

## **SAFEGUARDING POLICY (INCLUDING CHILD PROTECTION)**

**This policy applies to all schools in The Irthlingborough and Finedon Learning Trust**

Name	Signature	Date	Position
Mr S Ward	Mr S Ward	Sept 2017	Chair of Directors
Mrs P Reading	Mrs P Reading	Sept 2017	Safeguarding Director Designated Safeguarding Lead trained
Mrs J Sanchez- Thompson	Mrs J Sanchez – Thompson	September 2016	Executive Head Teacher Irthlingborough and Finedon Learning Trust
Mrs J Marshall	Mrs J Marshall	Sept 2017	Head Teacher INIS
Mrs J Marshall	Mrs J Marshall	Sept 2017	Designated Safeguarding Lead INIS
Mrs T Harvey	Mrs T Harvey	Sept 2017	Designated Safeguarding Deputy
Mrs J Luke	Mrs J Luke	Sept 2017	Designated Safeguarding Deputy
Mrs L Colquhoun	Mrs L Colquhoun	Sept 2017	Designated Safeguarding Deputy Working across Irthlingborough site
Miss R Chapman	Miss R Chapman	Sept 2017	Designated Safeguarding Deputy
Mrs J Lloyd - Williams	Mrs J Lloyd – Williams	Sept 2017	Head Teacher FMJ &FIS
Mrs J Lloyd - Williams	Mrs J Lloyd – Williams	Sept 2017	Designated Safeguarding Lead FMJS/FIS
Ms K Ellis	Ms K Ellis	Sept 2017	Designated Safeguarding Deputy FMJS/FIS
Ms C Jewell	Ms C Jewell	Sept 2017	Designated Safeguarding Deputy FMJS/FIS
Ms L Sadler	Ms L Sadler	Sept 2017	Designated Safeguarding Deputy FMJS/FIS
Miss F Pettitt	Miss F Pettitt	Sept 2017	Designated Safeguarding Deputy FMJS/FIS
Mr N Garley	Mr N Garley	Sept 2017	Head Teacher IJS
Mr N Garley	Mr N Garley	Sept 2017	Designated Safeguarding Deputy IJS
Mr N Johnson	Mr N Johnson	Sept 2017	Designated Safeguarding Deputy IJS
Mrs J Meekings	Mrs J Meekings	Sept 2017	Designated Safeguarding Lead IJS
Ms Carly Cummins	Ms C Cummins	Sept 2017	Designated Safeguarding Deputy IJS

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## **1. Named staff and initial contacts:**

**Safeguarding Director:** Mrs P Reading also trained safeguarding lead

Contact details: email: [penny.reading@ift.org.uk](mailto:penny.reading@ift.org.uk)

Tel: 01933 654900

### **Designated Safeguarding Lead for The Irthlingborough and Finedon Learning Trust:**

Name: Joanne Sanchez – Thompson Contact details: email: [jsanchez-thompson@ift.org.uk](mailto:jsanchez-thompson@ift.org.uk)

Tel: 01933 654921

### **Designated Safeguarding Leads for INIS:**

Name: Jan Marshall Contact details: email: [head@irthlingborough-inf.northants-ecl.gov.uk](mailto:head@irthlingborough-inf.northants-ecl.gov.uk)

Tel: 01933 654900

Name: Jo Luke Contact details: email: [jo.luke@ift.org.uk](mailto:jo.luke@ift.org.uk)

Tel: 01933 654900

Working across Irthlingborough Nursery, Infant and Junior School

Name: Lesley Colquhoun Contact details: email: [Lesley.colquhoun@ift.org.uk](mailto:Lesley.colquhoun@ift.org.uk)

Tel: 01933 654900

Name: Tracy Harvey contact details: email: [tracy.harvey@ift.org.uk](mailto:tracy.harvey@ift.org.uk)

Tel: 07584050433

Name: Rachel Chapman contact details email: [Rachel.chapman@ift.org.uk](mailto:Rachel.chapman@ift.org.uk)

Tel: 01933 654900

### **The nominated safeguarding and child protection governor is:**

Name: Penny Reading Contact details: email: [Bursar@irthlingborough-inf.northants-ecl.gov.uk](mailto:Bursar@irthlingborough-inf.northants-ecl.gov.uk) or [penny.reading@ift.org.uk](mailto:penny.reading@ift.org.uk)

Tel: 01933 654900

The Head Teacher is:

Name: Jan Marshall Contact details: email: [head@irthlingborough-inf.northants-ecl.gov.uk](mailto:head@irthlingborough-inf.northants-ecl.gov.uk)

Tel: 01933 654900

**Designated Safeguarding Leads for FMJS and FIS:**

Name: Joanne Lloyd – Williams, Head Teacher Contact Details: email: [head@finedon-inf.northants-ecl.gov.uk](mailto:head@finedon-inf.northants-ecl.gov.uk)

Tel: 01933 680433 / 01933 680467

Name: Caroline Jewell Contact details: email: [caroline.jewell@ifft.org.uk](mailto:caroline.jewell@ifft.org.uk)

Tel: 01933 680467

Name: Karen Ellis Contact details: email: [Karen.ellis@ifft.org.uk](mailto:Karen.ellis@ifft.org.uk)

Tel: 01933 680433 / 01933 680467

Name: Lucy Sadler Contact details: email: [lucy.sadler@ifft.org.uk](mailto:lucy.sadler@ifft.org.uk)

Tel: 01933 680433 / 01933 680467

Name: Felicity Pettitt Contact details: email [felicity.pettitt@ifft.org.uk](mailto:felicity.pettitt@ifft.org.uk)

Tel: 01933 680433 / 01933 680467

**The nominated safeguarding and child protection governor is:**

Name: Jo McDougall Contact details: email: [head@finedon-inf.northants-ecl.gov.uk](mailto:head@finedon-inf.northants-ecl.gov.uk)

Tel: 01933 680433 / 01933 680467

**Designated Safeguarding Leads for IJS:**

Tel: 01933 654921

Name: Nick Garley, Head Teacher Contact details: email: [head@irthlingborough-jun.northants-ecl.gov.uk](mailto:head@irthlingborough-jun.northants-ecl.gov.uk)

Name: Joanne Meekings Contact details: email [Jo.meekings@ifft.org.uk](mailto:Jo.meekings@ifft.org.uk)

Name: Nick Johnson Contact details: email [nick.johnson@ifft.org.uk](mailto:nick.johnson@ifft.org.uk)

Name: Lesley Colquhoun Contact details: email: [Lesley.colquhoun@ifft.org.uk](mailto:Lesley.colquhoun@ifft.org.uk)

Name: Carly Cummins Contact details: email: [carly.cummins@ifft.org.uk](mailto:carly.cummins@ifft.org.uk)

**The nominated safeguarding and child protection governor is:**

Name: Mike Fargher Contact details: email: [mike.fargher@ifft.org.uk](mailto:mike.fargher@ifft.org.uk)

Tel: 01933 654921

## **Safeguarding, advice and training contacts:**

Plumsun <https://www.plumsun.com/members-home/>

NSPCC <http://www.nspcc.org.uk/what-you-can-do/get-expert-training/>

## **Safeguarding Referrals must be made in one of the following ways:**

- By telephone contact to the Multi-Agency Safeguarding Hub: **0300 126 1000**;
- By e-mail to: [MASH@northamptonshire.gcsx.gov.uk](mailto:MASH@northamptonshire.gcsx.gov.uk);
- In an emergency outside office hours, by contacting the Emergency Duty Team or the Police 01604 626938
- If a child is in immediate danger at any time, left alone or missing, you should contact the police directly and/or an ambulance using 999

## **Multi-Agency Safeguarding Hub (M.A.S.H)**

The Multi-Agency Safeguarding Hub (MASH) deals with referrals from professionals and members of the public who may have concerns about a child's welfare following contact with the helpline that is now also based in the Multi-Agency Safeguarding Hub. It makes the process of dealing with referrals quicker and more effective by improving the way county council: Children's social care, Northamptonshire Fire and Rescue Service (NFRS), Youth Offending Service (YOS) and education, work alongside other partner agency colleagues including Northamptonshire police, Northamptonshire health partners, National Probation Service, and the East Midlands Ambulance Service (EMAS) to share information.

## **For referrals regarding adults in education:**

Please email MASH at [MASH@northamptonshire.gcsx.gov.uk](mailto:MASH@northamptonshire.gcsx.gov.uk) and copy in the DO at [doreferral@northamptonshire.gov.uk](mailto:doreferral@northamptonshire.gov.uk)

Local Authority Designated Officers  
Phone: 01604 367862 or 01604 362633

## **2. Policy statement and principles:**

- We recognise our moral and statutory responsibility to safeguard and promote the welfare of all pupils. We endeavour to provide a secure and welcoming environment where children feel safe and are respected and valued. We are alert to the signs of abuse and neglect and follow our procedures to ensure that children receive effective support, protection and justice.
- The procedures contained in this policy apply to all directors, staff/volunteers and governors and are consistent with:
- The legal duty on schools to safeguard and promote the welfare of children, as described in section 175 of the Education Act 2002 [or section 157 of the Education Act 2002 for independent schools and academies]
- The statutory guidance *"Keeping Children Safe in Education – Statutory Guidance for Schools and Colleges"* - September 2016
- The government's *'Working Together to Safeguard Children 2015'* which sets out statutory guidance for agencies and *'What to do if you're worried a child is being abused - Advice for practitioners 2015'*
- The government's *Early Years Foundation Stage Framework (EYFS) 2014*

- The Northamptonshire Safeguarding Children Board (NSCB) Procedures, which contain procedures and guidance for safeguarding children
- Northamptonshire thresholds and pathways

### **Child protection policy principles:**

- **Prevention** (e.g. positive, supportive school atmosphere, teaching and pastoral support to pupils, safer recruitment procedures);
- **Protection** (by following agreed procedures, ensuring all staff are trained and supported to respond appropriately and sensitively to Child Protection concerns);
- **Support** (to pupils and school staff and to children who may have been abused);
- **Working with parents** (to ensure appropriate communications and actions are undertaken).

### **Child Protection policy aims:**

- To provide all staff with the necessary information to enable them to meet their child protection responsibilities
- To ensure consistent good practice
- To demonstrate the school's commitment with regard to child protection to pupils, parents and other partners
- To contribute to the school's safeguarding portfolio
- This policy applies to all staff, directors, governors and visitors to the school. We recognise that child protection is the responsibility of the whole MAT community. We ensure that all parents and other working partners are aware of our child protection policy by highlighting it in our school prospectus and on our school website, displaying appropriate information in our reception and by raising awareness at meetings with parents.

Children and young people are supported most effectively when services are planned and delivered in a co-ordinated way to offer integrated support across the continuum of needs and services. Reference to Northamptonshire Thresholds and Pathways early help, prevention and statutory services for children and families will help support accurate identification of the relevant level of need and identify the range of services that are available for the different levels of need, particularly in relation to Early Help and Targeted support. Irthlingborough and Finedon Learning Trust schools fully engage with these services to meet the needs of all children.

### **Safeguarding Commitment:**

We adopt an open and accepting attitude towards children as part of our responsibility for pastoral care. All staff encourage children and parents to feel free to talk about any concerns and to see school as a safe place when there are difficulties. Children's fears and concerns will be taken seriously and children are encouraged to seek help from members of staff. Therefore our schools:

- Maintains an ethos where children feel secure and are encouraged to talk, and are always listened to therefore creating a culture of vigilance
- Ensure that children know that there are adults in the school whom they can approach if they are worried or are in difficulty;
- Every action and / or response is in the best interests of the child

- Include in the curriculum activities and opportunities for PSHE/Citizenship which equip children with the skills they need to stay safe from abuse (including online), and to know to whom they can turn for help;
- Provide opportunities to establish effective working relationships with parents and colleagues from other agencies;
- Operate safer recruitment procedures and make sure that all appropriate checks are carried out on new staff and volunteers who will work with children, including references, Criminal Record and prohibition from teaching checks
- All staff have access to regular to safeguarding training within school, as and when guidance is reviewed. Some staff also access specific training offered by the Northamptonshire Safeguarding Children Board, Local Authority and other providers including online training
- All staff have a duty to read the following documentation:
  - Keeping Children in Education (2016) Part One
  - What to do if you're worried a child is being abused - Advice for practitioners 2015
  - School's Code of Conduct
  - Irthlingborough and Finedon Learning Trust Safeguarding Policy
- Policies will be reviewed regularly in accordance with specified times
- An annual safeguarding audit is completed (Section 11 audit)

### **Safeguarding Information for pupils:**

The schools are committed to ensuring that pupils are aware of behaviour towards them that is not acceptable and how they can keep themselves safe. We inform pupils of the availability of advice and support and whom they might talk to, both in and out of school; their right to be listened to and heard and what steps can be taken to protect them from harm in our PSHE lessons, through special assemblies, posters, suggestion boxes and each school has a School Council with representatives from each class in KS 1 or KS 2, this gives the pupils a voice. The following areas are among those addressed in PSHE and in the wider curriculum;

- Bullying/Cyberbullying
- Diversity issues
- Relationships
- Drug, alcohol and substance abuse
- E Safety / Internet Safety
- Fire and Water Safety
- Protective Behaviours
- Road Safety
- Stranger Awareness
- Other safeguarding issues as relevant

### **Pupil Information:**

In order to keep children safe and provide appropriate care for them the schools require accurate and up to date information regarding:

- Names and contact details of persons with whom the child normally lives
- Names and contact details of all persons with parental responsibility
- Emergency contact details (if different from above)
- Details of any persons authorised to collect the child from school (if different from above)
- Any relevant court orders in place including those which affect any person's access to the child (e.g. Residence Order, Contact Order, Care Order, Injunctions etc.)
- If the child has or has had a Child Protection Plan
- Name and contact detail of G.P.
- Any other factors which may impact on the safety and welfare of the child

The schools will collate, store and agree access to this information and ensure all staff are aware of and adhere to agreed procedures.

### **Extended School Activities:**

Where the Schools provide services or activities directly under the supervision or management of school staff, the school's arrangements for child protection will apply. Where services or activities are provided separately by another body, the LGB will seek assurance in writing that the body concerned has appropriate policies and procedures in place to safeguard and protect children and that there are arrangements to liaise with the school on these matters where appropriate, including safer recruitment procedures. Risk assessments are completed by the relevant staff before any visit takes place.

### **3. Roles and Responsibilities:**

#### **General**

All adults working with or on behalf of children have a responsibility to safeguard and promote their welfare.

It is the responsibility of staff to report their concerns. It is not their responsibility to investigate or decide whether a child has been abused.

A child who is being abused or neglected may:

- have bruises, bleeding, burns, fractures or other injuries
- show signs of pain or discomfort
- keep arms and legs covered, even in warm weather
- be concerned about changing for PE or swimming
- look unkempt and uncared for
- display difficult behaviour
- change their eating habits
- have difficulty in making or sustaining friendships
- appear fearful
- be reckless with regard to their own or other's safety
- self-harm
- frequently miss school or arrive late
- show signs of not wanting to go home
- display a change in behaviour – from quiet to aggressive, or happy-go-lucky to withdrawn
- challenge authority
- become disinterested in their school work
- be constantly tired or preoccupied
- be wary of physical contact



- be involved in, or particularly knowledgeable about drugs or alcohol
- display sexual knowledge or behaviour beyond that normally expected for their age.

Individual indicators will rarely, in isolation, provide conclusive evidence of abuse. They should be viewed as part of a jigsaw, and each small piece of information will help the DSL to decide how to proceed.

**It is very important that staff report their concerns – they do not need ‘absolute proof’ that the child is at risk.**

All staff have training to enable them to recognise the possible signs of abuse and neglect and to know what to do if they have a concern. The training is regularly updated.

Supply staff and other visiting staff can find a *Safeguarding Concern* form and a guide on what to do or not in the event of a disclosure in the main office (see also Appendix 8 and 9). The names of the **Designated Safeguarding Leads/ Deputies** for the current year are listed at the start of this document and on visitor leaflets.

## **Directors**

In accordance with the Statutory Guidance "*Keeping Children Safe in Education*" – September 2016, the directors will ensure that:

- The schools have a child protection/safeguarding policy, procedures and training in place which are effective and comply with the law at all times .The policy is made available publicly.
- The school operates safer recruitment practices, including appropriate use of references and checks on new staff and volunteers. Furthermore, the Head Teacher, a nominated Governor, Director and other staff involved in the recruitment process have undertaken appropriate Safer Recruitment training;
- There are clear procedures for dealing with allegations of abuse against members of staff and volunteers;
- There is a senior member of the school’s leadership team who is designated to take lead responsibility for dealing with child protection (the “Designated Safeguarding Lead”) and that there is always cover for this role;
- The Designated Safeguarding staff undertake training is every two years, but there must be an update at least annually;
- The Head Teacher, and all other staff and volunteers who work with children, undertake appropriate training which is regularly updated in compliance with the NSCB protocol and that new staff and volunteers who work with children are made aware of the school’s arrangements for child protection and their responsibilities. The Local Authority pocket guide, “Making Children Safer”, the “Keeping Children Safe in Education - 2016 – Information for all School and College Staff” and the “Staff Code of Conduct” will be used as part of this induction;

- Any deficiencies or weaknesses brought to the attention of the Directors or LGB will be rectified without delay;
- The Chair of Directors (or, in the absence of a Chair, the Vice Chair) deals with any allegations of abuse made against the Head Teacher, in liaison with the Local Authority Designated Officer;
- Effective policies and procedures are in place and updated annually including a behaviour policy/"code of conduct" for staff and volunteers. Information is provided to the Local Authority (on behalf of the NSCB) through the annual Section 11 Audit;
- There is an individual member of each Local Governing Body and a Director who will champion issues to do with safeguarding children and child protection within the school, liaise with the Designated Safeguarding Lead, and provide information and reports to the Local Governing Body;
- The school contributes to inter-agency working in line with statutory guidance *"Working Together to Safeguard Children" 2015* and *Northamptonshire County Council's "Thresholds and Pathways Document"* including providing a co-ordinated offer of early help for children who require this. Safeguarding arrangements take into account the procedures and practice of the local authority and the Safeguarding Children Board for Northamptonshire (NSCB).
- Take note of current information and guidelines such as the NSCB which regularly updates policy and procedures, *"Working Together to Safeguard Children" September 2015*, which advocates working closely with other agencies and ensuring everyone takes responsibility to safeguard children.

## **Head Teachers**

The Head Teacher of the school will ensure that:

- The policies and procedures adopted by the Governing Body are effectively implemented, and followed by all staff;
- Sufficient resources and time are allocated to enable the Safeguarding Lead 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;
- Allegations of abuse or concerns that a member of staff or adult working at school may pose a risk of harm to a child or young person are notified to the Local Authority Designated Officer (DO);
- All staff and volunteers feel able to raise concerns about poor or unsafe practice in regard to children, and such concerns are addressed sensitively, confidentially and effectively in a timely manner;
- All staff are made aware that they have an individual responsibility to pass on safeguarding concerns and that if all else fails to report these directly to Children's Social Care Services or the Police.

## **Designated Safeguarding Lead / Deputies**

The responsibilities of the Designated Safeguarding Lead are found in *Annex B* of "*Keeping Children Safe in Education*" 2016 and include:

- Provision of information to the NSCB/Local Authority on safeguarding and child protection;
- Liaison with the Local Governing Body and the Local Authority on any deficiencies brought to the attention of the Local Governing Body or Directors and how these should be rectified without delay;
- Referral of cases of suspected abuse to Multi-Agency Safeguarding Hub (and/or Police where a crime may have been committed);
- Acting as a source of support, advice and expertise within the school;
- Provide a report for, attend and contribute to any subsequent Child Protection Conferences and attend Core Group Meetings, when possible.
- Ensuring each member of staff has access to and understands the school's child protection policy especially new or part-time staff and lunch time staff who may work with different educational establishments;
- Ensuring all staff have induction training covering child protection and are able to recognise and report any concerns immediately they arise. Ensure all staff are given the guidance - the Local Authority pocket guide, "Making Children Safer", the "Keeping Children Safe in Education" - 2016 – Information for all School and College Staff" and the "Staff Code of Conduct";
- Keeping detailed, accurate and secure records of concerns and referrals;
- Obtaining access to resources and training for all staff and attend regular refresher training courses in line with statutory guidance;
- Where children leave the school, ensuring that their child protection information is handed to the Designated Safeguarding Lead of the receiving school/setting and signed for in the new school/college as soon as possible;
- Where a child is subject to a Child Protection Plan goes missing, immediately inform the key worker in Social Care and Education Inclusion Partnership. Clear escalation process to practice manager, MASH duty team and Police.
- Maintaining and monitoring child protection records, including monitoring and acting upon individual concerns, patterns of concerns or complaints.

## **4. Records, Monitoring and Transfer**

Irthlingborough and Finedon Learning Trust Schools notify their local authority when they are about to remove a pupil's name from the school admission register. This duty currently does not apply when a pupil's name is removed from the admission register at standard transition

points – when the pupil has completed the final year of education normally provided by that school – unless the local authority requests that such returns are to be made.

When removing a pupil's name Irthlingborough and Finedon Learning Trust Schools notify the local authority in accordance with Children Missing in Education - Statutory Guidance for Local Authorities (September 2016) this includes:

- the full name of the pupil
- the full name and address of any parent with whom the pupil normally resides
- at least one telephone number of the parent
- the pupil's future address and destination school, if applicable
- the reason why the pupil's name is to be removed from the admission register

Schools must make reasonable enquiries to establish the whereabouts of the child jointly with the local authority, before deleting the pupil's name from the register if the deletion is under regulation 8(1), sub-paragraphs (f)(iii) and (h)(iii) (see Annex A).

Irthlingborough and Finedon Learning Trust Schools must also notify the local authority within five days of adding a pupil's name to the admission register at a non-standard transition point. The notification must include all the details contained in the admission register for the new pupil. This duty does not apply when a pupil's name is entered in the admission register at a standard transition point – at the start of the first year of education normally provided by that school – unless the local authority requests that such returns are to be made. When adding a pupil's name, the notification to the local authority must include all the details contained in the admission register for the new pupil.

Well-kept records are essential to good child protection practice. All staff are clear about the need to record and report concerns about a child or children within the school. The Designated Safeguarding Lead is responsible for such records and for deciding at what point these records should be shared with, or copied and passed over to, other agencies

- Records relating to actual or alleged abuse or neglect are stored separately and securely from normal pupil or staff records. Normal records have markers to show that there is sensitive material stored elsewhere. This is to protect individuals from accidental access to sensitive material by those who do not need to know
- Child protection records are stored securely, with access confined to specific staff, e.g. the Designated Safeguarding Lead and the Head Teacher
- Child protection records are reviewed regularly to check whether any action or updating is needed. This includes monitoring patterns of complaints or concerns about any individuals and ensuring these are acted upon
- When children transfer school all their child protection records are also transferred. Safeguarding records are transferred separately from other records directly to a Designated Safeguarding Lead in the receiving school, with any necessary discussion or explanation and to obtain a signed and dated record of the transfer. In the event of a child moving out of area and a physical handover not being possible then the most secure method possible should be found to send the confidential records to a named Designated Safeguarding Lead by registered

post. Files requested by other agencies e.g. Police, should be copied and shared as appropriate.

## **5. Support for pupils and school staff**

### **Support for pupils**

Irthlingborough and Finedon Learning Trust recognise that children who are abused or who witness violence may find it difficult to develop a sense of self-worth and view the world in a positive way. For such children school may be one of the few stable, secure and predictable aspects of their lives. Other children may be vulnerable because, for instance, they have a disability, are in care, or are experiencing some form of neglect. We will actively seek to provide such children with the necessary support and to build their self-esteem and confidence.

Irthlingborough and Finedon Learning Trust recognise that children sometimes display abusive behaviour and that such incidents must be referred on for appropriate support and intervention.

Complaints or concerns raised by pupils will be taken seriously and followed up in accordance with the school's complaints process.

### **Support for Staff**

As part of their duty to safeguard and promote the welfare of children and young people staff may hear information, either from the child/young person as part of a disclosure or from another adult that will be upsetting. Where a member of staff is distressed as a result of dealing with a child protection concern, he/she should in the first instance speak to the Designated Safeguarding Lead about the support he/she requires. The Designated Safeguarding Lead should seek to arrange the necessary support.

### **Working with Parents/ Carers:**

Irthlingborough and Finedon Learning Trust will:

- Ensure that parents/carers have an understanding of the responsibility placed on the school and staff for child protection by setting out its obligations in the school prospectus and on the school website;
- Undertake appropriate discussion with parents/carers prior to involvement of CYPS Specialist Services (Children's Social Care) or another agency, unless to do so would place the child at risk of harm or compromise an investigation.

### **Early Help**

For children to reach their full potential, it is vital that support is given to families as soon as difficulties arise and before they reach crisis. Early Help can take many forms. This will usually involve work with the school Parent Support Advisor, who can offer support to parents and children. The Parent Support Advisor is available to help parents and children get the best from school, by providing support and information. Some of the things they can help with include:

- Behavioural problems
- Health issues such as sleeping problems
- Change and moving schools
- Supporting children through divorce, illness and bereavement
- Ensuring good attendance
- Understanding children with Special Needs
- Liaison with other professionals to organise additional support for children and their families
- Parenting Support and Classes

It may include an Early Help Assessment and Team around the Family approach. Requests for Early Help may be made by parents, or school staff or requests from MASH when thresholds are not met.

### **Complaints procedure:**

- Our complaints procedure will be followed where a pupil or parent raises a concern about poor practice towards a pupil that initially does not reach the threshold for child protection action. Complaints are managed by senior staff, the Head Teacher and governors.
- Complaints from staff are dealt with under the school's complaints and disciplinary and grievance procedures which can be found in The Irthlingborough and Finedon Learning Trust complaints policy.

### **6. Safer recruitment**

The Irthlingborough and Finedon Learning Trust safer recruitment processes are based on the Statutory Guidance: *"Keeping Children Safe in Education" – September 2016*. We ensure that all appropriate measures are applied in relation to everyone who works in the school who is likely to be perceived by the children as a safe and trustworthy adult including e.g. volunteers and staff employed by contractors. Safer recruitment practice includes scrutinising applicants, verifying identity and academic or vocational qualifications, obtaining professional and character references, checking previous employment history and ensuring that a candidate has the health and physical capacity for the job. It also includes undertaking interviews and stringent vetting. A Single Central Record is kept.

On every interview panel for school staff at least one member (teacher/manager or governor) will have undertaken safer recruitment training either online on the DfE website or by attending other another appropriate local or national accredited training course.

The Irthlingborough and Finedon Learning Trust will provide all the relevant information in references for a member of staff about whom there have been concerns about child protection / inappropriate conduct. Cases in which an allegation has been proven to be unsubstantiated, false or malicious will not be included in employer references. A history of repeated concerns or allegations which have all been found to be unsubstantiated, malicious etc. will also not be included in a reference.

The Irthlingborough and Finedon Learning Trust has an open safeguarding ethos regularly addressing safeguarding responsibilities during staff meetings and fostering an ongoing culture of vigilance. All new staff and volunteers receive a safeguarding induction and are briefed on the code of conduct for adults working with children. The Northamptonshire

County Council Local Authority pocket guide, "Making Children Safer", the "Keeping Children Safe in Education 2016– Information for all school and college staff" and the "Staff Code of Conduct" are given to all staff and are the basis for the safeguarding induction. A training log is maintained to record when child protection / safeguarding training and subsequent training occurs.

## **7. Photography and images**

The vast majority of people who take or view photographs or videos of children do so for entirely innocent, understandable and acceptable reasons. Sadly, some people abuse children through taking or using images, so we must ensure that we have some safeguards in place.

To protect pupils we will:

- seek their consent for photographs to be taken or published (for example, on our website or in newspapers or publications)
- seek parental consent
- use only the pupil's first name with an image
- ensure pupils are appropriately dressed
- encourage pupils to tell us if they are worried about any photographs that are taken of them
- parents or carers are permitted to take photographs of their own children during a school production or event. The Irthlingborough and Finedon Learning Trust protocol requires staff to tell parents that photos of other people's children are not to be published on social networking sites such as Facebook, as they do not have permissions

## **8. Online Safety**

- Mobile phones and computers are a source of fun, entertainment, communication and education and we embrace new technologies. However, there is an element of risk attached to them too.
- Chat rooms and social networking sites are the more obvious sources of inappropriate and harmful behaviour and the schools' E-Safety policy explain how we try to keep pupils safe in school. Cyber-bullying by pupils, via texts and emails, will be treated as seriously as any other type of bullying and will be managed through our anti-bullying procedures.

To ensure the safety and welfare of the children in our care we follow the protocol below for the use of personal mobile phones, lap tops and cameras in the schools.

- All staff must ensure that their mobile phones, personal cameras and recording devices are stored securely during working hours on school premises or when on outings. (This includes visitors, volunteers and pupils).
- Mobile phones must not be used in any teaching area in school or within toilet or changing areas.
- Only school equipment should be used to record classroom activities. Photos should be put on the school system as soon as possible and not sent to or kept on personal devices.
- During school outings nominated staff will have access to a mobile which can be used for emergency or contact purposes.
- All telephone contact with parents or carers must be made on the school phone. Personal mobile phones should not be used without the consent of the head teacher.

- Staff and parents are advised against the misuse of network sites such as Facebook and Twitter to share confidential or potentially negative or abusive comments or information regarding the school, a member of staff, parent or child.

## **9. Related Safeguarding Policies**

The Directors' statutory responsibility for safeguarding the welfare of children goes beyond simply child protection. The duty is to ensure that safeguarding permeates all activity and functions. This policy therefore complements and supports a range of other policies, for instance:

- Behaviour and Exclusion
- Managing allegations against pupils
- Medicines and Supporting Pupils with Medical Conditions Policy
- Managing Allegations
- Whistle blowing
- Complaints procedure
- Anti-bullying (including cyberbullying)
- Staff Code of Conduct (Appendix 9))
- Inclusion
- Equal opportunities
- Online safety
- Attendance
- Safer recruitment /Induction/Training
- Curriculum (including sex education/sexual exploitation/appropriate relationships etc.)
- Grievance and Disciplinary
- School trips and visits
- Health and Safety and Risk Assessments

The above list is not exhaustive but when undertaking development or planning of any kind the schools need to consider the implications for safeguarding and promoting the welfare of children.

## **10. Useful Links**

### **a) Local**

#### **Northamptonshire Safeguarding Children Board (NSCB):**

**1 Angel Square**

**Angel Street**

**Northampton**

**NN1 1ED**

**01604 364036**

<http://www.northamptonshirescb.org.uk/schools/referrals> - eha/how -to-make-an-online-referral/

**"Making Children Safer"** – A Pocket Guide download at:

<http://www.northamptonshire.gov.uk/en/councilservices/EducationandLearning/services/Documents/PDF/%Documents/makingchildrensafer-Guidanceschools.PDF>

**Thresholds and Pathways** document:



<http://www.northamptonshire.gov.uk/en/councilservices/children/-families-education/help-and-protection-for-children/protecting-children-information-for-professionals/Pages/report-concern-about-child-professionals.aspx>

**Early Help** – Request for Services  
Contact Early Help Co-ordinator  
[earlyhelpsupport@northamptonshire.gov.uk](mailto:earlyhelpsupport@northamptonshire.gov.uk)

**Multi-agency referral form** download at:  
<https://northamptonshire.firmstep.com/default.aspx/Renderform/?F.Name=a4NtwT46fcm>

**Directory of services for Early Help**  
[www3.northamptonshire.gov.uk/councilservices/children-families-education/help-and-protection-for-children/protecting-children-information-for-professionals/Documents/menu\\_services.pdf](http://www3.northamptonshire.gov.uk/councilservices/children-families-education/help-and-protection-for-children/protecting-children-information-for-professionals/Documents/menu_services.pdf)

**Directory of services for children with disabilities**  
<http://www.northamptonshire.gov.uk/en/councilservices/children/disabled-children/pages/default.aspx>

**Education Inclusion and Partnerships**  
Online referral form available at:  
[www.northamptonshire.gov.uk/en/councilservices/EducationandLearning/Parents/Pages/Education-Entitlement-Service.aspx](http://www.northamptonshire.gov.uk/en/councilservices/EducationandLearning/Parents/Pages/Education-Entitlement-Service.aspx)

**Safeguarding Adults access advice:**

e-referral form at:  
<http://www3.northamptonshire.gov.uk/councilservices/adult-social-care/safeguarding-/pages/default.aspx>

**b) National**

**National Society for Prevention of Cruelty to Children (NSPCC):**  
<http://www.nspcc.org.uk/>  
**0808 800 5000**

**ChildLine:**  
<http://www.childline.org.uk/Pages/Home.aspx>  
**0800 1111**

**Child Exploitation and Online Protection (CEOP):**  
<http://ceop.police.uk/>  
**0870 000 334**  
[www.dotcomcf.org](http://www.dotcomcf.org)

**Bullying & child abuse:**  
[www.anti-bullyingalliance.org](http://www.anti-bullyingalliance.org)  
[www.kidscape.org.uk](http://www.kidscape.org.uk)

**PLEASE NOTE: website addresses current at the time of writing the policy**



## Appendix 1

### DEFINITIONS OF ABUSE (from 'Keeping Children Safe in Education' 2016)

#### Types of abuse and neglect

All school and college staff should be aware that abuse, neglect and safeguarding issues are rarely standalone events that can be covered by one definition or label. In most cases multiple issues will overlap with one another.

**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. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others (e.g. via the internet). They may be abused by an adult or adults or another child or children.

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

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

**Sexual abuse:** involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving 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 (including via the internet). Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.

**Neglect:** 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.

## Specific safeguarding issues

All staff should have an awareness of safeguarding issues- some of which are listed below. Staff should be aware that behaviours linked to the likes of drug taking, alcohol abuse, truancy and sexting put children in danger. Children with disabilities are more vulnerable to abuse than their peers who do not have a disability for a range of reasons and yet, research shows us that they are less likely to be safeguarded from harm than people without learning disabilities.

When considering whether a disabled child is at risk of or suffering significant harm, professionals should always take into account the nature of the child's disability but should not confuse behaviours that might indicate a person is being abused with those associated with disability (e.g. behaviour that challenges). The following are some additional indicators of possible abuse or neglect:

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

All staff should be aware safeguarding issues can manifest themselves via peer on peer abuse. This is most likely to include, but not limited to: bullying (including cyber bullying), gender based violence/sexual assaults and sexting. Staff should be clear as to the school policy and procedures with regards to peer on peer abuse.

Expert and professional organisations are best placed to provide up-to-date guidance and practical support on specific safeguarding issues. For example information for schools and colleges can be found on the TES, MindEd and the NSPCC websites. School and college staff can access government guidance as required on the issues listed below via GOV.UK and other government websites:

- bullying including cyberbullying
- children missing education
- child missing from home or care
- child sexual exploitation (CSE) – see Appendix 4
- domestic violence
- drugs
- fabricated or induced illness
- faith abuse
- female genital mutilation (FGM) – see Appendix 5
- forced marriage-
- gangs and youth violence
- gender-based violence/violence against women and girls (VAWG)
- hate
  - honour based violence – see Appendix 6
- mental health

- missing children and adults strategy
- private fostering – see Appendix 7
- preventing radicalisation
- relationship abuse
- sexting
- trafficking

### **Prevent Duty Guidance**

All staff will be made aware of the Prevent Duty guidance and will have local awareness training, regarding strategies to ensure a broad and balanced curriculum. Visitors will be appropriately supervised.

Staff should have training to ensure they have the confidence and knowledge to identify children at the risk of being drawn into terrorism and to challenge extremist views that legitimise terrorism. Appropriate levels of filtering and supervision will be in place to ensure that children are safe from extremist and terrorist when accessing the internet.

For the full guidance please read the linked documentation

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

## Appendix 2

### PROCEDURE TO FOLLOW IN CASES OF POSSIBLE, ALLEGED OR SUSPECTED ABUSE, OR SERIOUS CAUSE FOR CONCERN ABOUT A CHILD

#### a) General

1. The Northamptonshire Safeguarding Children Board for Northamptonshire Procedures contains the inter-agency processes, protocols and expectations for safeguarding children. (Available on NSCB website [www.northamptonshirescb.org.uk](http://www.northamptonshirescb.org.uk)). The Designated Safeguarding Lead is expected to be familiar with these, particularly the referral processes and with NCC "Thresholds and Pathways".
2. It is important that all parties act swiftly and avoid delays.
3. Any person may seek advice and guidance from the Multi-Agency Safeguarding Hub particularly if there is doubt about how to proceed (see contacts at the start of this policy document). Any adult, whatever their role, can take action in his/her own right to ensure that an allegation or concern is investigated and can report to the investigating agencies.
4. Written records, dated and signed, must be made to what has been alleged, noticed and reported, and kept securely and confidentially (see Appendix 7)
5. In many cases of concern there will be an expectation that there have already been positive steps taken to work with parents and relevant parties to help alleviate the concerns and effect an improvement for the child. This is appropriate where it is thought a child may be in need in some way, and require assessment to see whether additional support and services are required. An example might be where it is suspected a child may be the subject of neglect. In most cases the parents' knowledge and consent to the referral are expected, unless there is reason for this not being in the child's interest. However, there will be circumstances when informing the parent/carer of a referral that might put the child at risk, and in individual cases advice from Children's Social Care will need to be taken.

#### b) Individual Staff/Volunteers/Other Adults – main procedural steps

1. When a child makes a disclosure, or when concerns are received from other sources, **do not** investigate, ask leading questions, examine children, or promise confidentiality. Children making disclosures should be reassured and if possible at this stage should be informed what action will be taken next (see Appendix )
2. As soon as possible write a dated, timed and signed note of what has been disclosed or noticed, said or done and report to the Designated Safeguarding Lead in the school.
3. If the concern involves the conduct of a member of staff or volunteer, a visitor, a governor, a trainee or another young person or child, the Head Teacher must be informed. The Head Teacher will contact the DO to seek advice (see page 5 for details).
4. If the allegation is about the Head Teacher, the information should normally be passed to the Chair of Local Governing Body or the Designated Officer (DO).

5. If this has not already been done, inform the child (or other party who has raised the concern) what action you have taken.

**c) Designated Safeguarding Lead – Main Procedural Steps**

1. Begin a case file for pupils where there are concerns, with an overview chronology, which will hold a record of communications and actions. This must be stored securely (see Section on Records and Monitoring, page 11).
2. Where initial enquiries do not justify a referral to the investigating agencies inform the initiating adult and monitor the situation. If in doubt, seek advice from the Multi-Agency Safeguarding Hub: 0300 126 1000.
3. Share information confidentially with those who need to know.
4. Where there is a child protection concern requiring immediate, same day, intervention from Children's Social Care, the Multi-Agency Safeguarding Hub should be contacted immediately by phone then by following up with the online form, where requested to do so. The Multi-Agency Safeguarding Hub is available for advice on the advice line number given in the contact details on page 5 of this document.
5. If it appears that urgent medical attention is required arrange for the child to be taken to hospital (normally this means calling an ambulance) accompanied by a member of staff who must inform medical staff that non-accidental injury is suspected. Parents must be informed that the child has been taken to hospital.
6. Exceptional circumstances: If it is feared that the child might be at immediate risk on leaving school, take advice from the Multi-Agency Safeguarding Hub (for instance about difficulties if the school day has ended, or on whether to contact the police). Remain with the child until the Social Worker or Police take responsibility. If in these circumstances a parent arrives to collect the child, the member of staff has no right to withhold the child, unless there are current legal restrictions in force (e.g. a restraining order). If there are clear signs of physical risk or threat, the Multi-Agency Safeguarding Hub should be updated and the Police should be contacted immediately.

## Appendix 3

**PROCESS FOR DEALING WITH ALLEGATIONS AGAINST STAFF (INCLUDING HEADTEACHERS) AND VOLUNTEERS** (References to staff in this process include staff in schools, central services and volunteers).

These procedures should be followed in all cases in which there is an allegation or suspicion that a person working with children 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 would pose a risk of harm if they work regularly or closely with children.

Relevant documents:

- DfE *"Keeping Children Safe in Education: Statutory guidance for schools and colleges"* - September 2016 (part 4).
- NSCB procedures – Section 5.

### **a) Individual Staff/Volunteers/Other Adults who receive the allegation:**

1. Write a dated and timed note of what has been disclosed or noticed, said or done.
2. Report immediately to the Head Teacher.
3. Pass on the written record.
4. If the allegation concerns the conduct of the Head Teacher, report immediately to the Chair of Local Governing Body. Pass on the written record. (If there is difficulty reporting to the Chair initially contact the Chair of Directors of The Irthlingborough and Finedon Learning Trust, contact the DO as soon as possible or if unavailable contact the Multi-Agency Safeguarding Hub on the same day.)

### **b) Head Teacher**

1. If there is no written record, write a dated and timed note of what has been disclosed or noticed, said or done.
2. Before taking further action notify and seek advice from the DO, or if unavailable the Multi-Agency Safeguarding Hub on the same day.
3. You may be asked to clarify details or the circumstances of the allegation, but this must not amount to an investigation.
4. Report to the Multi-Agency Safeguarding Hub if the DO, so advises or if circumstances require a referral.
5. Ongoing involvement in cases:
  - Liaison with the DO
  - Co-operation with the investigating agency's enquiries as appropriate.
  - Consideration of employment issues and possible disciplinary action where the investigating agencies take no further action.

### **c) Chair/vice chair of Local Governing Body and Chair of the Directors (only relevant in the case of an allegation against the Head Teacher)**

1. If there is no written record, write a dated and timed note of what has been disclosed or noticed, said or done.



2. Notify the DO, or if unavailable the Multi-Agency Safeguarding Hub on the same day.
3. You may be asked to clarify details or the circumstances of the allegation, but this must not amount to an investigation.
4. Report to the Multi-Agency Safeguarding Hub if the DO so advises or if circumstances require a referral.
5. Ongoing involvement in cases:
  - Liaison with the DO
  - Co-operation with the investigating agency's enquiries as appropriate.
  - Consideration of employment issues and possible disciplinary action where the investigating agencies take no further action.

## Appendix 4

### Child Sexual Exploitation

Child sexual exploitation (CSE) is a type of sexual abuse in which children are sexually exploited for money, power or status.

Children or young people may be tricked into believing they're in a loving, consensual relationship. They might be invited to parties and given drugs and alcohol. They may also be groomed online. Some children and young people are trafficked into or within the UK for the purpose of sexual exploitation. Sexual exploitation can also happen to young people in gangs.

#### Official definition of child sexual exploitation (CSE)

Sexual exploitation of children and young people under 18 involves exploitative situations, contexts and relationships where young people (or a third person or persons) receive 'something' (e.g. food, accommodation, drugs, alcohol, cigarettes, affection, gifts, money) as a result of them performing, and/or another or others performing on them, sexual activities. Child sexual exploitation can occur through the use of technology without the child's immediate recognition; for example being persuaded to post sexual images on the Internet/mobile phones without immediate payment or gain.

In all cases, those exploiting the child/young person have power over them by virtue of their age, gender, intellect, physical strength and/or economic or other resources.

Violence, coercion and intimidation are common, involvement in exploitative relationships being characterised in the main by the child or young person's limited availability of choice resulting from their social/economic and/or emotional vulnerability.

Child sexual exploitation is a hidden crime. Young people often trust their abuser and don't understand that they're being abused. They may depend on their abuser or be too scared to tell anyone what's happening.

It can involve violent, humiliating and degrading sexual assaults, including oral and anal rape. In some cases, young people are persuaded or forced into exchanging sexual activity for money, drugs, gifts, affection or status. Child sexual exploitation doesn't always involve physical contact and can happen online.

#### WARNING SIGNS AND VULNERABILITIES CHECKLIST

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

- Living in a chaotic or dysfunctional household (including parental substance use, domestic violence, parental mental health issues, parental criminality)
- History of abuse (including familial child sexual abuse, risk of forced marriage, risk of 'honour'-based violence, physical and emotional abuse and neglect)
- Recent bereavement or loss
- Gang association either through relatives, peers or intimate relationships (in cases of gang-associated CSE only)
- Attending school with young people who are sexually exploited
- Learning disabilities
- Unsure about their sexual orientation or unable to disclose sexual orientation to their families
- Friends with young people who are sexually exploited
- Homeless

- Lacking friends from the same age group
- Living in a gang neighbourhood
- Living in residential care
- Living in hostel, bed and breakfast accommodation or a foyer
- Low self-esteem or self-confidence
- Young carer

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

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

Evidence shows that any child displaying several vulnerabilities from the above lists should be considered to be at high risk of sexual exploitation. If you identify a child who you consider to be suffering from or a high risk of CSE, it is important that the Designated Safeguarding Lead in school is informed so that they can contact Children's Services.

### **Child sexual abuse online**

When sexual exploitation happens online, young people may be persuaded, or forced, to:

- send or post sexually explicit images of themselves
- take part in sexual activities via a webcam or smartphone
- have sexual conversations by text or online

Abusers may threaten to send images, video or copies of conversations to the young person's friends and family unless they take part in other sexual activity. Images or videos may continue to be shared long after the sexual abuse has stopped.

### **Child sexual exploitation in gangs**

Sexual exploitation is used in gangs to:

- exert power and control over members
- initiate young people into the gang
- exchange sexual activity for status or protection
- entrap rival gang members by exploiting girls and young women
- inflict sexual assault as a weapon in conflict.

Girls and young women are frequently forced into sexual activity by gang members. The majority of sexual exploitation within gangs is committed by teenage boys and men in their twenties.

### **Who sexually exploits children and young people?**

We don't know a great deal about who commits child sexual exploitation. Identifying abusers is difficult because:

- data often isn't recorded or is inconsistent or incomplete
- children and young people often only know their abuser by an alias, nickname or appearance
- victims may be passed between abusers and assaulted by multiple perpetrators
- children and young people are often moved from location to location and abused in each place
- young people may be given alcohol or drugs

The number of known perpetrators is likely to be far higher than those reported. People who sexually exploit children are often described as highly manipulative individuals. They exert power over young people through physical violence, emotional blackmail or financial pressure, for example holding them in debt.

To maintain control or to distance children and young people from those who may be able to protect them, abusers create or exploit weaknesses such as:

- being isolated/distant from friends and family
- disengagement from services such as education or health
- challenging or criminal behaviour

### **Gender, age and ethnicity of perpetrators**

The Children's Commissioner's study found that:

- 72% of abusers were male
- 10% of abusers were female
- in 18% of cases gender wasn't disclosed

The evidence indicated that the age range of abusers was from 12 to 75 years. Where ethnic group was recorded, the majority of perpetrators were White and the second largest group was Asian.

### **Child sexual exploitation committed by children and young people**

In 2012 Barnardo's reported an increase in sexual exploitation by peers in eight of their services. They found young people were sexually exploiting peers either directly by sexually abusing victims themselves or indirectly by introducing children and young people to abusers. The Children's Commissioner Inquiry found that of the 2,409 victims reported to them, 155 were also identified as perpetrators of child sexual exploitation.

According to the Child Exploitation and Online Protection Centre (CEOP), perpetrators can use one victim to gain access to others, asking victims to bring their friends along to prearranged meetings or 'parties'. In some cases, if victims try to break free, the perpetrator will use their peers to draw them back in.

## **Appendix 5**

### **Prevention of Female Genital Mutilation, Forced Marriage and Honour Based Violence**

Schools are well placed to raise concerns and take action to prevent young people from being forced into marriage whilst on extended visits to their parents' home country or that of extended family. The majority of extended holidays or visits to family overseas are for valid reasons. This guidance aims to raise the awareness of education professionals regarding the safeguarding of children at risk. It should be read together with the multi-agency practice guidelines produced by the Forced Marriage Unit and the Foreign and Commonwealth Office.

#### **What is forced marriage?**

A forced marriage is a marriage in which one or both spouses do not (or, in the case of some adults with learning or physical disabilities, cannot) consent to the marriage and duress is involved. Duress can include physical, psychological, financial, sexual and emotional pressure. This is not the same as an arranged marriage. In arranged marriages, the families of both spouses take a leading role in arranging the marriage but the choice whether or not to accept the arrangement remains with the prospective spouses.

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

Pupils, male or female, from as young as 11 may be at risk of being forced into marriage by parents. They may be pressurised and then agree to marry one of the prospective candidates without time for reflection. The younger pupils may be betrothed with the expectation that they will enter full married state at a later stage of their lives.

In the UK, young people can be forced into a legal marriage from age 16 or undergo a religious ceremony at an earlier age and suffer sexual abuse.

#### **The key motives for forcing a child into marriage have been identified as:**

- Controlling unwanted behaviour and sexuality (including perceived promiscuity such as kissing or hand holding, or being gay, lesbian, bisexual or transgender) – particularly the behaviour and sexuality of women
- Controlling unwanted behaviour, for example, alcohol and drug use, wearing make-up or behaving in a 'westernized manner'
- Preventing 'unsuitable' relationships, e.g. outside the ethnic, cultural religious or caste group
- Protecting 'family honour' or 'izzat'
- Rejecting a proposal of marriage
- Responding to peer group or family pressure
- Attempting to strengthen family links
- Achieving financial gain
- Ensuring land, property and wealth remain within the family
- Protecting perceived cultural ideas
- Protecting perceived religious ideals that are misguided
- Ensuring care for a child or vulnerable adult with special needs when parents or existing carers are unable to fulfil that role
- Assisting claims for residence and citizenship
- Long standing family commitments

## Female genital mutilation (FGM)

Female genital mutilation (FGM) involves procedures that include the partial or total removal of the external female genital organs for cultural or other non-therapeutic reasons. The practice is medically unnecessary, extremely painful and has serious health consequences, both at the time when the mutilation is carried out and in later life. Schools are well placed to identify concerns and take action to prevent children from becoming victims of FGM. This guidance aims to raise awareness amongst education professionals of children at risk of FGM; it should be read together with the Multi-Agency practice guidelines produced by the [Home Office](#).

Who is at risk?

A recent study<sup>1</sup> has estimated that approximately:

- 60,000 girls aged 0 to 14 years were born in England and Wales to mothers who had undergone FGM.
- 103,000 women aged 15 to 49 and approximately 24,000 women aged 50 and over who have migrated to England and Wales are living with the consequences of FGM.
- 10,000 girls aged under 15 who have migrated to England and Wales are likely to have undergone FGM.

FGM is prevalent in 30 countries. These are concentrated in countries around the Atlantic coast to the Horn of Africa, in areas of the Middle East and in some countries in Asia. However, it also takes place within parts of Western Europe and other developed countries, primarily amongst immigrant and refugee communities. UK communities that are at risk of FGM include Somali, Kenyan, Ethiopian, Sierra Leonean, Sudanese, Egyptian, Nigerian, Eritrean, Yemeni, Kurdish and Indonesian women and girls.

### Risks & Indicators of FGM<sup>2</sup>

There are a range of potential indicators that a child or young person may be at risk of FGM. It is important to remember this is not an exhaustive list of risk factors. There may be additional risk factors specific to particular communities. For example, in certain communities FGM is closely associated to when a girl reaches a particular age.

If any of these risk factors are identified professionals will need to consider what action to take. If unsure whether the level of risk requires referral at this point, professionals should discuss the case with their designated safeguarding lead.

**If the risk of harm is imminent, emergency measures may be required.**

<b>FACTORS THAT MAY INDICATE A GIRL IS POTENTIALLY AT RISK OF BEING AFFECTED BY FGM</b>
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The most significant factor to consider when deciding whether a girl or woman may be at risk of FGM is whether her family has a history of practising FGM. In addition, it is important to consider whether FGM is known to be practised in her community or country of origin.
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There are a number of factors in addition to a girl's or woman's community, country of origin and family history that could indicate she is at risk of being subjected to FGM. Potential risk factors may include:
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<sup>1</sup> Macfarlane A, Dorkenoo E. Female Genital Mutilation in England and Wales: Updated statistical estimates of the numbers of affected women living in England and Wales and girls at risk.

<sup>2</sup> Adapted from 'Multi-Agency Practice Guidelines: Female Genital Mutilation', HM Government (2016)

- a female child is born to a woman who has undergone FGM;
- a female child has an older sibling or cousin who has undergone FGM;
- a female child's father comes from a community known to practise FGM;
- the family indicate that there are strong levels of influence held by elders and/or elders are involved in bringing up female children;
- a woman/family believe FGM is integral to cultural or religious identity;
- a girl/family has limited level of integration within UK community;
- parents have limited access to information about FGM and do not know about the harmful effects of FGM or UK law;
- a girl confides to a professional that she is to have a 'special procedure' or to attend a special occasion to 'become a woman';
- a girl talks about a long holiday to her country of origin or another country where the practice is prevalent;
- parents state that they or a relative will take the girl out of the country for a prolonged period;
- a parent or family member expresses concern that FGM may be carried out on the girl;
- a family is not engaging with professionals (health, education or other);
- a family is already known to social care in relation to other safeguarding issues;
- a girl requests help from a teacher or another adult because she is aware or suspects that she is at immediate risk of FGM;
- a girl talks about FGM in conversation, for example, a girl may tell other children about it - it is important to take into account the context of the discussion;
- a girl from a practising community is withdrawn from Personal, Social, Health and Economic (PSHE) education or its equivalent;
- a girl is unexpectedly absent from school.

#### **INDICATIONS THAT FGM MAY HAVE ALREADY TAKEN PLACE**

A girl may:

- ask for help;
- confide in a professional that FGM has taken place;
- have difficulty walking, sitting or standing or looks uncomfortable;
- find it hard to sit still for long periods of time, and this was not a problem previously;
- spend longer than normal in the bathroom or toilet due to difficulties urinating;
- spend long periods of time away from a classroom during the day with bladder or menstrual problems;

- have frequent urinary, menstrual or stomach problems;
- avoid physical exercise or requires to be excused from physical education (PE) lessons without a GP's letter;
- have prolonged or repeated absences from school or college
- have increased emotional and psychological needs, for example withdrawal or depression, or a significant change in behaviour;
- be reluctant to undergo any medical examinations;
- ask for help, but is not be explicit about the problem; and/or
- talk about pain or discomfort between her legs.

### **Mandatory Reporting Requirements for Teachers (October 2015)**

Section 5B of the FGM Act 2003 (as amended by the Serious Crime Act 2015) introduces a mandatory reporting duty which requires regulated health and social care professionals and teachers in England and Wales to report '**known**' cases of FGM in under 18s which they identify in the course of their professional work to the police. The duty applies from 31 October 2015 onwards.

The duty applies to any teacher who is employed or engaged to carry out 'teaching work', whether or not they have qualified teacher status, in maintained schools, academies, free schools, independent schools, non-maintained special schools, sixth form colleges, 16-19 academies, relevant youth accommodation or children's homes in England.

The duty does not apply in suspected cases or if a teacher identifies a child at risk of FGM but these concerns should be reported to the Designated Safeguarding Lead within the school in any event.

The duty is a personal duty which requires the individual professional who becomes aware of the case to make a report; the responsibility cannot be transferred. The only exception to this is if you know that another individual from your profession has already made a report; there is no requirement to make a second.

Guidance from the Home Office on this reporting requirement advises that any professional making a report to the police does this orally by calling 101, the single non-emergency number. Where there is a risk to life or likelihood of serious immediate harm, professionals should report the case immediately to police, including dialling 999 if appropriate. Full procedural information relating to the requirement including frequently asked questions is provided within the Home Office Guidance and should be read by all relevant professionals working in a school.

If a member of staff needs to report a 'known' case of FGM to the police, they should also be advised to inform the Designated Safeguarding Lead in line with the school's safeguarding policy.

### **What can you do to spot the risks?**

It is believed that FGM happens to British girls in the UK as well as overseas (often in the family's country of origin). Girls of school age who are subjected to FGM overseas are



thought to be taken abroad at the start of the school holidays, particularly in the summer holidays, in order for there to be sufficient time for her to recover before returning to her studies.

When managing requests for absence, it is useful for school clusters/pyramids to share a common absence request form which requests information on all siblings who attend other schools. Sometimes younger siblings tell teachers information that has a bearing on older members of the family. Schools should liaise with each other when considering requests for leave of absence during term-time.

Parents/carers will sometimes require translation or interpretation of absence request forms and explanation of the rules concerning term time holidays.

Where head teachers require a meeting with parents to discuss applications for extended leave of absence during term time, this can provide an opportunity to gather important information.

When parents/carers make requests for extended holiday leave, consider whether the parents/carers are volunteering information on the following:

- The precise location of where the pupil is going
- The purpose of the visit
- The child/children know and corroborate the purpose of the visit
- The return date and whether it is estimated or fixed

Parents/carers may not always be able to provide a definite return date due to return flights being booked as last minute availability occurs. The circumstances triggering a trip may also necessitate a flexible return date.

**If a return date has been specified and a child has not returned to school, school must contact their Attendance Improvement Officer.**

In no circumstances should a school remove the student from the roll without first making enquiries about the child's disappearance in line with Northamptonshire County Council's Children Missing Education Procedures. Children's Services and the Police should be notified as appropriate.

### **What to do if you are concerned:**

A child at risk of FGM may also be at risk of other forms of honour based abuse. Extreme caution should be taken in sharing information with any family members or those with influence within the community as this may alert them to your concerns and may place the student in danger.

### **Honour based violence**

'Honour' based violence (HBV) occurs when perpetrators believe a relative or other individual has shamed or damaged a family's or community's 'honour' or reputation (known in some communities as izzat), and that the only way to redeem the damaged 'honour' is to punish and/or kill the individual.

'Honour' based violence is a term that is widely used to describe this sort of abuse however it is often referred to as so called 'honour' based violence because the concept of 'honour' is used by perpetrators to make excuses for their abuse. There is a very strong link between

'honour' based violence, forced marriage and domestic abuse.

Examples of damaged honour are:

- Defying parental authority
- Becoming overly westernised in style (e.g. clothing, make up, behaviour, attitudes, etc.)
- Having sex/relationships/pregnancies outside marriage
- Using drugs, alcohol, cigarettes
- Gossip – family honour can be damaged by unfounded or untrue gossip or rumours
- Interfaith or intercommunity relationships
- Leaving a spouse or seeking a divorce

### **Forms of 'honour' based violence can include, but are not limited to:**

- Being disowned or ostracised by the community
- Physical abuse of the victim by family members including spouse and in laws
- Restriction of freedom or loss of independence – being "policed" by family members
- Isolation from wider family or community, e.g. stopped from seeing friends
- Forced marriage
- Murder

Internalisation of guilt or shame by the victim can cause internal conflict for them, and not wanting to cause further shame can result in self-harm and suicide attempts.

### **Potential indicators of 'honour' based violence**

Cases will rarely present as forced marriage and/or 'honour' based violence, and the victim (particularly children and young people) will not usually mention either forced marriage or 'honour' based violence.

### **Education**

- Withdrawal of student from school by those with parental responsibility
- Removal of day centre for person with physical or learning disability
- Sudden announcement of engagement to a stranger
- Student being prevented from attending higher or higher education
- Truancy or persistent absences
- Request for extended leave or student not returning from an overseas visit
- Surveillance by siblings/cousins/extended family members at school
- Decline in behaviour, engagement, performance or punctuality, poor exam results – in particular for previously motivated student
- Decline in physical presentation or demeanour

### **Health**

- Patient constantly being accompanied on visits to doctor, midwife and/or clinics
- Self-harm and/or eating disorders
- Attempted suicide
- Depression
- Isolation
- Alcohol or substance misuse
- Early, unwanted or constant pregnancy
- Female genital mutilation (an offence under the Female Genital mutilation Act 2003)

## **Family History**

- Siblings being forced to marry
- Early marriage of siblings
- Self-harm or suicide of siblings
- Death of a parent
- Family disputes
- Domestic Violence and abuse
- Running away from home
- Unreasonable restrictions (e.g. house arrest)
- Never being allowed to leave the home unescorted
- Financial restrictions (e.g. not being access to own money or bank account)

## **Employment**

- Poor performance
- Poor attendance
- Limited career choices
- Unable to attend business trips or functions
- Not allowed to work
- Subject to financial control (e.g. not being given access to own money or bank account)

## **Police Involvement**

- Victim or other sibling being reported as missing
- Reports of domestic abuse, violence harassment or breaches of the peace in the family home
- Reports of other offences such as rape or kidnap
- Victim reported by family for alleged offences (e.g. substance misuse, shoplifting)
- Threats to kill
- Attempts to kill or harm
- Acid attacks
- Female genital mutilation (an offence under the Female Genital mutilation Act 2003)

## **Risk Factors and Motivations**

Many young people, throughout their childhood, expect their parents to choose or select their marriage partner for them, and may not realise they have a fundamental human right to choose their spouse. Motives behind forced marriage can be justified, by the perpetrators, as protection of their children or preservation of cultural or religious traditions, and they are unlikely, therefore, to see anything wrong with their actions.

Some of the key motivations, identified by practitioners working with victims of forced marriage and "honour" based violence, include:

- Controlling unwanted or perceived promiscuity
- Controlling sexuality
- Preventing "unsuitable" or undesirable relationships (e.g. outside ethnic, cultural, religious or caste group)
- Protecting family 'honour' and pride/ izzat
- Responding to peer group or family pressure

- Fulfilling long standing family commitments and/or to strengthen family links or ties
- Protecting perceived cultural ideals
- Protecting perceived religious ideals which are misguided
- Ensuring care for a child or vulnerable adult with special needs
- Assisting claims for UK residence and/or citizenship
- Protecting family wealth, land or property or increasing wealth

**Some factors increase the risk of someone being forced into marriage and can include:**

- Bereavement within a family – occasionally, when a parent dies, the remaining parent feels an urgency to ensure the children are married
- When a step parent moves in with the family
- When an older child refuses to marry a younger child may be forced in to the marriage to protect the family 'honour' or fulfil the original contract
- When a disclosure of sexual abuse is made – parents may feel the marriage will restore the family 'honour' or stop the abuse These motivations may help practitioners understand why parents may force their children to marry but cannot be used as justification for denying their children their human right to choose their own marriage partner.

Every major faith group, including Islam, Sikh, Hindu and Christian, condemns forced marriage and all require freely given consent as a pre requisite for a valid marriage to take place.

**Initial steps –**

Agencies may only get 'one chance to help an individual escape from honour based violence. Remembering the 'one chance rule' the agency should carefully question the person concerned as cases are frequently complex and highly sensitive to the individual. The reason behind a forced marriage or "honour" based violence may be due to sexuality or disability as well as cultural belief. The majority of victims will be women but this does not mean that there are not male victims. All cases should be dealt with seriously. There is no specific offence of forced marriage or "honour" based violence but the victim concerned may have been subjected to a number of offences

Initially agencies will need to take the following essential action:

- Ensure the victim is seen in a safe and private place (if there is imminent risk phone 999)
  - See the victim on their own, if an interpreter is needed take steps to ensure that the interpreter is not connected with the individual or community
  - Where victim is under 18, refer to child safeguarding procedures
  - Identify any potential criminal offences and refer to the police if appropriate
  - Reassure the victim, this will include ensuring that their confidentiality is maintained
  - Establish a safe way of maintaining contact with the victim
- Do not send the victim back to the family home as part of the routine safeguarding or domestic abuse procedures – practitioners need to be sure that such action will be safe for the victim and, if it is, that the victim has a safety plan and is clear on how to access support when it is needed at any point in the future
    - Do not approach family members and/or members of the community without an express request from the victim,

- Do not breach confidentiality or share information inappropriately, unless due to safeguarding concerns for a child or vulnerable adult or an adult at risk of serious harm or homicide (MARAC referral).
- Do not use friends, family members, community leaders or members as interpreters even if they give reassurances of their support for the victim
- Do not share information from any strategy meetings or MARAC discussions without the agreement of partners at those meetings and the expressed consent of the victim
- Do not contact the family in advance of any enquiries by the police, the Forced Marriage Unit, adult or children's social care, either by telephone or letter

Remember Cases of 'honour' based violence and forced marriage may not fit with some of the principles of working with children and families, as they may, inadvertently, place the victim at greater risk of harm. This includes the principle that the best place for a child or young person is with his/her family. It also includes the practice of attempting to resolve cases through family mediation, counselling, arbitration or reconciliation.

## **Appendix 6**

### **Peer on Peer Abuse**

#### **Managing allegations against other pupils**

DfE guidance Keeping Children Safe in Education (2016) says that 'governing bodies should ensure that there are procedures in place to handle allegations against other children'. The guidance also states the importance of minimising the risks of peer-on- peer abuse. In most instances, the conduct of students towards each other will be covered by the school's behaviour policy. Some allegations may be of such a serious nature that they may raise safeguarding concerns. These allegations are most likely to include physical abuse, emotional abuse, sexual abuse and sexual exploitation. It is also likely that incidents dealt with under this policy will involve older students and their behaviour towards younger students or those who are vulnerable.

#### **The safeguarding implications of sexual activity between young people**

The intervention of child protection agencies in situations involving sexual activity between children can require difficult professional judgments. Some situations are statutorily clear – for example, a child under the age of 13 cannot consent to sexual activity. But it will not necessarily be appropriate to initiate safeguarding procedures where sexual activity involving children and young people below the age of legal consent (16 years) comes to notice. In our society generally the age at which children become sexually active has steadily dropped. It is important to distinguish between consensual sexual activity between children of a similar age (where at least one is below the age of consent), and sexual activity involving a power imbalance, or some form of coercion or exploitation. It may also be difficult to be sure that what has or has been alleged to have taken place definitely does have a sexual component.

As usual, important decisions should be made on a case by case basis, on the basis of an assessment of the children's best interests. Referral under safeguarding arrangements may be necessary, guided by an assessment of the extent to which a child is suffering, or is likely to suffer, significant harm. Key specific considerations will include:

- The age, maturity and understanding of the children
- Any disability or special needs of the children
- Their social and family circumstance
- Any evidence in the behaviour or presentation of the children that might suggest they have been harmed
- Any evidence of pressure to engage in sexual activity
- Any indication of sexual exploitation.

There are also contextual factors. Gender, sexuality, race and levels of sexual knowledge can all be used to exert power. A sexual predator may sometimes be a woman or girl and the victim a boy

#### **Policy:-**

At The Irthlingborough and Finedon Learning Trust we believe that all children have a right to attend school and learn in a safe environment. Children should be free from harm by adults in the school and other students.

We recognise that some students will sometimes negatively affect the learning and wellbeing of others and their behaviour will be dealt with under the school's behaviour policy.

### **Prevention**

As a school we will minimise the risk of allegations against other pupils by:-

- Providing a developmentally appropriate PSHE syllabus which develops students understanding of acceptable behaviour and keeping themselves safe
- Having systems in place for any student to raise concerns with staff, knowing that they will be listened to, believed and valued
- Delivering targeted work on assertiveness and keeping safe to those pupils identified as being at risk
- Developing robust risk assessments & providing targeted work for pupils identified as being a potential risk to other pupils.

### **Allegations against other pupils which are safeguarding issues**

Occasionally, allegations may be made against students by others in the school, which are of a safeguarding nature. Safeguarding issues raised in this way may include physical abuse, emotional abuse, sexual abuse and sexual exploitation. It is likely that, to be considered a safeguarding allegation against a pupil, some of the following features will be found.

If the allegation:-

- Is made against an older pupil and refers to their behaviour towards a younger pupil or a more vulnerable pupil
- Is of a serious nature, possibly including a criminal offence
- Raises risk factors for other pupils in the school
- Indicates that other pupils may have been affected by this student
- Indicates that young people outside the school may be affected by this student

Examples of safeguarding issues against a student could include:

#### **Physical Abuse**

- Violence, particularly pre-planned
- Forcing others to use drugs or alcohol

#### **Emotional Abuse**

- Blackmail or extortion
- Threats and intimidation

#### **Sexual Abuse**

- Indecent exposure, indecent touching or serious sexual assaults
- Forcing others to watch pornography or take part in sexting

## **Sexual Exploitation**

- Encouraging other children to engage in inappropriate sexual behaviour ( For example - having an older boyfriend/girlfriend, associating with unknown adults or other sexually exploited children, staying out overnight)
- Photographing or videoing other children performing indecent acts

## **Sexting in schools and colleges, responding to incidents, and safeguarding young people, guidance from the UK Council for Child Internet Safety (UKCCIS)**

In August 2016 the UK Council for Child Internet Safety (UKCCIS) published non-statutory guidance on managing incidents of sexting by under-18s. Over 200 organisations were involved in creating the guidance, including government and the DfE, children's charities, UK Safer Internet Centre, CEOP, Police, and teachers' groups.

The UKCCIS guidance is non-statutory, but should be read alongside 'Keeping children safe in education'. It should be followed unless there's a good reason not to do so.

There is no clear definition of 'sexting'. Instead, this document talks about 'youth-produced sexual imagery'. This is imagery that is being created by under 18s themselves and involves still photographs, video, and streaming. In the guidance, this content is described as sexual and not indecent. Indecent is subjective and has no specific definition in UK law.

### **Incidents covered by this guidance:**

- Person under 18 creates a sexual image of themselves and shares it with another person under 18
- A person under 18s shares an image of another under 18 with another person under 18 or an adult
- A person under 18 is in possession of sexual imagery created by another person under 18

### **Incidents not covered by this guidance:**

- Under 18s sharing adult pornography
- Under 18s sharing sexual texts without sexual imagery
- Adults sharing sexual imagery of under 18s. (This is child sexual abuse and must always be reported to police.)
- 

### **Response to incidents of youth produced sexual imagery**

The response should be guided by the 'principle of proportionality'.

'The primary concern at all times should be the welfare and protection of the young people involved.' (Sexting in schools and colleges: responding to incidents and safeguarding young people (page 8))

### **The Law**

*Making, possessing, and distributing any imagery of someone under 18 which is indecent is illegal. This includes imagery of yourself if you're under 18.*



Indecent is not definitively defined in law, but images are likely to be considered indecent if they depict:

- a naked young person
- a topless girl
- an image which displays genitals, and
- sex acts including masturbation
- indecent images may also include overtly sexual images of young people in their underwear

These laws weren't created to criminalise young people but to protect them.

Although sharing sexual images of themselves is illegal and risky, it is often the result of curiosity and exploration. Young people need education, support, and safeguarding, not criminalisation.

The National Police Chiefs' Council (NPCC) is clear that "youth-produced sexual imagery should be primarily treated as a safeguarding issue."

Schools may respond to incidents without involving the police. (However, in some circumstances, the police must always be involved.)

## **Crime recording**

When the police are notified about youth-produced sexual imagery, they must record this as a crime. The incident is listed as a crime, and the young person is the suspect. This is, however, not the same as a criminal record.

Every crime reported to the police must have an outcome code. The NPCC, Home Office and the DBS have agreed a new outcome code for youth-produced sexual imagery.

Outcome 21: This outcome code allows the police discretion not to take further action if it is not in the public interest, even though there is enough evidence to prosecute.

Using this outcome code is likely to mean the offence would not appear on a future Enhanced DBS check, although not impossible, as that disclosure is a risk-based decision. Schools can be assured that the police have the discretion they need not to adversely impact young people in the future.

## **Handling incidents**

- Refer to the designated safeguarding lead
- DSL meets with the young people involved
- Do not view the image unless it is unavoidable
- Discuss with parents, unless there is an issue where that's not possible
- Any concern the young person is at risk of harm, contact social care or the police

### **Always refer to the police or social care if incident involves:**

- an adult
- coercion, blackmail, or grooming
- concerns about capacity to consent, [e.g., SEN]

- images show atypical sexual behaviour for the child's developmental stage
- violent acts are depicted
- image shows sex acts and includes a child under 13
- a young person at risk of immediate harm as a result of the disclosure (for example, self-harm or suicide)

Once DSL has enough information, the decision should be made to deal with the matter in school, refer it to the police or to social care. All information and decision-making should be recorded in line with school policy. If the incident has been dealt with in school, a further review should be held to assess risks.

### **Assessing the risks once the images have been shared**

- Has it been shared with the knowledge of the young person?
- Are adults involved in the sharing?
- Was there pressure to make the image?
- What is the impact on those involved?
- Does the child or children have additional vulnerabilities?
- Has the child taken part in producing sexual imagery before?

### **Viewing images**

- Avoid viewing youth-produced sexual imagery. Instead, respond to what you have been told the image contains
- If it is felt necessary to view, discuss with the head teacher first
- Never copy, print, or share the image (it's illegal)
- View with another member of staff present
- Record the fact that the images were viewed along with reasons and who was present. Sign and date.

### **Deleting images (from devices and social media)**

If the school has decided that involving other agencies is not necessary, consideration should be given to deleting the images.

It is recommended that pupils are asked to delete the images themselves and confirm they have done so. This should be recorded, signed, and dated.

Any refusal to delete the images should be treated seriously, reminding the pupil that possession is unlawful.

### **Summary**

- New guidance for schools
- Not "sexting" but "youth-produced sexual imagery."
- Although illegal, police involvement not always necessary
- Images can be deleted and incident managed in school
- Risk-based approach

### **Procedure**

When an allegation is made by a pupil against another student, members of staff should consider whether the complaint raises a safeguarding concern. If there is a safeguarding concern the Designated Safeguarding Lead (DSL) should be informed.

A factual record should be made of the allegation, but no attempt at this stage should be made to investigate the circumstances.

The DSL should contact Multi Agency Safeguarding Hub (MASH) to discuss the case. The DSL will follow through the outcomes of the discussion and make a referral where appropriate.

If the allegation indicates that a potential criminal offence has taken place, MASH will refer the case to the Police.

Parents, of both the student being complained about and the alleged victim, should be informed and kept updated on the progress of the referral.

The DSL will make a record of the concern, the discussion and any outcome and keep a copy in the files of both pupils' files.

It may be appropriate to exclude the pupil being complained about for a period of time according to the school's behaviour policy and procedures.

Where neither social services nor the police accept the complaint, a thorough school investigation should take place into the matter using the school's usual disciplinary procedures.

In situations where the school considers a safeguarding risk is present, a risk assessment should be prepared along with a preventative, supervision plan.

The plan should be monitored and a date set for a follow-up evaluation with everyone concerned.

## Appendix 7

### Private Fostering

#### **The law says that the Local Authority must be told about all private fostering situations.**

The child's parent(s), private foster carer(s) or anyone else involved in the arrangement are legally required to inform Northamptonshire Children's Services. However, private foster carers are often unaware of the legal requirements which can leave potentially vulnerable children at risk.

#### **Education and health professionals are often the first people to become aware of private fostering situations.**

Use the checklist below (also available on the [NSCB website](#)) to help you identify a current or impending arrangement that comes under the private fostering regulations.

If the answer to the questions below is 'yes', then it is likely that a private fostering arrangement is in place:

- Is the child/young person under 16 years (or under 18 years if disabled)?
- Are they being provided with accommodation by someone other than a parent, relative or a person with parental responsibility?
- Are the parents in agreement with the arrangement?
- Has the child/young person been accommodated for a period of 28 days? If not, is the intent to accommodate for a period of 28 days or more?
- Are the child's/young person's parents/persons with parental responsibility living in separate accommodation from the child/young person?

#### **Professionals becoming aware of a private fostering arrangement have a duty to satisfy themselves that Northamptonshire County Council has been notified:**

- Professionals should encourage the child's parent or carer to notify the authority
- Professionals should also consider contacting Northamptonshire County Council to ensure that the notification has or will be made
- You will not be breaching confidentiality by notifying us, but you will be helping to safeguard a child.

**If you think you know a child who is being privately fostered please contact the Multi Agency Safeguarding Hub (MASH) to notify or seek further information about private fostering.**

**Contact the MASH by email: [mash@northamptonshire.gcsx.gov.uk](mailto:mash@northamptonshire.gcsx.gov.uk) or call 0300 126 1000.**

**Appendix 8**

**The Irthlingborough and Finedon Learning Trust Safeguarding Concern Form**

**Safeguarding children at School Name**

***Safeguarding Concern***

**Child's Name:  
D.O.B.**

**Class:**

**Date:**

**Time:**

**Areas of Concern**

**Shared/discussed with Parent /Carer Yes/ No**

**Date:**

**Time:**

**Advice/ Action**

**Member of staff \_\_\_\_\_ Signed \_\_\_\_\_ Date \_\_\_\_\_**

**Passed to Designed Safeguarding Lead \_\_\_\_\_ signed Date \_\_\_\_\_**

**Individual school staff (delete as appropriate)**

**Actions/ Follow up (Dates)**

**Action completed date:**

*Please use yellow paper*

## Appendix 9

### If a pupil discloses to you

If a pupil talks to a member of staff about any risks to their safety or wellbeing, **the staff member will need to let the pupil know that they must pass the information on** – staff are not allowed to keep secrets. The point at which they tell the pupil this is a matter for professional judgement. If they jump in immediately the pupil may think that they do not want to listen, if left until the very end of the conversation, the pupil may feel that they have been misled into revealing more than they would have otherwise.

Staff are given the following guidelines to help them in the event of a disclosure

#### Do

- Be accessible and receptive
- Take it seriously ( e.g. 'this is very serious' or 'I am sorry that this has happened to you' )
- Listen carefully and ask open questions to clarify (eg. 'who, what, where, when, how')
- Negotiate getting help eg. 'I would like to help you, but I will need to talk to other people ( Designated safeguarding staff )who will know what to do
- Report all suspicions or disclosures **IMMEDIATELY** to the Designated safeguarding staff.If they are not available call the Multi – Agency Safeguarding Hub (MASH) **0300 126 1000 option 1 and then option 3**
- Make careful notes of what was said immediately – use the actual words and include any questions asked.
- Designated Safeguarding staff will ask you to complete an entry on My concern if necessary.
- Inform one of the Designated officers in person.
- Consider how you feel after a disclosure. You may want to talk it through with the Designated staff.

#### Do Not

- Jump to conclusions
- Try to get the pupil to disclose – let them talk and ask questions needed to clarify immediate **safety**. Repeated questioning in itself is abusive and may also prejudice subsequent investigations by police / social services
- Speculate or make accusations
- Make promises you cannot keep
- Guarantee confidentiality
- Make negative comments about the alleged perpetrator
- Show your own emotional responses to the situation

**Remember** – if a pupil has chosen you , as a trusted adult to confide in , they will expect your support!

## Appendix 10

### The Irthlingborough and Finedon Learning Trust

#### ADULT CODE OF CONDUCT

This policy applies to all staff, regardless of their designation.

In our capacity as School Staff and Governors, we have a duty to behave in a way that reflects well on the school, working at all times within the law and according to The Irthlingborough and Finedon Learning Trust and Local Authority policies and procedures. At no time should public confidence in the school be put at risk by the actions or words of a member of school staff or governing body. Volunteers are asked to make a similar commitment.

**It is important that adults read, understand and sign the school's Code of Conduct.**

**If the behaviour of a member of staff falls below the standards in this code, the Head Teacher/Chair of Local Governing/Chair of Directors Board may take disciplinary action against you, including dismissal.**

This Code of Conduct cannot cover every eventuality. Its purpose is to alert you to some areas of common agreement and potential risks of accusation whilst working in a school environment. It does not replace the general requirements of the law, common sense and good conduct.

If any points are unclear or you are not sure of the appropriate action to take in a situation, whether or not it is covered in this code, please consult the Head Teacher.

1. We are committed to safeguarding and promoting the welfare of all children.
2. We know and follow the school aims at all times.
3. We will respect confidentiality (see point 13)
4. We will treat others equally well, avoiding all forms of discrimination.
5. We will be good role models for children.
6. We will be punctual and fully prepared for our work.
7. We will respect and safeguard the school's property and resources.
8. We will listen to what children and adults have to say and value their opinions.
9. We will engage in a professional dialogue when our ideas and opinions differ.
10. We will speak with care to children and adults (see below)
11. We will dress modestly and appropriately for working with children.
12. We will follow Health and Safety guidelines.



## **Confidentiality and Information Disclosure**

We will not pass on to anyone information about any child or adult unless there is a need for them to have this information in the course of their work. This will be agreed with the Head Teacher.

- a) We will conform to the requirements of the Data Protection Act 2002 and will take all reasonable steps to ensure that the loss, destruction, inaccuracy or disclosure of information does not occur as a result of our actions. This includes information relating to school business and pupil data. Children's names and any records which may identify pupil or staff information must be stored securely using password access on laptops and devices.
- b) We will not disclose personal or financial information about any other member of staff or other adult involved with the school to any unauthorised person, external organisation or agency without the express consent of the individual concerned or that of the Head Teacher.
- c) We will not use information obtained in the course of our duties to the detriment of the individual School or MAT or for personal gain or benefit; nor will we impart this information to others who might use it in such a way.
- d) Confidential information belonging to the School will not be disclosed to any person not authorised to receive it.

## **Transportation of children in private cars**

- a) Adults will only transport a pupil in their car, as part of school duties, if they have provided the school with evidence of appropriate insurance cover. Car insurance must be covered for "Business" use. A copy of valid Car Insurance must be held in school.
- b) Adults will only transport pupils, in relation to school activities, in their private car with the knowledge and consent of the Head Teacher and the agreement of the child's parent
- c) In an emergency when children are taken to hospital in a staff car there will always be another member of staff present. Depending upon the nature of the emergency, permission from parents may not be requested before transportation.
- d) The normal rules of the road apply, for example, all children being transported should be wearing a seat belt and using a child seat as appropriate.

## **Privacy when speaking to or working with children**

- a) As a general rule, adults would not work with, a child alone in a room with the door closed. If an adult needs to speak to, or work with, a child out of the earshot or sight of other children, they should ask for the permission of the head teacher, this may include staff working with children on Phonics Screening, Reading Recovery or Drawing and Talking. Where possible the work should take place in a room with a window in the door or wall allowing others to see into the room.
- b) The administration of first aid should be carried out in a public area or with the support of another adult if involving treatment in private areas and in all other circumstances except in situations which the adult believes may be life-threatening.
- c) Adults should knock and shout a warning into pupil toilet areas before entering and should allow children time to cover up or to leave before they enter the area.
- d) Alternatively a child may be sent into the toilets to check that they are empty before the adult enters. This applies especially in boys' toilets where boys may be at the urinal. Toilet areas can be subject to unacceptable behaviour and adults may legitimately enter them in these or other work-related circumstances.

## **Physical Contact between adults and children**

In order to maintain an appropriate professional relationship, physical contact between adults and pupils should be kept to a minimum. Young children may be comforted when distressed and may initiate physical contact in other circumstances, but adults should always be aware that innocent physical contact may be misinterpreted by observers or by the recipient. Adults should avoid putting themselves in potentially compromising situations by observing the following rules:

- a) Physical restraint must only take place as described in the school's physical intervention policy and by trained personnel.
- b) Intimate touches, including kisses, should never be given by adults to pupils. Children who give them to adults must be kindly, but firmly, told that it is inappropriate. Some children, children with special needs related to social interaction for example, may persist with this behaviour throughout school. In such circumstances staff should ensure that other adults are aware, continue to firmly discourage the behaviour, and involve the parents in working towards more appropriate social behaviour.
- c) Where a child is distressed or hurt they may seek some sort of physical comfort. Adults should confine this to the minimum required to comfort the child, for example taking the child's hand, putting a hand on their shoulder. Younger children may actively seek a hug or to sit on the adult's knee. The aim of the adult must always be to minimise such contact and it should not be taken place privately.
- d) Physical contact may be necessary as part of instruction, for example in PE. Whenever practicable demonstration or instruction without physical contact should be used. In other situations make it clear to the children present what contact will be used and why.
- e) Physical contact may be necessary if a child is a danger to himself or others or to guide and support in an activity. This should be in the form of gentle and supportive holds.

## **Appropriate language**

- a) Adults will always model best use of language.
- b) Adults will not use inappropriate language at or in the presence of pupils.
- c) Adults will be polite and use respectful language in the presence of pupils.
- d) Adults will not shout at the children.
- e) Adults will not use sarcasm towards the children.

## **Further information**

This document should be read in conjunction with the school's Behaviour Policy.

## Appendix 11

### The Irthlingborough and Finedon Learning Trust

#### Name of School

#### Transfer Form for Child Protection Records between Educational Establishments

**Please phone the DSL before sending the information.** To ensure school records have been transferred securely please use the guidance and form available in the Guidance on the Retention and Transfer of Child Protection Records for Educational Establishments in Northamptonshire. Available at <http://www.northamptonshirescb.org.uk/schools/toolkits-docs-schools/documents-schools/>

Name of Child	
Date of Birth	
Unique reference number	
Home address	
Address of originating school	
Name of current Child Protection Lead	
Date file exchanged by hand	
<b>OR</b> Date file posted by special delivery	
<b>OR</b> Date information sent electronically	
Name of receiving establishment	
Address of receiving establishment	
Name of receiving Child Protection Lead	
Date files received	
Signature of receiving Child Protection Lead And date	

Upon receipt, the receiving setting should

- Sign this form and keep a copy with the child's Child Protection records
- Ensure the original form is returned to the originating establishment without delay.
- The originating establishment should keep the returned form securely in line with the Northamptonshire Guidance on the Transfer and Retention of Child Protection Record. Phone or email sender to confirm receipt of the information.

**Appendix 12**

The Trust will maintain a training log for safeguarding leads and all staff as a separate document. This will be updated termly.

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