



St Ursula's Convent School
A Humanities College and Teaching School

Safeguarding/Child Protection Policy

Date of Review:	January 2022
Date agreed by Governors:	Approved January 2022
Name of Designated Safeguarding Lead for Child Protection:	K Adams
Name(s) of Deputy Designated Safeguarding Leads for Child Protection:	A Innocent, D Nwadison, M Kerr, L Ormerod, T Higgins, E Cahir, N Mandalos, A Cushnahan, B Fisher, C Altman, L Mariategui
Name of Designated Teacher for Looked-after Children:	M Kerr
Name of person in charge of E-Safety: <i>(Note; KCSIE 2021 requires DSL to have oversight)</i>	C Collins
Name of Governor for Safeguarding/Child Protection:	M Filbee
Date policy was shared with all staff:	September 2021
Date of next review of the policy:	September 2022

Policy statement

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

We endeavour to provide a safe and welcoming environment where children and adults feel respected and valued.

We maintain an attitude of **'it could happen here'** where safeguarding is concerned and promote a culture of openness where children and adults are able to talk and are listened to.

This policy will provide staff, volunteers and governors with the framework they need in order to keep children safe and secure in our school. It will be used to inform parents and carers of how we will safeguard their children whilst they are in our care.

The policy provides information regarding different types of abuse, links to statutory and non-statutory documentation and outlines our procedures which ensure our children receive effective support, protection and justice.

Definition of safeguarding ¹

- 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

Introduction

The procedures contained in this policy apply to all staff and governors and are consistent with those of the Greenwich Safeguarding Children's Partnership (GSCP) and locally agreed procedures.

St Ursula's Convent School takes seriously its responsibility to protect and safeguard the children in its care and has updated this policy to meet the requirements within updated statutory guidance documents. These documents outline the responsibilities of schools, colleges, independent schools, academies and free schools (by virtual of their funding agreement) in carrying out their duties to safeguard and promote the welfare of children by ensuring that "mechanisms are in place to assist staff to understand and discharge their role and responsibilities".

¹ Keeping Children safe in Education (KCSIE) Part 1 – Statutory guidance for schools and colleges September 2021

The school will support all pupils in their understanding of their safety including staying safe when using new technology (in accordance with the DfE guidance published in June 2019 'Teaching online safety in schools' and any additional relevant guidance.²

Pupils will be supported in their understanding of personal safety through the broad curricular offer and the statutory teaching of Relationships and Sex and Health Education.

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² Additional advice to support schools can be found in [safeguarding-in-schools-colleges-and-other-providers](#) and [safeguarding-and remote-education](#) April 2020. Also, in KCSIE 2021 annex D - Online safety

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1 Aims and principles

1.1 St Ursula's Convent School fully recognises its responsibilities for safeguarding children including those in need of protection.

1.2 Aims

- To provide staff, volunteers and governors with the framework to promote and safeguard the wellbeing of children and in doing so ensure they meet their statutory responsibilities.
- To ensure consistent good practice across the school.
- To demonstrate our commitment to protecting children.

1.3 Principles and values

- Children have a right to feel secure and cannot learn effectively unless they do.
- All children have a right to be protected from harm.
- All staff, volunteers and governors have a key role in prevention of harm and an equal responsibility to act on any suspicion or disclosure that may indicate a child is at risk of harm, either in the school or in the community, taking into account contextual safeguarding, in accordance with the guidance.
- We acknowledge that working in partnership with other agencies protects children and reduces risk and so we will engage in partnership working throughout the child protection process to safeguard children.
- Whilst the school will work openly with parents and carers as far as possible, it reserves the right to contact Children's Social Care or the police, without notifying parents if this is believed to be in the child's best interests.

1.4 The school will

- Ensure safer recruitment procedures are robust and in line with national legislation and a strict staff code of conduct is promoted.
- Ensure a suitably trained workforce who are confident to implement the outlined procedures for identifying and reporting cases (or suspected cases), of abuse and responding to reports of sexual violence and harassment between children.

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

- Raise awareness of child protection issues and equip children with the skills needed to keep themselves safe and support their mental well-being;
- Establish and maintain an environment where children feel secure, are encouraged

to talk, and are listened to;

- Ensure children know that there are adults in the school whom they can approach if they are worried;
- Promote opportunities across the curriculum for children to develop the skills they need to recognise and stay safe from abuse.

2 Statutory Framework

2.1 In order to safeguard and promote the welfare of children, the school will act in accordance with Keeping Children Safe in Education (September 2021) and other legislation, guidance³ and advice detailed in Appendix 2

2.2 More specifically, we will:

- Ensure we have a Designated Safeguarding Lead (DSL) for child protection, and deputy safeguarding leads (DDSLs) for child protection, who have received appropriate training and support for their roles;
- Ensure we have a nominated governor responsible for child protection;
- Ensure every member of staff (including temporary and supply staff and volunteers) and governing body knows the name and role of the DSL;
- Have a comprehensive induction policy in place specifically outlining the school Safeguarding/CP policy; the staff code of conduct; acceptable use (ICT including mobile phones and cameras); school behaviour policy; the safeguarding response to children who go missing from education and identity and role of the DSL;
- Ensure all staff and volunteers understand their responsibilities in being alert to the signs of abuse and responsibility for referring any concerns to the DSL and have signed that they have read Keeping Children Safe in Education (September 2021) Part 1;
- Ensure that parents have an understanding of the responsibility placed on the school and staff for child protection by setting out its obligations in the school prospectus or website;
- Notify Social Care immediately (on the first day of absence) if there is an unexplained absence of a child on a **Child Protection Plan**;
- Contact the child's social worker directly if there is an unexplained absence of a child who is **Looked After**. This may then trigger actions identified in the "Joint Police and Social Care Protocol for Dealing with Children Missing from Care";
- Develop effective links with relevant agencies and co-operate as required with their enquiries regarding child protection matters including attendance at case conferences;
- Keep detailed, accurate, secure records of concerns about children, even where there is no need to refer the matter immediately.
- Have procedures in place to re-assess concerns when a child's situation fails to improve;

³ Including any safeguarding guidance issued by Public Health England or Department for Education in response to required changes to the normal functioning or provision of education in the school.

- Ensure all safeguarding and child protection records are kept securely, separate from the main pupil file, and in locked locations (This could be electronic secure storage);
- Follow the procedures set out in section 14 of this document, if an allegation is made against an employed member of staff, supply staff or volunteer;
- Ensure safe recruitment practices are always followed.
- Ensure clear protocols are in place for the appropriate supervision of visitors (including visiting speakers/educators) and that the school's values and British Values are upheld.
- Have easily understood and accessible procedures in place to gather and respond to the views and/or concerns of pupils
- Seek to hold more than one emergency contact number for each pupil
- Ensure all staff have an awareness of the local contextual safeguarding priorities. For the pupils attending this school they are: domestic abuse, county lines, Extremism/Prevent, gang crime, alcohol abuse, substance misuse, grooming, sexual exploitation etc.

3 Safeguarding Training

- 3.1 All staff members will receive appropriate safeguarding and child protection training which is regularly updated. In addition, all staff members will receive safeguarding and child protection updates (for example, via email, e-bulletins and staff meetings), as required, but at least annually, to provide them with relevant skills and knowledge to safeguard children effectively.
- 3.2 The designated safeguarding lead (and any deputies) will undergo training to provide them with the knowledge and skills required to carry out the role. This training will be updated at least every two years. The designated safeguarding lead will undertake Prevent awareness training. In addition to the formal training, their knowledge and skills will 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, but at least annually, to allow them to understand and keep up with any developments relevant to their role.
- 3.4 Any newly appointed DSL will attend the DSL one-day training provided by the Royal Borough of Greenwich Direct Services to Schools or another accredited training provider, followed by the GSCP Working Together course before taking lead responsibility for safeguarding. The deputy DSL will take a leading role on safeguarding for the short time that the DSL is waiting to receive training.
- 3.5 The designated Governor for Safeguarding and Child Protection will undertake governor safeguarding training annually.
- 3.6 The DSL will retain a training record indicating the attendance at safeguarding training

so that absent staff can receive an update on their return. Additionally, the DSL will retain a record showing staff have read Keeping Children Safe in Education (September 2021) Part 1.

- 3.7 All new members of staff will receive child protection training as part of their induction programme.
- 3.8 Briefings and updates on child protection and safeguarding procedures will be provided on a regular basis, at least annually, but more frequently, when necessary, to ensure that all members of staff are familiar with any changes to the school policy or in the national guidance materials as they occur.
- 3.9 At least one member of every appointment panel will have gained accreditation through Safer Recruitment training (statutory requirement). The school will ensure that there are always sufficient numbers of suitably trained staff and governors in post. (The Royal Borough of Greenwich recommends this is updated every 5 years.)
- 3.10 Record of training (summary):

	Staff/governor name/role	Date training completed
Designated Safeguarding lead training	K Adams / DHT E Cahir / AAHT A Cushnahan AAHT K Faherty / HT B Fisher / AAHT M Kerr / AHT N Mandalos / AAHT L Omerod / DDSL T Higgings/ DDSL C Altman / DDSL A Innocent / DDSL D Nwandison / DDSL L Mariategui / R and R	Sept 2021 Aug 2020 Aug 2020 Aug 2021 Sept 2021 Oct 2019 Sept 2020
Prevent awareness	All staff	Sept 21
Governor Safeguarding training	M Filbee / Chair of Governors B Farrelly / Vice Chair B Fisher / Staff Governor	Sept 21 Sept 21 Sept 21

Safer Recruitment	Matthew Filbee (Chair of Governors) Erin Cahir / AAHT Aine Cushnahan / AAHT Kathleen Faherty / HT Ben Fisher / AAHT Sarah Irvine / HoD Diane Williams / SBM	Jan 2022 Jun 2021 Jun 2021 Aug 2021 Mar 2021 Sept 2021 Aug 2021
Annual safeguarding/CP training for all staff to include information on:		
Honour Based Abuse (FGM, forced marriage etc)	Whole school	Sept 21
Peer on peer abuse	Whole school	Sept 21 and Oct 21
Child Sexual Exploitation (CSE)	Whole school	Sept 21, Oct 21
Child criminal exploitation and County lines	Whole school	Sept 21
Prevent and extremism	Whole school	Sept 21
E-Safety training	Whole school	Sept 21
First Aid	D Beaumont / MDS N Buckmaster / Finance K Bull / Snr MDS T Higgins / Wellbeing L McHale / Tech R O'Donnell / UQT S Taylor / Exams C Cahalane / Teacher A McDonald / Teacher	Sept 2018 Sept 2018 Sept 2018 Sept 2018 Sept 2018 Jun 2019 Sept 2018 Jul 2019 Jul 2019

A Elderfield / T teacher	Sept 2020
J Stone / MDS	Sept 2020
L Mariategui Pastor / Wellbeing	Sept 2020
A Moran / MDS	Sept 2020
L Painvin / Teacher	Sept 2020
N Smith / TA	Sept 2020
J Xavier / Teacher	Sept 2020
I Andres / Teacher	Sept 2020
R Radley / Admin	Jun 2021
L Villagomez / TA	Sept 2018
C Altman / Wellbeing	Dec 2018
E Cahir / AAHT	Jun 2019
C Franklin / Teacher	Jul 2019
L Ormerod / Safeguarding	Jul 2019
A Edwards / Teacher	Jul 2019
A Turpie / Teacher	Jul 2019
B Fisher / AAHT	Jul 2019
C Ferreira / SENco	Jul 2019
C Devine / Teacher	Jul 2019
S Irvine / HoD	Jul 2019
M Murray / Admin	Jul 2019
H Deegan / Librarian	Jul 2019
A Watkins / Teacher	Jul 2019
A Cushnahan / AAHT	Jul 2019
S Lui / Teacher	Jul 2019
H Woolgar / Teacher	Jul 2019
N Mandalos / AAHT	Jul 2019
Phil Linley (kitchen)	Sept 2020
Michele Smith-Wililams	Oct 2021
Carly Dowdall - Oct 2021	Oct 2021

Physical intervention (restraint)	<p>Karen Bull / SNR Midday Supervisor</p> <p>Dawn Beaumont / Midday Supervisor</p> <p>Annie Moran / Midday Supervisor</p> <p>Jo Stone / Midday Supervisor</p>	<p>Jan 2022</p> <p>Jan 2022</p> <p>Jan 2022</p> <p>Jan 2022</p>
Sexual harassment/ sexual violence	Whole school	Oct 21

4 The Head Teacher's Roles and Responsibilities re: Safeguarding

4.1 In line with the statutory guidance (2021), the Head Teacher will ensure that systems and procedures to ensure all staff understand their role in safeguarding and promoting the welfare of children. The Head Teacher will ensure:

- The policies and procedures adopted by the governing body or proprietor are fully implemented, and followed by all staff;
- The DSL is a senior member of the School Leadership Team and that he/she has a clear and concise job description explicitly referring to the role of taking **lead responsibility** for safeguarding and child protection (including online safety);
- Sufficient resources and time are allocated to enable the DSL and other staff to discharge their responsibilities, including taking part in strategy discussions and other inter-agency meetings, and contributing to the assessment of children;
- All staff and volunteers feel able to raise concerns about poor or unsafe practice with regard to children, and such concerns are addressed sensitively and effectively in a timely manner in accordance with agreed whistleblowing policies, where appropriate.
- Induction procedures are robust and meet the requirements outlined in KCSIE 2021
- A barred list check is completed and a risk assessment is in place to ensure any individual who starts before a DBS certificate is received, is appropriately supervised.
- There are arrangements in place for DSL availability to cover any out of hours or out of term time activities taking place.
- Procedures are in place to refer to DBS any person dismissed or removed due to safeguarding concerns.
- The school will take the lead role in the investigation of any allegation concerning a supply teacher in post and will keep the supply agency informed throughout.
- The school is satisfied that any alternative provider used by the school or visitors attending in a professional capacity have appropriate safeguarding procedures in place.

5 The Designated Safeguarding Lead for Child Protection's Role & Responsibilities (further detail in KCSIE Annex C)

5.1 Broad areas of responsibility proposed for the DSL for child protection.

- Recognise how to identify signs of abuse and neglect and when it is appropriate to make a referral to other agencies;
- Refer cases of suspected abuse or allegations to the relevant statutory agencies

(children's social care or the police);

- Act as a source of support, advice and expertise to staff within the educational establishment;
- Seek advice from and share information with relevant statutory agencies before seeking consent or informing parents of a referral. Where practicable, concerns should be discussed with the family and agreement sought for a referral to children's services **unless** this may, either by delay or the behavioural response it prompts, place the child at risk of significant harm. (Consideration will be given that by alerting parents or carers about a referral could potentially jeopardise a police or criminal investigation, DSLs should seek advice if this is the case.) Liaise with the head teacher or principal to inform him or her of any issues and ongoing enquiries under section 47 of the Children Act 1989 and police investigations and ensure there is always cover for this role;
- Understand the assessment process for providing early help and intervention, for example through locally agreed common and shared assessment processes, such as the Royal Greenwich Early Help Guidance;
- Have a working knowledge of how local authorities conduct a child protection case conference and a child protection review conference and be able to attend and contribute to these effectively when required to do so;
- To ensure that where a child needs a social worker, this should help inform decisions about safeguarding and the promotion of welfare and support within the school setting.
- Liaise as appropriate with staff including IT technician the SENCo and the named person with oversight for mental health.
- Ensure each member of staff has access to and understands the school's child protection policy and procedures, especially new or part-time staff who may work with different educational establishments;
- Ensure all staff have robust induction training covering child protection and are able to recognise and report any concerns about children's safety and welfare immediately they arise;
- Ensure all staff are aware of the guidance 'What to do if you're worried a Child is being Abused';
- Ensure staff are aware of contextual safeguarding and the influence of factors outside the school/college or the child's own family including vulnerability to possible abuse, exploitation and youth violence.
- Feedback and reassure staff who have raised a child protection concern;
- Keep detailed, accurate, secure written records of referrals and/or concerns;
- Maintain an up-to-date awareness of safeguarding developments and distribute these as appropriate to all staff in line with advice from the Greenwich Safeguarding

Children's Partnership (GSCP);

- Have attended Prevent Awareness training (Heather Hutchings Prevent Education Officer RBG 0208 921 8325)
- Ensure the establishment's child protection policy and procedures are updated and reviewed annually and work with the governing body, management committee or proprietor regarding this;
- Ensure parents can access copies of the child protection policy and procedures which alerts them to the fact that referrals about suspected abuse or neglect may be made and the role of the establishment in this.
- Where children leave the establishment ensure their child protection file is provided (with a receipt obtained) for any new establishment within 5 days of transfer. That it is transported separately and securely from the main pupil file.

5.2 The designated safeguarding lead will also help to promote educational outcomes of vulnerable children and those with a social worker. They will encourage staff to maintain a culture of high aspirations for this cohort and support teachers to identify any specific challenges or additional academic support required.

6 The Governing Body's Roles & Responsibilities re Safeguarding

6.1 Keeping Children Safe in Education (September 2021) outlines the responsibility of governing bodies:

Governing bodies and proprietors have a strategic leadership responsibility for their school's or college's safeguarding arrangements and must ensure that they comply with their duties under legislation. They must have regard to KCSIE 2021 guidance, ensuring policies, procedures and training in their schools or colleges are effective and comply with the law at all times.

Governors school facilitate a whole school approach to safeguarding which underpins all relevant aspects of process and policy development.

6.2 In light of this statutory guidance the Governing Body will nominate a governor who will be responsible for Safeguarding and Child Protection and will liaise with the DSL on matters relating to Safeguarding and Child Protection.

6.3 The Governing Body will ensure that:

- The school has a child protection policy and procedures in place that are in accordance with local authority guidance and locally agreed interagency procedures, and the policy is made available publicly on the website or on request;
- The school operates safe recruitment procedures (as outlined in KCSIE 2021) and makes sure that all appropriate checks are carried out on staff and volunteers who work with children;
- The school has procedures for dealing with allegations of abuse against members of staff and volunteers that comply with guidance from the local authority and locally

agreed interagency procedures;

- A senior member of the school's leadership team is designated to take lead responsibility for dealing with safeguarding and child protection (including online safety). To provide advice and support to other staff, liaising with the local authority, and working with other agencies;
- In addition to GSCP training (every two years) the Designated Safeguarding Lead will undertake training to support inter-agency working.
- There is annual training for all staff to equip them to carry out their responsibilities for child protection effectively. Also, that all temporary staff and volunteers who work with children are made aware of the school's arrangements for child protection and their responsibilities;
- There are clear systems and processes in place for identifying possible mental health concerns, including routes to escalate and clear accountability systems⁴
- An appropriate whistleblowing policy/procedure is in place and is reflected in staff training and staff behaviour policies (code of conduct) to encourage any staff member or volunteer to report concerns regarding safeguarding practice in school
- All allegations or safeguarding complaints are appropriately investigated by a senior leader from within the school and if necessary, by an independent investigator provided by RBG or externally sourced;
- The head teacher remedies without delay any deficiencies or weaknesses in regard to child protection arrangements that are brought to his/her attention;
- A member of the governing body (usually the chair) is nominated to be responsible for liaising with the Local Authority Designated Officer (LADO) in the event of allegations of abuse being made against the Headteacher (Contact details of the LADO are given in section 14.7);
- The Governing Body reviews the child protection policy and the effectiveness of safeguarding procedures (at least) annually.
- With staff welfare in mind, the Governing Body will consider the necessity and appropriateness of arranging for 'Safeguarding Supervision' for the DSL and or Deputy DSLs within the school.

7 The Role & Responsibilities of all Staff within School

7.1 All school and college staff members should read Keeping Children Safe in Education (2021) Part 1. They should be aware of the signs of abuse and neglect (Appendix 1 attached) so that they are able to identify cases of children who may be in need of help or protection.

7.2 Staff members working with children are advised to maintain an attitude of **'it could**

⁴ Further information can be found in the [mental health and behaviour in schools' guidance](#)

happen here' where safeguarding is concerned. When concerned about the welfare of a child, staff members should always act in the interests of the child.

- 7.3 Children with special educational needs or disabilities (SEND) or those with certain health conditions can face additional safeguarding challenges. Staff are aware of the additional barriers in identifying possible abuse and neglect in these children. They recognise the need to
- explore the reasons for changes in behaviour, mood and injury rather than assume it is related to the child's disability;
 - understand these children being more prone to peer group isolation or bullying (including prejudice-based bullying) than other children
 - understand that children with SEN and disabilities can be disproportionately impacted by things like bullying without outwardly showing any signs;
 - overcome the barriers and difficulties in communication with these children.

- 7.4 All staff will be aware that mental health problems can be an indicator that a child has suffered abuse, neglect or exploitation. They are well placed to observe the children and their behaviours. All staff will ensure they are aware of their responsibilities for safeguarding and child protection in being alert to the signs of abuse and of their responsibility to report and record any concerns. This means that they must:

- Recognise that a disclosure may come directly from the child, or from a third party, e.g., friend, neighbour, other family member. Alternatively, it may be through the suspicion of staff based on a variety of signs, symptoms and knowledge of possible indicators of abuse;
- Recognise that peer-on-peer abuse (all forms, including physical and sexual violence and harassment, sexting, 'up skirting'⁵, bullying and initiation/hazing) must not be downplayed and must be taken seriously and appropriately reported;
- Be aware of indicators which may signal involvement with violent crime (absences from school, change in friendship or relationships with older individuals/groups, decline in performance or unexplained injuries). Also, the increased likelihood of involvement of being male or permanently excluded from school.
- Take seriously any disclosures made to them and provide reassurance to the discloser through their responses and behaviour (without promising they will not tell anyone). Ensuring the victim or person disclosing is not given the impression they are causing a problem by reporting a concern or abuse;
- Read carefully any documentation provided by the DSL to update their safeguarding training.

- 7.5 It is recognised that a child may disclose sensitive information at any time of the day, and in particular this may occur outside of normal lesson time, e.g., break periods or

⁵ Changes to the Voyeurism (Offences) Act 2019 criminalises the act of 'up skirting'. The [Criminal Prosecution Service \(CPS\)](#) defines 'up skirting' as a colloquial term referring to the action of placing equipment such as a camera or mobile phone beneath a person's clothing to take a voyeuristic photograph without their permission.

during before/after school club sessions. It is therefore important that **all** the staff are aware of the signs and behaviour which **may** indicate abuse (see section 9 and Appendix 1).

- 7.6 All staff and volunteers have a duty to raise concerns about poor or unsafe practice and potential failures in the school's safeguarding regime. Where a staff member feels unable to raise an issue or feels that their genuine concerns are not being addressed, other whistleblowing channels are open to them:
- *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 – line is available from 8:00 AM to 8:00 PM, Monday to Friday and Email: help@nspcc.org.uk.*

8 Royal Greenwich Early Help Guidance

- 8.1 Royal Greenwich Early Help Guidance supports children and families with emerging needs and promotes a shared responsibility to facilitate significant and sustained change in children's lives, building resilience, preventing and protecting children from harm. Early help is focused on developing and breaking intergenerational cycles of poverty through working with children's parents/carers and families.

Professionals should, in particular, be alert to the potential need for early help for a child who:

- is disabled and has specific additional needs including certain medical needs
- has special educational needs
- is a young carer
- is showing signs of engaging in anti-social or criminal behaviour
- is in a family circumstance presenting challenges for the child, such as substance abuse, adult mental health, domestic violence
- is showing early signs of abuse and/or neglect.

Further information can be found from:

www.greenwichsafeguardingchildren.org.uk

Early Help consultation line 0208 921 4590 1- 4pm

Early-help-refer@royalgreenwich.gov.uk

Early Help preventions directory available on the GSCP website

9 When to be concerned

- 9.1 All staff and volunteers must be aware that the main categories of abuse are:
- Neglect
 - Physical abuse
 - Sexual abuse
 - Emotional abuse

9.2 All staff and volunteers must act in accordance with this policy if a child he/she presents with indicators of abuse (see Appendix 1 for details).

10 Dealing with a Disclosure/Reporting concerns See (Appendix 3 flowchart)

10.1 If any member of staff has a concern about a particular child in their care, they must immediately report their concerns to, and seek advice from the Designated Safeguarding Lead, or in their absence, the Deputy Designated Safeguarding Lead. Staff must provide the DSL with a signed and dated written (or electronic) record of their concerns.

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

10.3 If a child discloses that he or she has been abused in some way the member of staff should:

- Find time and, if necessary, a suitable place to listen to the child, when information about possible abuse comes to light
- Listen to what is being said without displaying shock or disbelief
- Do not make false promises which may not be able to be fulfilled and do not promise confidentiality
- Allow the child to talk freely. Do not cross examine, interview, probe or ask to see any injury that is not visible. Listen, only asking questions when necessary to clarify. Ask open questions such as "Tell me, and How did that happen"
- Do not ask leading questions but, if necessary, (KCSIE 2021 states) the member of staff **can** ask the question 'have you been harmed' and 'how'?
- Not criticise the alleged perpetrator
- Reassure the child that what has happened is not his or her fault
- Stress that it was the right thing to tell
- Explain what has to be done next and who has to be told
- Find out just enough to be sure of the need to refer
- Make records that are factual, accurate and relevant and avoid subjective judgements. It is not the school's responsibility to 'check out' what any child tells nor should any abuser be questioned.
- Sign and date the record of disclosure

- Speak with the Designated Safeguarding Lead for Child Protection, and provide him/her with the signed, dated written record, using the agreed school procedures, without delay.

- 10.3 The same approach to receiving a disclosure must be taken if the discloser is not the allegedly abused child but another child or an adult.
- 10.4 Education is a referrer, not an investigative agency for child protection matters. An incident may eventually end up as a court case and children's evidence can all too easily be compromised by leading questions or repeated recital.
- 10.5 When the DSL for Child Protection, or in his/her absence, the Deputy DSL for Child Protection, has been informed, he/she will make the decision whether or not to refer the concern to Social Care. The Multi Agency Safeguarding Hub (MASH) will be consulted when there is uncertainty about whether to refer.

**MASH Consultation Line Tel- 0208 921 2267 or contact
LADO/Greenwich Safeguarding Coordinator for Schools on 0208 921 3930.**

- 10.6 Referrals will be made as soon as possible by telephone **and the appropriate forms completed and sent at the same time.** Referrals to Children's Social Care must be made to the Multi Agency Safeguarding Hub (**MASH**) Tel 0208 921 3172 (see contact details below)

**Multi Agency Safeguarding Hub
Children's Services'
Safeguarding and Social Care, 1st Floor
The Woolwich Centre,
Wellington Street,
Woolwich, London
SE18 6HQ**

- 10.7 If the DSL has raised a safeguarding concern but does not feel that appropriate action has been taken by Children's Services, he/she should use the Greenwich Safeguarding Children's Partnership escalation policy to take this further. (This is available on the GSCP website, click on the professional's tab)
- 10.8 Additional referral guidance is provided in Appendix 3

11 Confidentiality

- 11.1 Safeguarding children raises issues of confidentiality that must be clearly understood by all staff / volunteers in school. All staff/volunteers in school have responsibility to share relevant information about the protection of children with other professionals. This sharing of information is outlined in the guidance 'Information sharing advice for practitioners providing safeguarding services to children, young people, parents and

carers' (July 2018). It identifies seven golden rules for sharing information. It reminds practitioners that the General Data Protection Regulation (GDPR), Data Protection Act 2018 (and 2020 update) and human rights law are not barriers to justified information sharing, but provide a framework to ensure that personal information about living individuals is shared appropriately.

- 11.2 If a child discloses to a member of staff/volunteer and asks that the information is kept secret, it is important that the member of staff / volunteer tells the child in a manner appropriate to the child's age / stage of development that they cannot promise complete confidentiality – instead he/she must explain that he/she may need to pass information to other professionals to help keep the child or other children safe.
- 11.3 Staff / volunteers who receive information about children and their families in the course of their work shall share that information only within appropriate contexts.

12 Communication with Parents

- 12.1 Parents and carers will be made aware of the school safeguarding/child protection policy through published information and in initial meetings with parents and carers of new children. Parents and carers will be informed that in certain circumstances there may be a need to contact other agencies without first notifying them. This decision will be made in partnership between Education Services and Social Care. It will be made clear that this is a legal obligation and not a personal decision.
- 12.2 The Governing Body makes this policy available to parents, carers and children through the school website. A hard copy is also available on request.

13 Record Keeping

- 13.1 All concern forms/body maps and chronology documents should be signed and dated. They should together provide an accurate factual account of the concern and action taken by the school.
- 13.2 The completed forms/records will be kept for the duration of the child's school career and where a child changes school the forms/records will be forwarded to the DSL at the new school within 5 days of the change of school. A receipt will be requested for the records, signed by the receiving school.
- 13.3 The information contained will be regarded as confidential. Any request for access to the information by non-Greenwich Safeguarding Children Partnership Agencies (e.g. Solicitor, investigating agent) will be referred to the Head teacher/Child Protection Designated Safeguarding Lead who is advised to seek legal advice before acting.
- 13.4 Record keeping at School
- All records of concern and multi-agency involvement should be kept separate from the child's academic records. They must be kept securely with access only for the DSL, Deputy DSL's and Head Teacher.
 - The procedures outline above (Section 10.1) should be followed

14 Dealing with Concerns raised or Allegations made against school staff, supply staff, volunteers and contractors⁶.

14.1 There are two levels of concern/allegation

An allegation that may meet the harms threshold

An allegation or concern that does not meet the harms threshold 'low level concern'

14.2 An allegation that meets the harms threshold is any information which indicates that a member of staff (including supply staff), volunteer or contractor may have:

- behaved in a way that has, or may have harmed a child;
- possibly committed a criminal offence against or in relation to a child;
- behaved towards a child or children in a way which indicates s/he would pose a risk of harm to children;
- behaved or may have behaved in a way that indicates they may not be suitable to work with children⁷;
- behaved in a way contrary to the Staff Code of Conduct

14.3 To reduce the risk of allegations, all staff and volunteers must be aware of safer working practice and must be familiar with the Government document, *'Guidance for Safer Working Practice for Adults who work with Children and Young People in Education Settings.'*

14.4 Any concern or allegation should be reported immediately to the DSL or Head Teacher (unless the allegation relates to the Head Teacher see 14.10 below). S/he should take the matter seriously and keep an open mind. S/he should not investigate or ask leading questions if seeking clarification; it is important not to make assumptions. Confidentiality must not be promised and the person must be advised that the concern or allegation will be shared on a "need to know" basis only.

14.5 Actions to be taken include making an immediate accurate, written record of the concern/allegation using the informant's words – including time, date and place where the alleged incident took place, brief details of what happened, what was said and who was present. This record must be signed and dated.

14.2.3 The recipient of a concern/allegation must not unilaterally determine its validity, and failure to report it in accordance with procedures is a potential disciplinary matter.

14.7 The Head Teacher will assess whether it is necessary to refer to the Local Authority Designated Officer (LADO) to determine the next step. The Children Safeguarding

⁶ KCSIE 2021 Part 4 also see appendix 3 attached to this policy

⁷ This applies to any child the member of staff, supply staff, volunteer or contractor has contact with in their personal, professional or community life.

Officers in the LADO Team in RBG are **Rachel Walker (0208 921 2206.) and Laura Lumbis (0208 921 2247).**

The LADO number is **0208 921 3930** and the email address is

Childrens-LADO@royalgreenwich.gov.uk

- 14.8 If the concern or allegation meets any of the four criteria set out in section 14.1 (i.e. may meet the harm threshold) then the Head Teacher shall contact the **LADO (Education)** without delay, and provide the LADO with written confirmation of the allegation.
- 14.9 The Head Teacher shall, as soon as possible, **following briefing** from the LADO inform the subject of the concern or allegation. (If the concern or allegation involves a supply teacher/staff or contractor, the agency will be informed and invited to share any information relating to previous concerns or allegations)
- 14.10 If there is an allegation or concern raised against the Head Teacher, then the Chair of Governors will be contacted. The Chair of Governors for this school is:

NAME: Matthew Filbee CONTACT NUMBER 07770 916194

- 14.11 In the event of allegations or concerns against the Head Teacher, the Chair of Governors (or the Vice Chair) will contact the LADO, whose contact details are given in 14.7 above.

15 Allegations concerning other children – Peer on Peer abuse

- 15.1 This policy recognises that children are capable of abusing their peers. Any allegations will be investigated appropriately by reporting concerns to the DSL Any form of inappropriate touching, physical abuse such as hitting, kicking, shaking, biting and hair pulling, or evidence of ‘initiation procedures, sexting, up-skirting (or other inappropriate use of new technology) will be robustly followed up.
- 15.2 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.
- 15.3 All staff understand the importance of challenging inappropriate behaviours between peers. **There will be a zero-tolerance approach to sexual violence and sexual harassment.** Staff will **not** downplay certain behaviours, for example dismissing sexual harassment as “just banter”, “just having a laugh”, “part of growing up” or “boys being boys” as this 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.
- 15.4 Victims (and perpetrators) of peer-on-peer abuse or bullying will be supported as for any other form of abuse and in their best interests.

- 15.5 Peer-on-peer abuse can manifest itself in many ways. The curriculum and in particular the RSE/RSHE curriculum provide regular opportunities for the school to help children safeguard themselves from new technology and through learning about personal safety. (See also ICT policy, curriculum policy, anti bullying policy and equalities policy.)
- 15.6 The school provides regular online safety information for children and they are given key information from CEOP and other online safety sites.

16 Monitoring & Evaluation

The responsibility for ensuring that the Safeguarding/Child Protection Policy and procedures are in place, available to parents and reviewed annually lies with the Governing Body. This policy will be reviewed in line with the timescale and details set out on the front cover.

17 List of related policies/procedures

- COVID Autumn 2021 risk assessment

- Remote Learning Policy for Parents/Carer
- Safeguarding policy addendum for COVID-19
- Behaviour policy
- Behaviour policy addendum for COVID-19
- Attendance Policy
- Accessibility Plan
- Anti-bullying policy
- Equality and Diversity Policy
- Children with health needs who cannot attend school
- Data Protection policy
- Alcohol and drugs policy
- SEN policy

APPENDIX 1: Types and Indicators of Abuse (to be read in conjunction with Keeping Children Safe in Education Part 1)

NB. This guidance is provided as a useful reminder of the types and indicators of abuse but should always be considered within the context of a comprehensive training programme and not as a substitute for more in-depth consideration

There are four categories of abuse, which may result in a child being placed on the Child Protection Register. They are:

- Physical Abuse
- Emotional Abuse
- Sexual Abuse
- Neglect

Definitions of child abuse

'Child Abuse and neglect' is a generic term encompassing all ill treatment of children including serious physical and sexual assault as well as cases where the standard of care does not adequately support the child's health (physical or mental) or development. Children may be abused or neglected through the infliction of harm or through the failure to act to prevent harm. Abuse can occur in a family, an institutional or community setting. The perpetrator may be known or not known to the child. There are 4 broad categories of abuse which are used for the purposes of registration. These categories overlap and an abused child may suffer more than one type of abuse.

1. Physical Abuse

Physical abuse may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning or suffocating a 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.

Possible indicators of Physical Abuse - Some of these indicators would clearly suggest child abuse, whilst others, when combined, may suggest that a child is being abused:

- Unexplained injuries including burns, particularly if they are recurrent
- Improbable excuses given to explain injuries
- Refusal to discuss injuries
- Untreated injuries
- Admission of punishment which seems excessive
- Bald patches
- Withdrawal from physical contact
- Arms and legs covered, even in hot weather
- Fear of returning home
- Fear of medical help
- Self-destructive tendencies
- Aggression towards others
- Running away

2. Emotional Abuse

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

- conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person.
- not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate.
- feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability as well as overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction.
- seeing or hearing the ill-treatment of another (including witnessing domestic violence)
- serious bullying (including cyber bullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children.

Possible indicators of Emotional Abuse - Some of these indicators would clearly suggest child abuse, whilst others, when combined, may suggest that a child is being abused:

- Physical and/or mental and/or emotional development lags
- Admission of punishment that appears excessive
- Over-reaction to mistakes
- Continual self-deprecation
- Sudden speech disorders
- Fear of new situations
- Inappropriate emotional responses to painful situations
- Neurotic behaviour e.g. thumb sucking, hair twisting, rocking
- Self-mutilation
- Fear of parents being contacted
- Extremes of passivity or aggression
- Drug/solvent abuse
- Running away
- Compulsive stealing or scavenging

3. Sexual Abuse

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

Possible indicators of Sexual Abuse - Some of these indicators would clearly suggest child abuse, whilst others, when combined, may suggest that a child is being abused:

- Sudden changes in behaviour or in school performance
- Displays of affection in a sexual way, inappropriate to age
- Tendency to cling or need reassurance
- Regression to younger behaviour e.g. thumb sucking, acting like a baby, playing with discarded toys
- Complaints of genital itching or pain, or anal pain
- Distrust of a familiar adult, or anxiety about being left with a relative, babysitter or lodger
- Unexplained gifts or money
- Depression and withdrawal
- Apparent secrecy
- Bedwetting, daytime wetting and/or soiling
- Sleep disturbances, nightmares
- Chronic illness, e.g. throat infection, venereal disease or other STD * Anorexia, bulimia
- Unexplained pregnancy
- Fear of undressing, e.g. for sport
- Phobias or panic attacks

4. Neglect

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

Possible indicators of Neglect - Some of these indicators would clearly suggest child abuse, whilst others, when combined, may suggest that a child is being abused.

- Constant hunger
- Poor personal hygiene
- Constant tiredness
- Poor state of clothing
- Emaciation
- Frequent lateness or non-attendance at school
- Untreated medical problems
- Destructive tendencies
- Low self esteem
- Neurotic behaviour
- No social relationships
- Running away
- Compulsive stealing or scavenging

Additional safeguarding issues⁸

Honour Based Abuse

So-called 'honour-based' abuse (HBA) 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. Abuse committed in the context of preserving honour, often involves a wider network or family or community pressure and can include multiple perpetrators. All forms of so called HBA 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 HBA, or already having suffered HBA.

- **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.

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 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** examine pupils. 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.

Mandatory reporting of female genital mutilation procedural information can be found at:

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

- **Possible indicators of Female genital mutilation (FGM)**

- Holiday requests made to school for significant lengths of time (Pre warning)
- Long periods of time away from the classroom during the day with bladder or menstrual problems
- Avoidance of P.E.
- Difficulty walking, sitting or standing
- Prolonged absences from school
- Noticeable behaviour changes
- Withdrawal
- Depression
- Recurrent Urinary Tract Infections (UTI) or complaints of abdominal pain

⁸ Further detail to be found in KCSIE 2021 Annex B

- **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 perpetrators use perceived cultural practices as a way to coerce a person into marriage. Schools and colleges can play an important role in safeguarding children from forced marriage.

The Forced Marriage Unit has published Multi-agency guidelines, with pages 32-36 focusing on the role of schools and colleges. 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.

See also Royal Borough of Greenwich Safeguarding Children Partnership website:

www.greenwichsafeguardingchildren.org.uk

Domestic Abuse

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. The child may blame themselves or may have had to leave home.

Young people can also experience domestic abuse within their own intimate relationships. This is a form of peer-on-peer abuse.

Operation Encompass – helps police and schools to work together to provide emotional and practical help when children have experienced a domestic incident. The DSL will be notified of a domestic incident before the child arrives at school the following day and can therefore arrange appropriate support.

Children missing from Education

All children, regardless of their circumstances, are entitled to a full-time education which is suitable to their age, ability, aptitude and any special educational needs they may have. A child going missing from education is a potential indicator of abuse or neglect which may include sexual abuse or exploitation and child criminal exploitation including involvement in county lines. It may indicate mental health problems, risk of substance abuse, risk of travelling to conflict zones, risk of female genital mutilation, honour bases abuse or risk of forced marriage. The law requires all schools to have an admission register and with the exception of schools where pupils are boarders, an attendance register. All pupils must be placed on both registers. Staff should be aware of their school or college's unauthorised absence and children missing from education procedures.

The school must inform the local authority of any pupil who fails to attend school regularly, or has been absent without the school's permission for a continuous period of 10 school days or more, at such intervals as are agreed between the school and the local authority (or in default of such agreement, at intervals determined by the Secretary of State).

Private fostering

Private fostering is when a child under the age of 16 (under 18 for children with a disability) is provided with care and accommodation by a person who is not their parent, a person with parental responsibility for them or a relative in their own home

To help keep children safe and support families, all parents and private foster carers must **notify MASH** of care arrangements for children so they can ensure a child is well cared for. If a member of school staff suspects a child may be being privately fostered without formal arrangement it is important you share this information in case a child is at risk of harm.

Preventing Radicalisation

Extremist ideology, radicalisation and terrorism

Children and young people can suffer harm when exposed to an extremist ideology which may be social, political or religious in presentation. This harm can range from a child adopting or complying with extreme views which limits their social interaction and full engagement with their education, to children being groomed for involvement in violent actions.

Extremism: the vocal or active opposition to our fundamental British values. This also includes calling for the death of members of the armed forces

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

Terrorism: an 'action that endangers or causes serious violence to a person; causes serious damage to property or seriously interferes or disrupts an electronic system'. The use or threat must be designed to influence government or intimidate the public to advance a political, religious or ideological cause.

There is no single way of identifying an individual who is likely to be susceptible to an extremist ideology. It can happen in many different ways and settings. Background factors combined with specific influences such as family and friends may contribute to a child's vulnerability for which an extremist or terrorist group may appear to provide an answer. Similarly, radicalisation can occur through different methods such as social media or the internet.

PREVENT DUTY - Section 26 of the Counter-Terrorism and Security Act 2015 ("the CTSA 2015"), places a duty on schools to have due regard to the need to prevent people from being drawn into terrorism". This duty is known as the Prevent duty. Paragraphs 57-76 of the Revised Prevent duty guidance: for England and Wales⁹ is specifically concerned with schools (but also covers childcare)

The statutory "Revised Prevent duty guidance: for England and Wales" (for schools) summarises the requirements on schools in terms of four general themes: Risk assessment, working in partnership, staff training and IT policies

⁹ Revised Prevent Duty guidance for England and Wales (April 2019)

- Schools are expected to assess the risk of children being drawn into terrorism, including support for extremist ideas that are part of terrorist ideology. This means being able to demonstrate both a general understanding of the risks affecting children and young people in the area and a specific understanding of how to identify individual children who may be at risk of radicalisation and what to do to support them. Schools should have clear procedures in place for protecting children at risk of radicalisation. These procedures may be set out in existing safeguarding policies. It is not necessary for schools to have distinct policies on implementing the Prevent duty.
- The Prevent duty builds on existing local partnership arrangements. For example, governing bodies and proprietors of all schools should ensure that their safeguarding arrangements take into account the policies and procedures of the Local Safeguarding Children Partnership. Effective engagement with parents / the family should also be considered as they are in a key position to spot signs of radicalisation. It is important to assist and advise families who raise concerns and be able to point them to the right support mechanisms. Schools should also discuss any concerns in relation to possible radicalisation with a child's parents in line with the individual school's safeguarding policies and procedures unless they have specific reason to believe that to do so would put the child at risk.
- The Prevent guidance refers to the importance of Prevent awareness training to equip staff to identify children at risk of being drawn into terrorism and to challenge extremist ideas. Individual schools are best placed to assess the training needs of staff in the light of their assessment of the risk to pupils at the school of being drawn into terrorism. As a minimum, however, schools should ensure that the DSL lead undertakes Prevent awareness training and is able to provide advice and support to staff on protecting children from the risk of radicalisation.
- Schools must ensure that children are safe from terrorist and extremist material when accessing the internet in schools.
- If the Prevent referral is passed to a multi-agency Channel Panel, then a member of school staff will attend (if asked) to help with any assessment of vulnerability.

Child Sexual Exploitation (CSE) AND Child Criminal Exploitation (CCE)

Both are forms of abuse that occur where an individual or group takes advantage of an imbalance of 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 or through violence or the threat of violence. Whilst the age of the child may be a contributing factor for an imbalance of power, there are a range of other factors that could make a child more vulnerable to exploitation including, sexual identity, cognitive ability, learning difficulties, communication ability etc¹⁰. Children can be exploited by adult males, females, individuals or groups or by other children (who themselves may be experiencing exploitation).

CSE is a form of sexual abuse. It can involve violent, humiliating and degrading sexual assaults. It can involve penetrative or non-penetrative acts or it may involve non-contact activities such as involving children in the production of sexual images, forcing children to look at sexual images or watch sexual activities or encouraging them to behave in sexually inappropriate ways. Children can also be

¹⁰ See Annex B KCSIE 2021 for further information

groomed in preparation for abuse (including via the internet). The manipulation or ‘grooming’ process involves befriending children, gaining their trust, sometimes over a long period of time, before the abuse begins. Significant number of children who are victims of sexual exploitation go missing from home, care and education at some point.

CSE can be a one-off occurrence and may happen without the child’s knowledge e.g. others sharing videos or images on social media.

Consent cannot be given, even where a child may believe they are voluntarily engaging in sexual activity with the person who is exploiting them. Although it is true that the victim can be tricked into believing they are in a loving relationship, no child under the age of 18 can ever consent to being abused or exploited.

CCE is when children are forced or manipulated into participating in criminal activity. This can range from the transportation of drugs, weapons or money through county lines (see below) or being forced to work in a cannabis factory, forced to shoplift, committing vehicle crime or threatening/committing serious violence to others. Children can become trapped in a cycle of criminal activity as perpetrators can threaten their families with violence, or entrap and coerce the child into debt. The experiences of boy victims may be very different to those of girl victims

- **Possible indicators of CSE and CCE**
 - Having unaffordable/unexplained gifts or new possessions or expensive habits (alcohol, drugs)
 - Going to hotels or other unusual locations to meet friends
 - Getting in/out of different cars driven by unknown adults
 - Going missing from home or care or coming home late
 - Associating with other young people involved in exploitation
 - Truancy, exclusion, disengagement with school, opting out of education altogether
 - Changes in emotional well-being
 - Drug or alcohol misuse
 - Unexplained injuries

- **Further indicators of CSE include**
 - Having older boyfriends or girlfriends
 - Suffering from sexually transmitted infections, inappropriate sexual or sexualised behaviour or pregnancy

County lines is where gangs and organised criminal networks transport illegal drugs both locally and across the UK. Children and vulnerable adults are exploited to move, store and sell drugs and transport money sometimes from urban areas to suburban and rural areas, market and seaside towns. The threat of violence to the victim and their families can be used to trap the victim in continued criminality.

- **Possible indicators of County line involvement (in addition to some of the indicator mentioned for CSE and CCE) include¹¹:**
 - Victim is missing from home and subsequently found in area away from home or in accommodation to which they have no connection

¹¹ Other indicators found in KCSIE annex B

- As a victim or perpetrator of serious violence (e.g. knife crime)
- In possession of more than one phone and receiving multiple calls requesting movement of drugs or money

Peer-on-peer/ child on child abuse

Children can abuse other children. This is generally referred to as peer-on-peer abuse and can take many forms and can happen both inside and outside of school or college and online. 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.

Peer on peer 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 peers;
- physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (this may include an online element which facilitates, threatens and/or encourages physical abuse);
- **sexual violence**¹² such as rape, assault by penetration and sexual assault; (this may include an online element which facilitates, threatens and/or encourages sexual violence);
 - 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;
- **sexual harassment**¹³ such as sexual comments, remarks, jokes and online sexual harassment, which may be standalone or part of a broader pattern of abuse;
 - deliberately brushing against or interfering with someone’s clothes (this may cross into sexual violence)
 - displaying pictures, photos or drawings of a sexual nature
 - consensual and non-consensual sharing of nudes and semi-nude images and/or videos (also known as sexting or youth produced sexual imagery);
 - **upskirting**¹⁴, 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).

Information regarding the definition and signs of further safeguarding issues including homelessness, modern slavery, cybercrime, children with family members in prison and children and the court system etc can be found in Annex B of Keeping Children Safe in Education 2021.

¹² Further information in KCSIE 2021 Annex B

¹³ Further information in KCSIE 2021 Annex B

¹⁴ Further information in KCSIE 2021 Annex B

Appendix 2

Statutory Guidance, legislation and advice includes:

- The Children Act 1989 & 2004
- The Education Act 2002 (section 175)
- The Education (Pupil Information) (England) Regulations 2005
- Keeping Children Safe in Education (September 2021)
- Dealing with Allegations of Abuse Against Teachers and Other Staff
- Working Together to Safeguard Children (2019)
- Sexual violence and sexual harassment between children in schools and colleges (May 2018)
- Searching, screening and confiscation (January 2018)
- What to do if you're worried a child is being abused (March 2015)
- Information sharing advice for practitioners providing safeguarding services to children, young people, parents and carers (July 2018)
- Domestic Abuse Act 2021
- Designated teacher for looked-after and previously looked-after children (February 2018)
- UKCCIS Guidance: Sexting in schools and colleges, responding to incidents, and safeguarding young people (2017)
- Procedures set out by the Greenwich Safeguarding Children Partnership.
- Children Missing Education, September 2016
- London Child Protection Procedures and Practice Guidance March 2020
- Children & Families Act, 2014
- Relationships Education, Relationships and Sex Education (RSE) and Health Education, April 2019
- NSPCC – When to call the police

Note: All staff must read and be assisted to understand and discharge their roles and responsibilities set out in **Part one** of Keeping Children Safe in Education.

Annex A provides a condensed version for staff who do not work directly with children.

Other useful documents include:

Ofsted: Inspecting safeguarding in early years education and skills

APPENDIX 3: Record Keeping and Referral Guidance

It is essential that the school keeps clear records based on observation and evidence, which separate fact, allegation, hearsay, opinion or unsubstantiated evidence and which clearly indicate decisions and actions taken.

Child protection information will be kept in separate files (these may be electronic) by the designated teacher and will only be discussed with staff on a need-to-know basis. Staff need to know when a child is at risk and what plan has been decided by case conference, but may not need to know all the confidential details.

All records, notes and observations made by class staff as part of ongoing monitoring of children on the child protection register or causing concern, must be completed on the appropriate incident/concern form and immediately handed/forwarded to the DSL. Documents (paper copy and electronic) must be dated and an indication of the person completing the form recorded.

All child protection conference minutes must be stored in the confidential files kept by the Designated Safeguarding Lead.

Initial Concerns

Initial concerns, incidents or disclosure by a child must be reported to the DSL using the incident/concern form. A copy of the form and body map in Appendix 4 should be used to record injuries/marks/bruises.

The following information must be recorded:

- time, date, place and people who were present
- exact details of what was said by the child and/or others (no interpretation or opinion)
- the child's emotional or physical condition
- details of the behaviour(s) causing concern and the context in which it occurred

Details of injuries, marks or bruises - the position of these must be marked on the appropriate body drawing and suitably annotated to provide further detail (number, length of marks, description of marks, colour of marks/bruises etc.). Other relevant details - including information about previous incidents which may not have been reported but now seem relevant

Ongoing Concerns/Monitoring

- A chronology should be maintained
- Staff in regular contact with a child may be required to keep a running record noting information about particular aspects of a child's behaviour, physical and/or emotional condition or remarks they may make - either because concerns are ongoing or as part of a child protection plan. These need to be written on yellow incident sheets and handed to the DSL. Any records passed to the DSL electronically must be password protected.

Referrals

The DSL must keep detailed, contemporaneous notes of:

- discussions with staff
- discussions with the child
- discussion with parents
- information provided to social services
- decisions taken (with times, dates and signed)

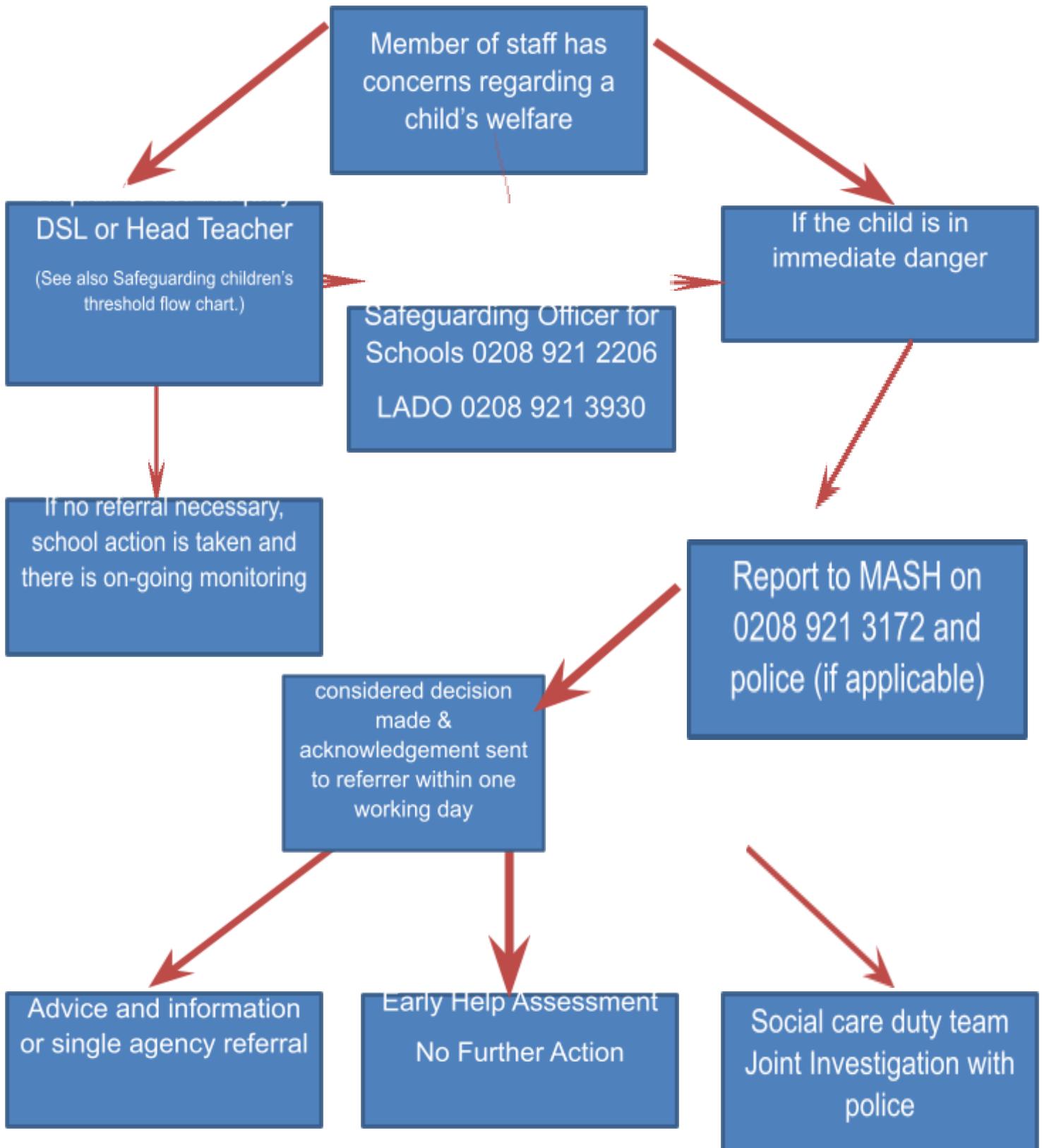
The designated teacher will confirm verbal and telephone referrals to social services in writing within 48 hours of the referral.

Reports for Child Protection Conferences/Core Group Meetings

Reports for child protection conferences must be written on the agreed pro-forma. They should focus on the child's educational progress and achievements, attendance, behaviour, participation, relationships with other children and staff and, where appropriate, their appearance and concerns. They should provide clear factual information. Staff should be aware that these reports will be made available to parents at the child protection conference.

Appendix 3 continued: Reporting concerns about a child

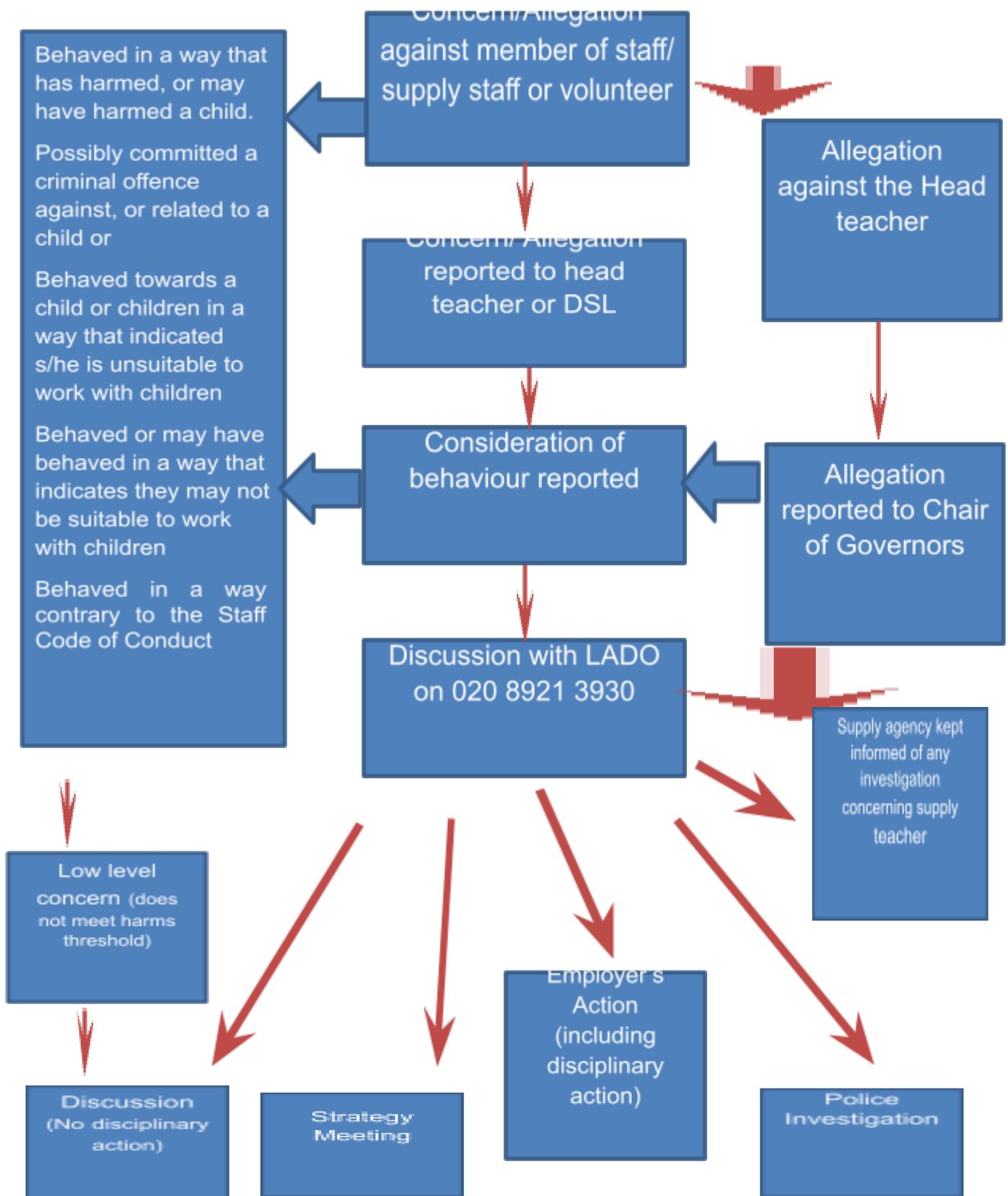
Flow Chart for Reporting Concerns



Appendix 3 continued:

Reporting concerns or allegations against school staff, supply staff, volunteers and contractors

Managing Concerns or Allegations

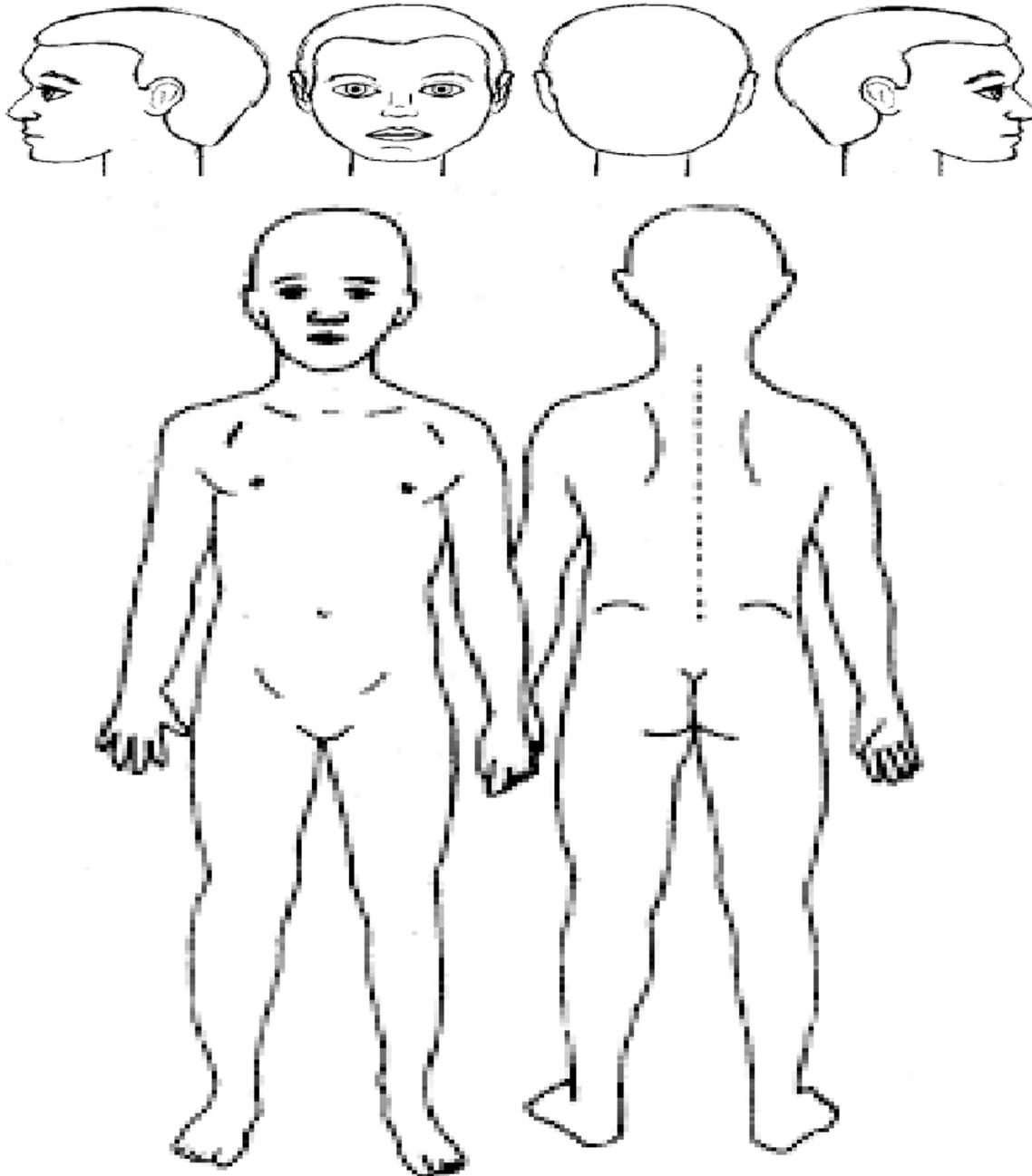


Body Chart

Once completed attach this body chart to the Concern Form

This chart must be used together with the Concern Form Show clearly the location of your concern and label with a number and a brief description, e.g. '1. Bum about 4cm.' On the Concern Form refer to the injury using the same number and description.

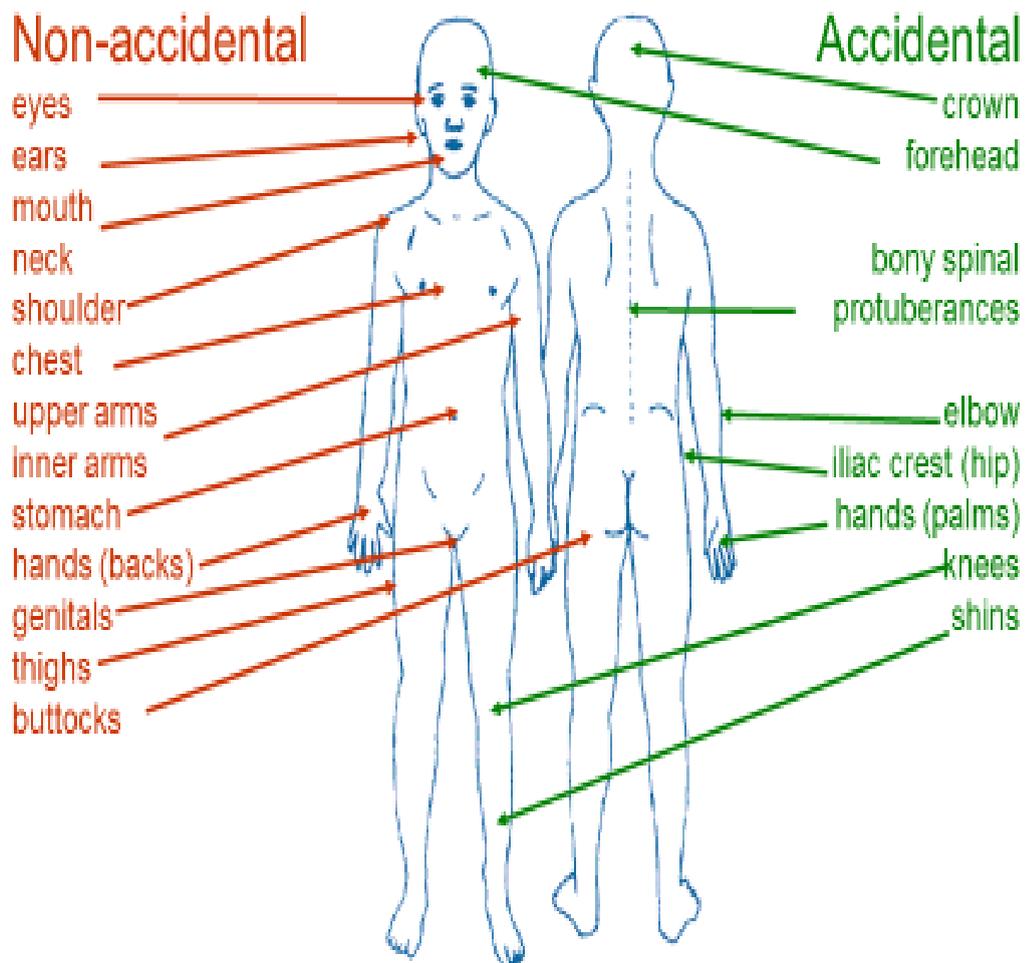
Child's Name _____



Observations made by----- Signed-----Date

Signs and symptoms of physical injury can be indicators of abuse, however there may be other reasons they are not fail safe mechanisms. **Red indicates a possible non-accidental injury.** **Green is the more usual sites for accidental injuries.**

Common Sites



**Concern Received
Date Check List**

Name _____ Year _____

2021	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31		
September																																	
October																																	
November																																	
December																																	
2022																																	
January																																	
February																																	
March																																	
April																																	
May																																	
June																																	
July																																	

APPENDIX 5: Royal Borough of Greenwich Referral Form



Inter-Agency Referral Form for Early Help or Children Social Care Services

This form is to be used to make a referral about a child or young person for either Early Help or Children Social Care Services. Before contacting the Multi Agency Safeguarding Hub (MASH) you need to consider whether the child or young person's needs can be met by services from within your own agency, referring to a specific service, or by other professionals already involved with the family

- Is the child at immediate risk of serious harm or injury? If so call 999 and ask for police
- If you have an urgent safeguarding concern, please contact us by telephone (020 8921 3172) immediately, do not wait to send the form.
- All telephone referrals should be followed up in writing within 24 hours by completion of this form.

CONSENT: Agencies who are making enquiries and/or making referrals about child(ren) should inform the parents/carers or those with parental responsibility that they are making a referral to Children Services, unless to do so would mean that the child or young person is at greater risk. **Have you sought consent for this referral from the parent or carer with parental responsibility?**

If YES please name the person who has provided consent	
If NO please explain why	

Referring agency details:

Name of Referrer		Job Title	
Agency:		Address:	
Tel/Mobile:		Email:	
Date:			

Have you discussed this with your agency safeguarding lead? Yes No

No

(this should not delay a referral being made)

Name of Lead:	
Email / Phone:	

Child(ren)'s / Young Person's details

Last Name	First Name	DOB/EDD	Gender	Ethnicity	Early Years / Educational Setting / UPN

Child(ren)'s / Young Person's main carers / significant others

Last Name	First Name	DOB	Gender	Relationship to child	Tel/Email	Parental Responsibility Yes/No

Address(es)

--

GP / Surgery	Address / Tel	NHS No <i>(if known)</i>

Languages spoken	
Is an Interpreter required?	
Family Immigration Status	

Does the child / young person / parent(s) / carer have an additional need or disability Yes No Not known

If yes, is it a long-term need/disability (please indicate) Yes No

Details of need/disability (if applicable)
--

Does the child / young person / parent / carer have a special educational need
Yes No

Does the child/young person have an Education and Health Care Plan (EHCP)
Yes No

What are your worries regarding this child / family

--

Risks

<p>Please tell us your opinion of the level of risk to the child and detail explicitly your reasoning for this</p>	<p><input type="checkbox"/> Low <input type="checkbox"/> Medium <input type="checkbox"/> High</p>
--	---

What is working well for this child / family?

--

Parent's / child(ren)'s / young person's views

What involvement have you and any other agencies had in the support and protection of this child/family? *Please list names and contact details where possible (YOS, CAMHS, Health Visitor, education settings, other local authority etc).*

What do you want to be different for this child / young person / family?

Please email this form securely to MASH

Duty Team: 020 8921 3172

Consultation line for professionals: 020 8921 2267

Out of hours: 020 8854 8888

Email: MASH-referrals@royalgreenwich.gov.uk *(please only send information to this email address using a secure email system, e.g. Egress)*

MASH-referrals@royalgreenwich.gov.uk.cjsm.net

Royal Borough of Greenwich MASH Team, 1st Floor, The Woolwich Centre, 35 Wellington Street, London SE18 6HQ

To help you to determine levels of need when making your own assessment, please refer to the threshold document

www.proceduresonline.com/greenwich/cs/p_threshold.html?zoom_highlight=threshold

APPENDIX 6

Brook Sexual Behaviours Traffic Light Tool

Behaviours: age 0 to 5 years

All green, amber and red behaviours require some form of attention and response. It is the level of intervention that will vary.

Green behaviours

- holding or playing with own genitals
- attempting to touch or curiosity about other children's genitals
- attempting to touch or curiosity about breasts, bottoms or genitals of adults
- games e.g. mummies and daddies, doctors and nurses
- enjoying nakedness
- interest in body parts and what they do
- curiosity about the differences between boys and girls

Amber behaviours

- preoccupation with adult sexual behaviour
- pulling other children's pants down/skirts up/trousers down against their will
- talking about sex using adult slang
- preoccupation with touching the genitals of other people
- following others into toilets or changing rooms to look at them or touch them
- talking about sexual activities seen on TV/online

Red behaviours

- persistently touching the genitals of other children
- persistent attempts to touch the genitals of adults
- simulation of sexual activity in play
- sexual behaviour between young children involving penetration with objects
- forcing other children to engage in sexual play

What is green behaviour?

Green behaviours reflect safe and healthy sexual development. They are:

- displayed between children or young people of similar age or developmental ability
- reflective of natural curiosity, experimentation, consensual activities and positive choices

What can you do?

Green behaviours provide opportunities to give positive feedback and additional information.

What is amber behaviour?

Amber behaviours have the potential to be outside of safe and healthy behaviour. They may be:

- unusual for that particular child or young person
- of potential concern due to age, or developmental differences
- of potential concern due to activity type, frequency, duration or context in which they occur

What can you do?

Amber behaviours signal the need to take notice and gather information to assess the appropriate action.

What is red behaviour?

Red behaviours are outside of safe and healthy behaviour. They may be:

- excessive, secretive, compulsive, coercive, degrading or threatening
- involving significant age, developmental, or power differences
- of concern due to the activity type, frequency, duration or the context in which they occur

What can you do?

Red behaviours indicate a need for immediate intervention and action.

Behaviours: age 5 to 9 years

All green, amber and red behaviours require some form of attention and response. It is the level of intervention that will vary.

Green behaviours

- feeling and touching own genitals
- curiosity about other children's genitals
- curiosity about sex and relationships, e.g. differences between boys and girls, how sex happens, where babies come from, same-sex relationships
- sense of privacy about bodies
- telling stories or asking questions using swear and slang words for parts of the body

What is green behaviour?

Green behaviours reflect safe and healthy sexual development. They are:

- displayed between children or young people of similar age or developmental ability
- reflective of natural curiosity, experimentation, consensual activities and positive choices

What can you do?

Green behaviours provide opportunities to give positive feedback and additional information.

Amber behaviours

- questions about sexual activity which persist or are repeated frequently, despite an answer having been given
- sexual bullying face to face or through texts or online messaging
- engaging in mutual masturbation
- persistent sexual images and ideas in talk, play and art
- use of adult slang language to discuss sex

What is amber behaviour?

Amber behaviours have the potential to be outside of safe and healthy behaviour. They may be:

- unusual for that particular child or young person
- of potential concern due to age, or developmental differences
- of potential concern due to activity type, frequency, duration or context in which they occur

What can you do?

Amber behaviours signal the need to take notice and gather information to assess the appropriate action.

Red behaviours

- frequent masturbation in front of others
- sexual behaviour engaging significantly younger or less able children
- forcing other children to take part in sexual activities
- simulation of oral or penetrative sex
- sourcing pornographic material online

What is red behaviour?

Red behaviours are outside of safe and healthy behaviour. They may be:

- excessive, secretive, compulsive, coercive, degrading or threatening
- involving significant age, developmental, or power differences
- of concern due to the activity type, frequency, duration or the context in which they occur

What can you do?

Red behaviours indicate a need for immediate intervention and action.

Behaviours: age 9 to 13 years

All green, amber and red behaviours require some form of attention and response. It is the level of intervention that will vary.

Green behaviours

- solitary masturbation
- use of sexual language including swear and slang words
- having girl/boyfriends who are of the same, opposite or any gender
- interest in popular culture, e.g. fashion, music, media, online games, chatting online
- need for privacy
- consensual kissing, hugging, holding hands with peer

Amber behaviours

- uncharacteristic and risk-related behaviour, e.g. sudden and/or provocative changes in dress, withdrawal from friends, mixing with new or older people, having more or less money than usual, going missing
- verbal, physical or cyber/virtual sexual bullying involving sexual aggression
- LGBT (lesbian, gay, bisexual, transgender) targeted bullying
- exhibitionism, e.g. flashing or mooning
- giving out contact details online
- viewing pornographic material
- worrying about being pregnant or having STIs

Red behaviours

- exposing genitals or masturbating in public
- distributing naked or sexually provocative images of self or others
- sexually explicit talk with younger children
- sexual harassment
- arranging to meet with an online acquaintance in secret
- genital injury to self or others
- forcing other children of same age, younger or less able to take part in sexual activities
- sexual activity e.g. oral sex or intercourse

Behaviours: age 13 to 17 years

All green, amber and red behaviours require some form of attention and response. It is the level of intervention that will vary.

Green behaviours

- solitary masturbation
- sexually explicit conversations with peers
- obscenities and jokes within the current cultural norm
- interest in erotica/pornography
- use of internet/e-media to chat online
- having sexual or non-sexual relationships
- sexual activity including hugging, kissing, holding hands
- consenting oral and/or penetrative sex with others of the same or opposite gender who are of similar age and developmental ability
- choosing not to be sexually active

Amber behaviours

- accessing exploitative or violent pornography
- uncharacteristic and risk-related behaviour, e.g. sudden and/or provocative changes in dress, withdrawal from friends, mixing with new or older people, having more or less money than usual, going missing
- concern about body image
- taking and sending naked or sexually provocative images of self or others
- single occurrence of peeping, exposing, mooning or obscene gestures
- giving out contact details online
- joining adult-only social networking sites and giving false personal information
- arranging a face to face meeting with an online contact alone

Red behaviours

- exposing genitals or masturbating in public
- preoccupation with sex, which interferes with daily function
- sexual degradation/humiliation of self or others
- attempting/forcing others to expose genitals
- sexually aggressive/exploitative behaviour
- sexually explicit talk with younger children
- sexual harassment
- non-consensual sexual activity
- use of/acceptance of power and control in sexual relationships
- genital injury to self or others
- sexual contact with others where there is a big difference in age or ability
- sexual activity with someone in authority and in a position of trust
- sexual activity with family members
- involvement in sexual exploitation and/or trafficking
- sexual contact with animals
- receipt of gifts or money in exchange for sex

What is green behaviour?

Green behaviours reflect safe and healthy sexual development. They are:

- displayed between children or young people of similar age or developmental ability
- reflective of natural curiosity, experimentation, consensual activities and positive choices

What can you do?

Green behaviours provide opportunities to give positive feedback and additional information.

What is amber behaviour?

Amber behaviours have the potential to be outside of safe and healthy behaviour. They may be:

- unusual for that particular child or young person
- of potential concern due to age, or developmental differences
- of potential concern due to activity type, frequency, duration or context in which they occur

What can you do?

Amber behaviours signal the need to take notice and gather information to assess the appropriate action.

What is red behaviour?

Red behaviours are outside of safe and healthy behaviour. They may be:

- excessive, secretive, compulsive, coercive, degrading or threatening
- involving significant age, developmental, or power differences
- of concern due to the activity type, frequency, duration or the context in which they occur

What can you do?

Red behaviours indicate a need for immediate intervention and action.

Brook has taken every care to ensure that the information contained in this publication is accurate and up to date at the time of being published. As information and knowledge is constantly changing, readers are strongly advised to use this information for up to one month from print date. Brook accepts no responsibility for difficulties that may arise as a result of an individual acting on the advice and recommendations it contains.

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