



# **Child Protection & Safeguarding Policy**

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***Last Reviewed: December 2021***

***Timescale of Review: 6 Monthly minimum***

# Child Protection and Safeguarding

Policy was revised and updated in: December 2021

The next scheduled policy review will be: February 2022

## Key Contacts:

<p>Designated Safeguarding Lead for Child Protection (DSL) <b>and the Prevent lead/officer:</b> Previously known as: Designated Member of staff</p>	<p>Leeha Watney – Headteacher <a href="mailto:Leeha.watney@theamicuscommunity.com">Leeha.watney@theamicuscommunity.com</a></p> <p>Kerry Foster – Service Manager <a href="mailto:Kerry.foster@theamicuscommunity.com">Kerry.foster@theamicuscommunity.com</a></p> <p>Tel: 01243 544107 or 07584 055330 and ask for the safeguarding team</p> <p><b>Dedicated Safeguarding email:</b> <a href="mailto:safeguarding@theamicuscommunity.com">safeguarding@theamicuscommunity.com</a></p>
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<b>Local Authority Designated Officer (LADO):</b>	<b>0330 2226450</b>
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## Definition of Safeguarding

In line with the updated Keeping Children Safe in Education (KCSIE September 2021), the definition of Safeguarding and promoting children's welfare is defined as:

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

## Introduction

The children at the Amicus Community have a wide range of personal circumstances and backgrounds and it is important to recognise this whilst reading the policy. Each child's need for protection from potential or past abuse will be individual and fully observed and thought about.

The purpose of this policy is to inform staff<sup>1</sup>, parents, volunteers and visitors about the organisation's responsibilities for safeguarding children and to enable everyone to have a clear understanding of how these responsibilities should be carried out.

Amicus takes seriously its responsibility to safeguard and promote the welfare of children in its care; and to work together with other agencies to ensure adequate arrangements within our organisation to identify, assess, and support children who have, who are, or who may be, suffering harm.

We recognise that all adults, including temporary staff and volunteers, have a full and active part to play in protecting children from harm, and that the child's welfare is our paramount concern.

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<sup>1</sup> Wherever the word "staff" is used, it covers ALL staff on site, including ancillary and supply staff, and volunteers working with children

All staff members believe that our organisation should provide a caring, positive safe and stimulating environment that promotes the social, physical and moral development of the individual child.

Staff members working with children are advised to maintain an attitude of 'it could happen to a child we know' where safeguarding is concerned. Many of the children who are placed with us would have experienced trauma/abuse in their earlier years. When concerned about the welfare of a child, staff members should always act in the best interests of the child.

### **The Amicus Community Will:**

- Support the child's development in ways that will foster security, confidence and independence.
- Provide an environment in which children and young people feel safe, secure, valued and respected, and feel confident, and know how to approach adults if they may be worried about being listened to.
- Provide a systematic means of monitoring children known or thought to be at risk of harm and ensure that the organisation contributes to assessments of need and support packages for those children.
- Emphasise the need for good levels of communication between all members of staff, and between the organisation and other agencies.
- Have and regularly review a structured procedure within the organisation which will be followed by all members of our therapeutic community in cases of suspected abuse.
- Develop and promote effective working relationships with other agencies, especially the Police and Children's Services.
- Ensure that all adults within our organisation who have authorised and substantial access to children have been recruited and checked as to their suitability.
- Will be aware that safeguarding issues can manifest themselves via peer on peer abuse including sexual violence and sexual harassment between peers.

- All staff will be given annual updating training to ensure that they are fully aware of current DFE guidance.
- Give due regard to the wider environmental factors affecting the child's life that may pose a threat to their safety and/or welfare (contextual safeguarding).

## **Corresponding Policies**

This policy document should also be read alongside the following Amicus policies

- Safeguarding Children from Child Sexual Exploitation (CSE)
- Safer Recruiting Policy
- Online Safeguarding of Children Policy
- Anti-bullying Policy
- Health and Safety Policy
- Whistle Blowing Policy
- Physical Intervention Policy
- DBS Disclosure Policy
- Involving Children in Recruitment Policy
- Prevent Policy
- Extremism and Radicalisation Policy
- Methods of Care and Control Policy
- Missing Children Policy

## **Statutory Framework**

The Amicus Community fully recognises its legal and moral responsibilities for child protection and safeguarding and our policy refers to all staff working at The Amicus Community. The organisation will act in accordance with the following government legislation and guidance:

- The Children Act 1989
- The Children Act 2004
- Education Act 2011
- Keeping Children Safe in Education September 2021
- Teaching Online Safety in School June 2019
- Working Together to Safeguard Children (2015) amended 2017
- The Education (Child Information) (England) Regulations 2015
- Teaching Online Safety in School June 2019
- Sexual Violence & Sexual Harassment between children in Schools & Colleges – May 2018

## The Amicus Community's Principles

- All children have an **absolute right** to a childhood free from abuse, neglect or exploitation
- All children in whatever setting have an **equal right** to protection from abuse, neglect or exploitation
- All staff involved with children have a **responsibility** to be mindful of issues related to children's safety and welfare and a **duty** to report and act on any concerns immediately
- Children are best protected when professionals work effectively together and share responsibility for protective action
- Where there are possible concerns about a child's safety, unconditional confidentiality cannot be guaranteed and should not be offered. When a child is subject of a Child Protection Plan information about the child and his / her circumstances should only be shared on a "need to know" basis
- The Amicus Community should be proactive and take positive steps to inform children of their **rights** to safety and protection and the options available to express their fears or concerns
- Children (regrettably) are sometimes abused and exploited. Amicus should have in place systems that deter possible abusers and manage effectively any allegations or concerns about abuse when they arise
- When children make allegations about abuse or neglect they should always be listened to, have their comments taken seriously and, where appropriate, thoroughly investigated by relevant agencies

## Abused Children

We recognise that children who are abused or witness violence may find it difficult to develop a sense of self-worth. They may feel helplessness, humiliation and some sense of blame. When at Amicus their behaviour may be challenging and defiant or they may be withdrawn.

Amicus will support children through:

- Amicus' ethos which promotes a positive, supportive and secure environment and gives children a sense of being valued
- Amicus' behaviour policy which is aimed at supporting all children in the school, especially vulnerable children
- Liaisons with other agencies that support the child such as Social (Children) Services

## General Staff Responsibilities

- Amicus is aware of and follows the Sussex Child Protection & Safeguarding Procedures, produced by West Sussex, East Sussex, and Brighton & Hove. You can view a full electronic copy - <http://pansussexscb.proceduresonline.com/index.htm>
- Staff should be alert to signs of abuse and know to whom they should report any concerns or suspicions. Staff are to act on any concerns immediately and speak to the Designated Safeguarding Lead (DSL) or one of the DSL Deputies. The DSL and their deputies are most likely to have a complete safeguarding picture and will be the most appropriate individuals to advise on any safeguarding concerns.
- All staff should be aware that they can report any concerns directly to the local LADO and the IFD (Integrated Front Door): social services. Contact details are on the front of this document.
- Amicus has procedures (of which all staff are kept aware) for handling suspected cases of abuse of children, including procedures to be followed if a child harms another child or a member of staff is accused of abuse, or suspected of abuse.

- A safeguarding lead for Child Protection (referred to in 'Keeping Children Safe in Education DFE 2021 as 'Designated Safeguarding Lead' - previously known as the Designated Member of staff for Child Protection: DFE Working Together 2015 should have responsibility for co-ordinating action within the organisation and liaising with other agencies (see below for further details).
- Designated Safeguarding Leads undergo updated child protection training every two years. The Senior Managers, The Head Teacher, Home Managers and all members of staff are provided with regular updated child protection training in line with Keeping Children Safe in Education 2021, and advice from the West Sussex LSCB (currently every three years). Deputies should be trained to the same standard as the DSL.
- In line with the latest guidance in KCSIE 2021 all staff will also receive an internal training annual update to ensure that they are fully informed of the latest guidance from the Department of Education.
- The Recruitment Policy will ensure the suitability of adults working with children or organisations premises at any time. Those authorised by the organisation to work with children on school or homes premises should enter into a formal commitment to comply with the organisation's child safeguarding responsibilities.
- We will ensure that everybody working in Amicus read and sign to say they have read at least Part One of the KCSIE 2021 (Part of Induction). It is also essential that everybody working in The Amicus Community school understands their safeguarding responsibilities
- We will ensure that those staff who do not work directly with children, read either Part one or Annex A (a condensed version of Part one) of this guidance. Staff will be directed as to which part of the guidance will be most effective for their staff to safeguard and promote the welfare of children.
- Copies of policies and a copy of Part One of KCSIE should be provided to staff at induction. Staff will also be required to read and understand the staff behaviour policy (employee handbook), the safeguarding response to children who go missing, and know the identity of the DSL and the two deputies.

## Management Responsibilities

The Responsible Individual, Proprietor, Directors, Head Teacher and Managers must ensure that they comply with their duties under legislation. They must also have regard to this guidance to ensure that the policies, procedures and training in their organisation is effective and complies with the law at all times.

The nominated leads for safeguarding and child protection in this organisation are :

Name: **Leeha Watney (Headteacher) & Kerry Foster (Service Manager)**

The responsibilities placed on management include:

- Ensuring that an effective safeguarding and child protection policy is in place and reviewed annually, together with a staff behaviour policy (Code of Conduct) and that these are provided to all staff – including temporary staff and volunteers – on induction and that staff are kept up to date with changes
- Contributing to inter-agency working, which includes providing a coordinated offer of early help when additional needs of children are identified.
- Appointing a Designated Safeguarding Lead who should undergo refresher child protection training at the appropriate level every two years.
- Ensuring that the organisation creates a culture of safe recruitment and, as part of that, adopt recruitment procedures that help deter, reject or identify people who might abuse children.
- Ensuring that at least one member of an appointing panel will have attended safer recruitment training.
- Ensuring that the organisation keeps an up to date single central record of staff appointments for all staff, directors and volunteers and the dates of all appropriate safeguarding checks.
- Monitoring the adequacy of resources committed to child protection, and the staff and manager training profile.
- Recognising that neither it, nor individual managers, have a role in pursuing or managing the processes associated with individual cases of child protection, nor a

right to know details of such cases, except when exercising their disciplinary functions in respect of allegations against staff

- Making sure that the Safeguarding / Child Protection policy is available to parents upon admission of their child to the Amicus School and is on the school website.
- Ensuring that this policy and practice complements other policies e.g. anti-bullying including cyber bullying and health and safety, to ensure safeguarding.
- Prioritising and promoting the welfare of children and young people and creating a culture where staff are confident to challenge senior leaders over any safeguarding concerns.
- Giving consideration as to how children may be taught about safeguarding, including online, through teaching and learning opportunities, as part of providing a broad and balanced curriculum.

The designated lead for child protection should agree with the management team how these responsibilities should be monitored and reported.

## **Partnership**

The Amicus Community believes that the best outcomes for children generally are achieved when professionals can work together in relation to child protection and safeguarding concerns. We believe in open and honest communication and will always share with parents / guardians (if appropriate) and Managers from Amicus, as well as Social Workers any information or concerns that they have about the children at the earliest opportunity.

The only exception to this would be where it was felt that such communication might compromise the child's safety (with parents / guardians). Amicus has a good collaborative working relationship and partnership with West Sussex LADO and IFD, working with them to refer and consult with on safeguarding incidents and concerns.

## Prevention

Amicus takes seriously its duty of care and will be proactive in seeking to prevent children becoming the victims of abuse or neglect. We will do this in a number of ways:

- Through the creation of an open culture which respects all individuals' rights and discourages bullying and discrimination of all kinds.
- By identifying members of staff (Leeha Watney -Headteacher and Kerry Foster – Service Manager) who have overall responsibility for child protection matters. They have received specialist training in this field and acts as a source of advice and support to other Amicus staff.
- By informing children of their rights to be free from harm and encouraging them to talk to Amicus staff if they have any concerns.

## The Designated Safeguarding Lead for Child Protection (DSL)

The role of the Designated Safeguarding Lead role carries a significant level of responsibility and Amicus will ensure that the DSL will be given the time, funding, training, resources and support they need to carry out the role effectively.

The Designated Safeguarding Leads (DSL) for Child Protection in this organisation are:

**NAME: Leeha Watney – Headteacher and Kerry Foster (Service Manager)**

Deputy DSL's are appointed to act in the absence / unavailability of the DSL and to also carry out duties within the Safeguarding Team.

The Deputy Designated Safeguarding Leads for Child Protection for the children is:

**NAMES: Lucy Hairsine – Head of Therapeutic Practice**

The Designated Safeguarding Lead for Child Protection for the children homes is:

**NAME: Kerry Foster – Service Manager**

The Designated Safeguarding Lead for Child Protection for the school is:

**NAME: Leeha Watney – Headteacher**

### **The Areas of Responsibility for the Designated Member of Staff are:**

The Designated Safeguarding Lead should help promote educational outcomes by;

- Sharing the information about the welfare, safeguarding and child protection issues, that children, including children with a Social Worker, are experiencing, or have experienced, with teachers and school / homes leadership staff

### **Managing Referrals and Concerns Regarding Individual Children:**

- Referring all cases of suspected abuse to the West Sussex Children's Access Point, via the IFD (Integrated Front Door) and to the Police (cases where a crime may have been committed).
- Sending a written record of the referral to the IFD / LADO by the end of the working day the referral is made.
- Keeping written records of concerns about a child even if there is no need to make an immediate referral, (the 'child protection file')
- Ensuring that all such records are kept confidentially and securely and are separate from child records, and if these are stored electronically, that they are differently password protected from the child's other files, and accessible only by the Head Teacher/Designated leads.
- Ensuring that an indication of further record-keeping is marked on the child's records.
- Liaise with the senior managers, including the Head Teacher and /or Home Managers informing them of issues especially new or on-going child protection investigation enquiries and police investigations.

- Act as a source of support, advice and expertise to staff on matters of safety and safeguarding and when deciding whether to make a referral by liaising with relevant agencies.
- Ensuring that either they or the deputy DSL, or the class teacher or therapeutic care worker attends Child Protection Conferences, core groups, or other multi-agency planning meetings, contributes to assessments, and provides a report which will normally have been shared with the parents. (In some circumstances it may not be appropriate to share the report to conference with parents. If the DSL is uncertain on this point advice can be obtained from the allocated social worker).
- Ensuring that any pupil who is subject to a Child Protection Plan and who is absent without explanation for two days or more is referred to their key worker's Social Care Team. In some cases, any absence may be a cause for concern and warrant immediate reporting.
- Where children leave the organisation, ensure their child protection file is copied for any new school or college as soon as possible but transferred separately from the main child file. (The original child protection file being retained by the former organisation).

## **Safeguarding Lead Training**

The DSL for Child Protection should undertake the initial training and subsequent refresher courses every two years, which includes online safety, in order to:

- Understand the assessment process for providing early help and intervention, for example through locally agreed common and shared assessment processes such as early help assessments.
- Be alert to those children within the school who are at risk or experiencing: domestic violence; female genital mutilation; children missing from education; child trafficking; bullying which includes race / hate or homophobic behaviour.
- Being alert to those children in Amicus Homes who are at risk of experiencing any of the above, and particularly bullying which includes race / hate or homophobic behaviours.

- Have a working knowledge of how the local authority conducts a child protection enquiry, case conference and a child protection review conference and be able to attend and contribute to these effectively when required to do so.
- Be alert to the specific needs of children in need, those with special educational needs and young carers.
- Be able to keep detailed, accurate, secure written records of concerns and referrals.
- Obtain access to resources and attend any relevant or refresher training courses.
- Encourage a culture of listening to children and taking account of their wishes and feelings, among all staff, in any measures the home, school or college may put in place to protect them.
- Link with the West Sussex Local Safeguarding Children Board (LSCB) to make sure staff are aware of training opportunities and the latest local policies on safeguarding.
- Organising child protection training for all staff every three years and additional training in new areas of safeguarding is available to ensure staff can carry out their duty of care effectively and with the expected competence required.

### **Raising Awareness & Other Duties**

- The DSL should ensure the organisation's policies are known and used appropriately ensuring each member of staff has access to and understands the organisation's child protection policy and procedures, especially new and part time staff.
- The DSL will ensure that safeguarding training provided is updated annually and assists relevant skills and knowledge for all including the Head Teacher, Directors and Senior Staff. It will include taking account of any updated national guidance including Keeping Children Safe in Education 2021, and beyond.
- In addition, the DSL should ensure that all staff at the Homes and School have read and signed to say they have done so: at least, Part One of Keeping Children Safe in Education 2021. A copy of Part One of Keeping Children Safe in Education 2021 should be given to all staff at Induction. All staff members should be aware of systems within their establishment which support safeguarding, and these should be explained to them, and copies given to them as part of staff induction.

This includes the Child Protection Policy, Staff Behaviour Policy, and the role of the Designated Member of Staff. Updated statutory guidance will be given to staff who will sign they have received and read it.

- Ensure the organisation's child protection and safeguarding policy is reviewed at least annually, the procedures and implementation are updated and reviewed regularly, and work with the management team regarding this.
- Ensure the child protection policy is available publicly, parents are aware that referrals about suspected abuse or neglect may be made and the role of the organisation in this.
- Parents and carers are made aware that they can make a referral about any suspected abuse or neglect to the local LADO. The school DSL should be informed

## **Procedures**

- If any member of staff is concerned about a child, he or she must inform the Designated Safeguarding Lead for Child Protection.
- If the concern or allegation relates to the DSL, the Deputy DSL should be notified. If the concern relates to the Head Teacher and Home Manager the directors need to be informed.
- The member of staff must record information regarding the concerns on the same day. The recording must be a clear, precise, factual account of the observations. Staff may not add comments or opinion although observations about a child's demeanour or emotional state may be recorded.
- The DSL will decide whether the concerns should be referred to the IFD (Integrated Front Door). If it is decided to make a referral this will be discussed with the parents or the person with Parental Responsibility, unless to do so would place the child at further risk of harm. (The IFD is able to provide advice on this question). If the child has a Social Worker, they will also be notified.
- Particular attention will be paid to the attendance and development of any child about whom the organisation has concerns, or who has been identified as being the subject of a child protection plan and a written record will be kept.

- If a child who is / or has been the subject of a Child Protection Plan changes school or homes, the DSL will inform the social worker responsible for the case and transfer the appropriate records to the DSL at the receiving school and / or home, in a secure manner, and separate from the child's academic / care file.
- The DSL is responsible for making the senior leadership team aware of trends in behaviour that may affect child welfare. If necessary, training will be arranged.
- Staff have a duty to refer safeguarding concerns to the DSL for Child Protection.

However, if:

- concerns are not taken seriously by an organisation or
- action to safeguard the child is not taken by professionals and
- the child is considered to be at continuing risk of harm

then staff should contact a manager in the Integrated Front Door (IFD).

- If, at any point there is a risk of immediate serious harm to a child, a referral should be made to the IFD or Local Police immediately. Anybody can make a referral. If the child's situation does not appear to be improving over relevant time the staff member with concerns should press for re-consideration. Concerns should always lead to help for the child at some point.
- If the allegations concern harm perpetrated by children in the school, then staff should follow section 8.7 of the West Sussex Child Protection and Safeguarding Procedures - Children who Harm Other Children.
- Where staff highlight a safeguarding issue, they will receive feedback on what has been done and how the child is safer as a result. Where there is an allegation about a staff member (including supply staff & volunteers) this information may be much more restricted but should still contain sufficient detail to assure the staff member that the perceived risk to the child is reduced.

## **What School or Home Staff Should do if They Have Safeguarding Concerns about Another Staff Member**

Schools, colleges and homes should have processes and procedures in place to manage any safeguarding concerns about staff members (including supply staff, volunteers, and contractors).

If staff have safeguarding concerns or an allegation is made about another member of staff (including agency staff, volunteers, and contractors) posing a risk of harm to children, then:

- this should be referred to the Headteacher or Home Manager;
- where there are concerns/allegations about the Headteacher or Home Manager, this should be referred to the School Proprietor and Responsible Individual of Amicus; and
- in the event of concerns/allegations about the Headteacher, where the Headteacher is also the sole proprietor of an independent school, or a situation where there is a conflict of interest in reporting the matter to the Headteacher, this should be reported directly to the local authority

## **Information Sharing**

Staff should not assume a colleague, or another professional will take action and share information that might be critical in keeping children safe. They should be mindful that early information sharing is vital for the effective identification, assessment, and allocation of appropriate service provision, whether this is when problems first emerge, or where a child is already known to local authority children's social care (such as a child in need or a child with a protection plan).

[Information sharing advice for safeguarding practitioners - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/consultations/information-sharing-advice-for-safeguarding-practitioners)

This advice includes the seven golden rules for sharing information and considerations with regard to the Data Protection Act 2018 (DPA) and UK General Data Protection Regulation (UK GDPR).

DPA and UK GDPR do not prevent the sharing of information for the purposes of keeping children safe and promoting their welfare. If in any doubt about sharing information, staff should speak to the designated safeguarding lead or a deputy.

Fears about sharing information must not be allowed to stand in the way of the need to safeguard and promote the welfare of children.

## **Record Keeping**

**All** concerns, discussions and decisions made, and the reasons for those decisions, should be recorded in writing. Information should be kept confidential and stored securely. It is good practice to keep concerns and referrals in a separate child protection file for each child.

Records should include:

- a clear and comprehensive summary of the concern;
- details of how the concern was followed up and resolved;
- a note of any action taken, decisions reached and the outcome.

If in doubt about recording requirements, staff should discuss with the designated safeguarding lead (or deputy).

### **Why Is All of This Important?**

It is important for children to receive the right help at the right time to address safeguarding risks, prevent issues escalating and to promote children's welfare. Research and serious case reviews have repeatedly shown the dangers of failing to take effective action.

Further information about serious case reviews can be found in Chapter four of [Working Together to Safeguard Children](#). Examples of poor practice include:

- failing to act on and refer the early signs of abuse and neglect;
- poor record keeping;
- failing to listen to the views of the child;
- failing to re-assess concerns when situations do not improve;
- not sharing information with the right people within and between agencies;
- sharing information too slowly; and
- a lack of challenge to those who appear not to be taking action

## **Monitoring & Managing Records**

To continually ensure the quality of records, we ensure the monitoring is undertaken daily, by the Home Management team, alongside a Senior Manager.

We also have Monthly Independent Regulation 44 visits, who scrutinise our paperwork and recordings, alongside Ofsted inspections and Safeguarding Inspections / Audits by the local authority.

We welcome and encourage such visits, as part of the monitoring process, and take learning points from feedback, and amend and update our formats as and when necessary.

The recording and records are introduced to new staff as part of their Induction and ongoing inhouse training is given to staff if areas of improvement required are identified.

We have a Policy around Record Keeping and all staff having a copy of this policy, and this is regularly discussed in staff's Supervision and Safeguarding is a fixed agenda point in staff supervisions. Safeguarding is also a fixed agenda point in the termly advisory board meetings.

### **What Staff Should Look Out For:**

The following indicators may indicate the potential need for early help – if staff have concerns they must speak to the DSL or deputies. The DSL will lead when early help is appropriate:

- The child is showing signs of being drawn in to anti-social or criminal behaviour, including gang involvement and association with organised crime groups
- The child is at risk of modern slavery, trafficking or exploitation
- The child is at risk of criminal exploitation and child sexual exploitation
- The child is showing early signs of abuse and / or neglect
- The child is at risk of being radicalised or exploited
- The child is a privately fostered child

In most cases, multiple issues will overlap with one another, therefore staff should always be vigilant and always raise any concerns with their Designated Safeguarding Lead (DSL) or deputy

## **Contextual Safeguarding**

All staff should be aware that safeguarding incidents and / or behaviours can be associated with factors outside school / homes and / or can occur between children outside of these environments. All staff, but especially the DSL and Deputy DSL should consider whether children are at risk of abuse or exploitation in situations outside of their families / carers.

Extra-familial harms can take a variety of different forms and children can be vulnerable to multiple harms, including, but not limited to, sexual exploitation, criminal exploitation and serious youth violence.

Staff must also be aware of the wider environmental factors that are present in a child's life and if these are a threat to their safety and / or welfare. This can include different relationships that young people in their neighbourhoods, schools and online which can feature violence and abuse or pose safeguarding risks.

If staff have any concerns, they must report these immediately to a member of the safeguarding team. Staff must provide as much information as possible if a referral to Social Care is required, including details of these contextual factors. This will allow any assessment to consider all the available evidence and the full context of any abuse.

## **The Child's Need for a Social Worker – Children at Potentially Greater Risk**

Most children at Amicus have an allocated Social Worker. Children may need a social worker due to safeguarding and / or welfare needs. Children may need this help due to abuse, neglect and complex family circumstances.

A child's experiences of adversity and trauma can leave them vulnerable to further harm, as well as educationally disadvantaged in facing barriers to attendance, learning, behaviour and mental health.

Local authorities should share the fact a child has a social worker, and our designated safeguarding lead will hold and use this information so that decisions are made in the best interests of the child's safety, welfare and educational outcomes. This information will be shared at the referral stage for any child and should be considered as a matter of routine.

This information is shared to ensure the safeguarding of children and promote the welfare of children.

## **Mental Health and Wellbeing of Children**

As a school and residential homes, at Amicus, we have an important role to play in supporting the mental health and wellbeing for all children we care for and educate.

All staff will be aware that mental health problems can, in some cases, be an indicator that a child has suffered, or is at risk of suffering abuse, neglect or exploitation. The Amicus Community have ensured that there are clear systems, processes and policies in place for identifying possible mental health problems, including routes of how to escalate concerns and a clear referral and accountability system.

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

Where children have suffered abuse and neglect, or other potentially traumatic adverse childhood experiences, this can have a lasting impact throughout childhood.

Amicus can access a wide range of advice and support to help staff identify children in need of extra mental health support, which includes working with external agencies.

More information can be found in the Mental Health & Behaviour in Schools guidance;

<https://www.gov.uk/government/publications/mental-health-and-behaviour-in-schools--2>

## **When to be Concerned**

All staff, volunteers and agency staff should be aware of the main categories of abuse: (further detailed information in Appendix 1)

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

**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. They may be abused by an adult or adults or another child or children or be open to exploitation.

**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 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) by establishing a close relationship or friendship. 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; exploitation; 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.

## **Other Aspects of Risk Requiring Special Attention**

Children with special educational needs (SEN) and disabilities can face additional safeguarding challenges, it is important to note the fact that additional barriers can exist when recognising abuse and neglect in this group of children.

In addition, all Amicus Homes and School staff should be aware of specific safeguarding issues. These can be found in the Sussex Child Protection and Safeguarding Procedures:

<http://pansussexscb.proceduresonline.com/index.htm>

Schools and homes should ensure that, where such risks may be more likely, that staff are guided on how to understand and act accordingly where there is concern:

- child sexual exploitation (CSE) *(see also separate policy and Appendix 1)*
- bullying including cyberbullying *(see also Appendix 1)*
- domestic violence
- drugs
- fabricated or induced illness
- faith abuse
- female genital mutilation (FGM) *(see also Appendix 1)*
- forced marriage
- gangs and youth violence
- gender-based violence/violence against women & girls (VAWG) *(see also Appendix 1)*
- mental health
- private fostering
- radicalisation *(see also Appendix 1)*
- sexting
- teenage relationship abuse
- trafficking

- self-harm
- peer on peer abuse including sexual violence & sexual harassment (including upskirting) (*see also Appendix 1*)
- Child criminal exploitation: county lines
- Serious violence
- ‘Upskirting’ (typically involves taking a picture under a person’s clothing without them knowing, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm. It is now a criminal offence and may constitute sexual harassment)

Links to many of these topics can be found in Keeping Children Safe in Education – September 2021

Amicus has a separate policy on **‘Safeguarding Children against Child Sexual Exploitation’**. This policy details how we safeguard children against CSE and details the procedures around this and the different levels risk factors identified and how we will collaborate with interagency working.

Amicus has a separate **‘Prevent Policy’** in place which focuses on supporting the prevention of violent extremism. The policy details the government definition of extremism and also indicators in recognising extremism, how we prevent violent extremism within the school and curriculum and how the school actively promotes the government’s definition of British values from the 2011 Prevent Strategy.

## **The DSLs are the Prevent Lead / Officer for Amicus, who are: Leeha Watney and Kerry Foster**

The use of technology has become a significant component of many safeguarding issues. Child sexual exploitation; radicalisation; sexual predation - technology often provides the platform that facilitates harm.

See: **Online & Mobile Safeguarding of Children Policy**

## **Confidentiality**

**We recognise that all matters relating to child protection are confidential**

- The DSL and deputy DSL will disclose any child protection related information about a child to other members of staff on a need to know basis only.

- All staff must be aware that they have a professional responsibility to share information with other agencies in order to safeguard children.
- All staff must be aware that they cannot promise a child to keep secrets if doing so might compromise the child's safety or wellbeing.
- We will always undertake to share our intention to refer a child to Children's Services with the parents /carers or with Parental Responsibility unless to do so could put the child at greater risk of harm or impede a criminal investigation. If in doubt, we will consult with the Duty Manager at Children's Services.
- We will not under the GDPR as supplemented by the Data Protection Act 2018 provide pupils' education data where the serious harm test under that legislation is met. Therefore, in a situation where a child is in a refuge, this could mean that schools can withhold education data under the GDPR; they should do so where the serious harm test is satisfied.

## **Dealing with a Disclosure**

All staff receive appropriate safeguarding and child protection training (including online safety) at induction. The training will be regularly updated.

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

All staff should be aware of their local 'early help' process (MASH & IFD) and understand their role in it.

The safeguarding team can give guidance and support to staff around the process for making referrals to children's social care and for statutory assessments under the Children Act 1989, especially section 17 (children in need) and section 47 (a child suffering, or likely to suffer, significant harm) that may follow a referral, along with the role they might be expected to play in such assessments.

All staff should know what to do if a child tells them he/she is being abused, exploited or neglected. Staff must be aware of the requirement to maintain an appropriate level of confidentiality.

This means only involving those who need to be involved, such as the designated safeguarding lead (or a deputy) and/or children's social care.

You must never promise a child that you will not tell anyone about a report of any form of abuse, as this may ultimately not be in the best interests of the child.

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

If a child discloses that he or she has been abused in some way (including peer on peer abuse) the member of staff or volunteer should:

- **accept what the child says.**
- **stay calm, the pace should be dictated by the child without them being pressed for detail by asking leading questions such as "did x touch you there?" It is our role to listen - not to investigate.**
- **use open questions such as "Is there anything else you want to tell me?" or "yes?" or "and?"**
- **be careful not to burden the child with guilt by asking questions like "Why didn't you tell me before?" but you could ask 'have you spoken to anyone else about this?'**
- **acknowledge how hard it was for the child to tell you.**
- **do not criticise the perpetrator, the child might have a relationship with them.**
- **do not promise confidentiality but reassure the child that they have done the right thing, explain who you will have to tell (the Designated Safeguarding Lead) and why; and, depending on the child's age, what the next stage will be. It is important that you avoid making promises that you cannot keep such as "I'll stay with you all the time" or "It will be all right now".**
- **Staff should only involve those who need to be involved when a child tells them he/she is being abused or neglected.**

When recording information:

- **Make some brief notes at the time or immediately afterwards; record the date, time, place and context of disclosure or concern.**
- **Record facts and what is said but not your assumption or interpretation.**
- **When marks have been seen of bruising or an injury try to record detail or where and appearance/colour/size, e.g. “right arm above elbow” Do not take photographs!**
- **Note the non-verbal behaviour and the key words in the language used by the child (do not to translate into ‘proper terms’).**
- **It is important to keep these original notes and pass them on to the designated member of staff who may ask you to write a referral.**

We recognise that staff working in our organisation who have become involved with a child who has suffered harm or appears to be likely to suffer harm may find the situation stressful and upsetting.

We will support such staff by providing an opportunity to talk through their anxieties with the DMS and to seek further support as appropriate. Amicus can provide additional clinical supervision sessions to discuss this and can provide help in arranging the staff member to speak to an external psychotherapist or counsellor.

## **Early Help**

All of the day students may benefit from early help, but all staff should be particularly alert to the potential need for early help for a child who:

- is disabled or has certain health conditions and has specific additional needs;
- has special educational needs (whether or not they have a statutory EHCP);
- has a mental health need;
- is a young carer;
- is showing signs of being drawn in to anti-social or criminal behaviour, including gang involvement and association with organised crime groups or county lines;

- is frequently missing/goes missing from care or from home;
- is at risk of modern slavery, trafficking, sexual or criminal exploitation;
- is at risk of being radicalised or exploited;
- has a family member in prison, or is affected by parental offending;
- is in a family circumstance presenting challenges for the child, such as drug and alcohol misuse, adult mental health issues and domestic abuse;
- is misusing drugs or alcohol themselves;
- has returned home to their family from care;
- is at risk of 'honour'-based abuse such as Female Genital Mutilation or Forced Marriage;
- is a privately fostered child; and
- is persistently absent from education, including persistent absences for part of the school day.

## **Managing Allegations Against Staff, Volunteers & Supply Staff**

An allegation is any information which indicates that a member of staff, volunteer or agency staff may have:

- 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
- Behaved towards a child or children in a way that indicates he or she may pose a risk of harm to children
- Behaved or may have behaved in a way that indicates they may not be suitable to work with children

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

## **Transferable Risk**

This pertains to 'an incident outside of school or homes which did not involve children but could have an impact on their suitability to work with children'. For example: an incident of domestic abuse.

The personal circumstance of staff will be explored as part of the Warner (Safeguarding) Interview as part of the recruitment procedure.

Whilst the Amicus Community are not the employers of supply staff, we will ensure that any allegations are dealt with properly.

Amicus would usually take the lead (in any investigation) because agencies do not have direct access to children or other school / homes staff, so they would not be able to collect the facts or liaise with LADO.

To reduce the risk of allegations, all staff should be aware of safer working practice and should be familiar with the guidance contained in the staff handbook, organisation code of conduct or Government document '*Guidance for Safer Working Practice for Adults who work with Children and Young People in Education Settings*'. It is best practice for all staff to have a signed acknowledgement to show that this has occurred.

The person to whom an allegation is first reported should take the matter seriously and keep an open mind. S/he should not investigate or ask leading questions if seeking clarification. It is important not to make assumptions. Confidentiality should not be promised, and the person should be advised that the concern will be shared on a 'need to know' basis only.

Actions to be taken include:

making an immediate written record of the allegation using the informant's words - including time, date and place where the alleged incident took place, brief details of what happened, what was said and who was present. This record needs to be written up as a significant incident on Amicus Significant Incident Report format and should be signed, dated and immediately passed on to the DSL.

If the concerns are about the DSL, then the Deputy DSL's should be contacted. The Deputy DSL is:

**NAME: Lucy Hairsine**

Any concerns in the first instance need to be notified to the DSL, this includes concerns about the Directors, School Proprietor, Responsible Individual, Head Teacher or Home Managers.

In the absence of the DSL or deputy DSLs, the School Proprietor / Responsible Individual should be contacted. The School Proprietor / Responsible Individual in this organisation is:

**NAME: Rebecca Newton**

Contact with the Deputy DSL's or School Proprietor can be made through the organisations Head Office. If for any reason this causes a delay (for example the office is closed) then the concerns should be referred to the Children's Access Point via the IFD.

The recipient of an allegation must **not** unilaterally determine its validity, and failure to report it in accordance with procedures is a potential disciplinary matter. The DSL, Head Teacher or Managers will not investigate the allegation itself, or take written or detailed statements, but will assess whether it is necessary to refer the concern to the Local Authority Designated Officer (LADO) on 0330 222 6450.

If the allegation meets any of the three criteria set out at the start of this section, contact should always be made with the Local Authority Designated Officer without delay.

If it is decided that the allegation meets the threshold for safeguarding, the next steps will take place in accordance with section 8.2 of the Sussex Child Protection and Safeguarding Children Procedures.

If, at the completion of the allegation's management process, the organisation dismisses an individual (or would have, had the person not left first) because the person poses a risk of harm to children, the organisation must make a referral to the Disclosure and Barring Service. It is an offence to fail to make a referral without good reason.

If it is decided that the allegation does not meet the threshold for safeguarding, it will be handed back to the employer for consideration via the organisation's internal procedures.

## **Safer Recruiting**

Our policy on Safer Recruiting details our recruitment process taking into account safeguarding and should be read in conjunction with this policy. This is inline with the updated Keeping Children Safe in Education 2021.

All potential employees undergo a rigorous recruitment process and safeguarding checks. At least one person on the recruitment panel is trained in Safer Recruiting. The recruitment process includes an initial interview, followed by a shadow shift in the home or school - in which the children and staff are consulted which on how the applicant managed the shadow shift and their experience of them. Then a Warner (Safeguarding) Interview and then lastly a final discussion and debrief in which the recruitment process will be reviewed with the applicant and feedback from both parties given. The applicant will then know at this stage if they have been successful and will be given a letter regarding an Offer of Employment pending satisfactory enhanced DBS check and at least two references, one from their last / previous employer.

Also, as part of our safer recruiting procedures, Teachers who are applying for a Teaching post at Amicus will undergo a prohibition order check, this ensures the Teacher is not prohibited from Teaching.

Applicant's employment history will be checked and gaps in dates in employment history will be explored and discussed with the applicant. Applicant's qualifications and ID are also carefully checked, and copies taken and stored in their personnel file.

## **Disclosure by Association**

All applicants will also be asked about disclosure by association; as to whether they reside with anyone with whom to their knowledge has been alleged of or convicted of safeguarding offences or concerns.

This will be queried as part of the questioning in the Warner Interview and applicants will be given a declaration to sign to confirm this.

A section 128 direction prohibits or restricts a person from taking part in the management of an independent school, including academies and free schools. A person who is prohibited is unable to participate in any management of an independent school such as: a management position in an independent school.

## Whistleblowing (Confidential Reporting)

The organisation has a whistleblowing policy. This enables any member of staff to make complaints about conduct within the organisation to a person outside the homes and / or school on a confidential basis and without fear that their confidentiality will be breached. This policy will rarely be applicable where a referral of abuse or risk to a child needs to be reported unless that abuse or risk arises within the organisation itself. Referrals in such cases should still be made to the DSL or as indicated in this policy. Where the circumstances are such that a member of staff believes that a complaint can only safely be made to person outside the organisation then reference should be made to the organisation's Whistleblowing Policy.

If you have any safeguarding child protection concerns about a child at Amicus you should raise this with Designated Safeguarding Lead or a deputy in the first instance.

However, it is important to note that the Amicus policy on whistleblowing is informed and supported by the NSPCC helpline on whistleblowing regarding a child protection matter See NSPCC's website

<https://www.nspcc.org.uk/what-you-can-do/report-abuse/dedicated-helplines/whistleblowing-advice-line/>

The helpline number is 0800 028 0285 or email [help@nspcc.org.uk](mailto:help@nspcc.org.uk)

## Physical Intervention

Our policy on physical intervention by staff is set out separately, and acknowledges that staff must only ever use physical intervention as a last resort, when a child is endangering him / herself or others, or damaging property and that at all times it must be the minimal force necessary to prevent injury to another person

Staff who are likely to need to use physical intervention will be appropriately trained in the Team Teach technique.

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

The views and experiences of the children are sought during and after physical interventions and this is logged.

All physical interventions are written up and monitored by Managers and our internal Team Teach Tutors at Amicus.

## **Education of Children & Young People**

This will include covering relevant issues for schools through;

- Relationships Education – for all primary pupils
- Relationship & Sex Education – for all secondary pupils
- Health Education – for all pupils in state-funded schools

The Amicus School has the flexibility to decide how we discharge our duties effectively within the first year of the compulsory teaching, and we will be taking a phased approach when introducing these subjects.

Statutory guidance:

<https://www.gov.uk/government/publications/relationships-education-relationships-and-sex-education-rse-and-health-education>

Further resources are available at:

- Public Health England: Rise Above

<https://campaignresources.phe.gov.uk/schools/topics/rise-above/overview>

## **Bullying**

Our policy on bullying (this includes homophobic, racist and gender related bullying as well as cyber-bullying) is set out in a separate document.

## **Health and Safety**

Our Health & Safety policy, set out in a separate document, reflects the consideration we give to the protection of our children both physically within the school and homes

environment, and for example in relation to internet use, and when away from the school and homes when undertaking school / home trips and visits.

## IT and Online Safety and Mobile Phones

Amicus has a comprehensive policy on the Online and Mobile, Safeguarding of Children and follows the protocols set out Teaching Online safety in Schools June 2019. This covers how to safeguard children online and also set parental controls on children's mobile and internet devices. The policy explains the safeguarding risks to children and covers topics such as cyber-bullying and sexting and the risks involved and legal position as well as how to approach the children about these topics and support them.

The policy also gives recommendations and practical guidance on how to keep children safe through mobile phones, gaming, social media, online access etc and provides step by step instructions on how to set privacy setting and parental controls. The policy also gives guidance on how to report inappropriate material or contact and give links to useful sites providing further guidance in this area.

## Technology and Online Safety

We recognise that the use of technology has become a significant component of many safeguarding issues, such as;

**Child Sexual Exploitation; Radicalisation; Sexual Predation:** technology often provides the platform that facilitates harm. An effective approach to online safety empowers us as a school and homes to protect and educate the whole community in their use of technology and establishes mechanisms to identify, intervene in, and escalate any incident where appropriate.

The breadth of issues classified within online safety is considerable, but can be categorised into three areas of risk:

- **Content:** being exposed to illegal, inappropriate or harmful material; for example, pornography, fake news, racist or radical and extremist views;
- **Contact:** being subjected to harmful online interaction with other users; for example, commercial advertising as well as adults posing as children or young adults; and

- **Conduct:** personal online behaviour that increases the likelihood of, or causes, harm; for example, making, sending and receiving explicit images, or online bullying.

All staff should be aware that technology is a significant component in many safeguarding and wellbeing issues. Children are at risk of abuse online as well as face to face.

In many cases abuse will take place concurrently via online channels and in daily life. Children can also abuse their peers online, this can take the form of abusive, harassing, and misogynistic messages, the non-consensual sharing of indecent images, especially around chat groups, and the sharing of abusive images and pornography, to those who do not want to receive such content

## Education

Opportunities to teach safeguarding, including online safety, looks at resources that could support schools, which include:

- **Be Internet Legends** developed by Parent Zone and Google is a free internet safety curriculum with PSHE accredited lesson plans and teaching resources for Key Stage 2 pupils
- **Disrespectnobody** is Home Office advice and includes resources on healthy relationships, including sexting and pornography
- Education for a connected world framework from the UK Council for Internet Safety supports the development of the curriculum and is of particular relevance to RSHE education and Computing. It is designed, however, to be usable across the curriculum and beyond (covering early years through to age 18) and to be central to a whole school or college approach to safeguarding and online safety.
- **PSHE** association provides guidance to schools on developing their PSHE curriculum
- **'Teaching Online Safety in School'** is departmental guidance outlining how schools can ensure their pupils understand how to stay safe and behave online as part of existing curriculum requirements
- **Thinkuknow** is the National Crime Agency/CEOPs education programme with age specific resources

- **UK Safer Internet Centre** developed guidance and resources that can help with the teaching of the online safety component of the Computing Curriculum.

## **Protecting Children**

Amicus ensures that we have appropriate filters and monitoring systems in place. Whilst considering our responsibility to safeguard and promote the welfare of all of our children, to provide them with a safe environment in which to learn, we consider the age range of our pupils, the number of pupils, how often they access any IT system.

Whilst we consider filtering and monitoring an important part of the online safety picture for our school and homes, it is only one part. We consider a whole 'community' (school / homes) approach to online safety. This includes a clear policy on the use of mobile technology in the school or homes.

## **Reviewing Online Safety**

At Amicus, we take the safety of our children seriously, and have very stringent 'device' checking in place for any children who have any level of time or access to devices. The devices are checked regularly, and the individual child's usage reviewed and amended accordingly.

## **Education at Home**

When we have / are asking our children to learn online at home, to ensure the children's safety, we follow advice and guidance from;

[safeguarding-in-schools-colleges-and-other-providers and safeguarding-and-remote-education](#)

Alongside KCSIE 2021 the DfE published [Teaching Online Safety in Schools](#). This is a useful reminder to include reporting and acting on online safety concerns in the child protection policy, school behaviour policy and bullying policy.

At Amicus we believe that all of our children "should be just as clear about what is expected of them online as offline".

**Sian Elliman is The Amicus Community CEOP Ambassador**

## **Unauthorised Absences**

At times, children may find things very difficult and this may lead to them leaving the school or home without authorisation. The children at Amicus are classed as vulnerable and if the adults do not know of their whereabouts then this is a potential safeguarding concern.

If a child or young person leaves unauthorised, then Amicus' policy on 'Methods of Care and Control (Unauthorised Absences) & Children Missing' is followed.

This policy explains the definition of when a child leaves unauthorised and when they are classed as 'missing'. It also defines the procedures and notifications involved when this happens. When a child leaves unauthorised or goes missing, the Amicus adults always actively try and search for the child as well as any other agencies involved such as the police.

The Police Missing Persons Team has a good relationship with the homes and school and are aware of the children who are placed at Amicus and have details of their profiles on record which are regularly kept up to date.

If a child or young person leaves without authorisation, when they have returned it is always tried to establish where they have been and with whom they may have had contact. If there are any safeguarding concerns around this then Amicus' Child Protection and Safeguarding Policy and Procedures are followed, and the local safeguarding team notified. When a child does return to the home, they have an opportunity to speak to an independent person regarding what led to them leaving and their feeling around this and what happened when they left unauthorised and where they were. The discussions that the child has had with the independent person may not necessarily be shared with Amicus, but main themes will be disclosed to the Police by the independent person.

## **Sexual Harassment and Sexual Violence**

Following DFE guidance on Sexual Violence and Harassment between children in school and colleges (May 2018): all staff at Amicus are trained to be vigilant and report and formally address any issues deemed to be of a harassing nature or sexually violent nature. By sexual harassment we mean any unwanted conduct of a sexual nature that can be both on and offline. Such behaviour may include sexual 'jokes', lewd comments, remarks about body type and clothes or targeting a child because of their gender /sexual orientation. Amicus will not accept this is mere banter or part of growing up – but take any of such behaviours with the seriousness they deserve.

Regarding Sexual Violence. Under no circumstances will this be tolerated or deemed in any way acceptable. This includes peers attempting to touch body parts, expose themselves to another child, and make inappropriate demands of a sexual nature.

Following DFE guidance each case of either sexual harassment or sexual violence from one child to another will be dealt with on a case by case basis by taking into account the power relationship and different ages of the children involved. Wider professionals, such as the child's social worker or those with parental responsibility or where necessary the police, will be involved as appropriate in discussions with Amicus staff and the children concerned. They will be informed of decision making regarding the safeguarding of a child who is victim of such behaviour and any formal actions taken against a child, who has behaved in sexual harassing or violent manner, if this has been deemed necessary by agencies involved.

In line with DFE guidance Keeping Children Safe in Education (September 2021) staff will be vigilant to ensure practices such as 'up skirting' are not occurring.

Following the guidance this policy defines 'Up skirting' as typically involving taking a picture under a person's clothing without them knowing, with the intention of viewing their genitals or buttocks to obtain sexual gratification or cause the victim humiliation, distress or alarm. It is now a criminal offence.

As part of a child's time at Amicus and as part of their education we actively discuss sexual health, sexual consent in the context of growing up and moving from childhood into adolescence and early adulthood and developing a normal and healthy attitude to growing up and having positive relationships

## **Self-Harming and Suicidal Behaviour**

Any child or young person who self-harms or expresses thoughts about this or about suicide will be taken seriously and appropriate help and intervention offered at that point.

### **Definitions and Meanings (National Inquiry 'Young People and Self-harm')**

**Suicide** – Self-harm, resulting in death

**Attempted Suicide** – Self-harm with the intent to take life, resulting in non-fatal injury

**Deliberate Self-harm / Self-harm** - In its broadest sense, self-harm describes a wide range of things that people do to themselves in a deliberate and usually hidden way, which are damaging.

The focus is:

- Cutting behaviours
- Other forms of self-harm, such as burning, scalding, banging, hair pulling
- Self-poisoning.

The difference between suicide and deliberate self-harm is not always so clear. For example, deliberate self-harm is a common precursor to suicide, also children and young people who deliberately self-harm may kill themselves by accident.

## Responding to the Child or Young Person

In every case, the staff member who is made aware that a child or young person has self-harmed, or is contemplating this or suicide, should talk with them without delay and:

- Ascertain if they have taken any substances, including tablets, or injured themselves *(if so, the child or young person should receive urgent medical attention, even if they appear well, as harmful effects can sometimes be delayed)*;
- Try to find out what may be troubling them;
- Explore to what extent self-harm is likely or imminent or planned;
- Ascertain what help or support the child or young person would wish.

A supportive attitude, respect and understanding of the child or young person, along with a non-judgmental stance, is of prime importance. Note also that a child or young person who has a learning disability will find it more difficult to express their thoughts.

A record will be made of any concern of self-harm with any related plan to address this and appropriate mental health and other professionals will be involved as needed / required.

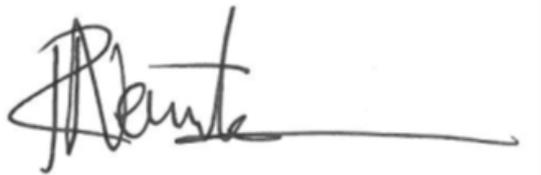
## Prevention

We recognise that the organisation plays a significant part in the prevention of harm to our children by providing them with good lines of communication with trusted adults, supportive friends and an ethos of protection.

The Amicus community will therefore:

- Establish and maintain an ethos where children feel secure and are encouraged to talk and are always listened to.
- Ensure that all children know there is an adult in the school or homes whom they can approach if they are worried or in difficulty.
- Include across the curriculum, including Personal, Social, Health and Economic Education and Citizenship (PSHE and C), opportunities which equip children with the skills they need to stay safe from harm and to know to whom they should turn for help.

**Signed by Rebecca Newton - Clinical and Strategic Director**



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**Date: December 2021**

# APPENDIX 1

## Indicators of Harm

All Amicus staff, Homes, school or office based should be aware that abuse, neglect and safeguarding issues are rarely stand-alone events that can be covered by one label. In most cases issues will overlap one another.

### Physical Abuse

***Physical abuse is:***

***'abuse that 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'***

### Indicators In the Child

#### Bruising

It is often possible to differentiate between accidental and inflicted bruises. The following must be considered as non-accidental unless there is evidence, or an adequate explanation provided:

- Bruising in or around the mouth
- Two simultaneous bruised eyes, without bruising to the forehead, (rarely accidental, though a single bruised eye can be accidental or abusive)
- Repeated or multiple bruising on the head or on sites unlikely to be injured accidentally, for example the back, mouth, cheek, ear, stomach, chest, under the arm, neck, genital and rectal areas
- Variation in colour, possibly indicating injuries caused at different times
- The outline of an object used e.g. belt marks, handprints or a hairbrush
- Linear bruising at any site, particularly on the buttocks, back or face
- Bruising or tears around, or behind, the earlobe/s indicating injury by pulling or twisting
- Bruising around the face
- Grasp marks to the upper arms, forearms or leg
- Petechial haemorrhages (pinpoint blood spots under the skin.) Commonly associated

with slapping, smothering/suffocation, strangling and squeezing

## **Fractures**

Fractures may cause pain, swelling and discolouration over a bone or joint. It is unlikely that a child will have had a fracture without the carers being aware of the child's distress.

If the child is not using a limb, has pain on movement and/or swelling of the limb, there may be a fracture.

There are grounds for concern if:

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

Rib fractures are only caused in major trauma such as in a road traffic accident, a severe shaking injury or a direct injury such as a kick.

Skull fractures are uncommon in ordinary falls, i.e. from three feet or less. The injury is usually witnessed, the child will cry and if there is a fracture, there is likely to be swelling on the skull developing over 2 to 3 hours. All fractures of the skull should be taken seriously.

## **Mouth Injuries**

Tears to the frenulum (tissue attaching upper lip to gum) often indicates force feeding of a baby or a child with a disability. There is often finger bruising to the cheeks and around the mouth. Rarely, there may also be grazing on the palate.

## **Poisoning**

Ingestion of tablets or domestic poisoning in children under 5 is usually due to the carelessness of a parent or carer, but it may be self-harm even in young children.

## **Fabricated or Induced Illness**

Professionals may be concerned at the possibility of a child suffering significant harm as a result of having illness fabricated or induced by their carer. Possible concerns are:

- Discrepancies between reported and observed medical conditions, such as the incidence of fits
- Attendance at various hospitals, in different geographical areas
- Development of feeding / eating disorders, as a result of unpleasant feeding interactions
- The child developing abnormal attitudes to their own health
- Nonorganic failure to thrive - a child does not put on weight and grow and there is no underlying medical cause
- Speech, language or motor developmental delays
- Dislike of close physical contact
- Attachment disorders
- Low self esteem
- Poor quality or no relationships with peers because social interactions are restricted
- Poor attendance at school and under-achievement

### **Bite Marks**

Bite marks can leave clear impressions of the teeth when seen shortly after the injury has been inflicted. The shape then becomes a more defused ring bruise or oval or crescent shaped. Those over 3cm in diameter are more likely to have been caused by an adult or older child.

A medical / dental opinion, preferably within the first 24 hours, should be sought where there is any doubt over the origin of the bite.

### **Burns and Scalds**

It can be difficult to distinguish between accidental and non-accidental burns and scalds. Scalds are the most common intentional burn injury recorded.

Any burn with a clear outline may be suspicious e.g. circular burns from cigarettes, linear burns from hot metal rods or electrical fire elements, burns of uniform depth over a large area, scalds that have a line indicating immersion or poured liquid.

Old scars indicating previous burns / scalds which did not have appropriate treatment or adequate explanation. Scalds to the buttocks of a child, particularly in the absence of burns to the feet, are indicative of dipping into a hot liquid or bath.

The following points are also worth remembering:

- A responsible adult checks the temperature of the bath before the child gets in.
- A child is unlikely to sit down voluntarily in a hot bath and cannot accidentally scald its bottom without also scalding his or her feet.
- A child getting into too hot water of his or her own accord will struggle to get but and there will be splash marks

## Scars

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

## Emotional & Behavioural Presentation

- Refusal to discuss injuries
- Admission of punishment which appears excessive
- Fear of parents being contacted and fear of returning home
- Withdrawal from physical contact
- Arms and legs kept covered in hot weather
- Fear of medical help
- Aggression towards others
- Frequently absent from school
- An explanation which is inconsistent with an injury
- Several different explanations provided for an injury

## Indicators in the Parent

- May have injuries themselves that suggest domestic violence
- Not seeking medical help/unexplained delay in seeking treatment
- Reluctant to give information or mention previous injuries
- Absent without good reason when their child is presented for treatment
- Disinterested or undisturbed by accident or injury
- Aggressive towards child or others
- Unauthorised attempts to administer medication
- Tries to draw the child into their own illness.
- Past history of childhood abuse, self-harm, somatising disorder or false allegations of

physical or sexual assault

- Parent / carer may be over involved in participating in medical tests, taking temperatures and measuring bodily fluids
- Observed to be intensely involved with their children, never taking a much-needed break nor allowing anyone else to undertake their child's care.
- May appear unusually concerned about the results of investigations which may indicate physical illness in the child
- Wider parenting difficulties may (or may not) be associated with this form of abuse.
- Parent / carer has convictions for violent crimes.

## Indicators in the Family& Environment

- Marginalised or isolated by the community
- History of mental health, alcohol or drug misuse or domestic violence
- History of unexplained death, illness or multiple surgery in parents and/or siblings of the family
- homelessness
- Past history of childhood abuse, self-harm, somatising disorder or false allegations of physical or sexual assault or a culture of physical chastisement.

## Emotional Abuse

Emotional abuse is:

***‘the persistent emotional maltreatment of a child such as to cause severe and persistent adverse effects on the child’s emotional development. It may involve conveying to children that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person’***

It may include not giving the child opportunities to express their views, deliberately silencing them or ‘making fun’ of what they say or how they communicate.

It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond the child’s developmental capability, as well as overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction.

It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including 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, though it may occur alone.

## **Indicators in the Child**

- Developmental delay
- Abnormal attachment between a child and parent/carer e.g. anxious, indiscriminate or no attachment
- Aggressive behaviour towards others
- Child scapegoated within the family
- Frozen watchfulness, particularly in pre-school children
- Low self-esteem and lack of confidence
- Withdrawn or seen as a 'loner' - difficulty relating to others
- Over-reaction to mistakes
- Fear of new situations
- Inappropriate emotional responses to painful situations
- Neurotic behaviour (e.g. rocking, hair twisting, thumb sucking)
- Self-harm
- Fear of parents being contacted
- Extremes of passivity or aggression
- Drug/solvent abuse
- Chronic running away
- Compulsive stealing
- Low self-esteem
- Air of detachment – 'don't care' attitude
- Social isolation – does not join in and has few friends
- Depression, withdrawal
- Behavioural problems e.g. aggression, attention seeking, hyperactivity, poor attention
- Low self-esteem, lack of confidence, fearful, distressed, anxious
- Poor peer relationships including withdrawn or isolated behaviour

## **Indicators in the Parent**

- Domestic abuse, adult mental health problems and parental substance misuse may be features in families where children are exposed to abuse.
- Abnormal attachment to child e.g. overly anxious or disinterest in the child
- Scapegoats one child in the family
- Imposes inappropriate expectations on the child e.g. prevents the child's developmental exploration or learning, or normal social interaction through overprotection.
- Wider parenting difficulties may (or may not) be associated with this form of abuse.

## Indicators in the Family & Environment

- Lack of support from family or social network.
- Marginalised or isolated by the community.
- History of mental health, alcohol or drug misuse or domestic violence.
- History of unexplained death, illness or multiple surgery in parents and/or siblings of the family
- Past history of childhood abuse, self-harm, somatising disorder or false allegations of physical or sexual assault or a culture of physical chastisement.

## Neglect

### ***Neglect is:***

***'the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy as a result of maternal substance abuse'***

Once a child is born, neglect may involve a parent or carer failing to:

- provide adequate food, clothing and shelter (including exclusion from home or abandonment);
- protect a child from physical and emotional harm or danger;
- ensure adequate supervision (including the use of inadequate caregivers); or
- ensure access to appropriate medical care or treatment.

It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

## Indicators in the Child

### Physical Presentation

- Failure to thrive or, in older children, short stature
- Underweight
- Frequent hunger
- Dirty, unkempt condition
- Inadequately clothed, clothing in a poor state of repair
- Red/purple mottled skin, particularly on the hands and feet, seen in the winter due to cold
- Swollen limbs with sores that are slow to heal, usually associated with cold injury
- Abnormal voracious appetite
- Dry, sparse hair
- Recurrent / untreated infections or skin conditions e.g. severe nappy rash, eczema or persistent head lice / scabies/ diarrhoea
- Unmanaged / untreated health / medical conditions including poor dental health
- Frequent accidents or injuries

### Development

- General delay, especially speech and language delay
- Inadequate social skills and poor socialization

### Emotional & Behavioural Presentation

- Attachment disorders
- Absence of normal social responsiveness
- Indiscriminate behaviour in relationships with adults
- Emotionally needy
- Compulsive stealing
- Constant tiredness
- Frequently absent or late at school
- Poor self esteem
- Destructive tendencies
- Thrives away from home environment
- Aggressive and impulsive behaviour
- Disturbed peer relationships

- Self-harming behaviour

## **Indicators in the Parent**

- Dirty, unkempt presentation
- Inadequately clothed
- Inadequate social skills and poor socialisation
- Abnormal attachment to the child .e.g. anxious
- Low self- esteem and lack of confidence
- Failure to meet the basic essential needs e.g. adequate food, clothes, warmth, hygiene
- Failure to meet the child's health and medical needs e.g. poor dental health; failure to attend or keep appointments with health visitor, GP or hospital; lack of GP registration; failure to seek or comply with appropriate medical treatment; failure to address parental substance misuse during pregnancy
- Child left with adults who are intoxicated or violent
- Child abandoned or left alone for excessive periods
- Wider parenting difficulties, may (or may not) be associated with this form of abuse

## **Indicators in the Family & Environment**

- History of neglect in the family
- Family marginalised or isolated by the community.
- Family has history of poor mental health, alcohol or drug misuse or domestic violence.
- History of unexplained death, illness or multiple surgery in parents and/or siblings of the family
- Family has a past history of childhood abuse, self-harm, somatising disorder or false allegations of physical or sexual assault or a culture of physical chastisement.
- Dangerous or hazardous home environment including failure to use home safety equipment; risk from animals
- Poor state of home environment e.g. unhygienic facilities, lack of appropriate sleeping arrangements, inadequate ventilation (including passive smoking) and lack of adequate heating
- Lack of opportunities for child to play and learn

## Sexual Abuse

***‘Sexual abuse involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening’***

The activities may involve physical contact, including assault by penetration (for example, rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing.

They may 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.

## Indicators in the Child

### Physical Presentation

- Urinary infections, bleeding or soreness in the genital or anal areas
- Recurrent pain on passing urine or faeces
- Blood on underclothes
- Sexually transmitted infections
- Vaginal soreness or bleeding
- Pregnancy in a younger girl where the identity of the father is not disclosed and/or there is secrecy or vagueness about the identity of the father
- Physical symptoms such as injuries to the genital or anal area, bruising to buttocks, abdomen and thighs, sexually transmitted disease, presence of semen on vagina, anus, external genitalia or clothing

### Emotional & Behavioural Presentation

- Makes a disclosure
- Demonstrates sexual knowledge or behaviour inappropriate to age/stage of development, or that is unusually explicit

- Inexplicable changes in behaviour, such as becoming aggressive or withdrawn
- Self-harm - eating disorders, self-mutilation and suicide attempts
- Poor self-image, self-harm, self-hatred
- Reluctant to undress for PE
- Running away from home
- Poor attention / concentration (world of their own)
- Sudden changes in school work habits, become truant
- Withdrawal, isolation or excessive worrying
- Inappropriate sexualised conduct
- Sexually exploited or indiscriminate choice of sexual partners
- Wetting or other regressive behaviours e.g. thumb sucking
- Draws sexually explicit pictures
- Depression

### **Indicators in the Parents**

- Comments made by the parent/carer about the child.
- Lack of sexual boundaries
- Wider parenting difficulties or vulnerabilities
- Grooming behaviour
- Parent is a sex offender

### **Indicators in the Family & Environment**

- Marginalised or isolated by the community.
- History of mental health, alcohol or drug misuse or domestic violence.
- History of unexplained death, illness or multiple surgery in parents and/or siblings of the family
- Past history of childhood abuse, self-harm, somatising disorder or false allegations of physical or sexual assault or a culture of physical chastisement.
- Family member is a sex offender.

### **Specific Safeguarding Issues:**

Please see page 15 of this policy for a list of specific issues relating to safeguarding and details of links to local and government websites with more information regarding these issues.

## **Further information on Child Sexual Exploitation, Child Criminal Exploitation and Female Genital Mutilation**

Both CSE & CCE are forms of abuse and both occur when an individual or group takes advantage of an imbalance of power.

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

Both CSE and CCE are forms of abuse that occur where an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a child into taking part in sexual or criminal activity, in exchange for something the victim needs or wants, and/or for the financial advantage or increased status of the perpetrator or facilitator and/or through violence or the threat of violence.

CSE and CCE can affect children, both male and female and can include children who have been moved (commonly referred to as trafficking) for the purpose of exploitation.

#### **Child Sexual Exploitation (CSE)**

CSE is where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child into any sexual activity in:

- Exchange for something the victim needs or wants
- The financial advantage or increased status of the perpetrator or facilitator

The victim may have been sexually exploited, even if the sexual activity appears to be consensual. CSE does not always involve physical contact; it can also occur through the use of technology.

CSE is a form of child sexual abuse. Sexual abuse may involve physical contact, including assault by penetration (for example, rape or oral sex) or nonpenetrative acts such as masturbation, kissing, rubbing, and touching outside clothing.

It may include non-contact activities, such as involving children in the production of sexual images, forcing children to look at sexual images or watch sexual activities, encouraging children to behave in sexually inappropriate ways or grooming a child in preparation for abuse including via the internet.

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

Sexual exploitation involves varying degrees of coercion, intimidation or enticement, including unwanted pressure from peers to have sex, sexual bullying including cyberbullying and grooming.

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

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

However, it also important to recognise that some young people who are being sexually exploited do not exhibit any external signs of this abuse.

### **Child Criminal Exploitation (CCE)**

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

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

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

They may still have been criminally exploited even if the activity appears to be something they have agreed or consented to. It is important to note that the experience of girls who are criminally exploited can be very different to that of boys. The indicators may not be the same, however professionals should be aware that girls are at risk of criminal exploitation too. It is also important to note that both boys and girls being criminally exploited may be at higher risk of sexual exploitation.

CCE is where a an individual or group takes advantage of an imbalance of power to coerce, control, manipulate of deceive a child into any criminal activity in:

- Exchange for something the victim needs or wants
- For the financial or other advantage of the perpetrator or facilitator
- Through violence or the threat of violence

The victim may have been criminally exploited even if the activity appears to be consensual. CCE does not always involve physical contact; it can also occur through the use of technology.

CCE can include:

- Children being forced to work in Cannabis factories
- Being coerced into moving drugs or money across the country (See County Lines)
- Forced to shoplift or pickpocket; or
- To threaten other children or young people

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

Professionals in all agencies, and individuals and groups in relevant communities, need to be alert to the possibility of a girl being at risk of FGM, or already having suffered FGM. There is a range of potential indicators that a child or young person may be at risk of FGM, which individually may not indicate risk but if there are two or more indicators present this could signal a risk to the child or young person. Victims of FGM are likely to come from a community that is known to practise FGM.

Professionals should note that girls at risk of FGM may not yet be aware of the practice or that it may be conducted on them, so sensitivity should always be shown when approaching the subject.

Warning signs that FGM may be about to take place, or may have already taken place, can

be found on pages 11-12 of the Multi-Agency Practice Guidelines referred to above. Staff should activate local safeguarding procedures, using existing national and local protocols for multi-agency liaison with police and children's social care.

### **Mandatory Reporting Duty Regarding Female Genital Mutilation (FGM)**

Section 5B of the Female Genital Mutilation Act 2003 (as inserted by section 74 of the Serious Crime Act 2015) places a statutory duty upon teachers, along with social workers and healthcare professionals, to report to the police where they discover (either through disclosure by the victim or visual evidence) that FGM appears to have been carried out on a girl under 18. Those failing to report such cases will face disciplinary sanctions. It will be rare for teachers to see visual evidence, and they should not be examining students, but the same definition of what is meant by "to discover that an act of FGM appears to have been carried out" is used for all professionals to whom this mandatory reporting duty applies. The Mandatory reporting duty commenced in October 2015. Teachers must report to the police cases where they discover that an act of FGM appears to have been carried out. Unless the teacher has a good reason not to, they should still consider and discuss any such case with the school's designated safeguarding lead and involve children's social care as appropriate.

### **Domestic Abuse**

The Domestic Abuse Act 2021 received Royal Assent on 29 April 2021. The Act introduces the first ever statutory definition of domestic abuse and recognises the impact of domestic abuse on children, as victims in their own right, if they see, hear or experience the effects of abuse.

The statutory definition of domestic abuse, based on the previous cross-government definition, ensures that different types of relationships are captured, including ex-partners and family members. The definition captures a range of different abusive behaviours, including physical, emotional and economic abuse and coercive and controlling behaviour.

Both the person who is carrying out the behaviour and the person to whom the behaviour is directed towards must be aged 16 or over and they must be "personally connected" (as defined in section 2 of the 2021 Act).

Types of domestic abuse include intimate partner violence, abuse by family members, teenage relationship abuse and child/adolescent to parent violence and abuse. Anyone can be a victim of domestic abuse, regardless of gender, age, ethnicity, socio-economic status,

sexuality or background and domestic abuse can take place inside or outside of the home.

All children can witness and be adversely affected by domestic abuse in the context of their home life where domestic abuse occurs between family members. Experiencing domestic abuse and/or violence can have a serious, long lasting emotional and psychological impact on children. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result.

Young people can also experience domestic abuse within their own intimate relationships. This form of peer on peer abuse is sometimes referred to as 'teenage relationship abuse'. Depending on the age of the young people, this may not be recognised in law under the statutory definition of 'domestic abuse' (if one or both parties are under 16).

However, as with any child under 18, where there are concerns about safety or welfare, child safeguarding procedures should be followed and both young victims and young perpetrators should be offered support.

### **Operation Encompass**

Operation Encompass operates in all police forces across England. It helps police and schools work together to provide emotional and practical help to children. The system ensures that when police are called to an incident of domestic abuse, where there are children in the household who have experienced the domestic incident, the police will inform the key adult (usually the designated safeguarding lead) in school before the child or children arrive at school the following day. This ensures that the school has up to date relevant information about the child's circumstances and can enable immediate support to be put in place, according to the child's needs.

Operation Encompass does not replace statutory safeguarding procedures. Where appropriate, the police and/or schools should make a referral to children's social care if they are concerned about a child's welfare.

More information about the scheme and how schools can become involved is available on the Operation Encompass website

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

the team for a call can be booked.

Additional advice on identifying children who are affected by domestic abuse and how they can be helped is available at:

- NSPCC- UK domestic-abuse Signs Symptoms Effects
- Refuge what is domestic violence/effects of domestic violence on children
- Safelives: young people and domestic abuse.
- Domestic abuse: specialist sources of support - GOV.UK ([www.gov.uk](http://www.gov.uk)) (includes information for adult victims, young people facing abuse in their own relationships and parents experiencing child to parent violence/abuse)
- Home: Operation Encompass (includes information for schools on the impact of domestic abuse on children)

# Keeping Children Safe in Education 2021

## Whole School Approach to Safeguarding

Governing bodies and proprietors should ensure they facilitate a whole school approach to safeguarding. This means ensuring safeguarding and child protection are at the forefront and underpin all relevant aspects of process and policy development. Ultimately, all systems, processes and policies should operate with the best interests of the child at their heart.

Where there is a safeguarding concern, governing bodies, proprietors and school or college leaders should ensure the child's wishes and feelings are taken into account when determining what action to take and what services to provide.

Systems should be in place, and they should be well promoted, easily understood and easily accessible for children to confidently report abuse, knowing their concerns will be treated seriously, and knowing they can safely express their views and give feedback.

## Safeguarding Policies and Procedures

Governing bodies and proprietors should ensure there are appropriate policies and procedures in place in order for appropriate action to be taken in a timely manner to safeguard and promote children's welfare.

These policies should include individual schools having:

- an effective child protection policy which reflects the whole school approach to peer on peer abuse
- reflects reporting systems as set out at paragraph
- should describe procedures which are in accordance with government guidance;
- refers to locally agreed multi-agency safeguarding arrangements put in place by the safeguarding partners;
- includes policies as reflected elsewhere in Part two of this guidance, such as online safety, and special educational needs and disabilities (SEND)
- where appropriate, reflects serious violence. Further advice for schools and colleges is provided in the Home Office's Preventing youth violence and gang involvement and its Criminal exploitation of children and vulnerable adults:
- county lines guidance;

- should be reviewed annually (as a minimum) and updated if needed, so that it is kept up to date with safeguarding issues as they emerge and evolve, including lessons learnt;
- is available publicly either via the school website or by other means.
- a behaviour policy, which includes measures to prevent bullying (including cyberbullying, prejudice-based and discriminatory bullying)
- a staff behaviour policy (sometimes called the code of conduct) which should, amongst other things, include: acceptable use of technologies (including the use of mobile devices), staff/pupil relationships and communications including the use of social media.
- appropriate safeguarding arrangements in place to respond to children who go missing from education, particularly on repeat occasions

### **What School Staff Should do if they have a Safeguarding Concern or an Allegation is Made About Another Staff Member**

Governing bodies and proprietors should ensure there are procedures in place to manage safeguarding concerns, or allegations against staff (including supply staff and volunteers and contractors).

Concerns and allegations that may meet the harms test should be addressed as set out in Section one of Part four of this guidance.

‘Lower level’ concerns and allegations that do not meet the harms test should be addressed as set out in Section two of Part four of this guidance.

There must be procedures in place to make a referral to the Disclosure and Barring Service (DBS) if a person in regulated activity has been dismissed or removed due to safeguarding concerns or would have been had they not resigned. **This is a legal duty and failure to refer when the criteria are met is a criminal offence.**

Where a teacher’s employer, including an agency, dismisses or ceases to use the services of a teacher because of serious misconduct, or might have dismissed them or ceased to use their services had they not left first, they must consider whether to refer the case to the Secretary of State (via the Teaching Regulation Agency). Details about how to make a referral to the Teaching Regulation Agency can be found on GOV.UK.

## Staff Training

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

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

Governing bodies and proprietors should ensure that children are taught about safeguarding, including online safety, and recognise that a one size fits all approach may not be appropriate for all children, and a more personalised or contextualised approach for more vulnerable children, victims of abuse and some SEND children might be needed

## Resources

The Department has produced a one-stop page for teachers on GOV.UK, teaching about relationships sex and health.

This includes teacher training modules on the RSHE topics and non-statutory implementation guidance. The following resources may also help schools understand and teach about safeguarding:

DfE advice for schools: [teaching online safety in schools](#);

UK Council for Internet Safety (UKCIS) guidance: [Education for a connected world](#);

UKCIS guidance: [Sharing nudes and semi-nudes: advice for education settings working with children and young people](#);

The UKCIS [external visitors](#) guidance will help schools and colleges to ensure the maximum impact of any online safety sessions delivered by external visitors;

National Crime Agency's CEOP education programme: [Thinkuknow](#);

## **Online Safety**

It is essential that children are safeguarded from potentially harmful and inappropriate online material. An effective whole school college approach to online safety empowers a school or college to protect and educate pupils, students, and staff in their use of technology and establishes mechanisms to identify, intervene in, and escalate any concerns where appropriate.

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

- **Content:** being exposed to illegal, inappropriate or harmful content, for example: pornography, fake news, racism, misogyny, self-harm, suicide, anti-Semitism, radicalisation and extremism.
- **Contact:** being subjected to harmful online interaction with other users; for example: peer to peer pressure, commercial advertising and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes’.
- **Conduct:** personal online behaviour that increases the likelihood of, or causes, harm; for example, making, sending and receiving explicit images (e.g consensual and non-consensual sharing of nudes and semi-nudes and/or pornography, sharing other explicit images and online bullying; and
- **Commerce** - risks such as online gambling, inappropriate advertising, phishing and or financial scams.

If you feel your pupils, students or staff are at risk, please report it to the Anti-Phishing Working Group (<https://apwg.org/>).

Schools and colleges should ensure online safety is a running and interrelated theme whilst devising and implementing policies and procedures. This will include considering how online safety is reflected as required in all relevant policies and considering online safety whilst planning the curriculum, any teacher training, the role and responsibilities of the designated safeguarding lead and any parental engagement.

## Online Safety Policy

Online safety and the school approach to it should be reflected in the child protection policy. Considering the 4Cs (above) will provide the basis of an effective online policy. The school should have a clear policy on the use of mobile and smart technology. Amongst other things this will reflect the fact many children have unlimited and unrestricted access to the internet via mobile phone networks (i.e. 3G, 4G and 5G).

This access means some children, whilst at school, sexually harass their peers via their mobile and smart technology, share indecent images: consensually and non-consensually (often via large chat groups), and view and share pornography and other harmful content.

Schools and colleges should carefully consider how this is managed on their premises and reflect in their mobile and smart technology policy and their child protection policy.

## Remote Learning

Where children are being asked to learn online at home the Department has provided advice to support schools and colleges do so safely: [safeguarding in schools colleges and other providers](#) and [safeguarding and remote education](#).

The NSPCC and PSHE Association also provide helpful advice:

- NSPCC Learning - [Undertaking remote teaching safely during school closures](#)
- PSHE - [PSHE Association coronavirus hub Filters and monitoring](#)

Whilst considering their responsibility to safeguard and promote the welfare of children and provide them with a safe environment in which to learn, governing bodies and proprietors should be doing all that they reasonably can to limit children's exposure to the above risks from the school's or college's IT system.

As part of this process, governing bodies and proprietors should ensure their school or college has appropriate filters and monitoring systems in place. Governing bodies and proprietors should consider the age range of their children, the number of children, how often they access the IT system and the proportionality of costs vs risks.

The appropriateness of any filters and monitoring systems are a matter for individual

schools and colleges and will be informed in part, by the risk assessment required by the Prevent Duty.

The UK Safer Internet Centre has published guidance as to what “appropriate” filtering and monitoring might look like: [UK Safer Internet Centre: appropriate filtering and monitoring](#).

Support for schools when considering what to buy and how to buy it is available via the: schools' buying strategy with specific advice on procurement here: [buying for schools](#).

## **Information Security and Access Management**

Education settings are directly responsible for ensuring they have the appropriate level of security protection procedures in place, in order to safeguard their systems, staff and learners and review the effectiveness of these procedures periodically to keep up with evolving cyber-crime technologies. Guidance on e-security is available from the [National Education Network](#). In addition, broader guidance on cyber security including considerations for governors and trustees can be found at [NCSC.GOV.UK](#).

## **Reviewing Online Safety**

Technology, and risks and harms related to it evolve and changes rapidly. Schools and colleges should consider carrying out an annual review of their approach to online safety, supported by an annual risk assessment that considers and reflects the risks their children face. A free online safety self-review tool for schools can be found via the [360 safe website](#).

UKCIS has published Online safety in schools and colleges: [Questions from the governing board](#). The questions can be used to gain a basic understanding of the current approach to keeping children safe online; learn how to improve this approach where appropriate; and find out about tools which can be used to improve the approach. It has also published an [Online Safety Audit Tool](#) which helps mentors of trainee teachers and newly qualified teachers induct mentees and provide ongoing support, development and monitoring.

When reviewing online safety provision, the UKCIS external visitors guidance highlights a range of resources which can support educational settings to develop a whole school approach towards online safety. Information and support

There is a wealth of additional information available to support schools, colleges and

parents to keep children safe online. A sample is provided at Annex D

## **Honour Based Violence**

So-called 'honour-based' violence (HBV) encompasses crimes which have been committed to protect or defend the honour of the family and/or the community, including Female Genital Mutilation (FGM), forced marriage, and practices such as breast ironing. All forms of so-called HBV are abuse (regardless of the motivation) and should be handled and escalated as such. If in any doubts staff should speak to the designated safeguarding lead. Professionals in all agencies, and individuals and groups in relevant communities, need to be alert to the possibility of a child being at risk of HBV, or already having suffered HBV. <sup>[1]</sup><sub>SEP</sub>

## **Preventing Radicalisation**

From 1 July 2015 specified authorities, including all schools (and since 18 September 2015 all colleges) as defined in the summary of the National guidance, are subject to a duty under section 26 of the Counter-Terrorism and Security Act 2015 ("the CTSA 2015"), in the exercise of their functions, to have "due regard to the need to prevent people from being drawn into terrorism". This duty is known as the Prevent duty.

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

- Extremism is the vocal or active opposition to our fundamental values, including democracy, the rule of law, individual liberty and the mutual respect and tolerance of different faiths and beliefs. This also includes calling for the death of members of the armed forces.
- Radicalisation refers to the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups.
- Terrorism is an action that endangers or causes serious violence to a person/people; causes serious damage to property; or seriously interferes or disrupts an electronic system. The use or threat must be designed to influence the government or to intimidate the public and is made for the purpose of advancing a political, religious or ideological cause.

**Guidelines can be found at:**

As defined in the Government's Counter Extremism Strategy

<https://www.gov.uk/government/publications/counter-extremism-strategy>.

As defined in the Revised Prevent Duty Guidance for England and Wales

<https://www.gov.uk/government/publications/prevent-duty-guidance/revised-prevent-duty-guidance-forengland-and-wales>.

As defined in the Terrorism Act 2000 (TACT 2000),

<http://www.legislation.gov.uk/ukpga/2000/11/contents>

## **Peer on Peer Harm, including Sexual Violence & Sexual Harassment**

All staff should be aware that children can abuse other children (often referred to as peer on peer abuse). And that it can happen both inside and outside of school and online. It is important that all staff recognise the indicators and signs of peer on peer abuse and know how to identify it and respond to reports.

All staff should understand, that even if there are no reports in their schools it does not mean it is not happening, it may be the case that it is just not being reported. As such it is important if staff have any concerns regarding peer on peer abuse, they should speak to their designated safeguarding lead or deputy.

Sexual violence and sexual harassment can occur between two children of any age and sex, from primary through to secondary stage and into colleges. It can occur through a group of children sexually assaulting or sexually harassing a single child or group of children.

Sexual violence and sexual harassment exist on a continuum and may overlap; they can occur online and face to face (both physically and verbally) and are never acceptable. As set out in Part one of this guidance, all staff working with children are advised to maintain an attitude of 'it could happen here'

Addressing inappropriate behaviour (even if it appears to be relatively innocuous) can be an important intervention that helps prevent problematic, abusive and/or violent behaviour in the future

It is essential that all staff understand the importance of challenging inappropriate behaviours between peers, many of which are listed below, that are actually abusive in

nature. Downplaying certain behaviours, for example dismissing sexual harassment as “just banter”, “just having a laugh”, “part of growing up” or “boys being boys” can lead to a culture of unacceptable behaviours, an unsafe environment for children and in worst case scenarios a culture that normalises abuse leading to children accepting it as normal and not coming forward to report it.

You should read Part Five alongside the Departmental advice: *Sexual Violence and Sexual Harassment Between Children in Schools and Colleges*

### **Minimising the Risk of Peer on Peer Abuse**

Amicus installs a strong ethos based on mutual respect, fairness and equality between members of the community. Any incidents of peer on peer abuse must be taken seriously and responded to promptly and robustly.

Many of the children Amicus looks after will struggle greatly with their peer relationships due to the trauma they have experienced themselves and are likely to need high levels of support around their peers on a daily basis. Some children placed with Amicus will have experienced sexual abuse themselves and may at times display highly sexualised behaviour. Children who have been sexually abused may not know that what has happened to them is wrong and this can lead to a normalisation of sexual behaviour towards others, including their peers. Staff members must remain alert to this at all times, be ready to intervene and must record any incidents of sexualised behaviour when they occur as well as reporting these to the safeguarding team. All staff should recognise that children are capable of abusing their peers and that **all peer on peer abuse is unacceptable and will be taken seriously.**

Guidance is clear that systems should be in place (and they should be well promoted, easily understood and easily accessible) for children to confidently report abuse, knowing their concerns will be treated seriously.

Schools and colleges not recognising, acknowledging or understanding the scale of harassment and abuse and/or downplaying some behaviours related to abuse can lead to a culture of unacceptable behaviour, an unsafe environment and in worst case scenarios a culture that normalises abuse leading to children accepting it as normal and not coming forward to report it

Peer on Peer Harms can Include: bullying – including cyber bullying, physical abuse, including hitting, kicking, shaking, biting, hair pulling or otherwise causing physical harm;

sexual violence and sexual harassment; up skirting, which typically involves taking a picture under a person's clothing without them knowing, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or to cause the victim humiliation, distress or alarm; sexting (also known as sexting (also known as youth produced sexual imagery)).

## **Responding to the Report**

It is important to note that children may not find it easy to tell staff about their abuse verbally.

Children can show signs or act in ways that they hope adults will notice and react to. In some cases, the victim may not make a direct report. For example, a friend may make a report, or a member of school staff may overhear a conversation that suggests a child has been harmed or a child's own behaviour might indicate that something is wrong.

If staff have any concerns about a child's welfare, they should act on them immediately rather than wait to be told. The school's initial response to a report from a child is incredibly important. How the school responds to a report can encourage or undermine the confidence of future victims of sexual violence and sexual harassment to report or come forward

The starting point regarding any report should always be that there is a zero-tolerance approach to sexual violence and sexual harassment and it is never acceptable and it will not be tolerated. It is especially important not to pass off any sexual violence or sexual harassment as "banter", "just having a laugh", "part of growing up" or "boys being boys" as this can lead to a culture of unacceptable behaviours and an unsafe environment for children.

You can find advice and guidance at:

<https://www.gov.uk/government/publications/searching-screening-and-confiscation>

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/759007/6\\_2939\\_SP\\_NCA\\_Sexting\\_In\\_Schools\\_FINAL\\_Update\\_Jan17.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/759007/6_2939_SP_NCA_Sexting_In_Schools_FINAL_Update_Jan17.pdf)

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/759009/Overview\\_of\\_Sexting\\_Guidance.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/759009/Overview_of_Sexting_Guidance.pdf)

## **Understanding the Views of Children**

It is important that children feel heard and understood. Therefore, designated safeguarding leads should be supported in developing knowledge and skills to:

- encourage a culture of listening to children and taking account of their wishes and feelings, among all staff, and in any measures the school or college may put in place to protect them; and
- understand the difficulties that children may have in approaching staff about their circumstances and consider how to build trusted relationships which facilitate communication. Holding and sharing information

## **Children with Special Educational Needs and Disabilities or Physical Health Issues**

Children with special educational needs or disabilities (SEND) or certain health conditions can face additional safeguarding challenges.

Governing bodies and proprietors should ensure their child protection policy reflects the fact that additional barriers can exist when recognising abuse and neglect in this group of children. These can include:

- assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's condition without further exploration;
- these children being more prone to peer group isolation or bullying (including prejudice-based bullying) than other children;
- the potential for children with SEND or certain medical conditions being disproportionately impacted by behaviours such as bullying, without outwardly showing any signs; and
- communication barriers and difficulties in managing or reporting these challenges

## **How to Identify Harmful Sexual Behaviour Between Peers:**

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

harassment can occur between two children of any sex. Staff members must be alert to what may be considered *harmful* sexual behaviour between peers and if they have any concerns, these should be **immediately reported to the DSL or one of the Deputies**.

### **Sexual Behaviour between Children can be Considered Harmful if:**

- **One of the children is much older**, particularly if there is more than two years' difference or if one of the children is pre-pubescent and the other is not. Staff should be aware of the possibility that a younger child may abuse an older child.
- **If one of the children could be seen to have power or dominance over the other** – for example if one of the children is disabled, physically smaller, less confident or if bribes/coercion have been used to ensure compliance or secrecy.

### **All staff need to be aware that:**

Peer on peer abuse is most likely to include, but may not be limited to:

- bullying (including cyberbullying, prejudice-based and discriminatory bullying);
- abuse in intimate personal relationships between peers;
- physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (this may include an online element which facilitates, threatens and/or encourages physical abuse);
- sexual violence, such as rape, assault by penetration and sexual assault; (this may include an online element which facilitates, threatens and/or encourages sexual violence);
- sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment, which may be standalone or part of a broader pattern of abuse;
- causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party;
- consensual and non-consensual sharing of nudes and semi nudes images and or videos (also known as sexting or youth produced sexual imagery);

- upskirting, which typically involves taking a picture under a person's clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm; and
- initiation/hazing type violence and rituals (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element).

All staff should be clear as to the school's policy and procedures with regards to peer on peer abuse and the important role they have to play in preventing it and responding where they believe a child may be at risk from it.

Harmful sexual behaviour includes: using sexually explicit words and phrases, inappropriate touching, using sexual violence or threats, full penetrative sex with other children or adults. Harmful sexual behaviour and harassment can occur online and offline.

It is more likely that girls will be the victims of sexual violence and more likely that sexual harassment will be perpetrated by boys.

Children with Special Educational Needs and Disabilities (SEND) can be especially vulnerable. Disabled and deaf children are three times more likely to be abused than their peers.

Amicus will continue to teach young people about appropriate behaviour, personal boundaries and respectful and healthy peer relationships. Sex education will be taught at school in a way that is appropriate to each child's needs and developmental stage. All victims of peer on peer abuse will be taken seriously and offered appropriate support. Amicus acknowledges that those who try to harm others are also extremely vulnerable and need appropriate support and safeguards in place.

Where a concern regarding peer on peer abuse or sexual violence or harassment has been disclosed to the DSL(s), the following steps will be taken:

- Immediate action will be taken to safeguard all of the children involved. The designated safeguarding lead (or a deputy) will make an immediate risk and needs assessment. This will be done on a case by case basis and will consider:
  - the victim, especially their protection and support

- Safeguarding and supporting the alleged perpetrator and the implementation of any disciplinary sanctions (as appropriate)
  - all the other children (and, if appropriate, adult students and staff) at the school or college, especially any actions that are appropriate to protect them.
- As appropriate, information will be passed on to children’s social care and/or the police and discussions will take place as to what actions are required.
  - All concerns, discussions, decisions and reasons for decisions will be recorded (written or electronic) and will be represented in updates to each child’s risk assessment and behaviour plan.
  - Amicus’ response will always be underpinned by the principle that peer on peer abuse, sexual violence and sexual harassment is never acceptable and will not be tolerated.

## **Up Skirting**

The Voyeurism (Offences) Act, which is commonly known as the ‘Upskirting Act’, came into force on 12 April 2019.

‘Upskirting’ is where someone takes a picture under a person’s clothing (not necessarily a skirt) without their permission and or knowledge, with the intention of viewing their genitals or buttocks (with or without underwear) to obtain sexual gratification, or cause the victim humiliation, distress or alarm.

It is a criminal offence. Anyone of any gender, can be a victim.

## **County Lines**

County Lines is the term used to describe gangs and organised criminal networks involved in exporting illegal drugs – primarily crack cocaine and Heroin - into one or more importing areas within the UK, using dedicated mobile phone lines or other form of ‘deal-line’.

Exploitation is an integral part of the County Lines offending model with children & vulnerable adults used to move and store, drugs and money.

Offenders will often use coercion, intimidation, violence (including sexual violence) and weapons to ensure the compliance of the victim.

Children can often be targeted and recruited into County Lines in a number of locations, including schools, residential children's homes, care homes, special needs school, other educational establishments and pupil referral units. The children will often be recruited to move money and drugs between locations.

A key to identifying potential involvement in county lines are **missing episodes**, when the victim may have been trafficked for the purpose of transporting drugs.

Like other forms of abuse and exploitation, county lines exploitation:

- can affect any child or young person (male or female) under the age of 18 years;
- can affect any vulnerable adult over the age of 18 years;
- can still be exploitation even if the activity appears consensual;
- can involve force and / or enticement-based methods of compliance and is often accompanied by violence or threats of violence;
- can be perpetrated by individuals or groups, males or females, and young people or adults; and
- is typified by some form of power imbalance in favour of those perpetrating the exploitation. Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including gender, cognitive ability, physical strength, status, and access to economic or other resources.

## **The Responsibility of Governing Bodies, Proprietors and Management Committees**

### **Legislation and the Law**

Governing bodies and proprietors have a strategic leadership responsibility for their school's or college's safeguarding arrangements and must ensure that they comply with their duties under legislation.

They must have regard to this guidance, ensuring policies, procedures and training in their schools or colleges are effective and comply with the law at all times.

Where a school or college has charitable status, Charity Commission guidance on charity and trustee duties to safeguard children is available at GOV.UK.

Governing bodies and proprietors should have a senior board level (or equivalent) lead to take leadership responsibility for their school's or college's safeguarding arrangements.

Headteachers and principals should ensure that the policies and procedures, adopted by their governing bodies and proprietors, (particularly those concerning referrals of cases of suspected abuse and neglect), are understood, and followed by all staff

## **Homelessness**

Being homeless or being at risk of becoming homeless presents a real risk to a child's welfare. The designated safeguarding lead (and deputies) will be aware of contact details and referral routes into the Local Housing Authority so they can raise/progress concerns at the earliest opportunity of required.

## **Children Missing from Education**

Children missing from education, particularly persistently, can act as a vital warning sign to a range of safeguarding issues including neglect, sexual abuse, and child sexual and criminal exploitation. It is important the school's response to children missing from education supports identifying such abuse and also helps prevent the risk of them going missing in the future.

This includes when problems are first emerging but also where children are already known to local authority children's social care and need a social worker (such as on a child in need or child protection plan, or as a looked after child), where going missing from education may increase known safeguarding risks within the family or in the community. Further information and support, includes:

- schools' duties regarding children missing education, including information schools must provide to the local authority when removing a child from the school roll at standard and non-standard transition points can be found in the Department's statutory guidance:

### **Children Missing Education.**

- further information for colleges providing education for a child of compulsory school age can be found in: **Full-time-Enrolment of 14 to 16 year olds in Further Education and Sixth Form Colleges.**

- general information and advice for schools and colleges can be found in the Government's [Missing Children and Adults Strategy](#)

## **Contextual Safeguarding**

Staff must also be aware of the wider environmental factors that are present in a child's life and if these are a threat to their safety and/or welfare. This can include different relationships that young people form in their neighbourhoods, schools and online which can feature violence and abuse or pose safeguarding risks. If staff have any concerns, they must report these immediately to a member of the safeguarding team. Staff must provide as much information as possible if a referral to Social Care is required, including details of these contextual factors. This will allow any assessment to consider all the available evidence and the full context of any abuse.

Children's social care assessments should consider where children are being harmed in contexts outside the home, so it is important that we, as a school provide as much information as possible as part of the referral process. This will allow any assessment to consider all the available evidence and enable a contextual approach to address such harm.

Additional information is available here:

[Contextual Safeguarding Network – The Contextual Safeguarding programme, and the team who deliver it, are part of the International Centre: Researching child sexual exploitation, violence and trafficking \(IC\) at the University of Bedfordshire](#)

## **Deficiencies and Weaknesses**

It is the duty of all members of Staff and the proprietor to draw to the attentions of the DSL any weakness or deficiencies in this policy. The DSL will ensure that this is then followed up without delay, with policies and procedures being updated as needed rather than waiting to any regular review date.

## **Complaints**

All complaints arising from the operation of this policy should be referred to the DSL (who will keep the Head and Proprietor informed). The Proprietor will arrange for the complaint to be investigated.

## Key Contacts and Resources

### Ofsted

Piccadilly Gate, Store Street, Manchester, M1 2WD

Tel: 03001234234

Email: [enquiries@ofsted.gov](mailto:enquiries@ofsted.gov)

Web: [www.ofsted.gov.uk](http://www.ofsted.gov.uk)

### Disclosure and Barring Service (DBS)

Address for referrals: PO Box 181, Darlington, DL1 9FA

Telephone for referrals: 01325 953 795

Telephone for customer services: 0870 909 08

Email: [customerservices@db.s.gsi.gov.uk](mailto:customerservices@db.s.gsi.gov.uk)

### NSPCC Child Protection Helpline

Tel: 0808 800 5000

### Childline

Tel: 0800 1111

Web: [www.childline.org.uk](http://www.childline.org.uk)

### References

This policy has also been drawn up with reference to the following:

Education (Independent School Standards) (England) Regulations (2014) and (January 2015)  
<http://www.legislation.gov.uk/id/uksi/2014/3283>

Preventing and tackling bullying (DfE: 2017)  
<https://www.gov.uk/government/publications/preventing-and-tackling-bullying>

DfE and ACPO drug advice for schools <https://www.gov.uk/government/publications/drugs-advice-for-schools>

Channel Duty Guidance Protecting vulnerable people from being drawn into terrorism (HM Government: 2015)

[https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/425189/Channel\\_Duty\\_Guidance\\_April\\_2015.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/425189/Channel_Duty_Guidance_April_2015.pdf)

Domestic | violence and Abuse

<https://www.gov.uk/domestic-violence-and-abuse>

Female genital mutilation: multi agency practice guidelines (HM Government 2014)

<https://www.gov.uk/government/publications/female-genital-mutilation-guidelines>

Preventing youth violence and gang involvement (Home Office: March 2015)

[https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/418131/Preventing\\_youth\\_violence\\_and\\_gang\\_involvement\\_v3\\_March2015.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/418131/Preventing_youth_violence_and_gang_involvement_v3_March2015.pdf)

The Right to Choose: Multi-agency statutory guidance for dealing with forced marriage (HM Government: June 2014)

[https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/322310/HMG\\_Statutory\\_Guidance\\_publication\\_180614\\_Final.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/322310/HMG_Statutory_Guidance_publication_180614_Final.pdf)

National action plan to tackle child abuse linked to faith or belief

<https://www.gov.uk/government/publications/national-action-plan-to-tackle-child-abuse-linked-to-faith-or-belief>

No Health Without Mental Health strategy

[https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/213762/dh\\_125123.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/213762/dh_125123.pdf)

Mental Health and Behaviour in Schools (March 2016)

[https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/508847/Mental\\_Health\\_and\\_Behaviour\\_-\\_advice\\_for\\_Schools\\_160316.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/508847/Mental_Health_and_Behaviour_-_advice_for_Schools_160316.pdf)

Keeping Children Safe in Education. Statutory guidance for schools and colleges.

(September: 2021)

[Keeping children safe in education 2021 \(publishing.service.gov.uk\)](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/1002667/Keeping_children_safe_in_education_2021_(publishing.service.gov.uk))

Education and Training (Welfare of Children) Act 2021

[Education and Training \(Welfare of Children\) Act 2021 \(legislation.gov.uk\)](https://www.legislation.gov.uk/ukpga/2021/12/section/1)

This is Abuse Discussion Guide (Home Office: 2013)

[https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/443659/Discussion\\_Guide\\_-\\_This\\_is\\_Abuse\\_update\\_July15\\_v2\\_Final.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/443659/Discussion_Guide_-_This_is_Abuse_update_July15_v2_Final.pdf)

Working Together to Safeguard Children (2015) Working Together to Safeguard Children 2015 (amended 2017)

<https://www.gov.uk/government/publications/working-together-to-safeguard-children--2>

Children and Families Act (2014)

<http://www.legislation.gov.uk/ukpga/2014/6/contents/enacted>

Safeguarding children in whom illness is fabricated or induced

<https://www.gov.uk/government/publications/safeguarding-children-in-whom-illness-is-fabricated-or-induced>

Schedule 10 of the Equality Act (2010)

[http://www.legislation.gov.uk/ukpga/2010/15/pdfs/ukpga\\_20100015\\_en.pdf](http://www.legislation.gov.uk/ukpga/2010/15/pdfs/ukpga_20100015_en.pdf)

Special Educational Needs and Disability Code of Practice, 0-25 years (DfE and Department for Health: January 2015)

[https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/398815/S-END\\_Code\\_of\\_Practice\\_January\\_2015.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/398815/S-END_Code_of_Practice_January_2015.pdf)

Safeguarding Our Children - 4LSCB Procedures (2007)

<http://www.4lscb.org.uk/documents/4lscbproceduresupdated220708.pdf>

Supporting children and young people who are bullied: advice for schools (DfE: 2014)

[https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/444864/Supporting\\_bullied\\_children.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/444864/Supporting_bullied_children.pdf)

Guidance for Safer Working practices for Adults who Work with Children and Young People (2007)

<http://webarchive.nationalarchives.gov.uk/20101220152656/>

<http://dcsf.gov.uk/everychildmatters/research/>

<http://www.everychildmatters.gov.uk/resources-and-practice/IG00311/>

What to do if you suspect a child is being sexually exploited (DfE: 2012)

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

What to do if you're worried a child is being abused (HM Govt. 2015)

[https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/419604/What\\_to\\_do\\_if\\_you\\_re\\_worried\\_a\\_child\\_is\\_being\\_abused.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/419604/What_to_do_if_you_re_worried_a_child_is_being_abused.pdf)

Counselling in Schools: a blueprint for the future (DfE: March 2015)

<https://www.gov.uk/government/publications/counselling-in-schools>

Mental Health and Behaviour in School (DfE: March 2015)

<https://www.gov.uk/government/publications/mental-health-in-schools>

Safeguarding children who may have been trafficked: practice guidance DfE and Home Office: 2011)

[https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/177033/DFE-00084-2011.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/177033/DFE-00084-2011.pdf)

## Policy Reviews & Updates

Date of Review	Information on Updates	Reviewed By
<b>27<sup>th</sup> March 2015</b>	<p>Updated the legislation that this policy relates to</p> <p>Added section on other Amicus Policies for this document to be read with</p> <p>Added latest revision date to the front section</p> <p>Added information about declaration of disclosure by association made by staff</p> <p>Added paragraph on Safer Recruiting and disclosure by association</p>	<b>RN</b>
<b>5<sup>th</sup> June 2015</b>	<p>Section added on IT, E-Safety and mobile phones and how we have a comprehensive policy on the Online Safeguarding of Children – this also includes a section on Sexting and the risks and implications of this.</p> <p>Section added on Unauthorised Absences and Amicus’ policy around this.</p> <p>Section added on self-harming and suicide behaviour</p>	<b>RN</b>
<b>20<sup>th</sup> July 2015</b>	<p>Updating of legislation and reference to government documents</p> <p>Named DMS details changed</p> <p>Section added under heading Safer Recruiting on ‘Disclosure by Association</p> <p>Paragraph added to Safer Recruitment Heading on Prohibition order checks on Teachers / teaching staff to ensure that they are not prohibited from Teaching</p>	<b>RN</b>
<b>19<sup>th</sup> November 2015</b>	<p>Reference to Amicus Prevent Policy added with regards to countering radicalisation and terrorism and paragraph added on Prevent Policy and preventing violent extremism.</p> <p>Updating name of School Proprietor</p> <p>Updating the name of the Deputy DMS</p> <p>Expanded on a sentence and added clarification on who is the point of contact if concern or allegation is against the DMS, Deputy DMS, Head Teacher or Directors.</p>	<b>RN</b>
<b>August 2016</b>	<p>General update throughout document: small less important issues</p> <p>Page 2 and throughout: changes to Amicus and WSCC contacts names and phone numbers</p> <p>Added para for Des Safeguarding Lead (DSL) roles re children in Amicus Homes/school</p> <p>Procedures: added contact with deputy DSL if concern relates to DMS 2<sup>nd</sup> to final bullet point 2 changes made</p> <p>dealing with a disclosure: amended 2<sup>nd</sup> bullet point on recording</p> <p>amended/added to bullet point re marks being seen</p>	<b>RN</b>

	self-harming: added new para about records being kept added info in Appendix 1 pages 37-40	
<b>24<sup>th</sup> March 2017</b>	Correction of spelling errors in document Clarification that the Prevent Officer/Lead is within/ covered by the role of DSL Page 15 – added homes as well as school to detail regarding ‘risk that require additional attention’ Added detail that Amicus now has separate policy on ‘Safeguarding Children against Child Sexual Exploitation (CSE) – Added policy to page 4 of ‘corresponding policies’ and added paragraph about CSE policy to pages 15/16. Page 5 amended to read: Working Together to Safeguard Children 2015 (amended 2017) Page 14 bullet point regarding feedback to staff added as follows: ‘Where staff highlight a safeguarding issue they will receive feedback on what has been done and how the child is safer as a result. Where there is an allegation about a staff member this information may be much more restricted but should still contain sufficient detail to assure the staff member that the perceived risk to the child is reduced’.	<b>VG</b>
<b>26<sup>th</sup> February 2018</b>	Email address corrected for one of Deputy DSL Deputy DSL T. Milson mentioned throughout document as second DSL for the school. KCSIE 2018 – change from 2016	<b>VG</b>
<b>3<sup>rd</sup> October 2018</b>	2018 update: paragraphs covering peer on peer abuse including sexual violence and sexual harassment. Paragraphs added on Contextual Safeguarding, Child criminal exploitation: county lines, Homelessness.	<b>VG</b>
<b>6<sup>th</sup> February 2019</b>	Safeguarding telephone number added and email to DSL contact details.	<b>VG</b>
<b>2<sup>nd</sup> April 2019</b>	IFD email updated Safeguarding telephone number and email added.	<b>VG</b>
<b>26<sup>th</sup> August 2019</b>	Updating policy in accordance with Keeping Children Safe in Education 2019 Change in Deputy DSL for the school – contact details and name added.	<b>VG</b>
<b>19<sup>th</sup> November 2019</b>	Change in DSL and Deputy DSL for the homes – contact details and names added	<b>VG</b>
<b>March 2020</b>	Additional ‘standalone’ COVID-19 Safeguarding Policy Written	<b>RN</b>
<b>8<sup>th</sup> June 2020</b>	Change in DSL & Deputy DSL’s – contact details updated & amended	<b>NY</b>
<b>1 Aug 20</b>	Change in DSL / Deputy Updated to include KCSIE 2020	<b>NY</b>

15 <sup>th</sup> September 20	Updated details / names of safeguarding Team	NY
11 <sup>th</sup> January 21	Updated information of Safeguarding Team	NY
19 March 21	Reflected changes from MASH to IFD and updated contact numbers and e-mails for new team	NY
August 2021	Updates added to reflect KCSIE September 2021	NY
December 2021	Information on membership of Safeguarding Team (DSLs and Deputies) updated as well as contact info.  Amendments made in some sections of the policy made to refer to the homes as well as the school  Additional information added on recording and record keeping of safeguarding concerns	RN