



HEATHSIDE SCHOOL
HAMPSTEAD

**SAFEGUARDING
AND CHILD
PROTECTION POLICY**

Heathside School Safeguarding Team	
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16 New End Deputy DSL	Katy Deacon
OWB Deputy DSL	Louise Shotton
Lower School Deputy DSLs	Jonathan Breaden
Head Teacher	Kate Vintiner
Safeguarding Governor	Libby Nicholas

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Introduction

Heathside School is committed to providing a safe and secure environment for children, staff and visitors and promoting a climate where children and adults will feel confident about sharing any concerns that they may have about their own safety or the well-being of others. All adults in our school take all welfare concerns seriously and encourage children and young people to talk to us about anything that worries them. We will always act in the best interest of the child.

The school is physically located on three separate sites which fall in the Borough of Camden.

This policy is for the whole school including the EYFS and aims to cover the procedures, and lists the contacts for the Borough, and applies wherever staff and volunteers are working with pupils even if this is away from the School, for example during an educational visit.

This policy has been re-written in response to the KCSIE, which came into operation on 1st September 2021. This years update has included substantial change throughout, however the main elements of this are; Firstly, additional legislation reflecting the need for robust tackling of sexual Harrassment and Sexual Violence between children in schools. Secondly, additional information has been added to support schools and colleges in handling Concerns regarding staff which do not meet threshold. Finally, important clarifications which will help the sector better understand and/or follow the guidance including clarification of Safer recruitment guidance.

Heathside School ensures that the parents of children attending our school have access to our Safeguarding and Child Protection Policies and Procedures via our secure website and from our office in hardcopy, on request. It can be made available in large print or other accessible format if required.

Our priority at Heathside School is to understand that **Safeguarding is everyone's responsibility** and always put our children's safety and well-being first. All our staff are committed to providing a secure environment for our children to thrive, both socially and academically. For the purposes of this policy, Heathside School defines safeguarding and protecting the welfare of children as:

- Protecting children from maltreatment.
- Preventing the impairment of children's mental and physical health or development.
- Ensuring that children grow up in circumstances consistent with the provision of safe and effective care.
- We want our children, staff, parents and visitors to feel confident about sharing any concerns that they may have about their own safety or the wellbeing of others.
- Undertaking our role so as to enable children to have optimum life chances and to enter adulthood successfully. We take action to enable all children to have the best outcomes.

We understand that the social and emotional well-being of each of our children underpins their educational development and contributes to the nurturing, happy learning environment that is so evident at Heathside.

There are three main elements to our Safeguarding and Child Protection Policy;

- Prevention through the creation of a positive school atmosphere and the teaching and pastoral support offered to pupils.
- Protection by following agreed procedures, ensuring staff are trained and supported to respond appropriately and sensitively to child protection concerns.

- Support to pupils who may have been abused.

Our school and staff therefore aim to:

- Establish and maintain an environment where pupils feel safe and secure and are encouraged to talk and be heard.
- Ensure that pupils know that there are adults within the school and boarding houses they can approach if they are worried or are in difficulty. We have procedures to support the mental, emotional and social needs of our children, using our specialist staff and outside relevant parties when required.
- Ensure pupils receive the right help at the right time to address risks and prevent issues escalating by ensuring staff are aware of indicators of abuse through the 'Safeguarding and Child Protection Awareness' training they receive annually and know how to refer any suspected abuse or neglect.
- Include in the curriculum activities and opportunities which equip pupils with the skills they need to stay safe from abuse and to develop healthy and safe relationships, e.g. computing lessons on E-safety, PSHE lessons. i.e. they are taught about safeguarding at an age appropriate level.
- Include in the curriculum material which will help pupils develop realistic attitudes to the responsibilities of adult life.
- Protect children from harm and to ensure that they are taught in a way that is consistent with the law and our values and to promote respect for all others.
- Facilitate understanding of wider issues within the context to learning about the values on which our society is founded and our system of democratic government.
- Provide a curriculum which actively promotes the fundamental British values of democracy, the rule of law, individual liberty and mutual respect and tolerance of those with different faiths and beliefs.
- Promote tolerance of and respect for people of all faiths (or those of no faith), races, genders, ages, disability and sexual orientations.
- Ensure any new staff undergo the above training on induction and all staff receive updated training when due, which is recorded and monitored by the school.
- Make parents/carers aware of the school policies and practices for safeguarding and ensure that, wherever possible, every effort will be made to establish open and honest effective working relationships with parents and colleagues from partner agencies

In order to meet these aims, all teaching and non-teaching staff are responsible for:

- Safeguarding children's wellbeing and maintaining their vigilance as part of their professional duties.
- Providing a safe environment in which Heathside children can learn and feel secure
- Identifying children who may be in need of extra help or who are suffering, or likely to suffer, significant harm.
- Taking appropriate action, working with other services as required and knowing they must report suspected abuse or neglect or other welfare matters to their Designated Safeguarding Lead.
- Supporting social workers to make decisions about individual children, in collaboration with the designated safeguarding lead.

- If at any point there is a risk of immediate serious harm to any child, making a referral to children's social care immediately.
- Heathside School works in partnership with the LA's Channel Panel to assess the extent to which individual pupils are at risk of being drawn into terrorism.
- Ensure that their class electronic register is taken by 9.15am and passed to the Administrator. If for some reason the electronic register is not working, they must take a manual registration and deliver it to Administration. The Administrator will contact any parent/carer as necessary at 9.30am regarding an absent pupil.

All our staff are regularly trained in safeguarding and are responsible for:

- Educating pupils on how to keep safe and to recognise behaviour that is unacceptable.
- Identifying and making provision for any child that has been subject to abuse.
- Ensuring that members of the Heathside School Board of Governors, the Head teacher and staff members understand their responsibility, under safeguarding legislation and statutory guidance, and to be alert to the signs of child abuse and to refer concerns to the designated safeguarding lead.
- All adults working in and visiting this School (including visiting staff, volunteers and students on placement) are required to report instances of actual or suspected child abuse or neglect to the Designated Safeguarding Lead
- Being vigilant that any new staff members and volunteers are only allowed into school when all the appropriate checks have been satisfactorily completed.
- Being vigilant with visitors to our school, ensuring they have been signed in, and are wearing a Safeguarding Visitor badge. They must always be accompanied by a staff member whilst on Heathside premises. We have the right to challenge and refuse entry if we suspect their legitimacy. We also have the right to check their DBS record before approving entry.
- Being vigilant with any carers, friends, and relatives with whom we are unfamiliar with in drop-off and pick-up times. We have a responsibility to contact the main parent/s or carer/s of a child as detailed in our Admissions Register, to confirm that the person collecting their child has that parent's/carer's permission.
- All staff are aware that year on year 'Safeguarding' encompasses more complex considerations of safeguarding concerns and that in addition to fully understanding the four main areas of child abuse (physical, emotional, sexual abuse and neglect) that we also need to fully consider the possible impact of the following issues on the well-being of students attending our school;

All types of abuse/safeguarding issues are detailed further in Appendix A – all staff must be conversant with the content of this Appendix.

The enhanced role of the designated safeguarding lead and deputies means that the DSL and deputies are most likely to have the most complete safeguarding picture and be the most appropriate person to advise on responses to safeguarding concerns. The DSL and deputies will take a holistic view of safeguarding concerns in their wider context, and incidents will not be considered in isolation. Family, friends and the home environment and surrounding community will be taken into account when looking at the context of an issue. Safeguarding incidents and behaviours can be associated with factors outside the school and can occur between children outside of the school. All staff, but especially the DSL or deputies will consider the context within which such incidents and behaviours occur. This contextual safeguarding considers whether wider environmental factors are present in a child's life that are a threat to their safety and welfare. When making a referral it is important to include as much contextual information about a child as possible. This allows any assessment to consider all the available evidence and the full context of any abuse.

The designated safeguarding lead has a duty to:

- Refer all cases of suspected abuse to children's social care, the LA designated officer (LADO) for child protection concerns, the DBS, and the police in cases where a crime has been committed.
- Liaise with the Governing Board and Deputy Safeguarding Leads to inform them of safeguarding issues, especially on-going enquiries under section 47 of the Children's Act 1989 and police investigations.
- Act as a source of support, advice and expertise to staff members on matters of safeguarding by liaising with relevant agencies.
- Understand the assessment process for providing early help and intervention.
- Have a working knowledge of how LAs conduct a child protection case conference and a child protection review conference and be able to attend and contribute to these effectively when required to do so.
- Ensure each member of Heathside staff has access to and understands the school's Safeguarding and Child Protection Policy and procedures, especially new and part-time staff members.
- Be alert to the specific needs of children in need, including those with special educational needs and/or disabilities and young carers.
- Be able to keep detailed, accurate and secure records of concerns and referrals.
- Obtain access to resources and attend any relevant training courses.
- Encourage a culture of listening to children and taking account of their wishes and feelings.
- Ensure the school's Safeguarding and Child Protection Policy is reviewed annually and the procedures are updated and reviewed regularly, and work with the schools Governing body regarding this duty.
- Ensure the school's Safeguarding and Child Protection Policy is available publically and parents are aware of the fact that referrals regarding suspected abuse or neglect may be made and the role of the school in this.
- Ensure that the pupil's child protection file is copied when transferring to a new school.
- The Dukes Education Group and school leadership team are responsible for ensuring that the school follows recruitment procedures that help to deter, reject or identify people who might abuse children (see Safer Recruitment Policy for further information)
- The Designated Safeguarding Lead and Deputy Designated Safeguarding Lead will undertake an annual Safeguarding Audit in line with their responsibilities under S.157 of the Education Act 2002.
- The Designated Safeguarding Lead will be appraised in their DSL role by the Governing

body safeguarding advisor.

- The Designated Safeguarding Leads will cooperate with any requests from any relevant authority including the completion of forms in compliance with section 11 of the Children Act 2004.
- The Designated Safeguarding Leads will ensure that the Safeguarding and Child Protection Policy is reviewed at least annually.

If anyone has ANY CONCERNS at all regarding the safety of any child or adult, please immediately contact one or more of the following Designated Safeguarding Leads, these staff members are also the 'Prevent – Single Points of Contact' (SPOC): Please also see page 35 for a flow chart setting out the process for staff when they have concerns about a child.

The Designated Safeguarding Lead :

- **Nicholas Shaw – Tel No: 07944 028130**

Other Staff trained to the Advance Level include:

- Katy Deacon (New End) - 07944027159 (landline: 020 7794 5857)
- Louise Shotton (New End + OWB) - 07944 028 882 (landline: 020 7794 5857)
- Jonathan Breaden, (Heath Street) -07944 029418 (landline: 0203 058 4011)

If staff have safeguarding concerns, or an allegation is made about another member of staff (including volunteers) posing a risk of harm to children AND if staff members have concerns about any of the Heathside Safeguarding Team, their first contact is to the Headteacher:

- Kate Vintiner – 0203 058 4011 – also trained to the advanced level.

The school's procedures for managing allegations made against staff or volunteers are detailed from page 12 onwards.

If staff members have concerns about the Head teacher then they should contact the Safeguarding Governor, Libby Nicholas by email: Libby.Nicholas@dukeseducation.com

OR contact the **CAMDEN LADO Sophie Kershaw/John Lawrence-Jones** directly, on **020 7974 4556**

OTHER REFERRAL DETAILS TO OUTSIDE AGENCIES SUCH AS THE POLICE and MASH are to be found on page 8.

FURTHER POLICIES AND PROCEDURES

The following policies and procedures set out our practice in relation to safeguarding and are available for viewing from the school office, upon request. Those with asterisks (*) are viewable by the public on our website – www.heathsideschoolhampstead.com

- Accessibility Plan*
- Administration of Medicine and Advice for Illness*
- Admissions Policy *
- Anti-Discrimination and Equality Policy*
- Anti-Bullying Policy*
- Behaviour Management Policy *
- Safeguarding and Child Protection Policy (which includes our Safeguarding response to children missing education) *
- Complaints Procedure *
- Curriculum Policy *
- Data Protection Policy *
- E-Safety (and Acceptable Use) Policy *
- Fire Policy and Plan *
- First Aid Policy *
- Health & Safety Policy *
- Heath Toilet Procedures
- Intimate Care
- Mobile Phones Policy
- Pastoral Policy
- Photography Policy*
- Risk Assessment Policy *
- Relationships and Sex Education Policy*
- SEN Policy *
- Safer Recruitment Policy*
- School Outings
- School Security
- Searching, Screening and Confiscation 2018
- SMSC Policy
- Staff Behaviour Policy
- Substance Misuse Policy
- Sun Policy
- Teacher Appraisal
- Whistleblowing Procedure*

Legal framework

This policy will have consideration for, and be in compliance with, the following legislation and statutory guidance:

- Children Act 1989
- Children Act 2004
- The Children's and Families Act 2014
- S157 Education Act 2002
- Education (Health Standards) (England) Regulations 2003
- Safeguarding Vulnerable Groups Act 2006
- Education (Pupil Referral Units) (Application of Enactments) (England)(Amendment) Regulations 2012
- School Staffing (England) Regulations 2009, as amended
- Sexual violence and sexual harassment between children in schools and colleges 2021
- Education (Independent School Standards) (England) Regulations 2014
- Equality Act 2010
- Education (Non-Maintained Special Schools) (England) Regulations 2011, as amended
- Local Interagency Procedures for Camden
- Protection of Freedoms Act 2012
- DfE (2018) 'Working Together to Safeguard Children 2018'
- DfE (2020) 'Keeping Children Safe in Education 2021'
- DfE (2015) 'What to do if you're worried a child is being abused'
- DfE (2018) 'Information sharing'
- DfE (2015) 'Disqualification under the Childcare Act 1006
- DfE (2015) 'The Prevent duty'
- Ofsted – Inspecting Safeguarding in the Early Years – August 2016
- The Education (School Teachers' Appraisal) (England) Regulations 2012
- The Sexual Offences Act (2003)
- The Prevent Duty – Updated July 2015

KEY CONTACTS:

CAMDEN SAFEGUARDING CHILDREN PARTNERSHIP

Child protection lead officer and Local Authority Designated Officer (LADO):

Name: Sophie Kershaw

Deputy LADO: John Lawrence-Jones

Contact details: 020 7974 4556

Safeguarding lead officers:

Name: Michelle O'Regan (Head of Service – Children in Need)

Tel: 020 7974 1905

Name: Tracey Murphy (Service manager) Tel: 020 7974 4103

Name: Patricia Williams (Service manager) Tel: 020 7974 1558

Children's Contact Service/MASH team:

Manager: Jade Green

Tel: 020 7974 1553/3317

Fax: 020 7974 3310

Online safety contact officer:

Name: Jenni Spencer

Tel: 020 7974 2866

Prevent Education Officer

Name: Jane Murphy

Tel: 020 7974 1008

General

Local Police non-emergency contact number for FGM Reporting:

101

Police Emergency number(including high risk Prevent enquiries):

999

OFSTED Safeguarding Children (Monday to Friday from 8am to 6 pm)

08456 404 046

whistleblowing@ofsted.gov.uk

The Disclosure and Barring Service PO Box 181,

Darlington,

DL1 9FA

01325 953 795

Non-emergency DfE advice:

020 7340 7264

or

counter-extremism@education.gsi.gov.uk

Anti-Terrorist Hotline 0800 789 321

NSPCC Helpline can be contacted on:
National Society for the Prevention of Cruelty to Children (NSPCC)
Tel: 0800 028 0285
Email: help@nspcc.org.uk

Childline can be contacted on:
Tel: 0800 1111

Heathside School recognises its role is of referral and not of investigation.

Heathside is not an investigating agency – any probing may interfere with further investigations and make the child or young person repeat painful information; therefore, our role is to record any evidence revealed or observed and then to seek the advice of the appropriate agencies listed at the end of this policy.

PROCEDURES

STEPS TO TAKE IF CHILD ABUSE IS SUSPECTED

1. Consider what you know, what you have seen and think about the child that causes concern.
2. Listen to the child if s/he tells you of abuse. Reassure the child that they did the right thing to tell you. Never promise to keep something a secret. Let the child know you will be telling the Designated Safeguarding Leader for child protection (Nick Shaw) as you have the responsibility to keep the child safe. Do not probe or interrogate the child - write down what the child told you using the child's own words.
3. Report your concerns **urgently** using [CPOMS](#) or by speaking to the Designated Safeguarding Lead.
4. The Designated Safeguarding Lead will discuss and review the concerns and advise on what actions to take next, including whether a child protection referral is necessary.
5. Unless consultation with parents / guardian is likely to place the child at risk of significant harm through delay or the parent's actions you, together with the designated Safeguarding Lead, will:
 - Arrange to see the child's parent / guardian. Be open and honest, tell the parents the reasons for your concerns and seek explanations for your concerns.
 - Explain your duty to report your concerns and try to get parental agreement for referral to the local authority Children's Specialist Services.
 - If the parent refuses to give permission for the referral, further advice should be sought and a referral made without consent if this is necessary to secure the child's safety.

The Designated Safeguarding Lead will keep a confidential written record of all concerns, any discussions with the child and parents, with social workers and other professionals and any decisions made.

What happens next?

There are procedures for investigating cases where a child is at risk. The Children's Social Care Department has the main responsibility and may set up a Case Conference involving the appropriate agencies. They will:

- consider what you have told them together with any other information they may have already
- assess the strength of the allegation
- investigate if they suspect a child or young person is suffering from harm.

INFORMATION SHARING AND CONFIDENTIALITY

Information sharing is vital to safeguarding and promoting the welfare of children. Parental consent is sought by Heathside to share information. However, you can and should share information without consent if a child is at risk of significant harm or harming someone else, the child needs urgent medical treatment, information is required as part of a statutory or legal proceeding or information is requested by the police.

Safeguarding and Child Protection matters are strictly confidential. As a Heathside Staff member, you have a duty to respect confidentiality and privacy and ensure you keep all information and details about parents and children confidential within the setting. However, Heathside staff must never promise to keep a secret with a child.

Explain that you may not be able to keep secrets for them and that you may need to share the information with someone else in order to keep them safe.

If a member of staff wishes to speak to someone following a safeguarding or child protection incident they may do so with the Designated Member of Staff or Deputy Designated Member of Staff.

Professional Counselling can be arranged if necessary. The DSL has access to supervision.

Child protection information will be stored and handled in line with the Data Protection Act 2018 and General Data Protection Regulation (GDPR) guidelines. Information is:

- processed for limited purposes
- adequate, relevant and not excessive
- accurate
- kept no longer than necessary
- processed in accordance with the data subject's rights
- secure.

Furthermore, information which is sensitive and personal, and should be treated as 'special category personal data'. The Data Protection Act 2018 contains 'safeguarding of children and individuals at risk' as a processing condition that allows designated staff to share information. This includes allowing designated staff to share information without consent, if it is not possible to gain consent, it cannot be reasonably expected that a practitioner gains consent, or if to gain consent would place a child at risk

STAFF TRAINING

Induction Training

This is mandatory and should include;

- the Safeguarding and Child Protection policy;
- the Behaviour Management policy;
- the staff a code of conduct;
- the safeguarding response to children who go missing from education;

and

- the role of the designated safeguarding lead (including the identity of the designated safeguarding lead and any deputies). (see KCSIE (2020))

Additional Courses

School Staff have access to and are encouraged to complete a broad range of additional safety and Safeguarding courses via the Educare learning platform.

DSLs

Attend training every two years; and in addition to formal training, their knowledge and skills should be refreshed at regular intervals, at least annually. All other staff – will receive regular safeguarding and child protection updates as required, but at least annually, to provide them with relevant skills and knowledge to safeguard children effectively.

Safer Recruitment training is available via Educare to all relevant staff and governors who are involved in the recruitment process.

WORKING IN PARTNERSHIP WITH PARENTS

At Heathside, it is our policy to work in partnership with parents or guardians to secure the best outcomes for our children. We will therefore communicate as clearly as possible about the aims of this School:

- We will try to use clear statements in our brochures and correspondence.
- We will share information with the parents and pupils in the development of Behaviour Management policies and other policies as appropriate.
- We will liaise with agencies in the statutory, voluntary and community sectors that are active in supporting families.
- We will be aware that we have parents/guardians who do not have English as their first language.

NB: We will keep parents informed as and when appropriate, however if there is a risk of significant harm we have to make an immediate referral to MASH.

RECORDS

One of the most important functions we can perform at Heathside is to ensure there is a full written and dated history about a child with a possible cause for concern so that this history can be given to Children's Social Care and any other agencies to support a referral if necessary.

Accurate written notes will be kept on the schools CPOMS database of all incidents and child protection or child in need concerns relating to individual pupils. This information may be shared with other agencies as appropriate. Parental consent will be sought before making a Child in Need (S17) referral to Children's Social Care. If consent is withheld, consideration will be given to the potential impact of this for the child and to the need for a child protection referral (S47). The School will take into account the views and wishes of the child who is the subject of the concern but staff will be alert to the dangers of colluding with dangerous "secrets".

Child protection records are not open to pupils or parents. CP records are securely kept on CPOMS by the Designated Member of Staff, separately from educational records, and can only be accessed by the Designated Safeguarding Lead and their Deputies. Referrals made to Children's Social Care under the new local Safeguarding Partnership procedures will be recorded

on the Inter-Agency Referral form, with copies sent securely to Children's Social Care and the LA's Lead Officer.

INFORMATION FROM SOMEONE ELSE

Any Heathside staff member given information by a third person about alleged or suspected abuse has a responsibility to act on the information given and speak with their Designated Safeguarding Lead.

MENTAL HEALTH AND SAFEGUARDING

All staff at Heathside are 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. School staff are not expected or trained to diagnose mental health conditions or issues, but may notice behaviours that may be of concern. Where staff have a mental health concern about a child that may also be a safeguarding concern, they should raise the issue by raising an incident on CPOMS - flagging the incident with the appropriate mental health category.

CONTEXTUAL SAFEGUARDING

Heathside school recognises that young people may be vulnerable to experiences of significant harm beyond their families and that the different relationships that young people form in their neighbourhoods, schools and online can feature violence and abuse. Parents and carers have little influence over these contexts, and young people's experiences of extra-familial abuse can undermine parent-child relationships.

Therefore, the school must be mindful of young people's extra-familial contexts, and recognise that the risks and issues with these spaces are a critical part of safeguarding practices. Contextual Safeguarding, therefore, expands the objectives of safeguarding and referral considerations in recognition that young people are vulnerable to abuse beyond their front doors.

ONLINE LEARNING AND eSAFETY

All members of the Heathside community are made aware through Assemblies, Newsletters, Parent meetings and PSHE lessons that the broadest Safeguarding context also includes a child's online habits. Throughout 2020 and early 2021 this aspect of safeguarding has been brought to the forefront. Heathside takes action to enable our pupils stay safe online when at home or at school.

When children use the school's network to access the internet, they are protected from inappropriate content by our filtering and monitoring systems.

Onsite the schools network is equipped with A Sophos firewall which filters inappropriate content from our school network. Outside of school, pupils' Chromebooks are managed by the schools device management system and installed with the Securely browser extension which filters inappropriate content both on and offsite and generates a report of web filtering instances which is sent to the schools DSL daily.

However, many pupils are able to access the internet using their own data plan. To minimise inappropriate use, as a school we ask pupils to hand in their mobile phones to reception at the start of the school day.

For further information please refer to the following school Policies:

- Remote Learning Statement
- Safeguarding Addendum - Covid-19
- E-Safety Policy

VULNERABLE CHILDREN

Heathside recognises that a wide range of factors may make children more vulnerable to risk of harm common factors may include, but are not limited to:

CHILDREN WITH SOCIAL WORKERS

We recognise that when a child has a social worker, it is an indicator that the child is more at risk than most pupils. This may mean that they are more vulnerable to further harm, as well as facing educational barriers to attendance, learning, behaviour and poor mental health.

We take these needs into account when making plans to support pupils who have a social worker.

SEND

Children and young people with special educational needs and disabilities can face additional safeguarding challenges because:

- there may be assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's disability without further exploration;
- children with SEN and disabilities can be disproportionately impacted by things like bullying without outwardly showing any signs;
and
- difficulties may arise in overcoming communication barriers.

At Heathside the SENDCo is a Deputy DSL and an integral part of our Safeguarding team we identify pupils who might need more support to be kept safe or to keep themselves safe through;

- regular meetings with class teachers
- liaison with Therapeutic services
- classroom observations
- reviews with the SENDCo prior to admission

SAFETY IN THE SCHOOL

No internal doors to classrooms will be locked whilst pupils are present in these areas with the exception of during and Emergency Lockdown. Doors that are secured physically or by constant staff supervision will control entry to school premises. Authorised visitors to the school will be logged into and out of the premises and be issued with school visitor badges. Unidentified visitors will be challenged by staff or reported to the Headteacher or School office.

There are CCTV cameras at all the school sites with video recording. School sites are also alarmed when the school is empty.

The presence of suspicious strangers seen loitering near the school or approaching pupils will be reported to the Police and LA, with a view to alerting other local schools through appropriate systems.

If parents do not wish their children to be photographed or filmed and express this view in writing, their rights will be respected.

OPPORTUNITIES TO TEACH SAFEGUARDING

As a part of creating an effective culture of safeguarding, and providing a broad and balanced curriculum children are taught about safeguarding, including online safety. Through the school's PSHE programme.

This may include covering relevant issues for schools through Relationships Education for all primary age pupils and Relationships and Sex Education for all of our secondary aged pupils, and Health Education which are compulsory elements from September 2020. The statutory guidance can be found here:

[Statutory guidance: relationships education relationships and sex education \(RSE\) and health education.](#)

The following resources are available to help:

- DfE advice for schools: teaching online safety in schools
- UK Council for Internet Safety (UKCIS) guidance: Education for a connected world
- National Crime Agency's CEOP education programme: Thinkuknow
- Public Health England: Rise Above

ALLEGATIONS MADE AGAINST STAFF OR VOLUNTEERS

Heathside School follows the procedures outlined in KCSIE (part 4) in order to manage allegations of abuse against staff. In accordance with KCSIE 2021 these allegations may now fall into two categories;

1. Allegations that may meet the harms threshold.

for example:

- behaved in a way that has harmed a child, or may have harmed a child and/or;
- possibly committed a criminal offence against or related to a child and/or;
- behaved towards a child or children in a way that indicates he or she may pose a risk of harm to children; and/or
- behaved or may have behaved in a way that indicates they may not be suitable to work with children.

2. Allegation/concerns that do not meet the harms threshold – referred to as 'low level concerns'.

The term 'low-level' concern does not mean that it is insignificant, it means that the behaviour towards a child does not meet the threshold for referral to LADO. A low-level concern is any concern – no matter how small, and even if no more than causing a sense of unease or a 'nagging doubt' - that an adult working in or on behalf of the school or college may have acted in a way that:

- is inconsistent with the staff code of conduct, including inappropriate conduct outside of work; and

- does not meet the allegations threshold or is otherwise not considered serious enough to consider a referral to the LADO.

Examples of such behaviour could include, but are not limited to:

- being over friendly with children;
- having favourites;
- taking photographs of children on their mobile phone;
- engaging with a child on a one-to-one basis in a secluded area or behind a closed door; or,
- using inappropriate sexualised, intimidating or offensive language.

The procedure will apply where a staff person (anyone working with or in contact with the children at the school, whether paid or unpaid, volunteers, support staff, students etc.) has:

- Behaved in a way that has harmed or may have harmed a child
- Possibly committed an offence against or related to a child
- Behaved towards a child or children in a way that indicates that s/he is unsuitable to work with children.

They will also apply where:

- Concerns arise about the person's behaviour with regard to their own children
- Concerns arise about the behaviour in private or community life of a partner, member of the family or other household member.

Such behaviour can exist on a wide spectrum, from the inadvertent or thoughtless, or behaviour that may look to be inappropriate, but might not be in specific circumstances, through to that which is ultimately intended to enable abuse. It is crucial that any such concerns, including those which do not meet the harm threshold (see Part Four - Section one), are shared responsibly and with the right person, and recorded and dealt with appropriately. Ensuring they are dealt with effectively in order to protect those working in or on behalf of schools and colleges from potential false allegations or misunderstandings.

TEMPORARY OR SUPPLY STAFF

In some circumstances the school may have to consider an allegation against an individual not directly employed by Hampstead Schools Ltd, where its disciplinary procedures do not fully apply, for example, supply teachers provided by an employment agency or business.

Whilst Hampstead Schools Ltd is not the employer of supply teachers, allegations must still be dealt with properly. In no circumstances should the school decide to cease to use a supply teacher due to safeguarding concerns, without finding out the facts and liaising with the local authority designated officer (LADO) to determine a suitable outcome. The Head teacher and proprietors should discuss with the agency whether it is appropriate to suspend the supply teacher, or redeploy them to another part of the school, whilst they carry out their investigation.

Agencies should be fully involved and co-operate in any enquiries from the LADO, police and/or children's social services. Heathside will usually take the lead because agencies do not have direct access to children or other school staff, so they will not be able to collect the facts when an allegation is made, nor do they have all the relevant information required by the LADO as part of the referral process. Supply teachers, whilst not employed by the school, remain under the supervision, direction and control of the proprietors when working in the school.

The supply teacher should be advised to contact their trade union representative if they have one, or a colleague for support. The allegations management meeting which is often arranged by the LADO should address issues such as information sharing, to ensure that any previous concerns or allegations known to the agency are taken into account by the school during the investigation.

The school should inform the agency of its process for managing allegations. This should include inviting the agency's human resource manager or equivalent to meetings and keeping them up to date with information about its policies.

Abuse of Trust

The Sexual Offences Act (2003) has established the criminal offence of the abuse of trust affecting teachers and others who are in a relationship of trust with pupils up to 19 years of age within school or outside of school.

A relationship of trust is one where a teacher, member of education staff or volunteer is in a position of power or influence over a child by virtue of work or nature of the activity being undertaken.

Neither heterosexual nor homosexual relationships are acceptable within this position of trust. 'Grooming' a child or a person under 18 with a view for future sexual relationship is an offence.

All members of staff are deemed to be in a position of trust, irrespective of whether they work with pupils at the school on a daily basis, or if they are employed purely in a support or administrative role. Any member of staff who becomes aware of any inappropriate relationships between members of staff and pupils, even via social media e.g. Facebook, Twitter, text messaging, Tumbler, Instagram, Snapchat or WhatsApp etc. should immediately discuss with a Designated Safeguarding Lead.

Procedures will be based on the three safeguarding partners' (made up of the local authority, a clinical commissioning group and the chief of police) local procedures, as follows:

1. All allegations or suspicions against staff should be taken seriously and considered as requiring a child protection response/enquiry.
2. All services have a duty to report and refer to children's social care, the police and Ofsted any allegation or suspicion of child abuse made against any staff member. Children's Social Care will inform Ofsted of any child protection referrals in respect of your staff in their personal life.
3. Once your referral is made to children's social care, the allegation will be investigated by the Local Authority Designated Officer (LADO) or MASH who will consider the available information, decide whether an investigation is indicated and work out the details, who will be involved and arrangements for interviewing:
 - The child

- Parent/guardian
- Person to whom the allegation was made
- Any witnesses.

Name and Contact details of the LADO / MASH is listed under 'Key Contacts' as above in this policy for both Camden and Barnet.

An allegation may require consideration from any of the following four interrelated perspectives:

- Child protection
- Criminal investigation
- Staff disciplinary procedures
- Complaint procedures.

4. Information about an allegation must be restricted to those who have a need to know in order to:

- Protect children
- Facilitate enquiries
- Manage disciplinary/complaints aspects
- Protect any rights of the alleged perpetrator.

5. Employers have a dual responsibility – to safeguard the children in their care and to ensure staff are treated fairly.

6. If a staff member is faced with an allegation against them, they may benefit from the independent advice of a solicitor.

7. If an allegation is made, this staff member should not have any contact with children or their records until the matter has been resolved.

8. Suspension is a neutral act, and it should not be automatic. If possible relocate the member of staff to an alternative part of the school while the investigation is carried out. It should be considered in a case where:

- There is cause to suspect a child is at risk of significant harm, or
- The allegation warrants investigation by the police, or
- The allegation is so serious that it might be grounds for dismissal.

9. The final decision regarding the person's continued employment formally rests with the employer but should be informed by the outcome of the child protection investigation and/or criminal investigation.

10. The school will not accept a staff member's resignation as an alternative to dismissal.

11. Even if the police decide there is not enough evidence to bring criminal charges, the employer must decide whether to proceed with a disciplinary hearing on the basis of prima facie evidence under the Disciplinary Code.

12. Even when there is insufficient evidence to support a criminal investigation, Ofsted may pursue the matter under disciplinary, regulatory or complaints procedures and/or bring civil or criminal proceedings against registered or unregistered day care providers.

UNSUBSTANTIATED AND FALSE ALLEGATIONS

False allegations are rare and may be a strong indicator of abuse elsewhere which requires further exploration. If an allegation is demonstrably false, the employer, in consultation with the Local Authority Designated Officer and Ofsted, should refer the matter to the local authority Children's Social Care to determine whether the child is in need of services, or might have been abused by someone else.

Where it is concluded that there is insufficient evidence to substantiate the allegation, the chair of the strategy discussion or initial evaluation should prepare a separate report of the enquiry and forward this to the designated senior manager of the employer to enable her/him to consider what further action, if any, should be taken.

The DFE and ISI may also take further actions, as above.

If it is established that an allegation has been deliberately invented, the police may be asked to consider what action may be appropriate.

WHISTLEBLOWING

Where there are concerns about the way that safeguarding is carried out in the school, staff should refer to the Whistleblowing Policy.

A whistleblowing disclosure must be about something that affects the general public such as:

- a criminal offence has been committed, is being committed or is likely to be committed
- an legal obligation has been breached
- there has been a miscarriage of justice
- the health or safety of any individual has been endangered
- the environment has been damaged
- information about any of the above has been concealed.

The NSPCC runs a whistleblowing helpline on behalf of the government, the number is

0808 800 5000.

APPENDIX A - INDICATORS OF ABUSE

Abuse can be explained in four main ways:

1) Physical abuse may take many forms, e.g. 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 fabricated the symptoms of or deliberately induces illness in a child.

The following are often regarded as indicators of concern:

- An explanation, which is inconsistent with an injury
- Several different explanations provided for an injury
- Unexplained delay in seeking treatment
- The parents are uninterested or undisturbed by an accident or injury
- Parents are absent without good reason when their child is presented for treatment
- Repeated presentation of minor injuries (which may represent a 'cry for help' and if ignored could lead to a more serious injury)
- Family use of different doctors and accident & emergency departments
- Reluctance to give information or mention previous injuries.

The following must be considered as indicators of harm unless there is evidence or an adequate explanation provided. Only a paediatric view around such explanations will be sufficient to dispel concerns listed below:

- Any bruising to a pre-crawling or pre-walking baby
- Bruising in or around the mouth, particularly in some small babies, which may indicate force-feeding
- 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 to the head or on sites unlikely to be injured accidentally
- Variation in bruising colour possibly indicating injuries caused at different times
- The outline of an object used, e.g. belt marks, hand prints or a hairbrush
- Bruising or tears around, or behind, the earlobe/s indicating injury by pulling or twisting; bruising around the face; bruising on the arms, buttocks and thighs, which may be an indicator of sexual abuse
- Grasp marks on small children
- Bite marks – those over 3cm in diameter are more likely to have been caused by an adult or older children
- Burns and scalds with a clear outline may be suspicious, e.g. circular burns from cigarettes, linear burns from hot metal rods, scalds that have a line indicating immersion or poured liquid with no splash marks
- Fractures – non-mobile children rarely sustain fractures. The history provided is vague, non-existent or inconsistent with the fracture type. There is a delay in seeking medical attention.
- Scars – a large number of scars, or scars of different sizes or ages, or on different parts of the body, may suggest abuse.

2) 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 and may involve:

- Conveying to children that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person
- Imposing developmentally inappropriate expectations 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

- Causing children to feel frightened or in danger, e.g. witnessing domestic violence or experiencing bullying from siblings or peers
- Exploiting or corrupting children

Emotional abuse may be difficult to recognise, as the signs are usually behavioural rather than physical. The indicators of emotional abuse are often also associated with other forms of abuse. Professionals should be aware that emotional abuse might also signify the presence of other kinds of abuse.

The following may be indicators of emotional abuse:

- Developmental delay
- Abnormal attachment between a child and parent/carer, e.g. anxious, indiscriminate or no attachment
- Aggressive behaviour towards others
- Appeasing behaviour towards others
- 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.

3) Sexual abuse involves forcing or enticing a child to take part in sexual activities, including prostitution, whether or not the child is aware of what is happening. The activities may involve physical contact, including penetrative (e.g. rape, buggery, oral sex) or non-penetrative acts. They may include non-contact activities, such as involving children in looking at, or in the production of, pornographic material or watching sexual activities, or encouraging children to behave in sexually inappropriate ways.

Recognising sexual abuse can be difficult unless the child discloses and is believed. There may be no physical signs and indications are likely to be emotional and behavioural. Boys and girls of any age may be sexually abused and are often scared to say anything due to fear and/or guilt. It is particularly difficult for a child to talk about their sexual abuse. Disclosure can often initially be indirect as the child tests the professional's response.

Behavioural indicators include:

- Inappropriate sexualised contact
- Sexually explicit behaviour, play or conversation, inappropriate for the child's age
- Anxious unwillingness to remove clothes for sports/swimming (but this may be related to cultural norms or physical difficulties)
- Parents may ask staff not to undress or change their child
- Continual, excessive or inappropriate masturbation
- Self-harm (including eating disorder), self-mutilation or suicide attempts
- Involvement in sexual exploitation.

Physical indicators include:

- Pain or itching of genital area
- Blood stains on underwear
- 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.

4) 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 and development. Neglect may occur during pregnancy as a result of maternal substance abuse.

Neglect may involve a parent failing to:

- Provide adequate food and clothing
- Provide shelter including exclusion from home or abandonment
- Protect a child from physical and emotional harm or danger
- Ensure adequate supervision including the use of adequate care-taking
- Ensure access to appropriate medical care or treatment
- Meet or being unresponsive to a child's basic emotional need to feel loved and secure.

Recognising neglect

Evidence of neglect is often built up over a period of time and can cover different aspects of parenting. Indicators include:

- Failure by parents or carers to meet essential physical needs, e.g. adequate or appropriate food, clothes, warmth, hygiene and medical care
- Failure by parents or carers to meet essential emotional needs, e.g. to feel loved and valued, to live in a safe, predictable home environment
- A child seen as listless, apathetic and unresponsive with no apparent medical cause
- Failure of child to grow within normal expected pattern, with accompanying weight loss
- Child thrives away from home environment
- Child frequently absent from school/setting
- Child left with inappropriate carers, e.g. too young, complete strangers
- Child left with adults who are intoxicated or violent
- Child abandoned or left alone for excessive periods.

Potential risk to an unborn child:

- Domestic violence or parental substance abuse or mental ill health
- These concerns should be addressed as early as possible before the birth, so that a full assessment can be undertaken and support offered to enable the parents, wherever possible, to provide safe care.

Other potential safeguarding issues.

KCSIE 2021, acknowledges the following as specific forms of abuse and safeguarding issues, these are detailed below:

Abuse/Safeguarding Issue
Children and the court system
Children missing from education
Children with family members in prison
Child Criminal Exploitation (CCE)

Child sexual exploitation (CSE)
Consensual and non-consensual sharing of nudes and semi-nudes images and/or videos
County lines
Domestic abuse
Female Genital Mutilation
Homelessness
So-called 'honour-based' violence including FGM and Forced Marriage
Preventing radicalisation
Peer on peer abuse
Sexual violence and sexual harassment between children
Serious Violence
Upskirting

Children who go missing during the school day

If it is suspected that a child has gone missing the Headteacher should be informed immediately or in her absence the Deputy Head or the most senior member of staff on site. A roll call will be undertaken to establish whether or not the child is missing. A thorough search of the grounds and buildings will then be carried out. If the pupil is not found, the Police will be informed immediately along with the child's parents or guardians.

The same procedure will apply if a child is missing at night.

If a boarder fails to return after half-term, or holiday without explanation, a Houseparent will telephone his / her parents to establish his / her whereabouts.

The School will keep a record of any incidents involving missing pupils. On the return of a missing pupil, consideration will be given by the Headteacher, in consultation with the pupils' Parents, Tutors, Form Teachers, Houseparents, School Nurse, or School Doctor as relevant, as to the most appropriate course of action. Such a course may include an element of discipline but proper consideration will be given to the support that the pupil / boarder is likely to need including the possibility of counselling or other specialist professional assistance.

Children Missing from Education

Children missing from education (CME) are defined as children of compulsory school age who are not:

- on a school roll
- placed in alternative provision by the local authority
- receiving a suitable education elsewhere, either at home or within the private sector.

Children who are CME are at risk of poor educational outcomes and are more likely to become NEET (not in education, employment or training) later in life. Going missing from home, care or school can also be an indicator of abuse or harm and young people who are out of education are more vulnerable to becoming involved in substance misuse, anti-social and criminal behaviour, child sexual exploitation and violent extremism. Where children are already going missing from school this may indicate that they are already involved.

A pre school age child may be missing from early education and childcare where early years provision is part of the package of care for a child known to Camden SSW and there is an expectation that the child attends.

In line with Camden Supporting People Directorate's - Children missing from education: guidance for schools, social workers and education staff Parents and Schools have the following duties:

Duties of Parents

Parents have a duty to ensure that children of compulsory school age are receiving a suitable full time education. This may be at home or at a school and parents have a right to withdraw their child for home schooling at any time provided the child is not subject to a School Attendance Order. Where parents wish to remove the child for home education, they should give written notification to the school and the school must take the child's name off the school roll and notify the local authority. Camden may use a School Attendance Order to ensure parents have their child registered on a school roll where the child is not already registered. Camden will also prosecute parents where there is an issue of non-attendance for a child who is registered on a school roll. Action will be taken by the Education Welfare Service (EWS) in line with the policy set out in the School Attendance Order handbook.

The Schools Duties

- Schools have a statutory duty to:
- ensure details of the pupil are on the admission register when the child first registers at the school;
- monitor pupil attendance through daily attendance records;
- carry out reasonable enquiries about the child's whereabouts if the child fails to attend;
- notify Camden's Education services (via the Monitoring and Inclusion Officer) where:
 - a pupil's name is added to the school roll outside of the normal transition points (notification to be sent to the Admissions team)
 - a pupil does not attend for 10 school days or more without permission (notification to be sent to the EWS)
 - the school is about to remove the pupil's name from the roll on any of the grounds listed in Appendix 1 (notification to be sent to the Monitoring and Inclusion Officer).

Private Fostering

A private fostering arrangement is one that is made privately (without the involvement of a local authority) for the care of a child under the age of 16 years (under 18, if disabled) by someone other than a parent or close relative, in their own home, with the intention that it should last for 28 days or more. (*Close family relative is defined as a 'grandparent, brother, sister, uncle or aunt' and includes half-siblings and step-parents; it does not include great-aunts or uncles, great grandparents or cousins.)

Most frequently, young people are in private foster care for the following reasons:

- children from other countries sent to live in the UK with extended family
- host families for language schools
- parental ill-health
- where parents who have moved away, but the child stays behind (eg. to stay at the same school to finish exams)
- teenagers estranged from their families

The Ofsted report into Private Fostering also refers to these reasons:

- children brought from outside the UK with a view to adoption
- children at independent boarding schools who do not return home for holidays and are placed with host families
- trafficked children

The Duty to refer to the Local Authority

Each party involved in the private fostering arrangement has a legal duty to inform the relevant local authority at least six weeks before the arrangement is due to start. Not to do so is a criminal offence.

Once the notification has been made to the authority, Children's Services have a duty to visit and speak to the child, the parent and the foster carer; and everyone in the foster carers household. Children's services will then undertake a range of suitability checks including DBS checks on everyone in the household over the age of 16.

Heathside School has a responsibility to report to the local authority if we become aware or suspect that a child is subject to a private fostering arrangement. (see 'Replacement Children Act 1989 Guidance on Private Fostering 2005 paragraph 2.6)

Note that although schools have a duty to inform the local authority, there is no duty for anyone, including the private foster carer or social workers to inform the school. However, it we should be clear as to who has parental responsibility.

Children with family members in prison

Approximately 200,000 children have a parent sent to prison each year. These children are at risk of poor outcomes including poverty, stigma, isolation and poor mental health. NICCO (National Information Centre on Children of Offenders) (www.nicco.org.uk) provides information designed to support professionals working with offenders and their children, to help mitigate negative consequences for those children.

Child Sexual Exploitation (CSE) and Serious Violence

Child sexual exploitation is a form of child sexual abuse. It occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or young person under the age of 18 into sexual activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial advantage or increased status of the perpetrator or facilitator. The victim may have been sexually exploited even if the sexual activity appears consensual. Child sexual exploitation does not always involve physical contact, it can also occur through the use of technology. Like all forms of child sex abuse, child sexual exploitation:

- can affect any child or young person (male or female) under the age of 18 years, including 16 and 17 year olds who can legally consent to have sex;
- can still be abuse even if the sexual activity appears consensual;
- can include both contact (penetrative and non-penetrative acts) and non-contact sexual activity;
- can take place in person or via technology, or a combination of both;
- can involve force and/or enticement-based methods of compliance and may, or may not, be accompanied by violence or threats of violence;
- may occur without the child or young person's immediate knowledge (e.g. through others copying videos or images they have created and posted on social media);
- can be perpetrated by individuals or groups, males or females, and children or adults. The abuse can be a one-off occurrence or a series of incidents over time, and range from opportunistic to complex organised abuse; and
- is typified by some form of power imbalance in favour of those perpetrating the abuse. Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including gender, sexual identity, cognitive ability, physical strength, status, and access to economic or other resources.

Some of the following signs may be indicators of child sexual exploitation and/or serious violence:

- children who appear with unexplained gifts or new possessions;
- children who show signs of self-harm
- children who show signs of assault or unexplained injuries
- children who change their friendship groups or relationships to older individuals or groups
- children who associate with other young people involved in exploitation or involved with, individuals associated with criminal networks or gangs;
- 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.
- children with increased absenteeism
- children showing a significant decline in performance

Child criminal exploitation: county lines

Child Criminal Exploitation (CCE) is where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child into any criminal activity

- (a) in exchange for something the victim needs or wants, and/or
- (b) for the financial or other advantage of the perpetrator or facilitator and/or
- (c) through violence or the threat of violence.

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

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

County Lines

County lines is a 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 and vulnerable adults exploited to move [and store] drugs and money. Offenders will often use coercion, intimidation, violence (including sexual violence) and weapons to ensure compliance of victims. Children can easily become trapped by this type of exploitation as county lines gangs create drug debts and can threaten serious violence and kidnap towards victims (and their families) if they attempt to leave the county lines network.

Criminal exploitation of children is a geographically widespread form of harm that is a typical feature of county lines criminal activity: drug networks or gangs groom and exploit children and young people to carry drugs and money from urban areas to suburban and rural areas, market and seaside towns. Key to identifying potential involvement in county lines are missing episodes, when the victim may have been trafficked for the purpose of transporting drugs and a referral to the National Referral Mechanism should be considered.

Like other forms of abuse and exploitation, CCE:

- 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 year
- 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.

Consensual and non-consensual sharing of nudes and semi-nudes images and/or videos

Sharing nudes and semi-nudes: advice for education settings working with children and young people – UK Council for Child & Internet Safety (December 2020) guidance for staff

In August 2015 the UK Council for Child Internet Safety (UKCCIS) published non- statutory guidance on managing incidents of sexting by under-18s.

The UKCCIS advice is non-statutory, and schools and colleges should read this alongside:

- [Keeping children safe in education](#): statutory guidance (DfE)
- [Sexual violence and sexual harassment between children in schools and colleges](#): non-statutory advice (DfE)
- [Searching, screening and confiscation](#): non-statutory advice (DfE).

The advice replaces ‘Sexting in schools and colleges: responding to incidents and safeguarding young people’ published in 2016 by UKCIS in collaboration with the NPCC and Charlotte Aynsley and it should be followed unless there’s a good reason not to do so.

The UKCCIS guidance talks about “youth produced sexual imagery”. This is imagery created by under-18s themselves and involves still photographs, video, and streaming. In this revised guidance, uses the term ‘sharing nudes and semi-nudes’ to mean the sending or posting of nude or semi-nude images, videos or live streams by young people under the age of 18 online. This could be via social media, gaming platforms, chat apps or forums. It could also involve sharing between devices via services like Apple’s AirDrop which works offline.

The term ‘nudes’ is used as it is most commonly recognised by young people and more appropriately covers all types of image sharing incidents. Alternative terms used by children and young people may include ‘dick pics’ or ‘pics’.

The motivations for taking and sharing nude and semi-nude images, videos and live streams are not always sexually or criminally motivated. Such images may be created and shared consensually by young people who are in relationships, as well as between those who are not in a relationship. It is also possible for a young person in a consensual relationship to be coerced into sharing an image with their partner. Incidents may also occur where:

- children and young people find nudes and semi-nudes online and share them claiming to be from a peer
- children and young people digitally manipulate an image of a young person into an existing nude online
- images created or shared are used to abuse peers e.g. by selling images online or obtaining images to share more widely without consent to publicly shame

Further guidance on the motivations for taking and sharing images and videos can be found in section 1.6 of the guidance.

The sharing of nudes and semi-nudes can happen publicly online, in 1:1 messaging or via group

chats and closed social media accounts.

Nude or semi-nude images, videos or live streams may include more than one child or young person.

Creating and sharing nudes and semi-nudes of under-18s (including those created and shared with consent) is illegal which makes responding to incidents involving children and young people complex. There are also a range of risks which need careful management from those working in education settings.

Alternative definitions

Many professionals may refer to 'nudes and semi-nudes' as:

- youth produced sexual imagery or 'youth involved' sexual imagery
- indecent imagery. This is the legal term used to define nude or semi-nude images and videos of children and young people under the age of 18.
- 'sexting'. Many adults may use this term, however some young people interpret sexting as 'writing and sharing explicit messages with people they know' rather than sharing images
- image-based sexual abuse. This term may be used when referring to the non-consensual sharing of nudes and semi-nudes

Terms such as 'revenge porn' and 'upskirting' are also used to refer to specific incidents of nudes and semi-nudes being shared. However, these terms are more often used in the context of adult-to-adult non-consensual image sharing offences outlined in s.33-35 of the Criminal Justice and Courts Act 2015, Voyeurism (Offences) Act 2019 and s.67A of the Sexual Offences Act 2003.

Incidents covered by the guidance:

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

Incidents not covered by the guidance:

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

Upskirting

- 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.

Response to incidents of youth produced sexual imagery

When an incident involving nudes and semi-nudes comes to the attention of any member of staff:

- the incident should be referred to the DSL via CPOMS as soon as possible
- the DSL (or deputy) should hold an initial review meeting with appropriate staff. This may include the staff member(s) who heard the disclosure and the safeguarding or leadership team who deal with safeguarding concerns
- there should be subsequent interviews with the children or young people involved (if appropriate)
- parents and carers should be informed at an early stage and involved in the process in order to best support the child or young person unless there is good reason to believe that involving them would put the child or young person at risk of harm
- a referral should be made to children's social care and/or the police immediately if there is a concern that a child or young person has been harmed or is at risk of immediate harm at any point in the process

The Law

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

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

- A naked young person
- A topless girl
- An image which displays genitals, and Sex acts including masturbation

Indecent images may also include overtly sexual images of young people in their underwear. These laws weren't created to criminalise young people but to protect them.

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

The National Police Chiefs' Council (NPCC) is clear that "youth-produced sexual imagery should

be primarily seen as a safeguarding issue”.

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

Crime Recording

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

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

Outcome 21: this outcome code allows the police discretion not to take further action if it is not in the public interest, even though there is enough evidence to prosecute. Using this outcome code is likely to mean the offence would not appear on a future Enhanced DBS check, although not impossible, as that disclosure is a risk based decision. Schools can be assured that the police have the discretion they need not to adversely impact young people in the future.

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

- An adult
- Coercion, blackmail, grooming Concerns about capacity, consent
- Images show atypical sexual behaviour for the child's developmental age
- Violent acts are depicted
- Image shows sex acts and includes a child under 13
- A young at risk of image harm as a result of the disclosure (for example self-harm or suicide)

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

Assessing Risks once the images have been shared:

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

Viewing images:

Avoid viewing youth-produced sexual imagery. Instead, respond to what you have been told the image contains. If it is necessary to view, discuss with the head teacher first.

- Never copy, print or share the image (it's illegal)

- View with another member of staff present
 - Record the fact that the images were videoed along with reasons and who was present.
- Sign and date.

Deleting images (from devices and social media)

If the school has decided that involving other agencies is not necessary, consideration should be given to deleting the images. It is recommended that pupils are asked to delete the images themselves to confirm they have done so. This should be recorded, signed and dated. Any refusal to delete the images should be treated seriously, reminding the pupil that possession is unlawful.

Summary:

Not “sexting” but “youth produced sexual imagery” Although illegal, police involvement is not always necessary Images can be deleted and incident managed in school Risk-based approach The safeguarding policy reflects the guidance and relevant safeguarding and pastoral staff are aware of it.

Domestic Abuse

Heathside recognises domestic abuse as any incident or pattern of incidents of controlling, coercive or threatening behaviour, violence or abuse between those aged 16 or over who are or have been intimate partners or family members regardless of gender or sexuality.

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.

A Designated Safeguarding Lead must be informed of any suspicions and then follow up their enquiry with Camden Safeguarding Children Partnership..

If a victim of abuse is identified as a member of the school community, Heathside staff may be required by law, to attend a Multi-Agency Risk Assessment Conference (**MARAC**) where information is shared on the highest risk cases of domestic violence and abuse between different statutory and voluntary sector agencies.

The cross-government definition of domestic violence and abuse is:

Any incident or pattern of incidents of controlling, coercive, threatening behaviour, violence or abuse between those aged 16 or over who are, or have been, intimate partners or family members regardless of gender or sexuality. The abuse can encompass, but is not limited to:

- psychological;
- physical;
- sexual;
- financial; and
- emotional

Exposure to domestic abuse and/or violence can have a serious, long lasting emotional and psychological impact on children. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result. Domestic abuse affecting young people can also occur within their personal relationships, as well as in the context of their home life.

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

<https://www.nspcc.org.uk/preventing-abuse/child-abuse-and-neglect/domestic-abuse/signs-symptoms-effects/>

<http://www.refuge.org.uk/get-help-now/support-for-women/what-about-my-children/>

Homelessness

Being homeless or being at risk of becoming homeless presents a real risk to a child's welfare. The designated safeguarding lead (and any deputies) should be aware of contact details and referral routes into the Local Housing Authority so they can raise/progress concerns at the earliest opportunity. Indicators that a family may be at risk of homelessness include household debt, rent arrears, domestic abuse and anti-social behaviour, as well as the family being asked to leave a property. Whilst referrals and or discussion with the Local Housing Authority should be progressed as appropriate, this does not, and should not, replace a referral into children's social care where a child has been harmed or is at risk of harm.

The Homelessness Reduction Act 2017 places a new legal duty on English councils so that everyone who is homeless or at risk of homelessness will have access to meaningful help including an assessment of their needs and circumstances, the development of a personalised housing plan, and work to help them retain their accommodation or find a new place to live. The following factsheets usefully summarise the new duties: Homeless Reduction Act Factsheets <https://www.gov.uk/government/publications/homelessness-reduction-bill-policy-factsheets>.

The new duties shift focus to early intervention and encourage those at risk to seek support as soon as possible, before they are facing a homelessness crisis.

In most cases, school and college staff will be considering homelessness in the context of children who live with their families, and intervention will be on that basis. However, it should also be recognised in some cases 16 and 17 year olds could be living independently from their parents or guardians, for example through their exclusion from the family home, and will require a different level of intervention and support. Children's services will be the lead agency for these young people and the designated safeguarding lead (or a deputy) should ensure appropriate referrals are made based on the child's circumstances.

'Honour-based' abuse including Female Genital Mutilation and Forced Marriage

'Honour-based' abuse (HBA) encompasses incidents or crimes which have been committed to protect or defend the honour of the family and/or the community, including female genital mutilation (FGM), forced marriage, and practices such as breast ironing. Abuse committed in the context of preserving "honour" often involves a wider network of family or community pressure and can include multiple perpetrators. It is important to be aware of this dynamic and additional risk factors when deciding what form of safeguarding action to take. All forms of HBA are abuse (regardless of the motivation) and should be handled and escalated as such. Staff in the school need to be alert to the possibility of a child being at risk of HBA, or already having suffered HBA.

Actions

If staff have a concern regarding a child that might be at risk of HBA or who has suffered from HBA, they should speak to the designated safeguarding lead (or deputy). As appropriate, they will activate local safeguarding procedures, using existing national and local protocols for multi-agency liaison with police and children's social care. Where FGM has taken place, since 31 October 2015 there has been a mandatory reporting duty placed on **teachers**¹ that requires a different approach (see following section)

Female genital mutilation (FGM)

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

FGM mandatory reporting duty for teachers

Section 5B of the Female Genital Mutilation Act 2003 (as inserted by section 74 of the Serious Crime Act 2015) places a statutory duty upon **teachers** along with regulated health and social care professionals in England and Wales, to report to the police where they discover (either through disclosure by the victim or visual evidence) that FGM appears to have been carried out on a girl under 18. Those failing to report such cases will face disciplinary sanctions. It will be rare for teachers to see visual evidence, and they should **not** be examining pupils.

All staff must be aware of the requirement for teachers 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. Teachers **must** personally report to the police cases where they discover that an act of FGM appears to have been carried out. The report should be made orally by calling 101, the single non-emergency number. Those failing to report such cases will face disciplinary sanctions. Unless the teacher has a good reason not to, they should still consider and discuss any such case with the DSL and involve children's social care as appropriate.

The duty does not apply in relation to at risk or suspected cases (i.e. where the teacher does not discover that an act of FGM appears to have been carried out, either through disclosure by the victim or visual evidence) or in cases where the woman is 18 or over. In these cases, teachers should follow local safeguarding procedures.

If the teacher is unsure whether this reporting duty applies, they must refer the matter to the DSL in accordance with this policy. See the Home Office guidance Mandatory Reporting of Female Genital Mutilation - procedural information for further details about the duty.

Guidance published by the Department for Health also provides useful information and support for health professionals, which will be taken into account by the School's wellbeing team.

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Guidance published by the Department for Health also provides useful information and support for health professionals, which will be taken into account by the School's wellbeing team.

Forced Marriage

Forcing a person into marriage is a crime in England and Wales. A forced marriage is one entered into without the full and free consent of one or both parties and where violence, threats or any other form of coercion is used to cause a person to enter into a marriage. Threats can be physical or emotional and psychological. A lack of full and free consent can be where a person does not consent or where they cannot consent (if they have learning disabilities, for example). Nevertheless, some communities use religion and culture as a way to coerce a person into marriage.

Staff should speak to the DSL if they have any concerns. Staff should refer to the Multi-agency guidelines: Handling case of forced marriage focus on the role of schools in detecting and reporting forced marriage and the Forced Marriage Unit can be contacted on 020 7008 0151 or fm@fco.gov.uk for advice and information.

Radicalisation and the PREVENT DUTY

Heathside staff are aware that they are expected to assess the risk of any pupils susceptible to terrorism. We must seek to protect our children against messages of all violent extremism.

Online Prevent Duty training (Channel General Awareness Module) is undertaken yearly by all Heathside staff through the 'College of Policing'.

<http://www.college.police.uk/Pages/Home.aspx>

As a school, we must be conscious of the current threat from terrorism in the United Kingdom, which may include the exploitation of vulnerable people to involve them in terrorism or in any activity in support of terrorism.

The normalisation of extreme views may also make children and young people vulnerable to future manipulation and exploitation. If any staff have concerns related to terrorism or radicalisation, they must inform one or more of the Safeguarding Leads immediately.

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

colleges' safeguarding approach.

- The School has a legal duty to have due regard to the need to prevent people from being drawn into terrorism.
- The School aims to build pupils' resilience to radicalisation by promoting fundamental British values and enabling them to challenge extremist views. Being drawn into terrorism includes not just violent extremism but also non-violent extremism, which can create an atmosphere conducive to terrorism and can popularise views which terrorists exploit.
- The School is committed to providing a safe space in which children, young people and staff can understand and discuss sensitive topics, including terrorism and the extremist ideas that are part of the terrorist ideology, understand the risks associated with terrorism and develop the knowledge and skills to be able to challenge extremist arguments.

The School has adopted the Government's definitions for the purposes of compliance with the Prevent duty:

- Extremism: "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"
- Radicalisation: "the process by which a person comes to support terrorism and forms of extremism leading to terrorism"

There is no single way of identifying an individual who is likely to be susceptible to a terrorist ideology. As with managing other safeguarding risks, staff should be alert to changes in children's behaviour which could indicate that they may be in need of help or protection. Children at risk of radicalisation may display different signs or seek to hide their views. School staff should use their professional judgement in identifying children who might be at risk of radicalisation and act proportionately which may include the designated safeguarding lead (or deputy) making a referral to the Channel programme.

In particular, outward expressions of faith, in the absence of any other indicator of vulnerability, will not be regarded as a reason to make a referral to Channel.

Channel Duty Guidance: Protecting vulnerable people from being drawn into terrorism (2015) notes the following:

There is no single way of identifying who is likely to be vulnerable to being drawn into terrorism. Factors that may have a bearing on someone becoming vulnerable may include: peer pressure, influence from other people or via the internet, bullying, crime against them or their involvement in crime, anti-social behaviour, family tensions, race/hate crime, lack of self-esteem or identity and personal or political grievances.

Example indicators that an individual is engaged with an extremist group, cause or ideology include:

- spending increasing time in the company of other suspected extremists;
- changing their style of dress or personal appearance to accord with the group;
- day-to-day behaviour becoming increasingly centred around an extremist ideology, group or cause;

- loss of interest in other friends and activities not associated with the extremist ideology, group or cause;
- possession of material or symbols associated with an extremist cause (e.g. the swastika for far-right groups);
- attempts to recruit others to the group/cause/ideology; or
- communications with others that suggest identification with a group/cause/ideology.

Example indicators that an individual has an intention to cause harm, use violence or other illegal means include:

- clearly identifying another group as threatening what they stand for and blaming that group for all social or political ills;
- using insulting or derogatory names or labels for another group;
- speaking about the imminence of harm from the other group and the importance of action now;
- expressing attitudes that justify offending on behalf of the group, cause or ideology;
- condoning or supporting violence or harm towards others; or
- plotting or conspiring with others.

Protecting children from the risk of radicalisation is part of the School's wider safeguarding duties and is similar in nature to protecting children from other harms (e.g. drugs, gangs, neglect, sexual exploitation), whether these come from within their family or are the product of outside influences.

The DfE briefing notes the use of social media for on-line radicalisation (2015) includes information on how social media is used to radicalise young people and guidance on protecting pupils at risk.

Peer on peer abuse

Children can abuse other children. This is generally referred to as peer on peer abuse and can take many forms. This 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. Please also refer to the section on sexual violence and sexual harassment (page 31).

The Schools approach to tackling Peer on Peer abuse

Sexual violence and sexual harassment between children in schools

Context

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. All staff at Heathside are advised to maintain an attitude of **'it could happen here'**.

Part 5 of the statutory guidance KCSIE 2021 states that schools should respond to all reports and concerns of child on child sexual violence and sexual harassment, including those that have happened outside of the school or college premises, and or online.

Children who are victims of sexual violence and sexual harassment will likely find the experience stressful and distressing. This will, in all likelihood, adversely affect their educational attainment. Sexual violence and sexual harassment exist on a continuum and may overlap, they can occur online and offline (both physical and verbal) and are never acceptable. It is important that **all** victims are taken seriously and offered appropriate support. Staff should be aware that some groups are potentially more at risk. Evidence shows girls, children with SEND and LGBT children are at greater risk.

Staff should be aware of the importance of:

- making clear that sexual violence and sexual harassment is not acceptable, will never be tolerated and is not an inevitable part of growing up;
- not tolerating or dismissing sexual violence or sexual harassment as “banter”, “part of growing up”, “just having a laugh” or “boys being boys”; and
- challenging behaviours (potentially criminal in nature), such as Sexist remarks or Jokes, grabbing bottoms, breasts and genitalia, flicking bras and lifting up skirts. Dismissing or tolerating such behaviours risks normalising them.

When referring to sexual violence it now includes sexual offences under the Sexual Offences Act 2003 which includes:

RAPE: A person (A) commits an offence of rape if: he intentionally penetrates the vagina, anus or mouth of another person (B) with his penis. B does not consent to penetration and A does not reasonably believe that B consents.

ASSAULT BY PENETRATION: a person (A) commits an offence if s/he intentionally penetrates the vagina or anus of another person (B) with a part of his/her body or anything else, the penetration is sexual, B does not consent to the penetration and A does not reasonably believe that B consents.

SEXUAL ASSAULT: A person (A) commits an offence of sexual assault if s/he intentionally touches another person (B), the touching is sexual, B does not consent to the touching and A does not reasonably believe that B consents.

What Is Consent?

Consent is about having the freedom and capacity to choose. Consent to sexual activity may be given to one sort of sexual activity but not another. Consent can be withdrawn at any time during sexual activity and each time activity occurs. Someone consents to vaginal, anal or oral penetration only if s/he agrees by choice to that penetration and has the freedom and capacity to make that choice.

A child under the age of 13 can never consent to sexual activity (the age of consent is 16), sexual intercourse without consent is rape, creating or sharing sexual images or vides of under 18s is illegal, including children making or sharing these themselves.

SEXUAL HARASSMENT

Sexual harassment is “unwanted conduct of a sexual nature” that can occur online and offline. Sexual harassment is likely to violate a child’s dignity and/or make the feel intimidated, degraded or humiliated and/or create a hostile, offensive or sexualized environment.

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

- sexual comments, such as: telling sexual stories, making lewd comments, making sexual remarks about clothes and appearance and calling someone sexualised names;
- sexual “jokes” or taunting; physical behaviour, such as: deliberately brushing against someone, interfering with someone’s clothes (schools and colleges should be considering when any of this crosses a line into sexual violence - it is important to talk to and consider the experience of the victim) and displaying pictures, photos or drawings of a sexual nature; and
- online sexual harassment. This may be standalone, or part of a wider pattern of sexual harassment and/or sexual violence. It may include:
 - non-consensual sharing of sexual images and videos;
 - sexualised online bullying;
 - unwanted sexual comments and messages, including, on social media; and
 - sexual exploitation; coercion and threats

Prevention

As a school we will minimise the risk of harm to and allegations against our pupils by:-

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

Responding to Reports of Sexual Violence or Sexual Harassment

The immediate response to a report 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 or college staff may overhear a conversation that suggests a child has been harmed or a child's own behaviour might indicate that something is wrong.

In accordance with DfE guidance, 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 or college responds to a report can encourage or undermine the confidence of future victims of sexual violence and sexual harassment to report or come forward.

It is essential that all victims are reassured that they are being taken seriously, regardless of how long it has taken them to come forward and that they will be supported and kept safe. Abuse that occurs online or outside of the school or college should not be downplayed and should be treated equally seriously. A victim should never be given the impression that they are creating a problem by reporting sexual violence or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report or their experience minimised.

In line with KCSIE 2021, all staff should be trained to manage a report. Local policies (and training) will dictate exactly how reports should be managed. However, effective safeguarding practice includes:

- if possible, managing reports with two members of staff present, (preferably one of them being the designated safeguarding lead or a deputy). However, this might not always be possible;
- where the report includes an online element, being aware of searching screening and confiscation advice (for schools) and UKCIS Sharing nudes and semi-nudes: advice for education settings working with children and young people. The key consideration is for staff not to view or forward illegal images of a child. The highlighted advice provides more details

on what to do when viewing an image is unavoidable. In some cases, it may be more appropriate to confiscate any devices to preserve any evidence and hand them to the police for inspection;

- not promising confidentiality at this initial stage as it is very likely a concern will have to be shared further (for example, with the designated safeguarding lead or children's social care) to discuss next steps. Staff should only share the report with those people who are necessary in order to progress it. It is important that the victim understands what the next steps will be and who the report will be passed to;
- recognising that a child is likely to disclose to someone they trust: this could be anyone on the school or college staff. It is important that the person to whom the child discloses recognises that the child has placed them in a position of trust. They should be supportive and respectful of the child;
- recognising that an initial disclosure to a trusted adult may only be the first incident reported, rather than representative of a singular incident and that trauma can impact memory and so children may not be able to recall all details or timeline of abuse;
- keeping in mind that certain children may face additional barriers to telling someone because of their vulnerability, disability, sex, ethnicity and/or sexual orientation;
- listening carefully to the child, reflecting back, using the child's language, being non-judgmental, being clear about boundaries and how the report will be progressed, not asking leading questions and only prompting the child where necessary with open questions – where, when, what, etc. It is important to note that whilst leading questions should be avoided, staff can ask children if they have been harmed and what the nature of that harm was;
- considering the best way to make a record of the report. Best practice is to wait until the end of the report and immediately write up a thorough summary. This allows the staff member to devote their full attention to the child and to listen to what they are saying. It may be appropriate to make notes during the report (especially if a second member of staff is present). However, if making notes, staff should be conscious of the need to remain engaged with the child and not appear distracted by the note taking. Either way, it is essential a written record is made;
- only recording the facts as the child presents them. The notes should not reflect the personal opinion of the note taker. Schools and colleges should be aware that notes of such reports could become part of a statutory assessment by children's social care and/or part of a criminal investigation; and
- informing the designated safeguarding lead (or deputy), as soon as practically possible, if the designated safeguarding lead (or deputy) is not involved in the initial report.

Where an incident between two or more pupils takes place away from the school, the school's duties remain the same.

After a Disclosure

- Staff have been trained in managing disclosures as per KCSIE 2021.
- Staff will never promise confidentiality.
- The school is aware of anonymity in cases where an allegation is progressing through the criminal justice system.
- The school will do all they reasonably can to protect the anonymity of any children involved in any report of sexual violence or sexual harassment, including considering the impact on social media.
- The school will make a risk assessment and consider the victim, alleged perpetrator and other children at the school.
- The school will act in the best interest of the child at all times.
- Whilst the facts are being established, the school will remove the alleged perpetrator from any classes shared with the victim and consider how best to keep them a reasonable distance apart, in the interests of both children.
- The school considers it of paramount importance that both the victim and perpetrator remain protected, especially from bullying or harassment. Where no further action is taken, or a child found not guilty, the school will continue to support the victim and perpetrator.

There are four likely scenarios when managing any reports of sexual violence and/or sexual harassment. It is particularly important to look out for potential patterns of concerning, problematic or inappropriate behaviour. Where a pattern is identified, the school should decide on a course of action. Consideration should be given to whether there are wider cultural issues within the school that enabled the inappropriate behaviour to occur and where appropriate extra teaching time and/or staff training should be delivered to minimise the risk of it happening again.

In all scenarios, all concerns, discussions, decisions and reasons for decisions should be recorded within CPOMS and the response, should be under-pinned by the principle that there is zero tolerance approach to sexual violence and sexual harassment and it is never acceptable and will not be tolerated at Heathside.

The four scenarios are:

1. Manage internally

- In some cases of sexual harassment, for example, one-off incidents, the school may take the view that the children concerned are not in need of early help or that referrals need to be made to statutory services and that it would be appropriate to handle the incident internally, perhaps through utilising the behaviour policy and by providing pastoral support.
- Whatever the response, it should be underpinned by the principle that there is a zero tolerance approach to sexual violence and sexual harassment and it is never acceptable and will not be tolerated.

2. Early help

The school may decide that the children involved do not require referral to statutory services but may benefit from early help. Providing early help is more effective in promoting the welfare of children than reacting later. Early help can be particularly useful to address non-violent HSB and may prevent escalation of sexual violence. It is also worth noting that Early help and the option to manage a report internally do not need to be mutually exclusive: a school could manage internally and seek early help

for both the victim and perpetrator(s).

3. Referrals to children's social care

Where a child has been harmed, is at risk of harm, or is in immediate danger, the school should make a referral to Camden MASH .

At the point of referral to children's social care, parents or carers should be informed unless there are compelling reasons not to (if informing a parent or carer is going to put the child at additional risk). Any such decision should be made with the support of children's social care.

If a referral is made, children's social care will then make enquiries to determine whether any of the children involved are in need of protection or other services.

Where statutory assessments are appropriate, the safeguarding lead or a deputy should work alongside, and cooperate with, the lead social worker. Collaborative working will help ensure the best possible package of coordinated support is implemented for the victim and, where appropriate, the alleged perpetrator(s) and any other children that require support.

The school should not wait for the outcome (or even the start) of a children's social care investigation before protecting the victim and other children in the school in accordance with KCSIE 2021 and the associated guidance. It will be important for the designated safeguarding lead (or a deputy) to work closely with children's social care (and other agencies as required) to ensure any actions the school takes do not jeopardise any investigation.

The risk assessment as per paragraph 444-446 of KCSIE 2021 will help inform any decision. Consideration of safeguarding the victim, alleged perpetrator(s), any other children directly involved in the safeguarding report and all children at the school or college should be immediate.

In some cases, children's social care will review the evidence and decide a statutory intervention is not appropriate. In this case the safeguarding team should consider other support mechanisms such as early help, specialist support and pastoral support.

The school should be prepared to refer again if they believe the child remains in immediate danger or at risk of harm.

4. Reporting to the Police

Where a report of rape, assault by penetration or sexual assault is made, the starting point is that this should be passed on to the police. Whilst the age of criminal responsibility is ten, if the alleged perpetrator(s) is under ten, the starting principle of reporting to the police remains. The police will take a welfare, rather than a criminal justice, approach. The following advice may help schools and colleges decide when to engage the Police and what to expect of them when they do:

When to call the police.

Where a report has been made to the police, the DSL (or Deputy) should consult the police and agree what information can be disclosed to staff and others, in particular, the alleged perpetrator(s) and their parents or carers. They should also discuss the best way to protect the victim and their anonymity.

At this stage, the school will, with the support of children's social care and any appropriate specialist agencies, generally inform parents or carers unless there are compelling reasons not to, for example, if informing a parent or carer is likely to put a child at additional risk. In circumstances where parents or carers have not been informed, it will be especially important that the school is supporting the child in any decision they take.

In some cases, it may become clear very quickly that the police (for whatever reason) will not take further action. In such circumstances, it is important that the school continues to engage with specialist support for the victim and alleged perpetrator(s) as required.

Whilst protecting children and/or taking any disciplinary measures against the alleged perpetrator(s), it will be important for the designated safeguarding lead (or a deputy) to work closely with the police (and other agencies as required), to ensure any actions the school or college take do not jeopardise the police investigation.

If the school has any questions about the investigation, they should be directed to the police who will help and support the school as much as they can (within the constraints of any legal restrictions).

- It may be appropriate to exclude the pupil being complained about for a period of time according to the school's behaviour policy and procedures;
- Where neither social services nor the police accept the complaint, a thorough school investigation should take place into the matter using the school's usual disciplinary procedures;
- In situations where the school considers a safeguarding risk is present, a risk assessment should be prepared along with a preventative, supervision plan;
- The plan should be monitored and a date set for a follow-up evaluation with everyone concerned.

On-going Response:

- Support for the victim will consider their age, the nature of the allegations and risk of further abuse.
- The needs and wishes of the victim are considered paramount and they should be able to continue their normal routine as far as possible.
- The school will be prepared to support the victim over a long period of time.
- Where the victim or perpetrator moves to another school the new school will be made aware of on-going support needs.
- The school will ensure that the victim is safeguarded but will still provide the perpetrator with an education and support as necessary.
- Support for the alleged perpetrator will also consider their age, the nature of the allegations. An alleged perpetrator may have unmet needs themselves.
- The school may discipline the alleged perpetrator, including while the investigation is on-going, although they will liaise with the police and social care to assist in determining sanctions.
- The school will be clear about when their actions are to support the victim or the perpetrator, and when their actions are to discipline the perpetrator for their past conduct.

Working with Parents & Carers:

The school will engage with the parents of both victim and perpetrator and will consider carefully what information they provide. The school will always meet with the victim's parents with the

victim present to discuss safeguarding arrangements. The school will also meet with the perpetrators parents to discuss what arrangements are being put in place, such as moving them out of classes.

Other children in the school may also need support, especially if they have witnessed sexual violence. Children may take “sides” following an incident and the school will do all they can to ensure neither victim nor perpetrator (or witnesses) are bullied or harassed.

Helpline

NSPCC has set up a dedicated Helpline to support the victims of Sexual abuse:

Tel: 0808 800 5000,

email: help@nspcc.org.uk or fill in their online form at:

<https://www.nspcc.org.uk/what-is-child-abuse/types-of-abuse/child-sexual-abuse/>

Allegations against other pupils which are safeguarding issues

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

If the allegation:-

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

Examples of safeguarding issues against a student could include:

1. Physical Abuse

- a) Violence, particularly pre-planned, e.g. honour-based violence
- b) Forcing others to use drugs or alcohol

2. Emotional Abuse

- a) Blackmail or extortion
- b) Threats and intimidation

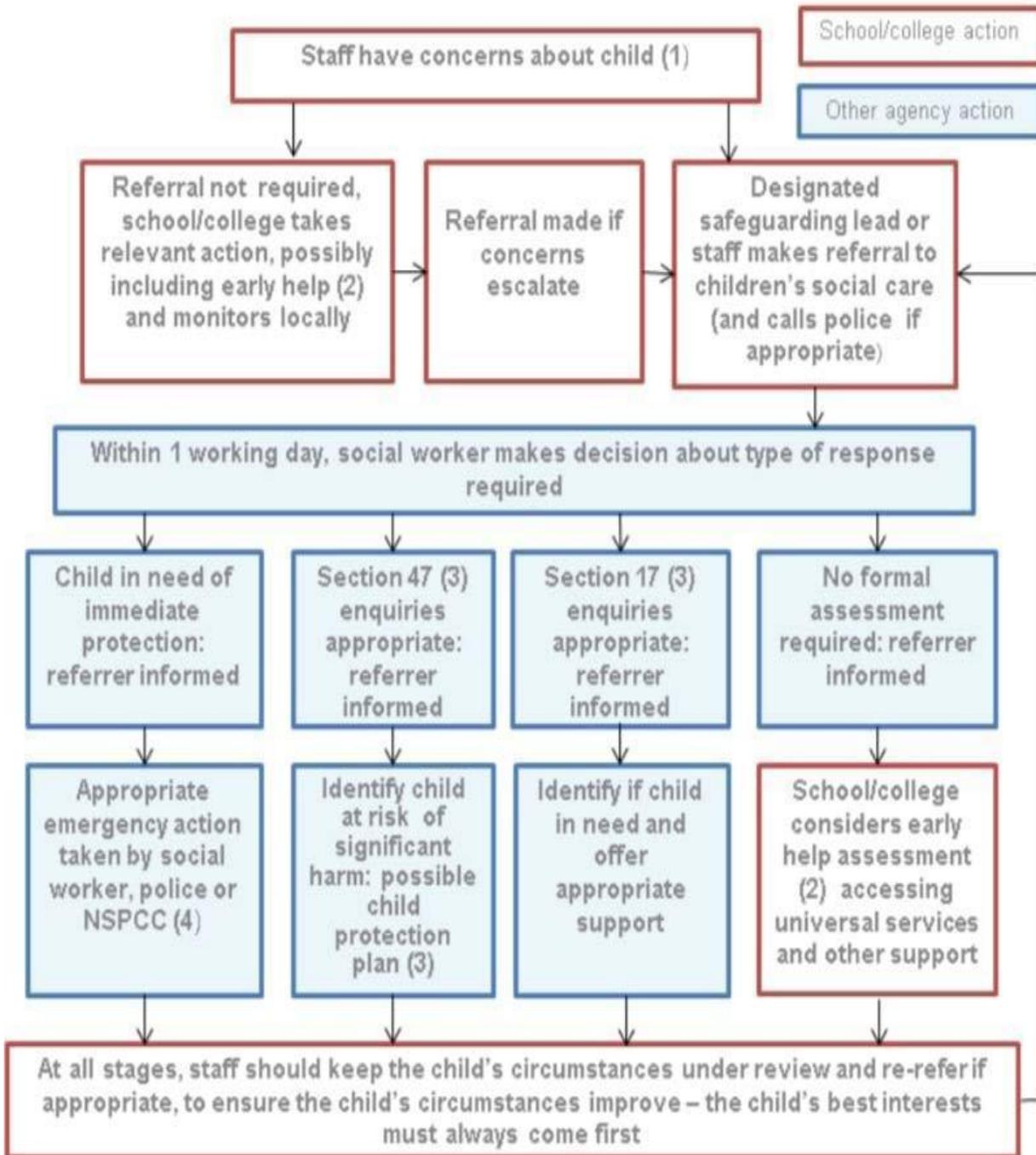
3. Sexual Abuse

- a) Indecent exposure, indecent touching or serious sexual assaults
- b) Forcing others to watch pornography or take part in sexting
- c) Upskirting

4. Sexual Exploitation

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

Actions where there are concerns about a child



HEATHSIDE SCHOOL

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Job Description for the Designated Safeguarding Lead

Working Together to Safeguarding Children July 2018 states that schools should work with social care, the police, health services and other services to promote the welfare of children and protect them from harm. This includes a coordinated offer of early help when additional needs are identified

The broad areas of responsibility for the designated safeguarding lead are:

Managing referrals

- Refer all cases of suspected abuse to the local authority children's social care and the LADO (all cases which concern a staff member),
 - Disclosure and Barring Service (cases where a person is dismissed or left due to risk/harm to a child); and/or
 - Police (cases where a crime may have been committed).
- Liaise with the Headteacher to inform her of issues especially ongoing enquiries under section 47 of the Children Act 1989 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.

Training

The designated safeguarding lead should receive appropriate training carried out every two years 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.
- Have a working knowledge of how local authorities conduct a child protection case conference and a child protection review conference and be able to attend and contribute to these effectively when required to do so.
- Ensure each member of staff has access to and understands the school's or college's Safeguarding and Child Protection Policy and procedures, especially new and part time staff.
- 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 school or college may put in place to protect them.

Raising Awareness

- The designated safeguarding lead should ensure the school's policies are known and used appropriately:
- Ensure the school's Safeguarding and Child Protection Policy is reviewed annually and the procedures and implementation are updated and reviewed regularly, and work with the schools Governing body regarding this
- be aware of pupils who have a social worker
- help promote educational outcomes by sharing the information about the welfare, safeguarding and child protection issues with teachers and school and college leadership staff.
- Ensure the Safeguarding and Child Protection Policy is available publicly and parents are aware of the fact that referrals about suspected abuse or neglect may be made and the role of the school in this.
- Link with the CSCP to make sure staff are aware of training opportunities and the latest local policies on safeguarding.
- Where children leave the school ensure their child protection file is transferred to the new school or college as soon as possible. This should be transferred separately from the main pupil file, ensuring secure transit and confirmation of receipt should be obtained.

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Safeguarding and Child Protection Annual Checklist for Staff

Name Position

- I have received the School's Safeguarding Policy and know how to access the most up to date version of it on the school's website
- I have received Keeping Children Safe in Education 2020 (Part 1) and Annex A and I have read them and understand them.
- I have received the Staff Code of Conduct, have read it and agree to abide by it and understand that I may be the subject of disciplinary action should I fail to do so.
- I have read and have an understanding of the principles outlined in the above documents and agree to abide by the contents of these documents
- I have an understanding of the current guidelines and legal contexts regarding Child Protection
- I have an understanding of the definition of abuse, the different types of abuse and what hurts children
- I fully understand the correct procedures regarding the reporting of a disclosure of abuse or a welfare concern to the relevant members of staff at Heathside Preparatory School
- I understand that I must be prepared to identify children who may benefit from early help
- I fully understand the correct procedures regarding the reporting of an allegation against a member of staff including the Head Teacher
- I am aware of the name of the Designated Safeguarding Lead and of staff members who are deputy DSLs at Heathside School
- I am aware of the Prevent Duty and understand my obligation under this duty
- I am aware of the school's Whistleblowing policy and where to access it
- I confirm that I have not been involved in any activity/incident since my last DBS/CRB check or within the last 12 months which might result in a change to my DBS (previously CRB) status, should a new check be requested. (If you are unable to confirm this, please detail any changes in writing to the Headteacher immediately. This information is given in the strictest confidence.)

Signature

Date

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Heathside Safeguarding and Welfare Reporting Form

Please use this form if you are unable to access CPOMS and hand directly to a member of the Safeguarding team.

Pupil Name:	Class:
DOB:	Male <input type="checkbox"/> Female <input type="checkbox"/>
Siblings in school?	
Yes <input type="checkbox"/> No <input type="checkbox"/>	If yes, sibling name(s)

Account of the concern: include what was said, observed, reported and by whom?

Your response: include what you said and did.

Your name:
Your position in school:

Your signature:
Date and Time of your concern:

Action and Response of the DSL:

DSL Name:	Signature	Date:
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