess the risks.

When assessing the risks the following should be considered:

- Why was the imagery shared? Was the young person coerced or put under pressure to produce the imagery?
- Who has shared the imagery? Where has the imagery been shared? Was it shared and received with the knowledge of the pupil in the imagery? Are there any adults involved in the sharing of imagery?
- What is the impact on the pupils involved? Do the pupils involved have additional vulnerabilities? Does the young person understand consent? Has the young person taken part in this kind of activity before?

DSLs should always use their professional judgement in conjunction with their colleagues to assess incidents.

Parents should be informed at an early stage and involved in the process unless there is good reason to believe that involving parents would put the young person at risk of harm At any point in the process if there is a concern a young person has been harmed or is at risk of harm a referral should be made to children's social care and/or the police immediately.

### **For further information**

The full 2020 guidance from the UK Council for Internet Safety (UKCIS), Sharing nudes and semi-nudes: advice for education settings working with children and young people:

<https://www.gov.uk/government/publications/sharing-nudes-and-semi-nudes-advice-for-education-settings-working-with-children-and-young-people>

### **Private Fostering**

When a member of staff or volunteer at a school or college becomes aware that a pupil may be in a private fostering arrangement, where a child under the age of 16 (or 18 if with a disability) goes to live with someone **for 28 days or more** by private arrangement (without the involvement of a local authority), they should raise this in the first instance with the designated senior person for child protection. The school or college should notify the local authority of the circumstances, and the local authority will check that the arrangement is suitable and safe for the child.

A person who is barred from regulated activity will themselves be committing an offence under the Children Act 1989 and under the Safeguarding Vulnerable Groups Act 2006 if they privately foster a child. If the school or college has any reason to believe that the third party is failing to undertake a statutory duty they should notify the police.

Schools and colleges arranging for their children to stay with families overseas should be aware that the DBS cannot access criminal records held overseas. Host families in other

countries, therefore, cannot be checked in the same way by local authorities as schools and colleges in this country when children stay abroad. Schools and colleges should work with partner schools abroad to ensure that similar assurances are undertaken prior to a visit. If they wish, local authorities and schools can contact the relevant foreign embassy or High Commission of the country in question and find out if similar checks can be done in that country.

### **Domestic Abuse**

The Domestic Abuse Act 2021 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 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”

Domestic abuse can encompass a wide range of behaviours and may be a single incident or a pattern of incidents. Domestic abuse can be, but is not limited to, psychological, physical, sexual, financial or emotional.

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. Exposure to domestic abuse and/or violence can have a serious, long lasting emotional and psychological impact on children. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result.

Young people can also experience domestic abuse within their own intimate relationships. This form of Child on Child abuse is sometimes referred to as ‘teenage relationship abuse’. Depending on the age of the young people, this may not be recognised in law under the statutory definition of ‘domestic abuse’ (if one or both parties are under 16). However, as with any child under 18, where there are concerns about safety or welfare, child safeguarding procedures should be followed and both young victims and young perpetrators should be offered support.

Domestic abuse can have a detrimental and long-term impact on a child’s health, well-being, development, and ability to learn

Additional advice on identifying children who are affected by domestic abuse and how they can be helped is available at: <https://www.nspcc.org.uk/what-is-child-abuse/types-of-abuse/domestic-abuse/>

Also, the National Domestic Abuse Helpline Refuge runs the National Domestic Abuse Helpline, which can be called free of charge and in confidence, 24 hours a day on 0808 2000 247. Its website provides guidance and support for potential victims, as well as those who are worried about friends and loved ones.

**Operation Encompass** operates in all police forces across England. The system ensures that when police are called to an incident of domestic abuse, where there are children in the household who have experienced the domestic incident, the police will inform the key adult (usually the designated safeguarding lead) in school before the child or children arrive at school the following day. This ensures that the school has up to date relevant information about the child’s circumstances and can enable immediate support to be put in place, according to the child’s needs. Immanuel routinely receives these reports as a result of Operation Encompass and takes appropriate supportive action.

Operation Encompass also provides an advice and helpline service for all staff members from educational settings who may be concerned about children who have experienced domestic abuse. The helpline is available 8AM to 1PM, Monday to Friday on 0204 513 9990 (charged at local rate)

### **Appendix 7c Background information for other Specific Safeguarding Issues**

- bullying including cyberbullying
- See <https://www.gov.uk/government/publications/preventing-and-tackling-bullying>
- children missing education (CME)
- See [https://www.gov.uk/government/publications/children / -missing-education](https://www.gov.uk/government/publications/children/-missing-education)
- child missing from home or care
- See <https://www.gov.uk/government/publications/children-who-run-away-or-go-missing-from-home-or-care>
- domestic abuse
- See <https://www.gov.uk/guidance/domestic-violence-and-abuse>
- See <https://www.nspcc.org.uk/what-is-child-abuse/types-of-abuse/domestic-abuse/>
- drugs
- See <https://www.gov.uk/government/publications/drugs-advice-for-schools>
- fabricated or induced illness
- See <https://www.nhs.uk/mental-health/conditions/fabricated-or-induced-illness/overview/>
- faith abuse
- See <https://www.gov.uk/government/publications/national-action-plan-to-tackle-child-abuse-linked-to-faith-or-belief>
- gangs and youth violence
- See <https://www.gov.uk/government/publications/advice-to-schools-and-colleges-on-gangs-and-youth-violence>
- gender-based violence/violence against women and girls (VAWG)
- See <https://www.gov.uk/government/policies/violence-against-women-and-girls>
- hate
- See <http://educateagainsthate.com/>
- mental health
- See: <https://www.gov.uk/government/publications/mental-health-and-behaviour-in-schools--2>
- missing children and adults
- See: <https://www.gov.uk/government/publications/missing-children-and-adults-strategy>
- relationship abuse
- See: [Teenage Relationship Abuse | The Children's Society \(childrensociety.org.uk\)](https://www.childrensociety.org.uk/teenage-relationship-abuse)
- Sexual violence and sexual harassment
- See: <https://www.gov.uk/government/publications/sexual-violence-and-sexual-harassment-between-children-in-schools-and-colleges>
- trafficking
- See: <https://www.gov.uk/government/publications/safeguarding-children-who-may-have-been-trafficked-practice-guidance>

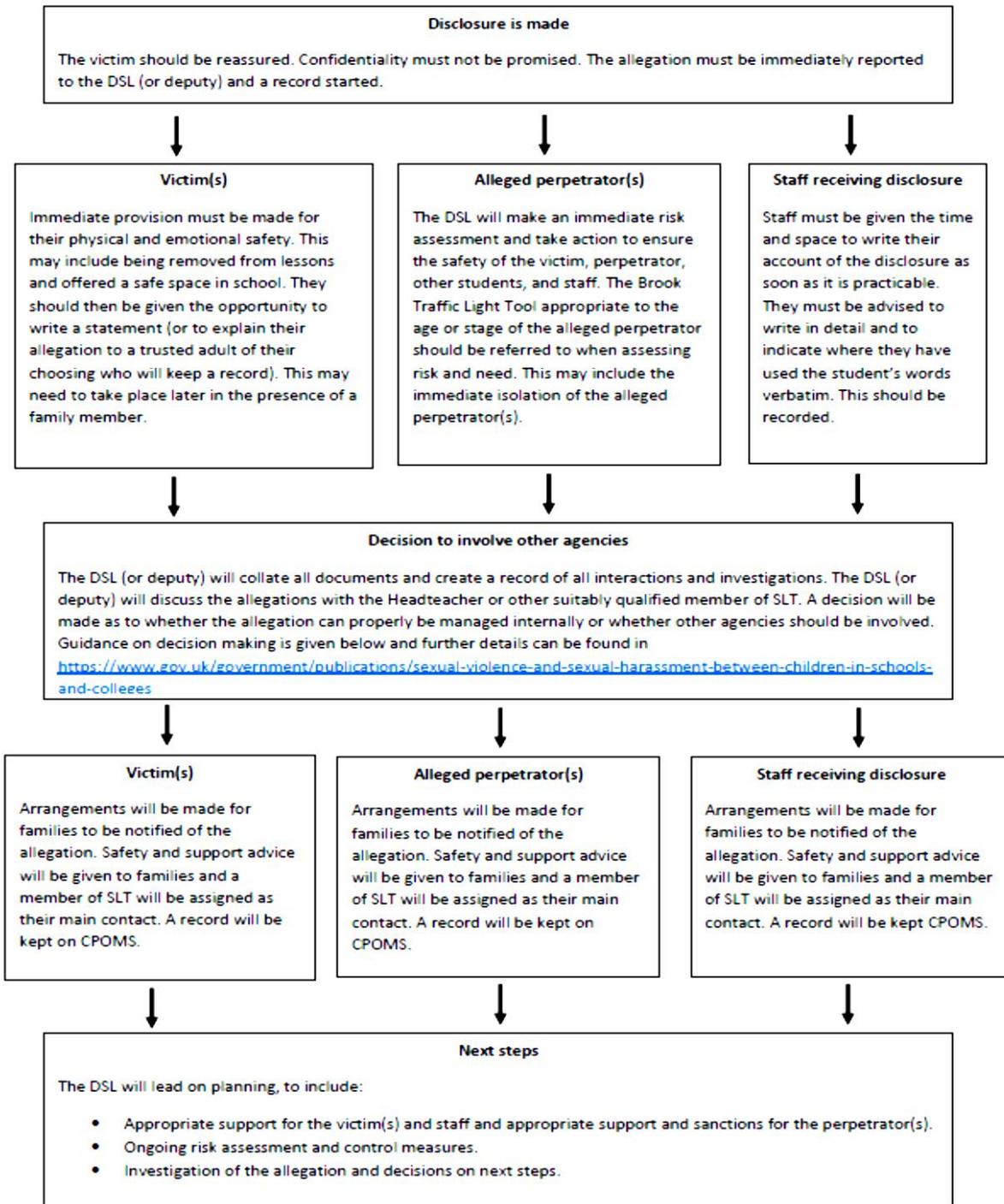
## **Appendix 7d Forms**

All referral forms can be found in

Imm Teacher/Documents/General/Teacher/Safeguarding/

## Appendix 7e Flow Chart for Initial Action in Child on Child Cases

School initial action flow chart



See also Bradford's HSB protocol (April 2021) in [Safer Bradford - Search results](#)

### Notes

**1. Team Teach:** Team Teach is the holistic approach we use to support people who may exhibit more challenging behaviours. The approach is based on a risk reduction approach involving de-escalation strategies, diversion and a last resort physical intervention.

Government/Ofsted advice on PI - <https://www.gov.uk/government/publications/positive-environments-where-children-can-flourish>

**2. CPOMS: Child Protection Online Monitoring Services:** Software from Meritec which holds ISO27001 Accreditation; is Cyber Essentials Accredited; is held in escrow with the National Computer Centre (NCC). Each school has its own database - it is not a shared database with other schools; all of the information within the system is encrypted and needs a school's keys to decrypt it. It has role-based access, and allows each school to securely control who has access to what information and when. Access is tiered to reflect the need of the setting and the relevant people have full control over system permissions.

**3. Channel:** Channel is a voluntary, confidential support programme which focuses on providing support at an early stage to people who are identified as being vulnerable to being drawn into terrorism. Prevent referrals may be passed to a multi-agency Channel panel, which will discuss the individual referred to determine whether they are vulnerable to being drawn into terrorism and consider the appropriate support required. A representative from the school or college may be asked to attend the Channel panel to help with this assessment. An individual's engagement with the programme is entirely voluntary at all stages. The designated safeguarding lead should consider if it would be appropriate to share any information with the new school or college in advance of a child leaving. For example, information that would allow the new school or college to continue supporting victims of abuse or those who are currently receiving support through the 'Channel' programme, and have that support in place for when the child arrives. Statutory guidance on Channel is available at: [Channel guidance](#).

#### **4. Human Rights Act**

The Human Rights Act 1998 (HRA) sets out the fundamental rights and freedoms that everyone in the UK is entitled to and contains the Articles and protocols of the European Convention on Human Rights (ECHR) (the Convention) that are deemed to apply in the UK. It compels public organisations to respect and protect an individual's human rights when they make individual decisions about them. Under the HRA, it is unlawful for schools and colleges to act in a way that is incompatible with the Convention. The specific convention rights applying to schools and colleges are:

- Article 3: the right to freedom from inhuman and degrading treatment (an absolute right)
- Article 8: the right to respect for private and family life (a qualified right) includes a duty to protect individuals' physical and psychological integrity
- Article 14: requires that all of the rights and freedoms set out in the Act must be protected and applied without discrimination, and
- Protocol 1, Article 2: protects the right to education.

Being subjected to harassment, violence and or abuse, including that of a sexual nature, may breach any or all of these rights, depending on the nature of the conduct and the circumstances. Further information (including on absolute and qualified rights) can be found at [Human Rights | Equality and Human Rights Commission \(equalityhumanrights.com\)](https://www.equalityhumanrights.com)

#### **5. Equality Act 2010**

Schools and colleges have obligations under the Equality Act 2010 (the Equality Act). According to the Equality Act, schools and colleges must not unlawfully discriminate against pupils because of their sex, race, disability, religion or belief, gender reassignment, pregnancy and maternity, or sexual orientation (protected characteristics). Whilst all of the above protections are important, in the context of safeguarding, this guidance, and the legal duties placed on schools and colleges in relation to safeguarding and promoting the welfare of children, governing bodies and proprietors should carefully consider how they are supporting their pupils and students with regard to particular protected characteristics - including disability, sex, sexual orientation, gender reassignment and race. Provisions within the Equality Act allow schools and colleges to take positive action, where it can be shown that it is proportionate, to deal with particular disadvantages affecting pupils or students with

a particular protected characteristic in order to meet their specific need, this includes a duty to make reasonable adjustments for disabled children and young people, including those with long term conditions. A school or college, could, for example, consider taking positive action to support girls if there was evidence they were being disproportionately subjected to sexual violence or sexual harassment.

Guidance to help schools understand how the Equality Act affects them and how to fulfil their duties under the act can be found at [Equality Act 2010: advice for schools - GOV.UK \(www.gov.uk\)](http://www.gov.uk), it may also be useful for colleges. For further information [Equality Act guidance | Equality and Human Rights Commission \(equalityhumanrights.com\)](http://equalityhumanrights.com)

## **6. Public Sector Equality Duty**

The Public Sector Equality Duty (PSED) is found in the Equality Act. Compliance with the PSED is a legal requirement for state-funded schools and colleges, advice on this – including on specific duties, is set out in the advice linked in Note 5 above. The PSED places a general duty on schools and colleges to have, in the exercise of their functions, due regard to the need to eliminate unlawful discrimination, harassment and victimisation (and any other conduct prohibited under the Equality Act), to advance equality of opportunity and foster good relations between those who share a relevant protected characteristic and those who do not. The duty applies to all protected characteristics and means that whenever significant decisions are being made or policies developed, specific consideration must be given to the equality implications of these such as, for example, the need to eliminate unlawful behaviours that relate to them such as sexual violence and sexual harassment, misogyny/misandry and racism. This is one reason why good record-keeping and monitoring of all forms of abuse and harassment is essential. The PSED helps schools and colleges (which are subject to it) to focus on key issues of concern and how to improve pupil and student outcomes. Some pupils or students may be more at risk of harm from specific issues such as sexual violence, homophobic, biphobic or transphobic bullying or racial discrimination. Such concerns will differ between education settings, but it is important schools and colleges are conscious of disproportionate vulnerabilities and integrate this into their safeguarding policies and procedures. For further information please see [Technical Guidance on the Public Sector Equality Duty: England | Equality and Human Rights Commission \(equalityhumanrights.com\)](http://equalityhumanrights.com)

<b>Document Control Table</b>			
Document Title	Safeguarding policy		
Author	Stuart Hacking, DSL		
Named Governor	John Watts		
Date Approved			
Approved by	SPC committee		
Date of Review	October 2023		
<b>Document History</b>			
Version	Date	Author	Note of Revisions
v2	3/9/18	SH	<p>Section 1 – updates/changes to safeguarding team.</p> <p>Section 2 – update legislation/guidance</p> <p>Section 4b – training regime updated</p> <p>Section 4e – updated agencies</p> <p>Section 4b – addition of para 22 from Disqualification from Childcare</p> <p>Section 4c - addition of mobile phone policy</p> <p>Section 5a – update to Safeguarding Definition</p> <p>Section 5c – Definitions of abuse updated</p> <p>Section 6a – updated SEND barriers</p> <p>Section 6c – KCSIE 2018 quotes &amp; update to Early Help information &amp; DSL action (with regards to BDAT) + GDPR info from KCSIE 2018 re sharing information with practitioners.</p> <p>Section 6d – quote from WT 2018 added</p> <p>Section 6e – removal of time limit on files</p> <p>Section 7 – all hyperlinks checked/corrected</p> <p>Section 7a – addition of ‘county lines’</p> <p>Section 7b – update of additional safeguarding risks as well as addition of Contextual Safeguarding, Peer on Peer abuse and updating of Sexting advice</p> <p>Section 7d – updated referral forms</p> <p>Notes Section – link to Govt PI advice</p>
v3	23/8/19	SH	<p>Section 1 - newly trained staff added to Safeguarding Team list</p> <p>Section 1 – directions if LADO is not available</p> <p>Section 4b – addition of reference in main body of policy to Ofsted’s ‘Positive environments where children can flourish’ (March 2018) and updating staff’s need to discuss potential unsafe relationships/associations in the light of GSWP 2019</p> <p>Section 4b – add ‘or mental health’ to incidents to which staff must call a First Aider.</p>

		<p>Section 4b.i – Addition of Section 128 checks for Governors</p> <p>Section 4b.ii – Removal of DBS 5 year renewal. Addition of report that the need of staff to discuss unsafe associations/relationships with SLT added to Annual Self Declaration Form in light of GSWP 2019</p> <p>Section 4b.iv - update re documentation given to new staff at their induction.</p> <p>Section 4b.iv - add 'Upskirting' to examples of Peer on Peer abuse (as per KCSIE 2019) as well as reference to Annex A of KCSIE 2019 and hyperlink to 'Sexual violence and sexual harassment between children in schools and colleges'</p> <p>Section 4b.iv – add 'Named Safeguarding Governor' to support</p> <p>Section 4c – Childline number added &amp; statement about role of PHSE in Immanuel strengthened to reflect KCSIE 2019 para 88</p> <p>Section 4f – add new 'Smoothwall' online monitoring to ICT Acceptable Use Policy and agreement</p> <p>Section 4g – add 'Mental Health Policy' to list of related College policies</p> <p>Section 5 – Serious Violence, CCE and Upskirting added to list of potential abuse (as per KCSIE 2019). Final quote from KCSIE 2019 added re reporting to CSC/Police</p> <p>Section 5a – add 'physical and mental health' to the work of First Aid</p> <p>Section 5a – Honour Based Violence clarified to show that FGM and Forced Marriage are examples of HBV (as per Annex A KCSIE 2019)</p> <p>Section 5a – hyperlink added to 'Guidance for safer working practice for those working with children and young people in education settings' May 2019</p> <p>Section 5c – hyperlink added to 'Sexual violence and sexual harassment between children in schools and colleges'</p> <p>Section 6 – introduction updated with quotation from KCSIE 2019</p> <p>Section 6a, 6b, 6e, 7a – addition of restriction on staff taking images/recordings of children's injuries or disclosures (as per Guidance for safer working practice for those working with children and young people in education settings' May 2019)</p> <p>Section 6c – updated action to take if DSL not available to reflect KCSIE 2019</p> <p>Section 6d - updated Education Safeguarding numbers</p>
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			<p>Section 6g – new link to LADO referral form and directions as to where to send it</p> <p>Section 6g – add more NSPCC contact info</p> <p>Section 7a – Serious Violence added to list of signs of abuse (as per KCSIE 2019)</p> <p>Section 7a – hyperlink added to CCE information</p> <p>Section 7b – add ‘Upskirting’ to examples of Peer on Peer Abuse (as per KCSIE 2019)</p> <p>Section 7b – CME local officer’s (Education Safeguarding Team) phone number added</p> <p>Section 7b – local Prevent Education officer number added</p> <p>Section 7b – hyperlink added to government publication: ‘Sexual violence and sexual harassment between children in schools and colleges’</p> <p>Section 7b – updated and expanded section on Child on Child Sexual Violence and Harassment using information from Annex A of KCSIE 2019.</p>
V4	13/8/20	SH	<p>Introduction to include definition of Safeguarding (KCSIE 2020 Part 1 para 4). This emphasizes mental health needs as well as physical</p> <p>Section 2 intro – updated Ofsted guidance – KCSIE 2020 paras 96</p> <p>Sections 2 intro; 4b; 4d; 4ii and 6g altered to reflect the ceasing of the BSCB and the replacement by the local tri-partnership: The Working Together to Safeguard Children – Bradford Partnership (as KCSIE 2020 paras 74-78)</p> <p>Section 4b – paragraph regarding mental health inserted from KCSIE 2020 Part 1 para 34</p> <p>Section 4b – updated bullet point re CE (from KCSIE 2020 Annex A)</p> <p>Section 4b – updated to reflect KCSIE 2020 para 211 regarding transferable risk</p> <p>Section 4b and 6g – addition of hyperlink to NSPCC ‘When to call the Police’ (as KCSIE 2020 para 70)</p> <p>Section 4f – link to College’s E-safety policy upgraded to explain that KCSIE 2020 Annex C information is to be found in it.</p> <p>Section 4f – add paragraph about remote online education at home – KCSIE 2020 Annex C</p> <p>Section 4i.iii – updated bullet point regarding DSL holding info on children’s social worker from KCSIE 2020 para 110-111 and whole section updated to include KCSIE 2020 Annex B</p>

			<p>Section 5 intro and 5a – updating definition of safeguarding to include mental health as in KCSIE 2020 Part 1 para 4</p> <p>Section 5a – updated contextual safeguarding paragraph from KCSIE 2020 Part 1 para 21 added</p> <p>Section 6c – updated GDPR information box from KCSIE 2020 paras 84 and 85</p> <p>Section 6g – added wording to make clear the section includes supply staff (as KCSIE 2020 Part 1 para 56)</p> <p>Section 6g – added fourth bullet point re transferable risk as KCSIE 2020 para 211</p> <p>Section 6g – added paragraph relating directly to allegations against supply staff from KCSIE 2020 para 214-217</p> <p>Section 7a – updated to included KCSIE 2020 Part 1 para 28 definition of CSE/CCE and more examples of CCE and signs that is happening from KCSIE 2020 Annex A</p> <p>Section 7b Contextual Safeguarding – updated paragraph from KCSIE 2020 Part 1 para 21</p> <p>Section 7b – hyperlink added to guidance to statutory Relationships and Sex Education as highlighted in KCSIE 2020 para 94</p> <p>Section 7b – Mental Health added to Extra Specific Safeguarding issues using KCSIE 2020 Part 1 paras 34-38 and paras 113-116</p> <p>Section 7b – new paragraph on Domestic Abuse – using KCSIE 2020 Annex A</p> <p>Section 7b – use of word ‘abuse’ in information on HBV to indicate that it includes non-violent forms of abuse – KCSIE 2020 Annex A</p> <p>Section 7b – update to terrorism definition (KCSIE 2020 Annex A)</p> <p>Section 7b – updated and additional information re Upskirting as KCSIE 2020 Annex A</p> <p>Notes 3 – definition of ‘Channel’ as per KCSIE 2020 Annex A</p>
V5	20/5/21	SH	<p>Section 1 – updated Safeguarding Team.</p> <p>Section 4b.iv - added PREVENT</p> <p>Section 4b.iv – added sexual harassment, sexual violence and harmful sexual behaviour and new hyperlink to government guidance</p> <p>Section 5a – added sexual harassment, sexual violence and harmful sexual behaviour to Peer on Peer definition.</p> <p>Section 7b Peer on Peer Abuse – added new paragraph summarizing new DfE guidance on sexual violence, sexual harassment and harmful sexual behaviour.</p>

			<p>Section 7b Peer on Peer Abuse – added contact details for the NSPCC helpline, ‘Report Abuse in Education’</p> <p>Section 7b Peer on Peer Abuse – added reference to Flow Chart to be used.</p> <p>Section 7b Peer on Peer Abuse added hyperlink to government publication on</p> <p>Section 7b Sexting – added new hyperlink to government guidance on sexual harassment, sexual violence and harmful sexual behaviour</p> <p>Appendix 7e – Flow Chart to be used in cases of Peer on Peer abuse</p>
V6	19/8/21	SH	<p>Section 1 – Safeguarding Team updated</p> <p>Section 2 – updated to reflect changes in KCSIE 2021 Summary eg the addition of SLT and ‘Sexual Violence/Harassment between children and schools’ in response to KCSIE 2021</p> <p>Section 2 – additional paragraph regarding groups that hire Immanuel’s building – in line with KCSIE 2021 paragraphs 155-156.</p> <p>Section 4a – added the checking of birth certificates in identity checks to potential employees (in line with KCSIE 2021 para 213)</p> <p>Section 4b i – clarification of DBS checks etc for those who have worked outside of the UK (in line with KCSIE 2021 para 262)</p> <p>Section 4b iv – change of ‘sexting’ to ‘sharing of nude or semi-nude images’ in response to KCSIE 2021</p> <p>Section 4b iv – addition of paragraph in response to KCSIE 2021 on how staff should make victims feel they are taken seriously and are not creating a problem by reporting</p> <p>Section 4b iv – including online safety as part of annual training and induction of new staff (KCSIE 2021)</p> <p>Section 4b iv – updating of Peer on Peer abuse in line with KCSIE 2021</p> <p>Section 4f – Online Safety extra paragraph added to reflect KCSIE 2021</p> <p>Section 4i i – new paragraph regarding governors’ responsibility to ensure whole school approach to safeguarding (in line with KCSIE 2021)</p> <p>Section 4i I – addition of governors ensuring that Peer on Peer abuse appears in the Safeguarding Policy (KCSIE 2021 para 145)</p> <p>Section 4i ii – updated paragraph regarding child’s wishes taken into account (KCSIE 2021)</p> <p>Section 4i iii – updated paragraph on DSL ensuring that child’s wishes are heard (as KCSIE 2021)</p>

		<p>Section 4i. iii – DSL referring to CSC updated to include consideration of contextual safeguarding in line with KCSIE 2021</p> <p>Section 4i iii – record keeping by DSL guidance updated in line with KCSIE 2021</p> <p>Section 4i iii – additional quote from KCSIE 2021 regarding looked after children’s vulnerability</p> <p>Section 4i iii – updated information on transferring of CP file as per KCSIE 2021</p> <p>Section 5a – Contextual Safeguarding – updated according to KCSIE 2021</p> <p>Section 6c – referrals to CSC updated in line with KCSIE 2021</p> <p>Section 6c – KCSIE 2021 para 105 added with regard to importance of information sharing</p> <p>Section 6e – updated section on CP info sharing for students on EHE (KCSIE 2021)</p> <p>Section 6g – New paragraph added on teacher dismissal and consideration whether to refer to the Secretary of State (KCSIE 2021 para 143)</p> <p>Section 7a – Child Exploitation – introduction updated in response to KCSE 2021</p> <p>Section 7a – CSE - overview updated in response to KCSIE 2021</p> <p>Section 7a – CCE – overview updated in response to KCSIE 2021</p> <p>Section 7b Peer on Peer Abuse – addition of paragraph on how staff should make victims feel they are taken seriously and are not creating a problem by reporting in response to KCSIE 2021</p> <p>Section 7b Peer on Peer Abuse – change of ‘Sexting’ to ‘sharing of nude or semi-nude images’ as well as clarification of consensual and non-consensual sharing in response to KCSIE 2021</p> <p>Section 7b Peer on Peer abuse and Child on Child Sexual Violence and Harassment substantially revised and augmented according to KCSIE 2021 Part 5</p> <p>Section 7b – section previously entitled, ‘Sexting’ changed to Sharing of nude or semi-nude images’ and the introduction updated in response to KCSIE 2021</p> <p>Section 7b – Serious Violence updated in line with KCSIE 2021</p> <p>Section 7b – Domestic Abuse – updated in line of new legislation and KCSIE 2021</p> <p>Section 7b – Contextual Safeguarding definition updated according to KCSIE 2021</p> <p>Section 7e – added link to Bradford’s Harmful Sexual Behaviours Protocol</p>
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			Footnote 3 – revised to bring in line with new information on Channel in KCSIE 2021
V7	15/8/22		<p>Section 1 – Safeguarding Team updated &amp; new link to LADO referral form and advice on Safer Bradford website about managing allegations</p> <p>Section 2 – updated to KCSIE 2022 – includes contractors in list of those whom the policy applies to</p> <p>Section 4a – updated to KCSIE 2022 para 214 and para 220 re CVs and online checks</p> <p>Section 4b iv – updated in line with KCSIE 2022 para 19 In particular re barriers to children reporting abuse to adults.</p> <p>Section 4d – added paragraph re online safety as in KCSIE 2022 para 139</p> <p>Section 4f - updated online safety regarding online challenges and hoaxes in line with KCSIE 2022 para 132</p> <p>Section 4i i – updated Governors responsibilities with paragraph on induction training etc from KCSIE 2022 para 81 and their responsibilities in light of Human Rights Act; Equality Act (including Public Sector Equality Duty) and the local multi-agency safeguarding arrangements. Also updated Governors’ responsibilities to ensure that school has an effective online filtering and monitoring system as outlined in KCSIE 2022 para 140</p> <p>Added ‘contractors’ to list of those working in Immanuel</p> <p>Section 4i iii – added that DSL must inform Head of need for Appropriate Adult – link to government guidance. KCSIE 2022 Annex C</p> <p>Section 4i iii note about sharing of records as per KCSIE 2022 Annex C under managing the child protection file</p> <p>Section 4i iv – added ‘contractors’ to list of people working in Immanuel</p> <p>Section 5a – updated safeguarding section according to KCSIE 2022 para 23</p> <p>Section 5c – update to definition of abuse (KCSIE 2022 para 26)</p> <p>Section 5 – footnote – updated to reflect KCSIE 2022 para 19</p> <p>Section 6g title updated to include contractors in line with KCSIE 2022 as well as 6g i and 6g ii</p> <p>Section 6g ii – paragraph about low level concerns updated in line with KCSIE 2022 para 432-434</p> <p>Section 7a – updated link to County Lines Toolkit under CCE as KCSIE 2022</p>

			<p>Section 7a – new link for support in responding to sexual abuse involving children – KCSIE 2022</p> <p>New link to serious violence toolkit – KCSIE 2022</p> <p>Section 7b – section on Domestic Abuse updated in line with KCSIE 2022 para 43</p> <p>Section 7b - Child on Child abuse updated [in text box] regarding children who may be LGBT - in line with KCSIE 2022 para 202-204</p> <p>Section 7b - Addition of information on intra familial harms under extra information on Child on Child Sexual Violence/Harassment (as per KCSIE 2022 para 482) and the need for schools to work with statutory safeguarding partners (KCSIE 2022 para 492)</p> <p>Section 7b - Additional link under Forced Marriage section – as in KCSIE 2022</p> <p>Section 7b - Under Domestic Abuse – new contact details for Operation Compass – KCSIE 2022</p>
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