

S9 CHILD PROTECTION POLICY AND THE PREVENT STRATEGY

Last Reviewed: September 2018
Next Review: September 2019
Responsible: The Vice Principal: Pastoral Care and Safeguarding

1. Introduction and Safeguarding Statement

All children deserve the opportunity to achieve their full potential. They are only able to achieve this if they live in a safe environment and are protected from harm.

The academy seeks to provide an environment in which young people feel safe, secure, valued and respected and know how to approach adults if they are in difficulties, believing they will be effectively listened to. All professionals should make sure their approach is child-centred, and they should consider, at all times, what is in the **best interests** of the child.

We recognise that the academy may provide the only stability in the lives of children who have been abused or who are at risk of harm.

Where a child is suffering significant harm, or is likely to so suffer, action should be taken to protect that child.

Action should also be taken to promote the welfare of a child in need of additional support, even if they are not suffering harm or are at immediate risk. All staff should be prepared to identify children who may benefit from early help.

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

The Teacher's Standards 2013 state that all teachers, including the Head teacher, should safeguard children's wellbeing and maintain public trust in the teaching profession as part of the professional duties.

In recognising this, the academy has procedures of which all staff should be aware, for the protection of students and the reporting and handling of suspected cases of the abuse of students. These include procedures to be followed if a member of staff is accused of abuse.

The academy will positively promote the welfare of students through a programme of education around safeguarding, with the focus on developing students' awareness and resilience and preparing them for their future responsibilities as adults, parents and citizens.

The academy's safeguarding procedures are designed to reflect the latest government guidance *Keeping children safe in education (Sept 2018-KCSIE)*.

This policy is reviewed by the Governing Body annually, and is available publically either on the academy's website or by other means. Parents and carers are made aware of this policy.

2. The Academy's Safeguarding Team

Although there is a specified leadership structure for safeguarding, it will always be an established academy principle that the safeguarding of children is **everyone's responsibility**.

Every member of staff is trained to Level 1 Safeguarding, and is required on a daily basis to be aware of, to recognise and to report any concerns around safeguarding.

The leadership structure below outlines the members of staff trained to Level 2 Safeguarding, and who therefore have additional responsibilities around safeguarding within the academy:

Designated Safeguarding Lead (DSL)	}	Mr A. Bilton, Vice Principal: Pastoral Care and Safeguarding
Designated Lead for Children Looked After (CLA)		
Designated Lead for the Prevent Strategy		
Designated Lead for E-Safety		

Deputy Designated Safeguarding Lead: Mrs J. Price, Director of Student Services

Lead Governor for Safeguarding: Mrs D. Cummins

Other staff trained to Level 2 Safeguarding:

Mrs K. Seabrook: Pastoral Care and Safeguarding Administrator

Mrs L. Brall: Head of Year 7

Mrs K. Copley: Head of Year 8

Mrs K. Mead: Head of Year 9

Mrs K. Keating: Head of Year 10

Mrs L. Rogers: Head of Year 11

Mrs C. Dundon: Sixth Form Support Officer

Mrs. R. Rennick: Individual Needs Co-ordinator

Mr. M. Chapman: Assistant Principal

The new Head of Year 8 will be subsequently trained to Level 2 as soon as practicable.

Both the DSL and Deputy DSL are directly responsible for all aspects of this policy to the Principal, and the Chair of Governors in exceptional cases. The Deputy DSL will supervise the day to day operational safeguarding concerns in the absence of the DSL.

The Principal, the Designated Safeguarding Lead and the Lead Governor for Safeguarding will, additionally, together review safeguarding practice and procedures by completing the Safeguarding Children Annual Checklist provided by Hertfordshire's Child Protection Schools Liaison Service. The Lead Governor for Safeguarding will meet with the DSL on a termly basis to review all aspects of the academy's safeguarding work, and report her findings back to the Governing Body, including any recommendations for improvements.

3. Further Specific Responsibilities

3.1 The responsibilities of the Governing Body:

This document promotes the duty laid upon the Governors' of the academy pursuant to Section 175 Education Act 2002, that is....[the]governing bodies....shall make arrangements for ensuring that the functions conferred on them are exercised with a view to safeguarding and promoting the welfare of children; and to work together with other agencies to ensure adequate arrangements within our school to identify, assess and support those children who are suffering harm.

All members of the Governing Body understand and fulfil their responsibilities, particularly in relation to ensuring:

- there is a Child Protection Policy in place, which is published on the school website and, along with safeguarding procedures, reviewed annually
- There is a senior leader appointed to be the Designated Safeguarding Lead (DSL) and who has the relevant training and time to carry out this role effectively
- The academy operates safer recruitment procedures
- The academy has procedures for dealing with allegations of abuse against staff and volunteers and to make a referral to the DBS if a person in regulated activity has been dismissed or removed due to safeguarding concerns, or would have if they had not resigned
- All staff have safeguarding training as appropriate
- Any weaknesses in safeguarding are remedied immediately, including policies, procedures, and training
- A member of the Governing Body, usually the Chair, is nominated to liaise with the Local Authority in the event of an allegation being made against the Principal
- The Governing Body considers how children are taught about keeping themselves safe. This may be part of a broad and balanced curriculum, through relationship and sex education, through the assembly and form programme, and through Personal, Social, Health Care Education (PSHE)

3.2 The responsibilities of the Designated Safeguarding Lead (DSL):

- the supervision of all the Level 2 qualified staff and the overall management of all safeguarding investigations, enquiries, referrals and safeguarding action plans, including early help
- chairing the weekly safeguarding action meetings with all other Level 2 qualified staff
- organising all safeguarding training for students, staff, governors, volunteers, and other stakeholders at the academy
- ensuring that all safeguarding records about a child are kept securely and separate from other student records, until the child's 25th birthday, and are copied on to the child's next school or college
- providing an annual report for the Governing Body, detailing any changes to the policy and procedures; training to be undertaken; number and type of incidents/cases, and the number of children on Child Protection and Child in Need plans, as well as Children Looked After
- The facilitation of all Personal Education Plans (PEPs) for Children Looked After

3.3 The responsibilities of the Level 2 Safeguarding qualified staff:

- Referring a child to Children's Services or another service (eg Community Adolescent Mental Health Service or the police) if there are concerns around safeguarding or possible abuse and Hertfordshire Safeguarding Board's thresholds are met
- Keeping written records of concerns about a child, including any investigations, even if there is no need to make an immediate referral
- Liaising with other agencies and professionals, including around early help
- Ensuring that they attend case conferences, core groups, or other multi-agency planning meetings, contribute to assessments, and provide reports where necessary

4. Definition of Safeguarding

All academy staff must be aware that safeguarding and promoting the welfare of children is defined in *Working Together to Safeguard Children* (2015) as:

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

Children includes everyone under the age of 18.

5. Definition of Abuse

The academy has adopted the definition of 'abuse' as described in The Children Act 1989 under the term 'Significant Harm'. Staff should be aware that this definition is wide-ranging and covers a number of areas as outlined below:

Harm is defined under S.31 (9) as: 'the ill treatment or impairment of health or development'. As a result of the Adoption and Children Act 2002, the definition of harm also includes 'impairment suffered by hearing or seeing the ill-treatment of another.'

Health means physical or mental health.

Development means physical, intellectual, emotional, social or behavioural.

Ill-treatment includes sexual abuse and forms of ill treatment which are not physical such as neglect, emotional abuse and certain types of bullying.

Staff must be aware that abuse can take many forms and guidance is set out in Appendix One on possible warning signs, and the definition of specific types of abuse being adopted by the academy. In cases of doubt, the best policy is to follow the procedure in preference to harbouring concerns.

6. Further Specific Safeguarding Concerns

All academy staff must be aware of certain safeguarding issues that have been identified by the government as being of national concern. These include radicalisation and the Prevent Strategy, Child Sexual Exploitation (CSE), Female Genital Mutilation (FGM), and other types of 'honour based' violence (eg forced marriages). Staff will receive training on how to identify signs of concern and the appropriate procedures in terms of response.

6.1 Detailed Information about radicalisation and the Prevent Strategy can be found in *Keeping children safe in education* (Sept 2018) and also in Appendix Two of this policy.

The academy will ensure that students are protected from radicalisation and violent extremism through:

- The delivery of an outstanding SMSC and PSHE programme throughout the academic year, which includes a focus on the academy's Proud to Belong ethos, the importance of key British values, and explicit education around the dangers of radicalisation and violent extremism.

- Ensuring that the academy's curriculum, particularly in History and PBE promotes community cohesion and tolerance of different faiths and beliefs.
- Ensuring that any external visitors delivering education (including assemblies) to students are appropriately vetted in advance, to ensure there are no concerns about the content or message they will be delivering.

6.2 Detailed further information about Child Sexual Exploitation can be found in *Keeping children safe in education* (Sept 2018) and also in Appendix One of this policy.

6.3 Further information about Female Genital Mutilation (FGM) can be found in Appendix One of this policy and also in *Keeping children safe in education* (Sept 2018). The government has legislated on this issue, and Section 5B of the Female Genital Mutilation Act 2003 (as inserted by section 74 of the Serious Crime Act 2015) has now placed (from October 2015) a statutory duty upon teachers and other professionals to report to the police where they discover that FGM appears to have been carried out on a girl under 18.

6.4 The academy's policy on anti-bullying is set out in a separate document and acknowledges that to allow or condone bullying may lead to consideration under child protection procedures. This includes all forms of bullying. We keep a record of known bullying incidents. All staff are aware that children with SEND and / or differences / perceived differences are more susceptible to being bullied.

6.5 *Keeping children safe in education* (Sept 2018) lists other types of specific safeguarding concerns that staff will be required to be aware of, including children missing from education and peer on peer abuse/sexual violence and sexual harassment.

6.6 The academy will ensure that all students will receive ongoing education around safeguarding so that they develop the knowledge to be able to keep themselves safe. This safeguarding education will be delivered through a variety of forums, including PSHE, form time, assemblies - which will feature a Safeguarding Tip of the Week - as well as in their curriculum subjects. This education will focus on both national and more localised issues.

7. Reporting Safeguarding Concerns

7.1 What to do if you have a Safeguarding Concern

If a member of staff has a concern about a child, they should act on it immediately.

All staff at the academy must utilise the academy's online safeguarding software programme called CPOMS to record and raise all safeguarding concerns.

In the event of an emergency or serious immediate concern, the member of staff should verbally alert the DSL or a member of the Level 2 trained staff. They should then follow up their concern in writing via CPOMS.

Do not assume a colleague or another professional will take action and share information that might be critical in keeping children safe. Early information sharing is vital for effective identification, assessment and allocation of appropriate service provision.

The academy will also continue to maintain the following designated email address to allow parents, students or other external parties who work with the academy as a communication channel for safeguarding concerns: childprotection@thebusheyacademy.org.

- Contact details for Children's Services are as follows: 0300 123 4043
- SOOHS (Out of Hours Service - Children's Services): 0300 123 4043
- The personal mobile number for the academy's Designated Safeguarding Lead is published via email (from Andrew Bilton) to all members of the academy staff at the start of September each academic year. This is to allow a member of staff to access out of hours support in the event of an emergency or serious safeguarding concern

The Level 2 trained staff and the DSL will usually decide to make a referral to Children's Services but staff are entitled under legislation to make a direct referral themselves should they wish to.

7.2 Key Points:

- All cases of possible abuse must be treated sensitively and only be disclosed to those who need to know about it
- Level 1 trained staff should not investigate any safeguarding concerns, but confine themselves to reporting their concerns or allegations made to them
- Any discussion of such matters must be handled with tact and sympathy and all members of staff should be aware that the way in which they talk to a child may affect the evidence, should the matter progress to any subsequent court proceedings. If a Level 1 trained member of staff becomes aware of suspected abuse or neglect affecting a student, they must not attempt to conduct a disclosure interview, although it would be appropriate to ask questions of a student to clarify if there is an actual concern. Staff should aim to use open questions and avoid any leading questions when initially clarifying if there is a concern. Once this has been established, questioning by a Level 1 trained member of staff should cease
- Staff cannot promise confidentiality to the student. Should the matter proceed to a Local Authority investigation, the alleged perpetrator and the child's family may well be informed of the source of the complaint. Staff must explain to the child that the allegation will be passed to the DSL and the appropriate authorities. It is essential that the child be reassured that the information will only be disclosed to those who need to know about it
- A concern must be recorded by staff in writing as soon as possible using the academy's CPOMS system. In the event of a serious concern (where you believe the child to be at risk of significant harm, the member of staff should verbally advise the DSL or another Level 2 qualified member of staff immediately, to avoid any delay caused by the administration process). Records of notes made by a member of staff should be passed to the DSL as soon as possible. Records may be required to be disclosed in court proceedings and must include the date, time, place of discussion and the names of others who are present. Records relating to child protection must be kept secure and in such a way that protects their confidential nature

7.3 What will happen with the Safeguarding Concern

All safeguarding concerns will be initially assessed by the DSL and/or the Level 2 trained members of staff.

Options will then include:

- Managing any support for the family internally via the academy's own pastoral support processes;
- An early help assessment; or
- A referral to statutory services, for example as the child might be in need, is in need, or suffering or likely to suffer harm

CPOMS will be used by all Level 2 qualified staff and the DSL to record details of any safeguarding enquiries, investigations and outcomes.

7.4 Early help and what staff should look out for

Early help means providing support as soon as a problem emerges at any point in a child's life, from foundation years through to teenage years. Any child may benefit from early help but staff should be particularly aware of the potential need for early help for a child listed under the categories within section 18 of *KCSIE 2018 Part 1: Information for all school and college staff*.

7.5 Communication with Parents and Carers:

- When a referral is considered necessary by the DSL or other Level 2 trained member of the safeguarding team, the parent/carer of the child should usually be informed in order to seek their agreement. *Working Together to Safeguard Children* requires this to be done and it is good practice, unless any such discussion will place the child at increased risk of harm, or interfere with a potential criminal investigation
- Serious and urgent matters will be referred immediately, others by the appropriate referral form. The DSL or the relevant Level 2 trained member of staff will keep the parent or carer apprised of action taken and always attempt to work positively with them to address any form of safeguarding concern where the academy is acting as a universal service

8. Allegations made against a Member of Staff

Because of their daily contact with children in a variety of situations, including the caring role, staff are vulnerable to allegations of abuse. Allegations may come from students, parents or another member of staff. They may also come from students, parents or staff who have heard about allegations regarding a member of staff. These allegations may be true, but equally may be false, malicious or misplaced and may be either deliberate or innocent of such intention. In acknowledging the above, the following procedures shall be adhered to:

- All reports of abuse must be listened to
- Such reports must be referred to the DSL. The DSL will immediately inform the Principal of the allegation
- The DSL shall consider the matter in consultation with the Principal, and the Local Authority Designated Officer (LADO) where guidelines require this consultation. If the allegation requires a consultation with the LADO, no investigation will take place until the latter has confirmed that the academy can deal with this through its own internal procedures
- The DSL will inform the relevant Children's Services Department and the police if appropriate and in doing so keep the Principal informed of the actions being pursued. It is for the Principal alone to consider what actions should be taken to protect the students as a body and what disciplinary action is appropriate
- The exception to the above is in the case of the DSL being the subject of an allegation. The Principal must then be informed. The Principal must then relieve the DSL of his duties as the 'designated person' and act in his place or delegate the role to another appropriate member of staff
- The other exception is in the case of the Principal being the subject of an allegation. Should the complaint be against the Principal, then the DSL should be informed, or in his absence another member of the Senior Leadership Team, and he/she will then inform the Chair of Governors
- Any member of staff found not suitable to work with children will be notified to the Disclosure and Barring Service (DBS) for consideration for barring, following resignation, dismissal, or when we cease to use their services as a result of a substantiated allegation, in the case of a volunteer (as directed by the LADO)
- In these matters the procedures for promoting the welfare of students should be adhered to

- The academy has appropriate whistleblowing procedures in place for the raising of concerns with the school's senior leadership team but the established principle will always be that all staff and volunteers should feel able to raise concerns about poor or unsafe practice and potential failures in the academy's safeguarding regime and know that such concerns will be taken seriously by the senior leadership team

9. Staff Training

- All Level 2 trained members of staff, including the DSL, will attend an interagency 'update' safeguarding course every 2 years. In addition to formal training, their knowledge and skills should be updated at regular intervals, but at least annually
- All other members of staff will be trained to Level 1 in safeguarding; this is a qualification which lasts for 3 years
- All members of staff will additionally receive annual safeguarding training at the start of each academic year, including on radicalisation, and how to deal with incidents of bullying and concerns around e-safety
- Additionally, all members of staff will receive ongoing training and safeguarding briefings throughout the course of the academic year
- Furthermore, all new staff joining the academy will receive safeguarding training as part of their induction programme

10. Specific Guidance on Professional Behaviour

Problems may arise if a member of staff becomes too closely involved with students. It is important for all staff to be aware of the professional basis of their relationship with students, so that the students' best interests are always promoted and staff members are protected from allegations of inappropriate behaviour. Further information is provided for staff guidance under the separate academy policy Code of Conduct for Academy Employees.

Social Contact and Social Networking:

Staff should not establish or seek to establish social contact with students for the purpose of securing a friendship or to pursue or strengthen a relationship. This includes the use of various social networking sites. Should staff or students have need to have contact via electronic means for educational purposes, then this should be done via the member of staff's academy email address or via other authorised systems such as Smart Homework.

Physical Contact and Personal Privacy:

There are occasions when it is entirely appropriate and proper for staff to have physical contact with students, but it is crucial that they only do so in ways appropriate to their professional role. When physical contact is made with students this should be in response to their needs at the time, of limited duration and appropriate given their age, stage of development, gender, ethnicity and background. It is not possible to be specific about the appropriateness of each physical contact, since an action that is appropriate with one student in one set of circumstances may be inappropriate in another, or with a different student.

Physical contact should never be secretive or casual, or for the gratification of the adult, or represent a misuse of authority. Where feasible, staff should seek the student's permission before initiating contact. Staff should listen, observe and take note of the student's reaction or feelings and - so far as is possible - use a level of contact which is acceptable to the student for the minimum time necessary. If a member of staff believes that an action could be misinterpreted, the incident and circumstances should be reported.

Physical contact, which occurs regularly with a student or students should be formalised as part of an agreed and open academy plan, subject to regular review (for example in relation to students with SEN or physical disabilities).

There may be occasions when a distressed student needs comfort and reassurance. This may include age-appropriate physical contact. Staff should remain self-aware at all times in order that their contact is not threatening, intrusive or subject to misinterpretation.

Some staff, for example, those who teach PE and games, or who provide music tuition will on occasions have to initiate physical contact with students in order to support a student so they can perform a task safely, to demonstrate the use of a particular piece of equipment/instrument or assist them with an exercise. This should be done with the student's agreement. Contact under these circumstances should be for the minimum time necessary to complete the activity and take place in an open environment. Staff should remain sensitive to any discomfort expressed verbally or non-verbally by the student.

Students are entitled to respect and privacy when changing clothes or taking a shower. However, there needs to be an appropriate level of supervision in order to safeguard students, satisfy health and safety considerations and ensure that bullying or teasing does not occur. This supervision should be appropriate to the needs and age of the students concerned and sensitive to the potential for embarrassment.

Staff with a job description which includes intimate care duties will have appropriate training and written guidance. No other member of staff should be involved in intimate care duties except in an emergency.

Behaviour management and physical intervention:

All students have a right to be treated with respect and dignity. Corporal punishment is unlawful in all schools. Staff must not use any form of degrading treatment to punish a student.

The circumstances in which staff can physically intervene with a student are covered by Section 93 of the Education and Inspections Act 2006 and supplemented by the DfE guidance document "The Use of Force to Control or Restrain Students 2007." Staff may legitimately intervene to prevent a student from committing a criminal offence, injuring themselves or others, causing damage to property, engaging in behaviour prejudicial to good order and to maintain good order and discipline. Staff should have regard to the health and safety of themselves and others. Under no circumstances should physical force be used as a form of punishment. Staff should always utilise the very minimum amount of force, for the very minimum amount of time, in order to exercise their duty of care.

One to one situations:

Staff working in one to one situations with students are more vulnerable to allegations. Staff must recognise this possibility and plan and conduct such meetings accordingly. Every attempt should be made to ensure that the safety and security needs of both staff and students are met. Where such a meeting is demonstrably unavoidable it is advisable to avoid remote or secluded areas of the school and to ensure that the door of the room is left open and/or visual/auditory contact with others is maintained. Any arrangements should be reviewed on a regular basis.

Pre-arranged meetings with students away from the academy premises or on the academy site when the academy is not in session are not permitted unless approval is obtained from their parent/guardian and the Principal or other senior colleague with delegated authority. In the rare circumstances that a member of staff receives information to suggest that an academy student may be in danger outside of school hours, the member of staff should not meet with the student but rather attempt to obtain advice from a member of the Senior Leadership Team where possible and / or inform the relevant emergency or medical services, as well as the student's family if possible. Any such concerns should be reported to the DSL as soon as possible.

Transporting students:

In certain situations e.g. out of school activities, staff may agree to transport students. Wherever possible, transport arrangements should be made in advance by a designated member of staff. Wherever possible and practicable, transport should be provided, other than in private vehicles, with at least one adult in addition to the driver acting as an escort.

Adults should ensure that their behaviour is safe and that the transport arrangements and the vehicle meet all legal requirements. They must ensure that the vehicle is roadworthy and appropriately insured and that the maximum capacity is not exceeded.

11. Single Central Record and Safer Recruitment

Although operating within a Multi-Academy Trust, the academy maintains its own Single Central Record to ensure that all staff working within our school who have substantial access to children have been checked as to their suitability, and that the relevant DBS checks (according to guidance) have been satisfactorily completed, including verification of their identity and qualifications. This will include Section 128 checks for any department heads, all governors/trustees, the Principal and any member of the Senior Leadership Team. The Single Central Record will include a separate column to show whether an individual is in regulated activity or not.

A risk assessment will be undertaken for each volunteer to decide whether they are in regulated activity and an enhanced DBS check is required.

If children are staying with parents from overseas as part of an exchange, then the latter do need to have an enhanced DBS check. If there are other people in the family aged over 16, the academy will decide whether to do an enhanced DBS check for those 16 and 17 year olds who live in the house.

The academy will obtain written confirmation from all Alternative Providers that they have completed all the vetting and barring checks that are necessary on their staff.

The Single Central Record will be audited each term by the DSL in conjunction with either the Principal or the Lead Governor for Safeguarding.

The academy operates safer recruitment procedures by ensuring that there is at least one person on every recruitment panel that has completed Safer Recruitment training. Additionally, at least one member of the Governing Body will also complete Safer Recruitment training, to be renewed every 5 years.

12. Confidentiality

In the context of the academy, there are several areas in which confidentiality is expected:

- Confidential information about students must be held securely.
- Confidential information about a member of staff or her/his family must never be disclosed to anyone other than on a need to know basis. Personal information about a student's family or personal circumstances may be shared, where appropriate, if it is likely to affect the student's work, welfare or safety. In this case, the relevant member of staff or other pastoral leaders should let other members of staff know discretely, eg marital problems such as separation or impending divorce, or certain medical problems which may prove embarrassing for the student.
- Discussions in meetings – staff meetings or briefings – whether regarding students or other members of staff should be kept private and not disclosed to other students. In certain situations, Sixth Form students who are utilised by the academy in their capacity as a Peer Mentor may be given certain information regarding a particular pastoral issue or the behaviour

of a particular student, but this will always be assessed on a case by case basis, and careful judgement exercised about the disclosure of information prior to their deployment by pastoral leaders. However, Sixth Form Peer Mentors will not be used to discuss safeguarding issues with other students.

13. Pregnancy

Although not necessarily a matter of child abuse, this is an area where child protection issues do arise and it is important that staff are aware of academy policy and procedures. Sometimes a student will tell a member of staff that she is pregnant and ask for confidentiality and help. The academy will always help a student in this situation, and offer appropriate guidance and support.

If the student is under 16, confidentiality must not be promised. It is the academy's general policy that in such cases parents have to be told; there may be scope for some small delay while, for instance, the girl checks with her GP that she is actually pregnant, or works out how to tell her parents.

The academy would certainly want to support the girl in telling her parents herself. However, there may be some exceptional circumstances in which it would not be in the best interests of the student for the academy to communicate this information to parents. In such circumstances, the academy will seek appropriate advice from the Local Authority Designated Officer (LADO) and, where appropriate, suitable legal advice.

Any teacher dealing with such a case should discuss the matter as soon as possible with the DSL.

14. Sexting

If a member of staff becomes aware of any images or videos generated:

- By a child under the age of 18
- Of children under the age of 18 that are of a sexual nature or are indecent

They must immediately:

- Where possible confiscate the device
- Inform the DSL or, in his absence, another Level 2 trained member of staff
- Record the incident on the academy's CPOMS system
- Act in accordance with the academy's Safeguarding and Child Protection procedures

They must not:

- Search the mobile device in response to an allegation or disclosure as this is likely to cause additional stress to the student, UNLESS there is clear evidence to suggest that there is an immediate problem
- Print out any material for evidence
- Move any material from one storage device to another

If the content has been shared across a personal mobile device, where possible confiscate and secure the device(s); staff should **never**:

- View the image unless there is clear reason to do so
- Send, share or save the image anywhere
- Allow students to do any of the above

If the image has been shared across a school network, a website or a Social Network, always block the network to users and isolate the image.

In cases of sexting, the DSL will ensure that the academy has taken the appropriate action which may include:

- Contacting the parents of the children
- Contacting the police
- Contacting Children's Services
- Contacting the website concerned or Social Networking site
- Contacting CEOP

The DSL and / or other member of the Level 2 safeguarding team will consider all sexting incidents in light of current guidance and judge whether there are any aggravating factors present when reviewing whether a referral is needed to an external agency (eg involvement of a potential adult offender; allegations of blackmail, coercion or intimidation involved in the sexting incident).

15. Other Online Safety

Further information regarding safeguarding and e-safety / ICT issues can be found in the S38 Student E-Safety and ICT Acceptable Use Policy.

References

1. The Children Act 1989 HMSO
2. The Children Act 2004 HMSO
3. Education Act 2002 HMSO
4. Hertfordshire Safeguarding Children Board Inter-Agency Child Protection and Safeguarding Children Procedures
5. Working Together to Safeguard Children March 2015
6. Keeping children safe in education: Information for all school and college staff (Sept 2018)
7. HM Govt (March 2016) Prevent Duty Guidance for England and Wales
8. Teacher Standards 2013

Links to other academy policies and documents

9. The Bushey Academy P2 Code of Conduct for Academy Employees Policy
10. The Bushey Academy P12 Whistleblowing Policy
11. The Bushey Academy S4 Student Behaviour Policy
12. The Bushey Academy S15 Home Academy Agreement
13. The Bushey Academy S18 Anti-Bullying Policy
14. The Bushey Academy S38 Student E-Safety and ICT Acceptable Use Policy

Appendix One: Definitions and Potential Signs of Abuse

Definitions and Potential Signs of Abuse

The following information should be read in conjunction with *Keeping children safe in education* (Sept 2018). Abuse is 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.

Physical Abuse

This 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. The following may be indicators of physical abuse (this is not designed to be used as a checklist):

- Multiple bruises in clusters, or of uniform shape
- Bruises that carry an imprint, such as a hand or belt
- Bite marks
- Round burn marks
- Multiple burn marks and burns on unusual areas of the body such as the back, shoulders or buttocks
- An injury that is not consistent with the account given
- Changing or different accounts of how an injury occurred
- Bald patches
- Symptoms of drug or alcohol intoxication or poisoning
- Fear of going home or parents being contacted
- Fear of medical help
- Fear of changing for PE
- Inexplicable fear of adults or over-compliance
- Isolation from peers

Child Sexual Exploitation (CSE)

Child sexual exploitation occurs when a child or young person, or another person, receives 'something' (for example food, accommodation, drugs, alcohol, cigarettes, affection, gifts, money) as a result of the child / young person performing sexual activities, or another person performing sexual activities on the child / young person.

The presence of any significant indicator of sexual exploitation should trigger a referral to Children's Services. The significant indicators are:

- Having a relationship of concern with a controlling adult or young person (this may involve physical and / or emotional abuse and / or gang activity)
- Entering and / or leaving vehicles driven by unknown adults
- Possessing unexplained amounts of money, expensive clothes or other items such as several mobile phones
- Frequenting areas known for risky activities or associating with other young people believed to be involved in CSE
- Being groomed or abused via the internet and mobile technology
- Having unexplained contact with hotels or taxi companies

Sexual Abuse

This 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 (eg 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. The following may be indicators of sexual abuse (this is not designed to be used as a checklist):

- Sexually explicit play or behaviour or age-inappropriate knowledge
- Anal or vaginal discharge, or soreness
- Reluctance to go home
- Inability to concentrate, tiredness
- Refusal to communicate
- Thrush, persistent complaints of stomach disorders or pains
- Eating disorders, for example anorexia or bulimia
- Attention seeking behaviour, self-harm, substance abuse
- Aggressive behaviour, including sexual harassment or molestation
- Unusual compliance
- Regressive behaviour, enuresis, soiling, lack of self-care (eg dirty clothes)
- Frequent or open masturbation, and touching others inappropriately
- Depression, withdrawal, isolation from peer group
- Reluctance to undress for PE or swimming
- Bruises or scratches in the genital area

Peer on Peer Abuse

Children can abuse other children. This is generally referred to as peer on peer abuse and can take many forms. It can include (but is not limited to) bullying (including cyberbullying); sexual violence and sexual harassment; physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm; sexting and initiating/hazing type violence and rituals.

Sexual Violence and Sexual Harassment between children in schools and colleges

Page 23 of *KCSIE 2018 Part 1: Information for all school and college staff* provides a more detailed overview of this issue for staff to be aware of.

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

Children who are victims of sexual violence and sexual harassment will likely find the experience stressful and distressing. This may adversely affect their educational attainment. Sexual violence and sexual harassment exist on a continuum and may overlap: they can occur online or offline (both physically and verbally) and are never acceptable. It is important that all victims are taken seriously and offered appropriate support.

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

- Sexual comments, such as: telling sexual stories, making lewd comment, making sexual remarks about clothing and appearance and calling someone sexualised names
- Sexual jokes or taunting
- Physical behaviour, such as: deliberately brushing against someone, interfering with someone's clothes, displaying pictures, photos or drawings of a sexual nature, other forms of coercion
- Online sexual harassment. This may be standalone, or part of a wider pattern of sexual harassment and / or sexual violence

How the Academy deals with Peer on Peer Abuse

The academy's Behaviour Policy and behaviour system details the actions for staff to follow in relation to incidents of physical assault.

The academy's Anti-Bullying Policy details the actions for staff to follow in relation to incidents of bullying and hate speech.

In relation to sexual violence and / or sexual harassment, staff should always refer concerns to the DSL via CPOMS, or verbally in the event of an emergency.

Reports of sexual violence and sexual harassment are extremely complex to manage.

Any such reports will be investigated by the relevant Head of Year who is trained to Level 2, overseen by the DSL.

All investigations will be discussed and reviewed each week at the Safeguarding Meeting, chaired by the DSL.

All reports and linked investigations will be fully recorded on the academy's CPOMS system.

It is essential that victims are protected: they will be offered appropriate support facilitated by the Pastoral Year Team (and external organisations where appropriate) and every effort will be made to ensure that their education is not disrupted. Ongoing communication with parents will be facilitated by the Pastoral Year Team.

It is important to consider sexually harmful behaviour in broad terms. It can create an atmosphere that, if not challenged, can normalise inappropriate behaviours and provide an environment that may lead to sexual violence. However, there are different forms of peer on peer abuse, and children's sexual behaviour exists on a wide continuum, from normal and developmentally expected to inappropriate, problematic, abusive and violent. When considering any particular behaviour, the ages and the stages of development of the children are critical factors to consider.

Developmental Sexual Activity encompasses those actions that are to be expected from children and young people as they move from infancy through to an adult understanding of their physical, emotional and behavioural relationships with each other. Such sexual activity is essentially information gathering and experience testing. It is characterised by mutuality and the seeking of consent. However, abuse is abuse and should never be tolerated or passed off as 'banter', 'having a laugh' or simply 'part of growing up'.

Inappropriate or Harmful Sexual Behaviour can be inappropriate socially, inappropriate to development, or both. In considering whether behaviour fits into this category, it is important to consider what negative effects it has on any of the parties involved and what concerns it raises about a child or young person. It should be recognised that some actions may be motivated by information seeking, but still cause significant upset, confusion, worry, physical damage. It may also be that the behaviour is 'acting out' which may derive from other sexual situations to which the child has been exposed. Sexual behaviour between children is likely to be considered harmful if one of the children is much older, particularly if there is more than 2 years difference or if one of the children is pre-pubescent and the other is not.

If an act appears to have been inappropriate, there may be a need for some form of behaviour management or intervention. For some children, educative inputs may be enough to address the behaviour.

Forced Marriage

This is an entirely separate issue from arranged marriage. It is an abuse of human rights and falls within the Crown Prosecution Service definition of domestic violence. Young men and women can be at risk in affected ethnic groups. Disclosure may come from younger siblings. Other indicators may be detected by changes in adolescent behaviours. Never attempt to intervene directly as a school or through a third party-instead, this would be a referral to Children's Services.

Female Genital Mutilation (FGM)

It is essential that staff are aware of FGM practices and the need to look for signs, symptoms and other indicators of FGM.

What is FGM?

It involves procedures that intentionally alter/injure the female genital organs for non-medical reasons. 4 types of procedure:

Type 1: Clitoridectomy - partial/total removal of the clitoris

Type 2: Excision - partial / total removal of the clitoris and labia minora

Type 3: Infibulation - entrance to vagina is narrowed by repositioning the inner/outer labia

Type 4: all other procedures that may include: pricking, piercing, incising, cauterising and scraping the genital area

Why is it carried out?

Belief that:

- FGM brings status / respect to a girl – social acceptance for marriage
- Preserves a girl's virginity
- Part of being a woman / rite of passage
- Upholds family honour
- Cleanses and purifies the girl
- Gives a sense of belonging to the community
- Fulfils a religious requirement
- Perpetuates a custom / tradition
- Helps girls be clean / hygienic
- Is cosmetically desirable
- Mistakenly believed to make childbirth easier

Is FGM legal?

FGM is internationally recognised as a violation of human rights for girls and women. It is illegal in most countries, including the UK.

Circumstances and occurrences that may point to FGM happening:

- Child talking about getting ready for a special ceremony
- Family taking a long trip abroad
- Child's family being from one of the 'at risk' communities for FGM (Kenya, Somalia, Sudan, Sierra Leone, Egypt, Nigeria, Eritrea as well as non-African communities including Yemeni, Afgani, Kurdistan, Indonesia, and Pakistan)
- Knowledge that the child's sibling has undergone FGM
- Child talks about going abroad to be 'cut' or to prepare for marriage

Signs that may indicate a child has undergone FGM;

- Prolonged absence from school and other activities
- Behaviour may change on return from a holiday abroad, such as being withdrawn and appearing subdued
- Bladder or menstrual problems
- Finding it difficult to sit still and looking uncomfortable
- Complaining about pain between the legs
- Mentioning something someone did to them that they are not allowed to talk about
- Secretive behaviour, including isolating themselves from the group
- Reluctance to take part in physical activity
- Repeated urinal tract infection
- Disclosure

The 'One Chance' rule

As with Forced Marriage, there is the 'One Chance' rule. It is essential that the academy takes action without delay.

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 in so far 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 and how they communicate. It may feature age or developmentally inappropriate expectations imposed on children. These may include interactions that are beyond the child's development capacity, as well as overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction. It may also involve seeing and hearing the ill-treatment of another person. It may involve serious bullying (including cyber bullying), causing children to frequently feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment.

The following may be indicators of emotional abuse (this is not designed to be used as a checklist):

- The child constantly describes him/herself in very negative ways – as stupid, naughty, hopeless, ugly
- Over-reaction to mistakes
- Delayed physical, mental or emotional development
- Sudden speech or sensory disorders
- Inappropriate emotional responses, fantasies
- Neurotic behaviour: rocking, banging head, regression, tics and twitches
- Self-harming, drug or solvent abuse
- Fear of parents being contacted

- Running away
- Compulsive stealing
- Eating disorders
- Soiling, smearing faeces, enuresis

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 involve a parent or carer failing to:

- Provide adequate food, clothing and shelter (including exclusion from home or abandonment)
- Protect a child from physical and emotional harm or danger
- Ensure adequate supervision (including the use of inadequate care-givers)
- Ensure access to appropriate medical care or treatment

Neglect may also include neglect of, or unresponsiveness to, a child's basic emotional needs. The following may be indicators of neglect (this is not designed to be used as a checklist):

- Constant hunger
- Stealing, scavenging and/or hoarding food
- Frequent tiredness or listlessness
- Frequently dirty or unkempt
- Often poorly or inappropriately clad for the weather
- Poor school attendance or often late for school
- Poor concentration
- Affection or attention seeking behaviour
- Illnesses or injuries that are left untreated
- Failure to achieve developmental milestones, for example growth or weight
- Failure to develop intellectually or socially
- Responsibility for activity that is not age appropriate (which could include certain types of caring for siblings)
- The child is not collected from school when such arrangements have been made
- The child is left at home alone or with inappropriate carers

Responses from Parents

Research and experience indicates that the following responses from parents or carers may suggest a cause for concern across all the above categories:

- Delay in seeking treatment that is obviously needed
- Unawareness or denial of any injury, pain or loss of function (eg a fractured limb)
- Incompatible explanations offered, several different explanations, or the child is said to have acted in a way that is inappropriate to her/his age and development
- Reluctance to give information or failure to mention other known relevant injuries
- Frequent presentation of minor injuries
- A persistently negative attitude towards the child
- Unrealistic expectations or constant complaints about the child
- Alcohol misuse or other drug/substance misuse
- Parents request removal of the child from the home
- Violence between adults in the household

Additionally, under the latest KCSIE 2018 guidance, schools should have at least two emergency contacts for every child in the school in case of emergencies, and in case there are welfare concerns at home.

Children Missing from Education

All staff should be aware that children going missing, particularly repeatedly, can act as a vital warning sign of a range of safeguarding possibilities. Staff should read the specific guidance listed in *KCSIE 2018 Part 1: Information for all school and college staff*.

Children with Special Educational Needs and Disability (SEND)

When working with children with special educational needs and disabilities, staff should be aware that additional barriers can exist when recognising abuse and neglect in this group of children.

This can include:

- Assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's difficulties or impairment without further exploration
- Communication barriers and difficulties expressing themselves
- Reluctance to challenge carers (professionals may over empathise with carers because of the perceived stress of caring for a child with disabilities or significant special educational needs)
- Children with disabilities often rely on a wide network of carers to meet their basic needs and therefore the potential risk of exposure to abusive behaviour can be increased
- A child's understanding of abuse
- Lack of choice / participation
- Isolation

Whilst not a definitive checklist, staff should be mindful that some possible indicators of abuse and/or neglect may also include:

- A bruise or mark that might not be of concern on an ambulant child such as the shin, might be of concern on a non-mobile child
- Not getting enough help with feeding, leading to malnourishment
- Poor toileting arrangements
- Lack of stimulation
- Unjustified and/or excessive use of restraint
- Rough handling, extreme behaviour modifications such as deprivation of medication, food or clothing, disabling wheelchair batteries
- Unwillingness to try to learn a child's means of communication
- Ill-fitting equipment, for example callipers, sleep boards, inappropriate splinting
- Misappropriation of a child's finances
- Inappropriate invasive procedures

Children with SEND have a higher risk of peer group isolation, and there can be a disproportionate impact of bullying and difficulties with communication. The DSL and Pastoral Year Teams will work closely with the SENDCO to consider any additional pastoral support which can be offered to support children with SEND. Any requests will be reviewed at the weekly Safeguarding Meeting, chaired by the DSL.

Additional Safeguarding Concerns

KCSIE 2018 also raises other particular concerns which staff at the academy must be aware of, and which are highlighted in Annex A of the above document:

- Children and the court system, when children are appearing as witnesses
- Children with family members in prison
- Criminal exploitation of children (County Lines)
- Homelessness

Appendix Two: Preventing Radicalisation and Violent Extremism

Definitions and Indicators of Vulnerability to Radicalisation

Radicalisation refers to the process by which a person comes to support terrorism and forms of extremism leading to terrorism.

Extremism is defined by the Government in the Prevent Strategy as:

Vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs. We also include in our definition of extremism calls for the death of members of our armed forces, whether in this country or overseas.

Extremism is defined by the Crown Prosecution Service as:

The demonstration of unacceptable behaviour by using any means or medium to express views which:

- *Encourage, justify or glorify terrorist violence in furtherance of particular beliefs*
- *Seek to provoke others to terrorist acts*
- *Encourage other serious criminal activity or seek to provoke others to serious criminal acts*
- *Foster hatred which might lead to inter-community violence in the UK*

There is no such thing as a 'typical extremist'; those who become involved in extremist actions come from a range of backgrounds and experiences and most individuals, even those who hold radical views, do not become involved in violent extremist activity.

Students may become susceptible to radicalisation through a range of social, personal and environmental factors – it is known that violent extremists exploit vulnerabilities in individuals to drive a wedge between them and their families and communities. This includes, in the current social and political climate, extreme far right movements. It is vital that academy staff are able to recognise those vulnerabilities, and are also vigilant to the potential danger of another member of staff engaging in behaviour which might radicalise a student, and report those concerns immediately under the academy's Whistleblowing Policy.

Indicators of vulnerability include:

- **Identity crisis:** the student is distanced from their cultural / religious heritage and experiences discomfort about their place in society
- **Personal crisis:** the student may be experiencing family tensions; a sense of isolation and low self-esteem; they may have dis-associated from their existing friendship groups and become involved with a new and different group of friends; they may be searching for answers to questions around identity, faith and belonging
- **Personal circumstances:** migration; local community tensions; and events affecting the student's country or region of origin may contribute to a sense of grievance that is triggered by personal experience of racism or discrimination or aspects of Government policy
- **Unmet aspirations:** the student may have perceptions of injustice; a feeling of failure; rejection of civic life
- **Experiences of criminality:** which may include involvement with criminal groups and/or arrest
- **Special Educational Needs:** students may experience difficulties with social interaction, empathy with others, understanding the consequences of their actions and awareness of the motivations of others

However, this list is not exhaustive, nor does it mean that all young people experiencing the above are at risk of radicalisation for the purposes of violent extremism.

More critical factors include:

- Being in contact with extremist recruiters
- Accessing violent extremist websites, especially those with a social networking element
- Possessing or accessing violent extremist literature
- Using extremist narratives and a global ideology to explain personal disadvantage
- Justifying the use of violence to solve societal issues
- Joining or seeking to join extremist organisations
- Significant changes to appearance and/or behaviour
- Experiencing a high level of social isolation resulting in issues of identity crisis and/or personal crisis
- A number of prejudice-based incidents committed by a student

The Prevent Strategy

The government response to preventing young people becoming susceptible to radicalisation and extremist ideology is the Prevent Strategy. The fundamental purpose of the Prevent Strategy is to stop people becoming terrorists or supporting violent extremism.

The Channel Project

The Channel Project provides a mechanism for assessing and supporting people who may be targeted by violent extremists or drawn into violent extremism. It provides a multi-agency approach for identifying, assessing the nature and extent of risk and developing an appropriate support strategy for the individual concerned, in order to divert them away from the risks they face and reduce vulnerability.

Procedure when a concern has been highlighted

If a member of staff at the academy identifies a concern about a young person being vulnerable to, or at risk of radicalisation and violent extremism, the Designated Safeguarding Lead (DSL) should be notified immediately and the CPOMS safeguarding concern form completed. The DSL is also known, for the purposes of the Prevent Strategy, as the Designated Lead for the Prevent Strategy.

The DSL will discuss the concern with the Principal as soon as practically possible, and seek advice from Hertfordshire Police where necessary.

Where appropriate, the academy will make a formal referral, on the agreed form, to the Hertfordshire Channel Project Panel. The Designated Safeguarding Lead at the academy will attend the relevant Channel meetings where required and ensure that any agreed actions are carried out promptly.

All Prevent referrals should be made on the agreed referral form and sent to:
prevent@herts.pnn.police.uk.

Once a concern has been highlighted, the academy will be guided by the appropriate external authorities with regard to the information to be discussed with the student and their parents or carers. The Principal will then consider whether any further steps need to be taken in relation to protecting other students and staff within the academy.

P12 Whistleblowing Policy and Procedure

Additionally, all staff should be aware that there have been occasions in schools within the UK where staff themselves have engaged in attempting to radicalise students. Where a member of staff has a concern of this nature about a colleague working at the academy, this should be brought to the attention of a senior member of staff immediately, as outlined in the academy's P12 Whistleblowing Policy and Procedure.

