

# NAS(AT) Safeguarding Children (Child Protection) Policy – SO-0189

Date of Issue	1 September 2021
Date reviewed	October 2021
Date of next review	August 2022
Version Number	2.7
Policy Lead	Nominated Individual and Safeguarding Lead*  <i>*Acts in the capacity of Responsible Individual in relation to Children's Residential Services</i>
Distribution	Education and Children's services
Ratified by Board of Trustees	Dec 2020

This policy replaces:  
Safeguarding Children (Child Protection) NAS policy SO-0189 older versions  
Safeguarding Children policy NASAT-005

## EQUALITY STATEMENT

We will regularly review our policies to seek to ensure that we are

- promoting equality of opportunity
- eliminating discrimination and harassment
- valuing diversity and promoting positive relationships
- providing an inclusive education which enables all pupils to develop their full potential
- meeting the requirements of the Equality Act 2010 and the protected characteristics therein.

## QUALITY OF LIFE FRAMEWORK

All NAS schools and Children's services follow our Quality of life (QoL) Framework. In implementing this framework, we listen to pupils, parents and the child's keyworker to understand what is important to them in relation to their quality of life. We then work as a transdisciplinary team to seek to ensure we plan each child's education carefully and cohesively, shaping each pupil's provision around their EHCP and agreed developmental goals in order to develop pupils' knowledge and skills now and for the future.

**“Our goal is to help transform lives, change attitudes and create a society that works for autistic people.” The National Autistic Society**

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## 1. Purpose of this document

To outline the NAS Education Directorate's policy for NAS and NASAT schools and children's services approach to safeguarding and child protection. This policy outlines the framework for the school or children's service to meet its safeguarding duties and obligations, demonstrate best practice in relation to safeguarding and do everything it can to keep our children and pupils safe.

The policy is to be followed by:

- NAS Independent Schools
- NASAT Schools
- NAS Residential Special Schools
- NAS Children's Homes
- After School Clubs / Children's Clubs or activities
- Children's Outreach Services

This policy applies to:

- All NAS(AT) staff who work with children
- All NAS volunteers
- All Agency / Supply Staff working with children in NAS(AT) schools and services

## 2. Scope

This policy reflects the UN Convention on the Rights of the Child and acknowledges that every child has rights whatever their gender, ethnicity, religion, language, abilities or any other status. The convention makes provision for the prevention of harm for children.

Child protection is about the protection of children from violence, exploitation, abuse, neglect and radicalisation. The concerns are relevant to every child in our schools and in particular those who may be currently receiving support from statutory services.

Safeguarding and promoting the welfare of children is defined as:

- protecting children from maltreatment;
- preventing impairment of children's mental and physical health or development;
- ensuring that children grow up in circumstances consistent with the provision of safe and effective care; and
- taking action to enable all children to have the best outcomes.  
(DFE Working Together to Safeguard Children 2018)

## 3. Introduction

In the UK; Local authorities; Health and Social Care Trusts (HSCT) in Northern Ireland; and Scottish Social Services Council (SSSC) have overarching legal responsibility for safeguarding and promoting the welfare of all children and young people in their area. They have statutory functions which include specific duties in relation to children in need and children suffering and children at risk of harm including significant harm.

Whilst local statutory authorities play a lead role, safeguarding children and protecting them from harm is paramount and everyone's responsibility. Everyone who comes into contact with children and families has a role to play. Effective safeguarding arrangements should be underpinned by two key principles:

- safeguarding is everyone's responsibility: for services to be effective, each professional and organisation should play their full part; and
- a child-centred approach: for services to be effective they should be based on a clear understanding of the needs and views of children.

We recognise that we form part of the wider safeguarding system for children. This responsibility also means that we are aware of the behaviour of staff in the school; we maintain an attitude of **'it could happen here'** where safeguarding is concerned.

In all NAS(AT) schools we aim to seek to ensure that:

- All children, regardless of age, gender, ability, culture, race, language, religion or sexual identity, are treated equally and have equal rights to protection
- All staff act on concerns or disclosures that may suggest a child is at risk of harm
- Pupils and staff involved in Safeguarding issues receive appropriate support
- Staff adhere to a Code of Conduct and understand what to do in the event of any allegations against any adult working in the setting
- All staff are aware of Early Help and seek to ensure that relevant assessments and referrals take place
- All staff are aware that abuse, neglect and safeguarding issues are rarely standalone events that can be covered by one definition or label; they recognise that, in most cases, multiple issues will overlap with one another
- All staff understand that a child's needs and how they communicate those needs may be a sign they are suffering harm or that they have been traumatised by abuse.

This policy is available on our school website and printed copies of this document are available to parents upon request. We inform parents and carers about this policy when their children join our school and through other communication from our schools and services.

The policy is provided to all staff (including temporary staff and volunteers) at induction, alongside our Staff Code of Conduct.

In addition, all staff are provided with Part one of Keeping Children Safe in Education 2021 and are required to sign to indicate that they have read and understood it. The Designated Safeguarding Lead (DSL) is able to support all staff in understanding their responsibilities and implementing it in their practice.

No single person working with children can have a full picture of a child's needs and circumstances and, if children and families are to receive the right help at the right time, everyone who comes into contact with them has a role to play in identifying concerns, sharing information and taking prompt action.

In order that organisations and practitioners collaborate effectively, it is vital that every individual working with children and families is aware of the role that they have to play and the role of other professionals. Any NAS(AT) school or Service with concerns about a child's welfare should make a referral to local authority children's social care. If schools or services are not satisfied with the local authority children's social care response they should follow up their concerns and escalate as appropriate.

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

Autistic children share the right of all children to protection from abuse. We know that autistic children are potentially more vulnerable, because they may find it difficult to communicate with others, struggle with social interaction or have difficulties understanding people's motives, they may be less able to report abuse and thus be more vulnerable to it. This necessitates greater vigilance among professionals in recognising, reporting and investigating potential signs of abuse as well as ensuring that safeguarding issues remain on the agenda when working with autistic children and young people.

Identifying safeguarding issues for autistic children and knowing what should be investigated can be complex as many traits of autism can be confused with signs of abuse and neglect. Staff should be aware of this and always report concerns.

## 4. Objectives

NAS(AT) schools and children's services across the UK have responsibility to seek to ensure that policies and procedures are in place that protect, safeguard and promote the welfare of children we support. In doing so we will:

- support each child's development in ways that will foster security, confidence and independence within a safe environment
- have systems in place to identify and make provision for any pupil that has been subject to, or is at risk of, abuse, neglect, or exploitation
- have training and policies in place that seek to ensure members of the governing board, the principal, staff and volunteers understand their responsibilities under safeguarding legislation and statutory guidance, are alert to the signs of child abuse, and know to refer concerns to the DSL
- provide a systematic means of monitoring children known or thought to be at risk of harm
- emphasise the need for good levels of communication between all members of staff, and between the school / children's service and external agencies, including social services and the police
- maintain a structured set of procedures which are followed by all members of the school / service community
- to identify instances in which there are grounds for concern about a child's welfare, and initiate or take appropriate action to keep them safe
- to provide guidance on reporting suspected abuse and seek to ensure an appropriate systematic process for responding to an incident, allegation or concern of abuse
- to prevent unsuitable people working in our schools and children's services and seek to ensure that all adults who have contact with children have been checked as to their suitability as part of the recruitment and selection process, including placements and volunteers
- to provide a safe environment for children
- to promote welfare and safety of children and seek to ensure robust systems are in place to protect children and young people from harm
- to create a culture which recognises and understands the importance of safeguarding
- for staff to know their duties and how to report young people at risk of exploitation, grooming or radicalisation, female genital mutilation, peer on peer sexual abuse and other specific safeguarding issues
- seek to ensure that allegations of abuse are dealt with fairly, quickly and consistently
- support children and young people that may have been harmed, where appropriate in partnership with statutory services.

All staff in our Schools and Children's Services and our Local Governing Bodies (LGB's) believe that our schools and children's services should provide a caring, positive safe and stimulating environment that promotes the intellectual, social, physical and moral development of the individual child in a safe and nurturing place.

## 5. Operational Delivery: The procedures undertaken by the National Autistic Society with regards to safeguarding children

The NAS(AT) schools and children's services will adhere to the following procedures in relation to child protection, these are outlined in detail in the policy.

- We will follow the procedures set out by the Scottish Social Services Council (SSSC) and relevant safeguarding partners (Local Authorities, Chief Officers of Police, and Clinical Commissioning Groups) / Local Safeguarding Children's Partnerships / Local Children's Social Services / Safeguarding Board for Northern Ireland in the area in which the school or service is located and take account of guidance issued by the appropriate government department or regulatory body

- Seek to ensure that all schools and services providing support to children have a Designated Safeguarding Lead(s) / Child Protection Officer (Scotland) who will undertake regular, appropriate training and support for this role
- Seek to ensure that, where appropriate, there is a designated member of staff with responsibility for safeguarding children within the Early Years Foundation Stage (EYFS)
- Seek to ensure that each school and service has a member of staff who will act as the deputy to the Designated Safeguarding Lead / Child Protection Officer (Scotland)
- Seek to ensure that the Designated Safeguarding Lead / Child Protection Officer (Scotland) is aware of their responsibilities with regards to the family safeguarding programme that is local to their school / service
- Seek to ensure we have an organisational nominated lead responsible for safeguarding children
- Seek to ensure every member of staff (including temporary and agency staff and volunteers) and the Local Governing Body knows the name of the appropriate Designated Safeguarding Lead / Child Protection Officer (Scotland) in their service or the contact details of the Nominated Individual and Safeguarding Lead and understands their role in safeguarding
- Seek to ensure all staff and volunteers understand their responsibilities in being alert to the signs of abuse and neglect and maintain an attitude of **“it could happen here”**
- All systems, processes and policies should operate with the best interests of the child at their centre.
- Seek to ensure that all concerns about a child and young person are recorded and reviewed on a regular basis, so that there is a holistic overview of all concerns that may impact on a child's welfare. Where there are low level concerns, these will be discussed and escalated as appropriate
- All NAS(AT) schools and children's residential services will use Child Protection Online Monitoring and Safeguarding system software (CPOMS) to record concerns. Other children's services must use the NAS safeguarding reporting forms
- Concerns about sharing information must not be allowed to stand in the way of the need to promote the welfare, and protect the safety, of children, which must always be the paramount concern. The NAS will share any safeguarding concern internally via the relevant people (Designated Lead / Child Protection Officer (Scotland), Nominated Individual and Safeguarding Lead) and externally to our safeguarding partners using secure networks or password protected documents.
- Seek to ensure all staff and volunteers understand their responsibility for referring any concerns both within the school or children's service as well as to external statutory safeguarding partners.
- Seek to ensure that parents and carers have an understanding of the responsibility placed on the school or service and staff for safeguarding children by setting out its obligations on the school website, service welcome pack or user guide and publish the policy on the NAS and school websites.
- Operate a Safer Recruitment policy which seeks to ensure the suitability of adults working with children at all times

- Develop effective links with relevant statutory agencies and co-operate as required with their enquiries regarding safeguarding matters, including attendance at strategy meetings, initial case conference, core groups and child-in-need review meetings
- All staff are expected to adhere to the organisations Staff Code of Conduct and in particular observe professional boundaries between adult and child at all times.
- Keep records (either electronically or written) of concerns about children, including low level concerns regarding children or staff even where there is no need to refer to statutory services immediately
- Where a children's service is not using a dedicated Safeguarding database (e.g. CPOMS) Seek to ensure all child protection records are kept securely, separate from the main file, and in locked locations
- Seek to ensure that all child protection files are transferred in a safe and timely manner when a child moves school or changes service
- Be aware of and follow procedures set out by Children's Social Services and the Safeguarding Partners / Safeguarding Board for Northern Ireland where an allegation is made against a member of staff or volunteer, including making a referral to the DBS / PVG / Access NI and/or National College for Teaching and Leadership/Teacher Regulation Agency if a person in regulated activity has been dismissed or removed due to safeguarding concerns, or would have been had they not resigned. Such referrals will always be given priority and will be done promptly and made within at least one month of the person leaving our employment
- Operate safer recruitment practice, ensuring that at least one member on every recruitment panel for children's services has completed safer recruitment training
- Seek to ensure that the appropriate training in Safeguarding is provided to the Board of Trustees, Local Governing Body and appropriate members of staff across all our children's services
- Seek to ensure children are made aware of the potential risks of harm to them, in line with their age and ability, including keeping safe online, through teaching and learning opportunities, as part of providing a broad and balanced curriculum. This may include covering relevant issues through personal, social, health and economic education (PSHE) and Sex and Relationships Education (SRE) or wellbeing tutorials. This specifically includes raising awareness of peer on peer sexual abuse.
- Where reasonably possible Schools and Children's services should hold at least 2 emergency contact numbers for each pupil. To enable contact with a responsible adult when a child is identified as a welfare and/or safeguarding concern
- Seek to ensure a review of the safeguarding children policies and procedures is undertaken and monitor the efficiency with which the related duties have been discharged in accordance with current legislation. An annual safeguarding report will be produced for the Board of Trustees by the Nominated Individual and Safeguarding Lead

### **5.1 Multi agency working and Information sharing**

- Our schools and educational services contribute to multi-agency working as part of their statutory duty. They are aware of and will follow the Local Safeguarding Partnership arrangements.



- The school or service will work with CSCS, the police, health services and other services to protect the welfare of its pupils, through the early help process and by contributing to social care assessments and multi-agency plans to provide additional support.
- Where a need for early help is identified, the school will allow access for CSCS from the host LA and, where appropriate, a placing LA, for that LA to conduct (or consider whether to conduct) a section 17 or 47 assessment.
- The school also recognises the particular importance of inter-agency working in identifying and preventing Peer on Peer Sexual abuse, Child Sexual Exploitation and Child Criminal Exploitation.
- Our schools and children's services will always work in partnership with Local Statutory Safeguarding services and will externalise safeguarding concerns in accordance with locally published procedures.

### **Information sharing**

Staff should recognise the importance of proactive information sharing between professionals and local agencies in order to effectively meet children and young people's needs and identify any need for early help.

Considering the above, staff will be aware that whilst the UK GDPR and the Data Protection Act 2018 place a duty on schools to process personal information fairly and lawfully, they also allow for information to be stored and shared for safeguarding purposes – data protection regulations do not act as a barrier to sharing information where failure to do so would result in the pupil being placed at risk of harm.

Staff members will seek to ensure that fear of sharing information does not stand in the way of their responsibility to promote the welfare and safety of children and young people. If staff members are in doubt about sharing information, they will speak to the DSL or deputy DSL(s).

## **5.2 Understanding and Identifying Abuse**

Abuse and neglect are forms of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm, or by failing to act to prevent harm.

All staff, but especially the Designated Safeguarding Lead / Child Protection Officer (Scotland) should consider the context within which such incidents and/or behaviours occur. This is known as contextual safeguarding, which simply means assessments of children should consider whether wider environmental factors are present in a child's life that are a threat to their safety and/or welfare. Children's social care assessments should consider such factors so it is important that NAS(AT) Children's Services provide as much information as possible as part of the referral process. This will allow any assessment to consider all the available evidence and the full context of any abuse.

Child welfare concerns may arise in many different contexts, and can vary greatly in terms of their nature and seriousness. Children may be abused in a family or in an institutional or community setting, by those known to them or by a stranger, including, via the internet. In the case of female genital mutilation, children may be taken out of the country to be abused. They may be abused by an adult or adults, or another child or children. An abused child will often experience more than one type of abuse, as well as other difficulties in their lives. Abuse and neglect can happen over a period of time, but can also be a one-off event. Child abuse and neglect can have major long-term impacts on all aspects of a child's health, development and well-being.

Abuse, neglect and safeguarding issues are rarely standalone events that can be covered by one definition or label. In most cases multiple issues will overlap with one another. The warning signs and symptoms of child abuse and neglect can vary from child to child. Autistic children may be especially vulnerable to abuse, including because they may have an impaired capacity to resist or avoid abuse. They may have speech, language and communication needs which may make it difficult to tell others

what is happening. Children also develop and mature at different rates so what appears to be worrying for a younger child might be normal behaviour for an older child.

Parental behaviours may also indicate child abuse or neglect, so staff and volunteers should also be alert to parent-child interactions which are concerning and other parental behaviours. This could include parents who are under the influence of drugs or alcohol or if there is a sudden change in their mental health.

By understanding the warning signs, we can respond to problems as early as possible and seek to ensure that the right support and services are provided for the child and their family. It is important to recognise that a warning sign doesn't automatically mean a child is being abused.

Some of the following signs might be indicators of abuse or neglect:

- Children whose behaviour changes – they may become aggressive, challenging, disruptive, withdrawn or clingy, or they might have difficulty sleeping or start wetting the bed
- Children with clothes which are ill-fitting and/or dirty
- Children with consistently poor hygiene
- Children who make strong efforts to avoid specific family members or friends, without an obvious reason
- Children who don't want to change clothes in front of others or participate in physical activities;
- Children who are having problems at school, for example, a sudden lack of concentration and learning or they appear to be tired and hungry
- Children who talk about being left home alone, with inappropriate carers or with strangers
- Children who reach developmental milestones, such as learning to speak or walk, late, with no medical reason
- Children who are regularly missing from school or education
- Children who are reluctant to go home after school
- Children with poor school attendance and punctuality, or who are consistently late being picked up
- Parents who are dismissive and non-responsive to practitioners' concerns
- Parents who collect their children from school when drunk, or under the influence of drugs
- Children who drink alcohol regularly from an early age
- Children who are concerned for younger siblings without explaining why
- Children who talk about running away and
- Children who shy away from being touched or flinch at sudden movements.

There are several categories of abuse and neglect including: physical abuse, emotional abuse, sexual abuse and neglect. There are also specific safeguarding issues including peer on peer sexual abuse, Child Sexual Exploitation, Child Criminal Exploitation, Bullying & Cyberbullying, on line abuse, Child Trafficking, Female Genital Mutilation FMG Domestic Abuse and Radicalisation Each has its own specific warning indicators, which all those supporting children should be alert to (see appendices for more detail).

The following definitions show some of the ways in which abuse may be experienced by a child but are not exhaustive, as the individual circumstances of abuse will vary from child to child.

**Abuse** - is defined as a form of maltreatment of a child which involves inflicting harm or failing to act to prevent harm. Children may be abused in a family, institutional or community setting by those known to them or by others, e.g. via the internet. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Children may be abused by one or multiple adults or other children.

**Physical abuse** - Physical abuse is the causing of physical harm to a child or young person. Physical abuse may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning or suffocating or otherwise causing physical harm to a child. Physical harm may also be caused when a parent or carer feigns the symptoms of, or deliberately causes, ill health to a child they are looking after.

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

**Sexual abuse** - involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening or whether or not it is claimed that the child either consented or assented. The activities may involve physical contact, including assault by penetration (for example rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (including via the internet). Sexual abuse can be perpetrated by people of any gender and age

**Neglect** - Neglect is the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. This may involve a parent or carer failing to provide a child with adequate food, clothing or shelter (including exclusion from home or abandonment); failing to protect a child from physical or emotional harm or danger; failing to seek to ensure adequate supervision (including through the use of inappropriate caregivers); or failing to seek to ensure access to appropriate medical care or treatment. It may also include neglect of, or failure to respond to, a child's basic emotional needs.

Neglect may also result in the child being diagnosed as suffering from "non-organic failure to thrive", where they have significantly failed to reach normal weight and growth or development milestones and where physical and genetic reasons have been medically eliminated. In its extreme form children can be at serious risk from the effects of malnutrition, lack of nurturing and stimulation. This can lead to serious long-term effects such as greater susceptibility to serious childhood illnesses and reduction in potential stature. With young children in particular, the consequences may be life-threatening within a relatively short period of time.

Please refer to the appendices on further specific definitions of abuse.

### 5.3 Recognising child abuse

Recognising child abuse is not easy and it is not the responsibility of NAS staff and volunteers to decide whether or not child abuse has taken place or if a child is at risk of "significant harm". However, staff and volunteers do have a responsibility to act if they have a concern about a child's welfare or safety. Those responsibilities are summarised in Sections 6 and 7 of this policy.

All staff will be aware of the indicators of abuse and neglect. All staff will be aware that abuse, neglect and other safeguarding issues are rarely standalone events that can be given a specific label, and multiple issues often overlap one another; therefore, staff will be vigilant and always raise concerns with the DSL. All staff, especially the DSL and deputy DSL(s), will be aware that safeguarding incidents and/or behaviours can be associated with factors outside the school and/or can occur between children outside of these environments; this includes being aware that pupils can be at risk of abuse or exploitation in situations outside their families (extra-familial harms). All staff will be aware of the appropriate action to take

following a pupil being identified as at potential risk of abuse and, in all cases, will speak to the DSL if they are unsure.

All staff will be aware that technology is a significant component in many safeguarding and wellbeing issues, including online abuse, cyberbullying, and the sharing of indecent images.

#### **5.4 Response to concerns about child abuse and risk of harm**

It is very important that there are procedures in place to seek to ensure a speedy and effective response for dealing with concerns about the physical, sexual or emotional abuse or neglect of children.

Under no circumstances should anyone within the NAS(AT) school/service undertake an investigation into concerns that a child has been abused, or is at risk of being abused. This is the role of the statutory services (Social Care/Police) and any concerns or worries that staff or volunteers may have should be passed to the NAS(AT) Designated Safeguarding Lead as detailed under 'procedures' later in this document.

#### **5.5 Designated Safeguarding Lead / Child Protection Officer (Scotland)**

All NAS(AT) Schools, Children's services and regional teams who support children, have a Designated Safeguarding Lead / Child Protection Officer (Scotland) to whom any concerns must be reported immediately. The role of the Designated Safeguarding Lead / Child Protection Officer (Scotland) is to provide advice and reassurance to the member of staff or volunteer and make decisions about what to do next. **The Designated Safeguarding Lead / Child Protection Officer (Scotland) will seek to ensure that appropriate contact is made with the Local Authority (Social Care/Police) to promote partnership working and good practice.**

The Designated Safeguarding Lead / Child Protection Officer (Scotland) and any deputies should undergo training to provide them with the knowledge and skills required to carry out the role. The training should be updated every two years. In addition to their formal training, as set out above, their knowledge and skills should be updated, (for example via e-bulletins, meeting other designated safeguarding leads, or taking time to read and digest safeguarding developments), at regular intervals, but at least annually, to keep up with any developments relevant to their role. All relevant staff and volunteers will be informed who the Designated Safeguarding Lead / Child Protection Officer (Scotland) is and how to contact him/her as part of their induction.

#### **5.6 Disclosure**

**Concerns of abuse** - Staff and volunteer concerns about a child being abused may arise through various factors. These include:

- a child may tell them
- someone else might report that a child has told them or that they strongly believe that a child has been or is being abused
- a child might show signs of physical injury or neglect for which there appears to be no satisfactory explanation
- a child's behaviour may indicate to them that it is likely that he/she is being/has been abused
- observing one child abusing another
- a child having contact with a person who may pose a risk to them

#### **Child who may have been harmed needs**

The child who may have been harmed needs to be believed and

- to talk or communicate at their own pace
- to be heard
- to be supported

When a child or young person discloses that he or she has been abused or is at risk of abuse, victims should be taken seriously, kept safe and never be made to feel like they are creating a problem for reporting abuse, sexual violence or sexual harassment. Staff must provide immediate support and comfort and to assist in protecting the child from further abuse:

- Find a place to talk where there are no physical barriers between you and the child.
- Be on the same eye level as the child.
- Don't interrogate or interview the child.
- Be tactful. Choose your words carefully, do not be judgmental about the child or the alleged abuser. Listen to the child. Do not project or assume anything. Let the child tell his/her own story.
- Find out what the child wants from you. A child may ask you to promise not to tell anyone. Be honest about what you are able to do for the child.
- Be calm; reactions of disgust, fear, anger, etc., may confuse or scare a child.
- Assess the urgency of the situation. Is the child in immediate danger? Safety needs may make a difference in your response.
- Confirm the child's feelings. Let them know that it is okay to be scared, confused, sad, or however he / she is feeling.
- Believe the child and be supportive.
- Assure the child that you care. Some children will think you may not like them anymore if they tell you what happened. Let them know that he/ she is not to blame.
- Tell the child it is not their fault. Many children will think that the abuse happened because of something they did or did not do. Do not over dramatise.
- Tell the child you are glad she/he told you.
- Tell the child you will try to get some help.
- Let the child know what you will do. This will help build a sense of trust, and she/he will not be surprised when she/he finds out that you told someone.
- Tell the child you need to tell someone whose job it is to help with these kinds of problems.

## 5.7 Recording events

It is important that an accurate record (using CPOMS or the appropriate safeguarding form) of all events surrounding the disclosure or suspected abuse is kept, stating the facts, times, explanations and action taken. It is vital that when a disclosure is made to a member of staff or volunteer the person:

- is non-judgmental.
- does not coach or ask leading questions
- makes notes of the conversation as soon as possible after the event.

All safeguarding records are stored securely within CPOMS or in an appropriate locked cabinet.

That the NAS internal processes for reporting and closing safeguarding cases must be followed.

Records should include:

- a clear and comprehensive summary of the concern;
- details of how the concern was followed up and resolved;
- a note of any action taken, decisions reached and the outcome
- accurate record of time, date, names of people

Child Safeguarding records are kept securely and transferred in a safe and timely manner when a child moves school or service.

The Designated Safeguarding Lead / Child Protection Officer (Scotland) will maintain and regularly audit the safeguarding records and seek to ensure that each stand-alone file includes a chronology of significant events.

## 5.8 Support provided to the individual disclosing

In the event of disclosure of alleged abuse, the individual disclosing will be protected from any retaliation or unnecessary stress and will be supported through the process. Where appropriate and as necessary, support can be accessed from outside agencies such as Childline / NSPCC and counselling services.

## 5.9 Confidentiality

Confidentiality cannot be assured, as depending on the disclosure and individual concerned, information may need to be shared internally, with the Designated Safeguarding Lead / Child Protection Officer (Scotland) and with other agencies. This could include the Police and Local Authority. However, information will only be shared on a need to know basis, and the person making the disclosure should be reassured that the information they have given will be treated within best practice codes of conduct for confidentiality.

## 5.10 Referral

The Designated Safeguarding Lead / Child Protection Officer (Scotland) has a duty to share any concerns raised about a child with the relevant person within the Children's Social Services Team where the service is based. All information will be shared confidentially and in the appropriate format in line with the NAS Data Protection Policy (IGP-02) and the Local Safeguarding Children Partnership / Children's Social Services.

The Designated Safeguarding Lead (DSL) and any deputies should liaise with the three safeguarding partners and work with other agencies. The DSL should refer to the NSPCC guide "When to call the police," which should help Designated Safeguarding Leads understand when they should consider calling the police and what to expect when they do. (Please see Appendix 8 )

When a referral is made to the local authority, the Designated Safeguarding Lead / Child Protection Officer (Scotland) must confirm in writing with the Principal/ Director – Education and the NAS Safeguarding Lead the actions that have been taken.

The relevant regulator for Children's Services and the funding Child Placement Team should also be notified.

The Designated Safeguarding Lead / Child Protection Officer (Scotland) will record on CPOMS or in a confidential file using NAS forms of child protection suspicions and referrals.

## 5.11 Data Protection

Concerns about sharing information must not be allowed to stand in the way of the need to promote the welfare, and protect the safety, of children, which must always be the paramount concern.

We should aim to gain consent to share information, but need be mindful of situations where to do so would place a child at increased risk of harm. Information may be shared without consent if someone has reason to believe that there is good reason to do so, and that the sharing of information will enhance the safeguarding of a child in a timely manner. When decisions are made to share or withhold information, a record should be made regarding who has been given the information and why.

All NAS(AT) employees will have due regard to the relevant data protection principles which allow the sharing of personal information, as provided for in the Data Protection Act 2018 and the General Data Protection Regulation (GDPR).

The Data Protection Act 2018 and the GDPR allows the storage and sharing of information for safeguarding purposes, including information which is sensitive and personal, which is to be treated as 'special category personal data'.

Where special category personal data is shared, the Data Protection Act 2018 contains 'safeguarding of children and individuals at risk' as a processing condition that allows the sharing of information. This includes allowing the sharing of information without consent, if it is not possible to gain consent, it cannot be reasonably expected that a person gains consent, or if to gain consent would place a child at risk.

## 5.12 Allegations made against Staff or Volunteers (Including Agency / Supply Staff)

Any allegation should be reported immediately to a senior manager within the organisation and the Local Authority Designated Officer via the Designated Safeguarding Lead / Child Protection Officer – Scotland. This should be done within one working day of all allegations that come to an employer's attention or that are made directly to the Police if:

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

There are two aspects to consider when an allegation is made:

- **Looking after the welfare of the child** - the designated safeguarding lead is responsible for ensuring that the child is not at risk and referring cases of suspected abuse to the local authority children's social care as described in Part one of this guidance.
- **Investigating and supporting the person subject to the allegation** - the DSL should discuss with the LADO, the nature, content and context of the allegation, and agree a course of action.

When dealing with allegations, schools and children's services should:

- follow statutory guidance for Keeping Children Safe in Education (2021)
- deal with allegations quickly, fairly and consistently;
- provide effective protection for the child and support the person subject to the allegation.

Schools and services should seek to ensure they understand the local authority arrangements for managing allegations, including the contact details and what information the LADO will require when an allegation is made.

If there are concerns or an allegation against the Principal, this should be reported to the Director of Education for the National Autistic Society.

Suspension of a staff member or volunteer should take place without delay if there are concerns that a staff member has harmed a child or is at risk of harming a child.

Staff members and volunteers (including supply and agency staff) against whom an allegation is made are owed a duty of care and should be treated fairly, honestly and without discrimination. They should be provided with support throughout the process.

The Police and other relevant agencies should always agree jointly when to inform the subject of allegations which may be subject to criminal procedures.

When managing allegations against staff, it is important to recognise the distinction between allegations that meet the harms threshold and allegations that do not, also known as "low-level concerns.

### Low level concerns

As part of their whole school approach to safeguarding, schools and services should seek to ensure that they promote an open and transparent culture in which all concerns about all adults working in or on behalf of the school or college (including supply teachers, volunteers and contractors) are dealt with promptly and appropriately.

Creating a culture in which all concerns about adults (including allegations that do not meet the harms threshold)) are shared responsibly and with the right person, recorded and dealt with appropriately, is critical. It should enable schools and services to identify concerning, problematic or inappropriate behaviour early; minimise the risk of abuse; and seek to ensure that adults working in or on behalf of the school or college are clear about professional boundaries and act within these boundaries, and in accordance with the ethos and values of the institution.

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;
- 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 is not limited to being over friendly with children; spending too much time with one child, having favourites)

It is crucial such concerns are reported so appropriate guidance, training and action can be taken.

Schools and services should:

- ensuring their staff are clear about what appropriate behaviour is, and are
- confident in distinguishing expected and appropriate behaviour from
- concerning, problematic or inappropriate behaviour, in themselves and others;
- empowering staff to share any low-level safeguarding concerns with the
- designated safeguarding lead (or a deputy);
- addressing unprofessional behaviour and supporting the individual to correct it
- at an early stage;
- providing a responsive, sensitive and proportionate handling of such concerns
- when they are raised; and,
- helping identify any weakness in the school or services safeguarding system.

### 5.13 Safer Recruitment and Selection of Staff

The NAS(AT) has a written recruitment and selection policy statement and procedures linking explicitly to this policy.

The statement is included in all job advertisements, publicity material, recruitment websites, and candidate information packs.

The recruitment process is robust in seeking to establish the commitment of candidates to support the NAS(AT)'s measures to safeguard children and to deter, identify, reject or identify people who might pose a risk of harm to children or are otherwise unsuited to work with them.

All staff in regulated activity within our schools and services have been checked as to their suitability, including verification of their identity, qualifications, a satisfactory barred list check, a prohibition check and enhanced Criminal Records Check (DBS/ PVG/Access NI check) and a right to work in the UK. Schools and services will conduct the appropriate pre-employment checks for all prospective employees, including internal candidates and candidates who have lived or worked outside the UK.

The appropriate DBS and suitability checks will be carried out for all governors, volunteers, and contractors.



The NAS (AT) takes its responsibility to safeguard children very seriously and any staff member who is aware of anything that may affect his/her suitability to work with children must notify the service immediately. This will include notification of any convictions, cautions, court orders, reprimands or warnings he/she may receive.

Any member of staff working in regulated activity prior to verification by the NAS(AT) of their satisfactory DBS / PVG/ Access NI Certificate will not be left unsupervised and will be subject to a risk assessment.

Volunteers who are not working in regulated activity, will be supervised at all times.

**Secretary of State Section 128 Direction** – Schools will seek to ensure that all management if NAS(AT) children's services will be checked against a Secretary of State Section 128 Direction and will be prohibited from holding such a position if relevant. This includes Governors and Trustees.

**Single central record (SCR)** - The school keeps an SCR which records all staff, including supply staff and teacher trainees on salaried routes, who work at the school.

**Each NAS(AT) school** holds a central SCR containing information that is easily accessible and recorded in such a way that allows for details for each individual academy to be provided separately, and without delay, to all who need to see it.

All members of the proprietor body are also recorded on the SCR.

The following information is recorded on the SCR:

- An identity check
- A barred list check
- An enhanced DBS check
- A prohibition from teaching check
- A section 128 check (for senior leaders and governors)
- A check of professional qualifications
- A check to determine the individual's right to work in the UK
- Additional checks for those who have lived or worked outside of the UK

For agency and third-party supply staff, the school will also record whether written confirmation from the employment business supplying the member of staff has been received which indicates that all the necessary checks have been conducted and the date that confirmation was received.

If any checks have been conducted for volunteers, this will also be recorded on the SCR.

An individual's details should be removed from the SCR once they no longer work at the school or service.

If risk assessments are conducted to assess whether a volunteer should be subject to an enhanced DBS check, the risk assessment will be recorded.

### **Staff suitability**

**[This section is only for schools providing education to pupils under the age of eight.]**

All centres providing care for pupils under the age of eight must seek to ensure that staff and volunteers working in these settings are not disqualified from doing so under the Childcare (Disqualification) and Childcare (Early Years Provision Free of Charge) (Extended Entitlement) (Amendment) Regulations 2018. A person may be disqualified if they:

- Have certain orders or other restrictions placed upon them.
- Have committed certain offences.

All staff members are required to sign a declaration form provided in the appendices of this policy confirming that they are not disqualified from working in a schooling environment. A disqualified person will not be permitted to continue working at the school, unless they apply for and are granted a waiver from Ofsted. The school will provide support with this process.

### **Ongoing suitability**

Following appointment, consideration will be given to staff and volunteers' ongoing suitability – to prevent the opportunity for harm to children or placing children at risk

### **Referral to the DBS**

The school or service will refer to the DBS anyone who has harmed a child or poses a risk of harm to a child, or if there is reason to believe the member of staff has committed an offence and has been removed from working in regulated activity. The duty will also apply in circumstances where an individual is deployed to another area of work that is not in regulated activity or they are suspended.

### **Referral to the TRA**

The school/service should refer the person who has harmed a child or poses a risk to the Teacher Regulation Agency where the threshold is met for a referral.

## **5.14 Training**

All staff and volunteers will be recruited under the guidance of the Safer Recruitment Policy and will have a Criminal Records Check (DBS /PVG/ Access NI) that is deemed appropriate for the role. – Please refer to current guidance.

All staff members should be aware of systems within their school or service which support safeguarding and these should be explained to them as part of staff induction. This should include:

- the Safeguarding Children policy;
- the staff code of conduct;
- The role of the Designated Safeguarding Lead (including the identity of the Designated Safeguarding Lead and any deputies).
- Peer-on-Peer Abuse procedures.
- Part one of 'Keeping children safe in education' (KCSIE) (or Annex A, if appropriate).
- The Behavioural Policy.
- Missing Child Policy, including the safeguarding response to children who go missing from education.
- Appropriate child protection and safeguarding training, including online safety training.
- Online Safety Policy
- CPOMs training
- Identifying types of abuse.

All staff and volunteers will receive safeguarding children training that is relevant to their role. The local governing body members and Board of Trustees will also receive training. For those working directly with children, safeguarding training will be refreshed at least annually basis (or when required) via the face to face Safeguarding People training developed by the NAS(AT) or via the on-line safeguarding and child protection training or from the relevant Local Authority / Local Safeguarding Partners or specialist organization. In addition, all staff members / volunteers should receive safeguarding and child protection updates (for example, via email, e-bulletins and staff meetings), as required, but at least annually, to provide them with relevant skills and knowledge to safeguard children effectively.

The training will cover child protection procedures including:

- prevention and recognition of abuse

- dealing with disclosures and suspicions of abuse
  - information sharing
  - whistleblowing
  - maintaining confidentiality
  - the process for making referrals to children's social care and for statutory assessments that may follow a referral, along with the role they might be expected to play in such assessments.
  - The issues surrounding sexual violence and sexual harassment.
  - Contextual safeguarding.
  - How to keep LAC and PLAC safe.
  - CCE and the need to refer cases to the National Referral Mechanism.
  - Online safety training
  - PREVENT training
  - Peer on Peer Sexual abuse awareness raising

Staff will receive opportunities to contribute towards and inform the safeguarding arrangements in the school.

Training that staff receive should be integrated, aligned and considered as part of the whole school or service safeguarding approach, wider staff training and curriculum planning.' The CPD programme should be reviewed to seek to ensure that all the knowledge staff need is included and that this is effective in enabling them to follow procedures.

All staff in schools and children's services will receive Prevent Training in-line with government guidance.

Those recruiting staff will receive Safer Recruitment Training.

The DSL and deputy DSL(s) will undergo child protection and safeguarding training, and update this training at least every two years. The DSL and deputy DSL(s) will also obtain access to resources and attend any relevant or refresher training courses, ensuring they keep up-to-date with any developments relevant to their role. This will include training to understand:

- The assessment process for providing early help and statutory intervention, including local criteria for action and CSCS referral arrangements.
- How LAs conduct child protection case conferences and a child protection review conferences, to enable the DSL to attend and contribute to these effectively when required.
- The importance of providing information and support to CSCS.
- The lasting impact that adversity and trauma can have.
- How to be alert to the specific needs of children in need, pupils with SEND and/or relevant health conditions, and young carers.
- The importance of internal and external information sharing.
- The Prevent duty.
- The risks associated with online safety, including the additional risks faced online by pupils with SEND.

**All staff and volunteers must read, understand and become knowledgeable about child protection procedures during induction and must undertake refresher training on an annual basis. Failure by a member of staff to report actual or reasonably suspected abuse of a child will be treated as a disciplinary offence.**

### 5.15 Supporting Staff and Supervision of Staff

All staff working directly with children and vulnerable adults will have supervision with a suitably experienced person at least twice a year, during which safeguarding concerns and processes will be discussed. Staff can request a reflective supervision at any time with their appropriate line manager or with the DSL. DSL specific supervisions will be carried out through the DSL forum. A DSL forum has been

established for all DSL's for all schools and is chaired by the Nominated Individual / Safeguarding Lead. Terms of reference for this forum have been drafted. Meetings are held monthly during the academic year.

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

We will support such staff by providing an opportunity to talk through their anxieties with the relevant Designated Safeguarding Lead and to seek further support such as counselling or regular supervision, as appropriate. Employees also have access to a confidential helpline - called BeSupported.

In order to reduce the risk of allegations being made against staff, and seek to ensure that staff are competent, confident and safe to work with children, they will be made aware of safer working practice guidance and will be given opportunities in training to develop their understanding of what constitutes safe and unsafe behaviour.

### **5.16 Children, young people and carers**

Children and young people and their parents and carers should be informed of NAS(AT) child protection procedures, and what to expect, in their preferred communication and appropriate to their understanding.

The Mental Capacity Act 2005 in England and Wales, Mental Capacity (Northern Ireland) Act 2016 and Adults with Incapacity Act 2000 (Scotland) apply to anyone over the age of 16 years. Those children who are judged not to have capacity will need to have the full range of support from social care, advocacy services and perhaps the police to make sure they are protected. For those judged to have capacity, many would still benefit from an advocate to support them.

Children, young people and their carers will have access to the NAS(AT) Complaints Resolution Policy NAS Schools and Children's Services (QS-0010) and made aware of how they can make a complaint if they are unhappy with the service they are receiving.

### **5.17 Use of Technology**

As schools, colleges and children's services increasingly work online it is essential that children are safeguarded from potentially harmful and inappropriate online material. As such, the NAS(AT) will seek to ensure appropriate filters and appropriate monitoring systems are in place being mindful that "over blocking" does not lead to unreasonable restrictions as to what children can be taught with regards to online teaching and safeguarding and children will need to be taught critical thinking skills which are appropriate to their age and ability.

#### **Personal electronic devices :**

Staff are not permitted to have their mobile phones / similar devices (such as smart watches) turned on, unless they have the express permission of the Principal / Headteacher / Service Manager.

Mobile phones / devices with camera/video capability: **under no circumstances** are photographs or videos to be taken of the young people we support **on a personal device**. Staff are not permitted to show any images from their phone to the people we support.

The use of personal electronic devices, including mobile phones and cameras, by staff and pupils is closely monitored by the school, in accordance with the Personal Electronic Devices Policy.

Staff will report any concerns about pupils' or other staff members' use of personal electronic devices to using the school's reporting procedure (see flowchart on page 26)

#### **Cameras and Video Cameras:**

Personal Devices (mobile phones / smart watches etc.) should not be used in Schools or Children's Services to photograph / video the children or young people. **NAS(AT) devices may be used with the express permission of the Principal / Headteacher / Service Manager.**

Photographs and videos of the people we support remain the property of the individual and cannot be used externally without the individual/parental permission in writing. NAS(AT) Photo Permission forms are available and should be completed by the individual we support or parent/ carer (whichever relevant).

Photographs and videos of pupils will be carefully planned before any activity with particular regard to consent and adhering to the school's Data Protection Policy and Photography Policy. The DPO will oversee the planning of any events where photographs and videos will be taken.

Where photographs and videos will involve pupils who are LAC, fostered or adopted pupils, or pupils for whom there are security concerns, the Principal / headteacher will liaise with the DSL to determine the steps involved. The DSL will, in known cases of pupils who are LAC or who have been adopted, liaise with the pupils' social workers, carers or adoptive parents to assess the needs and risks associated with the pupils.

Visitors may only photograph buildings, with consent of the school or service.

Fictional names must be used in respect of people we support, staff or parents by any member of staff or student giving talks or attending courses.

Under no circumstances should NAS(AT) employees take devices home / off site outside of working hours that contain images of the young people we support.

Staff will adhere to the Online Safety Policy at all times.

As part of a broad and balanced curriculum, all pupils will be made aware of online risks and taught how to stay safe online.

Through training, all staff members will be made aware of:

- Pupil attitudes and behaviours which may indicate they are at risk of potential harm online.
- The procedure to follow when they have a concern regarding a pupil's online activity.

Further information regarding the school's approach to online safety can be found in the Online Safety Policy.

### **Reviewing online safety**

The school will carry out an annual review of its approach to online safety, supported by an annual risk assessment that considers and reflects the risks faced by pupils.

### **5.18 Early help**

Early help means providing support as soon as a problem emerges, at any point in a child's life.

Any pupil may benefit from early help, but in particular staff will be alert to the potential need for early help for pupils who:

- Have SEND (whether or not they have a statutory EHC plan / statement of special educational need / a co-ordinated support plan (CSP)).
- Have certain health conditions, or have specific additional needs.
- Have mental health needs
- Are young carers.

- Show signs of being drawn into anti-social or criminal behaviour, including gang involvement and association with organised crime groups or county lines.
- Are frequently missing/going missing from care or from home.
- Misuse drugs or alcohol.
- Are at risk of modern slavery, trafficking or sexual or criminal exploitation.
- Are in a family circumstance presenting challenges such as substance abuse, adult mental health problems or domestic abuse.
- Are returned home to their family from care.
- Show early signs of abuse and/or neglect in other ways.
- Are at risk of being radicalised or exploited.
- Are privately fostered.
- Have family members in prison, or are affected by parental offending
- Are in a family circumstance presenting challenges for them, such as drug and alcohol misuse, adult mental health problems, or domestic abuse.
- Are at risk of HBA, such as FGM or forced marriage.
- Are persistently absent from education, including persistent absences for part of the school day
- Pupils who are going to be home educated

Early help will also be used to address non-violent harmful sexual behaviour to prevent escalation.

All staff will be made aware of the local early help process and understand their role in it.

The DSL will take the lead where early help is appropriate. This includes liaising with other agencies and setting up an inter-agency assessment as appropriate. The local early help process will be followed as required.

Staff may be required to support other agencies and professionals in an early help assessment, in some cases acting as the lead practitioner. Any such cases will be kept under constant review and consideration given to a referral to CSCS for assessment for statutory services if the pupil's situation is not improving or is worsening.

### **5.19 Use of the school premises for non-school activities**

Where a school or service hires or rents out school facilities or the school premises to organisations or individuals, e.g. for providers to run community or extracurricular activities, it will seek to ensure that appropriate arrangements are in place to keep children and young people safe.

Where activities are provided separately by another body the school or service will seek assurance that the body concerned has appropriate safeguarding and child protection policies and procedures in place, including inspecting these as needed. The Local Governing Body will also seek to ensure that there are arrangements in place to liaise with the school on these matters where appropriate. The governing board will seek to ensure safeguarding requirements are included in any transfer of control agreement, i.e. a lease or hire agreement, as a condition of use and occupation of the premises, and specify that failure to comply with this would lead to termination of the agreement.

#### **Extracurricular activities and clubs**

Extra-curricular activities and clubs hosted by external bodies, e.g. charities or companies, will work in collaboration with the school / service to effectively safeguard pupils and adhere to local safeguarding arrangements.

Staff and volunteers running extracurricular activities and clubs are aware of their safeguarding responsibilities and promote the welfare of pupils. Paid and volunteer staff understand how they should respond to child protection concerns and how to make a referral to CSCS or the police, if necessary.

All national governing bodies of sport that receive funding from either Sport England or UK Sport must aim to meet the Standards for Safeguarding and Protecting Children in Sport.

## **5.20 Alternative provision**

The school / service will remain responsible for a child or young person's welfare during their time at an alternative provider. When placing a child or young person with an alternative provider, the school / service will obtain written confirmation that the provider has conducted all relevant safeguarding checks on staff.

### **5.21 Work experience**

When a child / young person is sent on work experience, the school will seek to ensure that the provider has appropriate safeguarding policies and procedures in place. Where the school has pupils conduct work experience at the school, an enhanced DBS check will be obtained if the pupil is over the age of 16.

### **5.22 Children and Young People potentially at greater risk of harm**

Some groups of children and young people can face additional safeguarding challenges, and it is important staff understand that further barriers may exist when determining abuse and neglect in these groups of pupils. Additional considerations for managing safeguarding concerns and incidents amongst these groups are outline below.

#### **Children and Young people in receipt of statutory children's services**

Some children and young people may need social workers due to safeguarding or welfare needs. These needs can leave pupils vulnerable to further harm and educational disadvantage.

As a matter of routine, the DSL will hold and use information from the LA about whether a pupil has a social worker in order to make decisions in the best interests of the pupil's safety, welfare, and educational outcomes.

Where a child or young person needs a social worker, this will inform decisions about safeguarding, e.g. responding to unauthorised absence, and promoting welfare, e.g. considering the provision pastoral or academic support.

#### **Educational Outcomes**

Our Designated Safeguarding Lead seeks to ensure that staff know the children who have experienced or are experiencing welfare, safeguarding and child protection issues so that, as relevant, we know who these children are, understand their academic progress and attainment; this means that we are able to make necessary adjustments to help these children to achieve. In this way we maintain a culture of high aspirations for this cohort. This includes children with a social worker

#### **Home-educated children**

Parents may choose elective home education (EHE) for their children. In some cases, EHE can mean that children are less visible to the services needed to safeguard and support them.

In line with the Education (Pupil Registration) (England) Regulations 2006, the school will inform the LA of all deletions from the admissions register when a pupil is taken off roll.

Where a parent has expressed their intention to remove a pupil from school for EHE, the school, in collaboration with the LA and other key professionals, will coordinate a meeting with the parent, where possible, before the final decision has been made, particularly if the pupil has SEND, is vulnerable, and/or has a social worker.

#### **LAC and PLAC**

Children most commonly become looked after because of abuse and/or neglect. Because of this, they can be at potentially greater risk in relation to safeguarding. PLAC, also known as care leavers, can also remain vulnerable after leaving care.

The governing board will seek to ensure that staff have the skills, knowledge and understanding to keep LAC and PLAC safe. This includes ensuring that the appropriate staff have the information they need, such as:

- Looked after legal status, i.e. whether they are looked after under voluntary arrangements with consent of parents, or on an interim or full care order.
- Contact arrangements with parents or those with parental responsibility.
- Care arrangements and the levels of authority delegated to the carer by the authority looking after the pupil.

The DSL will be provided with the necessary details of pupils' social workers and the VSH, and, for PLAC, personal advisers.

Further details of safeguarding procedures for LAC and PLAC are outlined in the school's LAC Policy.

### **Pupils with SEND**

All children and young people in our services have autism . When managing and considering safeguarding issues, staff will be aware of the following:

- Certain indicators of abuse, such as behaviour, mood and injury, may relate to the pupil's disability without further exploration; however, it should never be assumed that a pupil's indicators relate only to their disability
- Pupils with SEND can be disproportionately impacted by issues such as bullying, without outwardly showing any signs
- Communication barriers may exist, as well as difficulties in overcoming these barriers

When reporting concerns or making referrals for pupils with SEND, the above factors will always be taken into consideration.

### **Children and Young people in residential services.**

For residential special schools and children's homes proprietors and staff should be aware that there are additional factors to affect safeguarding, in particular opportunities and vulnerabilities for peer-on-peer abuse; and inappropriate staff/pupil relationships. Planning and procedures should be designed to take this into account and seek to ensure children and young people are safeguarded.

## **6. Safeguarding Children - Procedure for Staff and Volunteers in NAS(AT) Schools**

### **Step 1**

**Seek to ensure that the child is safe. If the child is at risk of immediate harm then the police and children's social services must be called immediately.**

On every occasion that any member of staff or volunteer has reason to suspect that a child has suffered abuse, or is at risk of suffering abuse, he/she should at the earliest opportunity contact the Designated Safeguarding Lead and Principal/Headteacher.

If the allegation or suspicion is about the Designated Safeguarding Lead then the report should be made to the Principal/Headteacher only.

If the allegation or suspicion is about the Principal/Headteacher then the report should be made to the Designated Safeguarding Lead only.



If possible write a brief note at the time, but always make a written note as soon as you can and whilst the facts are still clear in your mind. If two staff members witness something, they should write their accounts independently. This must be completed with 24 hours.

**Step 3**

On no account should staff or volunteers make physical examinations that require the removal of clothes or pursue enquiries beyond the initial statement. However, staff and volunteers should check and record the child's physical appearance and apparent state of mind.

**Step 4**

The Designated Safeguarding Lead will contact the appropriate Children's Social Care office, the LADO if it is an allegation about an employee or volunteer, Police (if needed) and parents (unless it is felt that to do so would place the child in danger). The appropriate team from Social Care will advise on the next step(s) to be taken. The Designated Safeguarding Lead will also hold contact names and address for all Purchasers, Regulators and be able to obtain copies of the Safeguarding Children procedures of the Local Authority.

**Step 5**

On accepting the referral, the relevant Children's Social Care Team becomes responsible for determining what action is to be taken including advising parents. It is not the responsibility of staff or volunteers to make enquiries when abuse is suspected.

Each local authority within the UK will have a dedicated team or named individuals who will have a role for receiving and determining safeguarding alerts, and that role is responsible for evaluating the investigation in consultation with other relevant agencies when there has been an allegation about a staff member or volunteer (e.g. police, children's social care).

**Step 6**

Verbal reports should be made immediately and followed as soon as possible by a written report using the Local Authority Child Protection Report form.

**Step 7**

The Designated Safeguarding Lead will notify placing authorities of the children involved of any allegation or suspicion of abuse, and the initiation and outcome of any child safeguarding enquiries involving the school.

## **6 Safeguarding Children - Procedure for Staff and Volunteers involved in other NAS Child Services**

**Step 1**

**Seek to ensure that the child is safe. If the child is at risk of immediate harm then the police and children's social services must be called immediately.**

On every occasion that any member of staff or volunteer has reason to suspect that a child has suffered abuse, or is at risk of suffering abuse, he/she should at the earliest opportunity contact the NAS Line Manager who will, in turn, seek advice from the Designated Safeguarding Lead.

If the allegation or suspicion is about the Designated Safeguarding Lead / Child Protection Officer then the report should be made to the Director of Education. Each region has an Out-of-Hours contact for emergency advice for safeguarding issues. All staff and volunteers will be given this number.

**Step 2**

If possible, write a brief note at the time, but always make a written note as soon as you can and whilst the facts are still clear in your mind. If two staff members witness something, they should always write their accounts independently. This must be completed within 24 hours.

### **Step 3**

On no account should staff or volunteers make physical examinations that require the removal of clothes or pursue enquiries beyond the initial statement. However, staff and volunteers should check and record the child's physical appearance, behaviour and apparent emotional state of mind.

### **Step 4**

The Designated Safeguarding Lead will contact the appropriate Children's Social Care office, or the LADO if it is an allegation about an employee or volunteer, who will advise on the next steps to be taken.

### **Step 5**

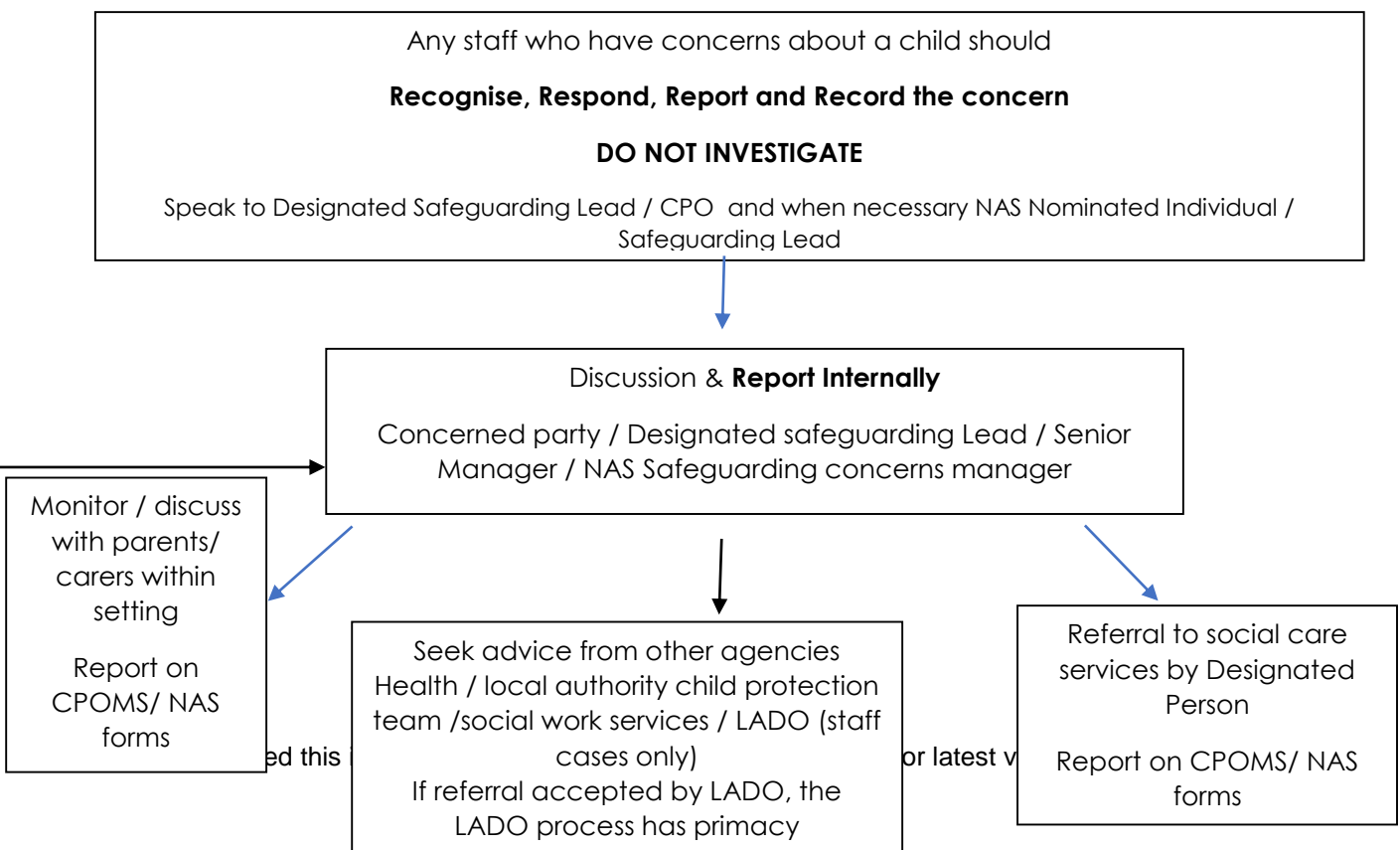
On accepting the referral, the Local Authority becomes responsible for determining what action is to be taken including advising parents. It is not the responsibility of staff or volunteers to make enquiries of or to notify parents when abuse is suspected.

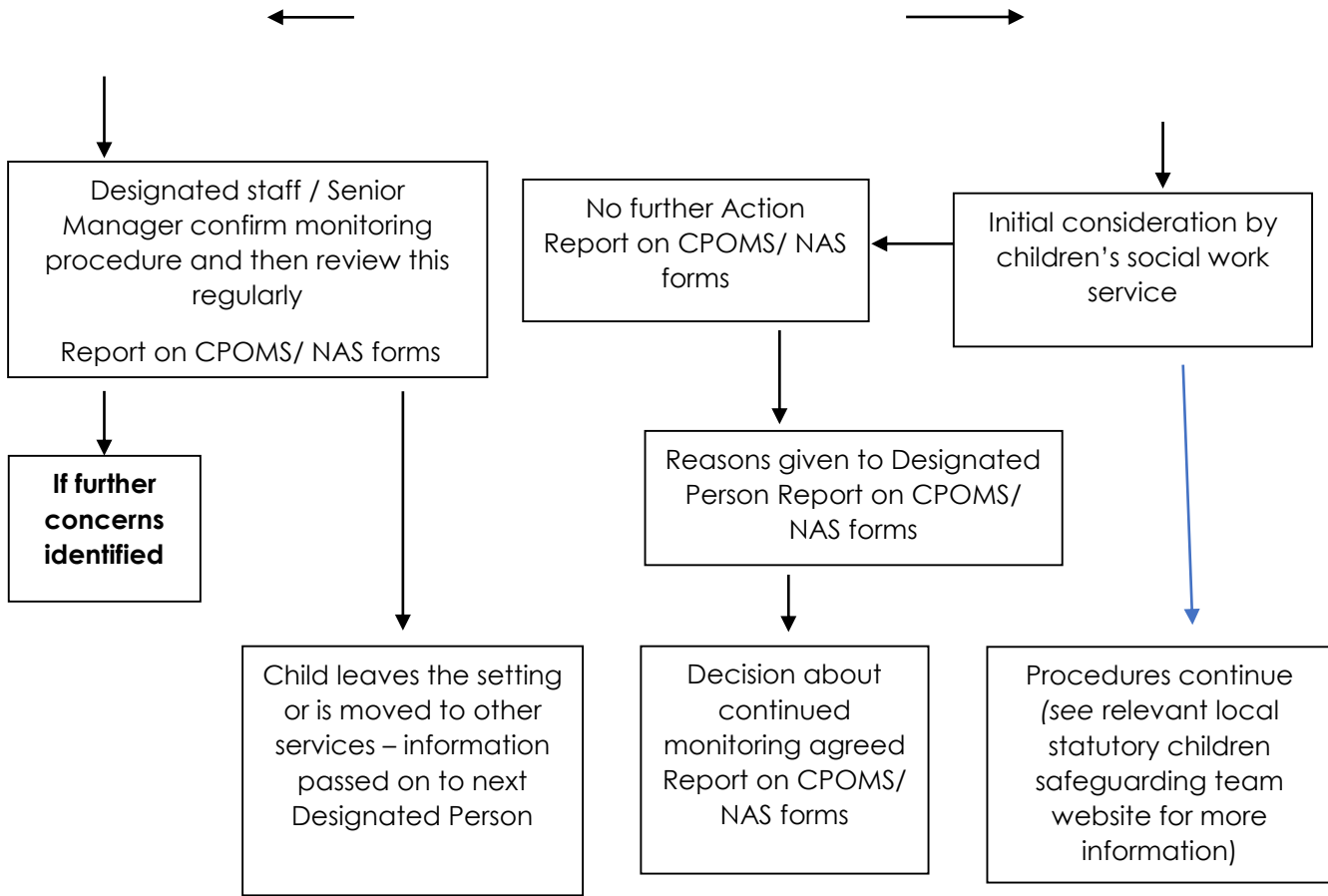
### **Step 6**

Verbal reports should be made immediately and followed as soon as possible by a written report using the Local Authority Child Protection Report Form.

**Both of these procedures do not take away the right of the informant to report the matter directly to Children's Social Services Departments / Local Safeguarding Partners or, if they believe an offence has been committed, the Police.**

## **7 NAS(AT) REPORTING FLOWCHART**





## 8 Staff and Volunteers' Roles and responsibilities

### All Staff

- Consider, at all times, what is in the best interests of the pupil.
- Maintain an attitude of 'it could happen here' where safeguarding is concerned.
- Provide a safe environment in which pupils can learn.
- Be aware of the school's systems which support safeguarding, including any policies, procedures, information and training provided upon induction.
- Know how to report concerns in line with policy
- Be aware of the role and identity of the DSL and deputy DSLs.
- Undertake safeguarding training, including online safety training, during their induction – this will be regularly updated.
- Receive and understand child protection and safeguarding (including online safety) updates, e.g. via email, as required, and at least annually.
- Be aware of the local early help process and understand their role in it, including identifying pupils who may benefit from it.
- Make a referral to local safeguarding teams and/or the police immediately, if at any point there is a risk of immediate serious harm to a child.
- Where appropriate Support social workers in making decisions about individual children, in collaboration with the DSL.

- Be aware of and understand the procedure to follow in the event that a child confides they are being abused, exploited or neglected.
- Maintain appropriate levels of confidentiality when dealing with individual cases.
- Reassure victims that they are being taken seriously, that they will be supported, and that they will be kept safe.
- Speak to the DSL if they are unsure about how to handle safeguarding matters.
- Be aware of safeguarding issues that can put pupils at risk of harm.
- Be aware of behaviours linked to issues such as drug-taking, alcohol misuse, deliberately missing education, and sharing indecent images, and other signs that pupils may be at risk of harm.
- To follow this policy and ask questions if not sure about any aspect of this policy.
- To act in loco parentis whilst any child is at the School/Service and have the responsibility to protect the child and promote his/her general welfare.
- To be aware of the early warning signs of potential abuse situations and the possible signs of abuse.
- To actively teach children about how to keep themselves safe (including online) through practical teaching and learning opportunities.

#### **Teachers, including the Principal, have a responsibility to:**

- Safeguard pupils' wellbeing and maintain public trust in the teaching profession as part of their professional duties, as outlined in the 'Teachers' Standards'.
- Under the mandatory reporting legislation, teachers are **required to report known cases of FGM in under 18s to the police**

#### **The NAS / NASAT Academies Trust Directors responsibilities**

- Ratify and review this policy annually to seek to ensure it conforms to relevant law and guidance
- The NAS / NASAT board has overall responsibility for ensuring that there are sufficient and appropriate measures in place to safeguard the children in the schools.
- The chair of governors will seek to ensure that enhanced DBS checks are undertaken for other members of the governing body and where such a check has been undertaken, an enhanced DBS certificate is obtained.

#### **Local School Governing Body Responsibilities**

It is the objective of the NAS that LGB's strive to achieve the following objectives:

- take strategic leadership responsibility for the school's safeguarding arrangements
- facilitate a whole-school approach to safeguarding; this includes ensuring that safeguarding and child protection are at the forefront and underpin all relevant aspects of process and policy development
- nominate a governor responsible for child protection who will liaise with the designated officer(s) from the relevant local authority and partner agencies in the event of allegations of abuse being made against the Principal
- seek to ensure that staff have skills, knowledge and understanding necessary to keep looked after children safe. Seek to ensure appropriate staff have information they need in relation to a child's looked after legal status and contact arrangements with birth parents or those with parental responsibilities
- seek to ensure that staff working directly with children read at least Part one of KCSIE
- seek to ensure that staff who do not work directly with children read either Part one or Annex A of KCSIE. **NB:** Individual schools assess which guidance will be most effective for their staff to safeguard and promote
- seek to ensure there is a designated teacher to promote the educational achievement of children who are looked after and seek to ensure that this individual has appropriate training. The

designated teacher should seek to ensure that the relevant DSL has details of the child's social worker and the name of the virtual school head in the authority that looks after the child

- have regard to how children may be taught about safeguarding within the curriculum
- seek to ensure systems are in place, children to confidently report abuse, knowing that their concerns will be treated seriously, and they can safely express their views and give feedback; these systems will be well-promoted, easily understood, and easily accessible
- seek to ensure that staff have due regard to relevant data protection principles that allow them to share and withhold personal information
- seek to ensure any deficiencies in child protection arrangements are remedied without delay; and
- seek to ensure that this policy and associated procedures are reviewed annually and the policy is up to date and effective
- seek to ensure the school adheres to statutory responsibilities by conducting pre-employment checks on staff who work with children, taking proportionate decisions on whether to ask for any checks beyond what is required. Seek to ensure where appropriate referrals are submitted to the DBS and the Teaching Regulation Agency (TRA) if a person in regulated activity has been dismissed or removed due to safeguarding concerns or would have been had they not resigned)
- seek to ensure appropriate staff have information they need in relation to a child's looked after legal status and contact arrangements with birth parents or those with parental responsibilities;
- seek to ensure that staff working directly with children read at least Part one of KCSIE
- seek to ensure that staff who do not work directly with children read either Part one or Annex A of KCSIE. **NB:** Individual schools assess which guidance will be most effective for their staff to safeguard and promote
- seek to ensure there is a designated teacher to promote the educational achievement of children who are looked after and seek to ensure that this individual has appropriate training. The designated teacher should seek to ensure that the relevant DSL has details of the child's social worker and the name of the virtual school head in the authority that looks after the child;
- have regard to how children may be taught about safeguarding within the curriculum .
- seek to ensure systems are in place, children to confidently report abuse, knowing that their concerns will be treated seriously, and they can safely express their views and give feedback; these systems will be well-promoted, easily understood, and easily accessible
- seek to ensure that staff have due regard to relevant data protection principles that allow them to share and withhold personal information
- seek to ensure any deficiencies in child protection arrangements are remedied without delay; and
- seek to ensure that this policy and associated procedures are reviewed annually.
- seek to ensure that staff are appropriately trained to support pupils to be themselves at school, e.g. if they are LGBTQ+
- seek to ensure the school has clear systems and processes in place for identifying possible mental health problems in pupils, including clear routes to escalate concerns and clear referral and accountability systems
- guarantee that volunteers are appropriately supervised.
- make sure that at least one person on any appointment panel has undertaken safer recruitment training
- seek to ensure that all staff receive safeguarding and child protection training updates, e.g. emails, as required, but at least annually.
- certify that there are procedures in place to handle allegations against staff, supply staff, volunteers and contractors
- guarantee that there are procedures in place to handle pupils' allegations against other pupils.

- seek to ensure that appropriate disciplinary procedures are in place, as well as policies pertaining to the behaviour of pupils and staff
- seek to ensure that procedures are in place to eliminate unlawful discrimination, harassment and victimisation, including those in relation to peer-on-peer abuse
- seek to ensure that there are systems in place for pupils to express their views and give feedback.
- establish an early help procedure and seek to ensure all staff understand the procedure and their role in it
- Appoint a designated teacher to promote the educational achievement of LAC and seek to ensure that this person has undergone appropriate training
- seek to ensure that the designated teacher works with the virtual school head (VSH) to discuss how the pupil premium funding can best be used to support LAC
- introduce mechanisms to assist staff in understanding and discharging their roles and responsibilities.
- make sure that staff members have the skills, knowledge and understanding necessary to keep LAC safe, particularly with regard to the pupil's legal status, contact details and care arrangements
- put in place appropriate safeguarding responses for pupils who go missing from school, particularly on repeat occasions, to help identify any risk of abuse, neglect or exploitation, and prevent the risk of their disappearance in future
- seek to ensure that all members of the governing board have been subject to an enhanced DBS check.
- support the school in creating a culture where staff are confident to challenge senior leaders over any safeguarding concerns

### **Designated Governor Responsibilities**

- Understand the safeguarding requirements
- Attend appropriate safeguarding training
- Support the work of the Designated Safeguarding Lead
- Seek to ensure that the school's Designated Safeguarding Lead is given sufficient time to carry out their duties, including accessing training.
- Report back to the Governing Body about how effective safeguarding is at the School
- Check that the school is compliant with statutory guidance
- Check out whether there is a consistency in safeguarding across the whole school
- Make sure that there are effective systems in place to keep vulnerable children safe
- Complete as a minimum annual safeguarding audit with the NAS / NASAT responsible individual

### **The Principal's / Headteacher's responsibilities**

- The Teachers' Standards 2012 state that teachers (which includes headteachers) should safeguard children's wellbeing and maintain public trust in the teaching profession as part of their professional duties.
- Seek to ensure all relevant staff are aware of this policy, receive appropriate training are aware of the school's systems to support safeguarding and follow this policy and procedures
- Seek to ensure safe recruitment practices are always followed
- Seek to ensure effective reporting to both the NAS / NASAT Academies Trust board and LGB by termly reports and as and when required.
- To seek to ensure appropriate duty of care to employees and minimise the stress inherent in the investigation process.

### **The Registered / Service Manager Responsibilities**

- To build a strong safeguarding culture in the home / service where children are listened to, respected and involved in both the development of the home / service and decisions about the home / service.

- Seek to ensure that day-to-day care is arranged and delivered so as to keep each child safe and to protect each child effectively from harm
- Seek to ensure that staff continually and actively assess the risks to each child and the arrangements in place to protect them, based on the individual child's needs and developmental-stage, about when to allow a child to take a particular risk or follow a particular course of action
- Help each child to understand how to keep safe
- Seek to ensure that staff have the training and skills to identify and act upon signs that a child is at risk of harm. Seek to ensure that staff skills in safeguarding are gained, refreshed and recorded in the workforce plan.
- Manage relationships between children to prevent them from harming each other.
- As children will spend significant periods of time away from the home, for example in education any assessed risks should be shared with the education provider or service the child is attending if appropriate
- Where there are safeguarding concerns for a child, their placement plan, agreed between the home and their placing authority, must include details of the steps the home will take to manage any assessed risks on a day to day basis.

### **NAS Nominated Individual and Safeguarding Lead**

- To lead on reviewing this policy annually (or earlier if required)
- To take leadership responsibility for the Charity's safeguarding arrangements and report to the relevant subcommittee of the Board of Trustees and the Independent Safeguarding Committee
- To promote a culture of listening to children and taking account of their wishes and feelings, both in individual decisions and the development of services
- To seek to ensure there are clear whistleblowing procedures and a culture that enables issues about safeguarding and promoting the welfare of children to be addressed
- To seek to ensure there are clear escalation policies for staff to follow when their child's safeguarding concerns are not being addressed within their school / service or by other agencies
- To seek to ensure safer recruitment practices and ongoing safe working practices are followed by schools / services
- To seek to ensure appropriate supervision and support for staff, including undertaking safeguarding training is available
- To create a culture of safety, equality and protection within services.
- To support the Designated Safeguarding Lead network via a monthly forum to promote and develop good practice and learn from relevant cases.

### **Designated Safeguarding Lead (DSL) / Child Protection Officer**

Schools and services should seek to ensure an appropriate senior member of staff, from the school or college leadership team, is appointed to the role of designated safeguarding lead. The designated safeguarding lead should take lead responsibility for safeguarding and child protection (including online safety). This should be explicit in the role holder's job description. This person should have the appropriate status and authority within the school or college to carry out the duties of the post. The role of the designated safeguarding lead carries a significant level of responsibility, and they should be given the additional time, funding, training, resources and support they need to carry out the role effectively. Their additional responsibilities include providing advice and support to other staff on child welfare, safeguarding and child protection matters, taking part in strategy discussions and interagency meetings, and/or supporting other staff to do so, and to contributing to the assessment of children

- The DSLs will liaise with other services and assist staff with their safeguarding duties. NAS(AT) will seek to ensure that there is always cover for this role. NAS(AT) will seek to ensure the DSLs undertake updated child protection training every two years. The DSLs will receive additional

updates to their formal training at regular intervals, and at least annually, to keep up to date with any developments relevant to their role.

- Ensuring that each member of staff has access to and understands NAS(AT) Safeguarding and Child Protection policy and procedures, especially new and part time staff.
- Ensuring the 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 NAS(AT) in this.
- Acting as a link with the local safeguarding partners to make sure staff are aware of training opportunities and the latest local policies on safeguarding.
- Ensuring that all newly appointed staff including NQTs receive child protection induction and training
- Undertaking Prevent Awareness Training such as the Home Office's Workshop to Raise Awareness of Prevent (WRAP).
- Take lead responsibility for safeguarding and child protection, including online safety.
- Provide advice and support to other staff on child welfare, safeguarding and child protection matters.
- Seek to ensure effective support and monitoring of 'Children in Need'.
- Take part in strategy discussions and inter-agency meetings, and/or support other staff to do so.
- Contribute to the assessment of children, and/or support other staff to do so.
- During term time, be available during school hours for staff to discuss any safeguarding concerns.
- **NB:** Individual schools, working with the DSL, define what "available" means and whether, in exceptional circumstances, availability via phone, videocall, or other media is an acceptable substitution for in-person availability.
- Refer cases:
  - To CSCS where abuse and neglect are suspected, and support staff who make referrals CSCS.
  - To the Channel programme where radicalisation concerns arise, and support staff who make referrals to the Channel programme.
  - To the DBS where a person is dismissed or has left due to harm, or risk of harm, to a child.
  - To the police where a crime may have been committed, in line with the National Police Chiefs' Council (NPCC) guidance.
- Liaise with the Principal to inform them of issues, especially regarding ongoing enquiries under section 47 of the Children Act 1989 and police investigations.
- Liaise with the deputy DSL(s) to seek to ensure effective safeguarding outcomes.
- Liaise with the case manager and the LA designated officer(s) (LADO) for child protection concerns in cases concerning staff.
- Liaise with staff on matters of safety, safeguarding and welfare, including online and digital safety.
- Liaise with staff when deciding whether to make a referral by liaising with relevant agencies so that children's needs are considered holistically.
- Liaise with the senior mental health lead and, where available, the Mental Health Support Team, where safeguarding concerns are linked to mental health.
- Promote supportive engagement with parents in safeguarding and promoting the welfare of children, including where families may be facing challenging circumstances.
- Work with the headteacher and relevant strategic leads, taking lead responsibility for promoting educational outcomes by knowing the welfare, safeguarding and child protection issues that children in need are experiencing, or have experienced, and identifying the impact that these issues might be having on their attendance, engagement and achievement at school. This includes:
  - Ensuring that the school knows which pupils have or had a social worker.
  - Understanding the academic progress and attainment of these pupils.
  - Maintaining a culture of high aspirations for these pupils.



- Supporting teachers to provide additional academic support or reasonable adjustments to help these pupils reach their potential.
- Helping to promote educational outcomes by sharing the information about the welfare, safeguarding and child protection issues these pupils are experiencing with teachers and the SLT.
- Seek to ensure that child protection files are kept up-to-date and only accessed by those who need to do so.
- Seek to ensure that a pupil's child protection file is transferred as soon as possible, and within five days, when transferring to a new school, and consider any additional information that should be shared.
- Seek to ensure each member of staff has access to and understands the school's Child Protection and Safeguarding Policy and procedures – this will be discussed during the staff induction process.
- Seek to ensure the school's local procedures for Child Protection and Safeguarding Policy are reviewed annually.
- Seek to ensure the Safeguarding Children's Policy is available on the website, and parents are aware that the school may make referrals for suspected cases of abuse or neglect, as well as the role the school plays in these referrals.
- Link with safeguarding partner arrangements to make sure that staff are aware of the training opportunities available and the latest local policies on safeguarding.
- Undergo training, and update this training at least every two years.
- 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; this includes understanding the difficulties pupils may have in approaching staff about their circumstances and considering how to build trusted relationships that facilitate communication.
- Support and advise staff and help them feel confident on welfare, safeguarding and child protection matters: specifically, to seek to ensure that staff are supported during the referrals processes; and to support staff to consider how safeguarding, welfare and educational outcomes are linked, including to inform the provision of academic and pastoral support.
- Understand the importance of information sharing, including within school, with other schools, and with the safeguarding partners, other agencies, organisations and practitioners.
- Understand relevant data protection legislation and regulations, especially the Data Protection Act 2018 and the UK GDPR.
- Keep detailed, accurate, secure written records of concerns and referrals, and understand the purpose of this record-keeping.

The designated teacher has a responsibility for promoting the educational achievement of LAC and previously LAC (PLAC), and for children who have left care through adoption, special guardianship or child arrangement orders or who were adopted from state care outside England and Wales.

## **9. Procedure for supporting a child or young person who may have been harmed**

Children who have been abused can feel very confused and scared about what has happened. Child abuse sometimes causes physical injury and will leave emotional scars. People who have grown up being abused can feel worthless, unloved, betrayed, powerless, confused, frightened and mistrustful of others. They might feel, wrongly, that the abuse is their fault. Autistic children have additional difficulties in communicating their feelings. Known preferred communication methods such as symbols, pictures, photographs, gestures, signs, words will be used to assist children in expressing their feelings.

Children will be supported to cope with expressions of anger and strategies put in place to deal with these. Children will be supported to make them feel less lonely and isolated, feel better about themselves, and more confident.

Children who have been abused may experience any of the following:

- Triggers – something someone says/does reminds them of abuse
- Intrusive memory – a recollection of some aspect of the abuse unsolicited and difficult to ignore or remove
- Panic attacks – feelings of absolute fear, anxiety that are overwhelming
- Inability to concentrate – interrupted learning – being so utterly consumed or overwhelmed by events that learning cannot take place
- Negative self-image – consider themselves, stupid, a failure, bad, naughty etc.
- Resignation or retaliation - withdrawal, retreat into self or attack and rejection of others, may pursue singular activities
- Self-harm – deliberately inflicting pain or injury to self

#### **Procedure for supporting a child who may have been abused:**

- Children should be taken seriously, kept safe and never be made to feel like they are creating a problem for reporting abuse, sexual violence or sexual harassment
- If there is a concern that a child may have been physically or sexually harmed medical attention must be sought.
- Any action should only be taken as part of an agreed care plan.
- Children will be enabled to share their feelings in their known preferred communication method with a person they can trust, such as a parent, teacher, relative, friend or advocate.
- Children will be supported to feel that they do not have to deal with abuse on their own.
- Staff have a duty to respect the confidentiality of children. Disclosure and sharing of information will only take place when there is an overriding concern for the rights of the child or others. Staff will only be informed of abuse on a “need to know basis”.
- Children who have been abused may respond inappropriately to groups of society who they consider responsible for the abuse. This will be managed through risk assessment and supporting the child to overcome the fear.
- If there is a likelihood that a child will act out behaviour that he/she has experienced this will be managed through risk assessment
- Staff will receive appropriate and ongoing training on child abuse.
- All Manager/Principals/Heads of Schools and Health Management counselling services will provide support to staff members.
- Where appropriate, and as necessary, support will be accessed from outside agencies such as Childline / NSPCC and counselling services.

## **10. Evaluation of Policy**

This policy is reviewed at least annually . This policy will be updated as needed to seek to ensure it is up-to-date with safeguarding issues as they emerge and evolve, including any lessons learnt.

Any changes made to this policy will be communicated to all members of staff

The policy will be evaluated in light of whether it is up to date with current legislation and whether it is effective in enabling staff to inform staff about the main areas of abuse and specific safeguarding issues. It will be judged to be effective if staff are able to follow the policy, identify and report concerns and safeguard our pupils, eliminating discrimination and promoting equal opportunities and inclusion. This policy will be reviewed annually or sooner if required.

## 11. The legal framework

This policy sits in the context of the overarching national guidance, legislation and standards on safeguarding children:

### Legislation

- Children Act 1989
- Children Act 2004
- Children and Social Work Act (2017)
- Safeguarding Vulnerable Groups Act 2006
- The Education (School Teachers' Appraisal) (England) Regulations 2012 (as amended)
- Sexual Offences Act 2003
- Female Genital Mutilation Act 2003 (as inserted by the Serious Crime Act 2015)
- Equality Act 2010
- Counter-Terrorism and Security Act 2015
- The UK General Data Protection Regulation (UK GDPR)
- Data Protection Act 2018
- **[Schools providing education to pupils under the age of eight only]** The Childcare (Disqualification) and Childcare (Early Years Provision Free of Charge) (Extended Entitlement) (Amendment) Regulations 2018
- Voyeurism (Offences) Act 2019
- Sexual Offences Act 2003
- The Human Rights Act 1998
- Domestic Abuse Act 2021
- Autism Act 2009
- Mental Capacity Act 2005

### Statutory guidance

- HM Government (2020) 'Multi-agency statutory guidance on female genital mutilation'
- HM Government (2013) 'Multi-agency practice guidelines: Handling cases of Forced Marriage'
- HM Government (2021) 'Channel Duty Guidance: Protecting people vulnerable to being drawn into terrorism'
- DfE (2021) 'Keeping children safe in education 2021'
- DfE (2018) 'Working Together to Safeguard Children'
- DfE (2015) 'The Prevent duty'
- DfE (2018) 'Disqualification under the Childcare Act 2006'
- The Children (Scotland) Act 1995
- Children and Young People (Scotland) Act 2014
- Social Services and Well-being (Wales) Act 2014.
- **Schools providing education to pupils under the age of eight only**] The Childcare (Disqualification) and Childcare (Early Years Provision Free of Charge) (Extended Entitlement) (Amendment) Regulations 2018

### Non-statutory guidance

- DfE (2015) 'What to do if you're worried a child is being abused'
- DfE (2018) 'Information sharing'
- DfE (2017) 'Child sexual exploitation'
- DfE (2021) 'Sexual violence and sexual harassment between children in schools and colleges'

- DfE (2021) 'Recruit teachers from overseas'
- DfE (2020) 'Sharing nudes and semi-nudes: advice for education settings working with children and young people
- DfE (2018) Mental health and behaviour in schools
- All Wales Child Protection Procedures 2008
- Co-operating to Safeguard Children (2016) – Northern Ireland
- Regulation and Quality Improvement Authority (RQIA) (Northern Ireland)
- Child sexual exploitation-Definition and a guide for practitioners, local leaders and decision makers working to protect children from child sexual exploitation (February 2017)
- Channel Duty Guidance 2015: Protecting vulnerable people from being drawn into terrorism
- Sexting in schools and colleges 2016: Responding to incidents and safeguarding young people
- Child sexual exploitation: definition and guide for practitioners (2017)
- DfE Searching, screening and confiscation, 2018
- Promoting positive emotional well-being and reducing the risk of suicide, 2018
- Keeping pupils and staff safe – management of behaviour in schools, including use of physical contact and restrictive / non-restrictive physical intervention to address difficult and harmful behaviour, 2018
- Disqualification under the Childcare Act: Statutory guidance for local authorities, maintained schools, independent schools, academies and free schools, 2016
- DfE (2017) Preventing and tackling bullying
- Scottish Government (2014) National Guidance for child protection in Scotland
- Sexual Offences Act 2003
- Serious Crime Act 2015
- Review of sexual abuse in schools and colleges Ofsted June 21
- DfE (2015) Information Sharing Advice for Safeguarding professionals

## 12. Equality Impact Assessment

NAS employees and volunteers shall not discriminate against any person on the grounds of race, nationality, age, religious or similar philosophical beliefs, sexual orientation, or social standing and shall work in such a way as to give equal opportunity for each person we support to achieve the maximum benefit and potential, consistent with respecting the dignity and value of fellow human beings.

In the design of this policy we have considered the complex inter-relating elements that impact on effective support and safeguarding of children and young people with Autism. Our implementation of this policy should seek to lessen some of the known inequalities that exist in society, including, but not limited to race, disability and gender. Through carefully designed provision and support that affords opportunities for people with those protected characteristics to receive equality of access to all aspects of safeguarding provision. This policy has been designed and consulted on with a large stakeholder group internal to the NAS, including schools and residential based staff.

The welfare of the child is paramount and everyone's responsibility and all children without exception have the right to protection from abuse regardless of gender, ethnicity, disability, sexuality or beliefs.

## 13. Linked Policies

- Positive Behaviour Support Policy SO-0029
- Supporting Behaviour in schools policy SO-030
- Complaints Resolution Policy NAS Schools and Children's Services QS-0010
- NASAT Complaints policy
- NASAT Exclusions policy
- Admissions, remissions and exclusions policy SO-0230
- Safeguarding Adults Policy and Procedure SO-0194

- On line Safety Policy SO-0106

- Anti-bullying in Schools SO-0193
- Mobile Phones (Personal) Policy SO-0001
- Data Protection IGP-02
- Acceptable use of ICT Policy ISP-09
- Whistleblowing SO-0023
- Conduct & Capability Policy HR-0040
- Safer Recruitment Policy and Guidance for NAS Schools & Services HR-0021
- Staff code of conduct
- Missing Child Policy SO-0142
- Relationships and Sex Education Policy SO-0133
- Use of restrictive practice in schools policy SO-0039
- Wellbeing and Mental Health in Schools policy SO-0353
- Supported home learning SO-0351

## 14. Definitions

The terms “**children**” and “**child**” refer to anyone under the age of 18.

For the purposes of this policy, “**safeguarding and protecting the welfare of children**” is defined as:

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

For the purposes of this policy, “**consent**” is defined as having the freedom and capacity to choose to engage in sexual activity. Consent may be given to one sort of sexual activity but not another, and can be withdrawn at any time during sexual activity and each time activity occurs. A person only consents to a sexual activity if they agree by choice to that activity, and has the freedom and capacity to make that choice. Children under the age of 13 can never consent to any sexual activity. The age of consent is 16.

For the purposes of this policy, “**sexual violence**” refers to the following offences as defined under the Sexual Offences Act 2003:

- **Rape:** A person (A) commits an offence of rape if they intentionally penetrate the vagina, anus or mouth of another person (B) with their penis, B does not consent to the penetration, and A does not reasonably believe that B consents.
- **Assault by penetration:** A person (A) commits an offence if they intentionally penetrate the vagina or anus of another person (B) with a part of their 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 they intentionally touch another person (B), the touching is sexual, B does not consent to the touching, and A does not reasonably believe that B consents.
- **Causing someone to engage in sexual activity without consent:** A person (A) commits an offence if they intentionally cause another person (B) to engage in an activity, the activity is sexual, B does not consent to engaging in the activity, and A does not reasonably believe that B consents. This could include forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party.

Our schools and Children's services recognise the extent of “**Peer on Peer Sexual Abuse**” . Peer on Peer sexual abuse is defined is sexual abuse that happens between children of a similar age or stage of

development. It can happen between any number of children, and can affect any age group (Department for Education (DfE), 2021a).

For the purposes of this policy, **“Sexual Harassment”** refers to unwanted conduct of a sexual nature that occurs online or offline, inside or outside of school. Sexual harassment is likely to violate a pupil's dignity, make them feel intimidated, degraded or humiliated, and create a hostile, offensive, or sexualised environment. If left unchallenged, sexual harassment can create an atmosphere that normalises inappropriate behaviour and may lead to sexual violence. Sexual harassment can include, but is not limited to:

- Sexual comments, such as sexual stories, lewd comments, sexual remarks about clothes and appearance, and sexualised name-calling.
- Sexual “jokes” and taunting.
- Physical behaviour, such as deliberately brushing against someone, interfering with someone's clothes, and displaying images of a sexual nature.
- Online sexual harassment, which may be standalone or part of a wider pattern of sexual harassment and/or sexual violence. This includes:
  - The consensual and non-consensual sharing of nude and semi-nude images and/or videos.
  - Sharing unwanted explicit content.
  - Upskirting.
  - Sexualised online bullying.
  - Unwanted sexual comments and messages, including on social media.
  - Sexual exploitation, coercion, and threats.

For the purposes of this policy, **“Upskirting”** refers to the act, as identified the Voyeurism (Offences) Act 2019, of taking a picture or video under another person's clothing, without their knowledge or consent, with the intention of viewing that person's genitals or buttocks, with or without clothing, to obtain sexual gratification, or cause the victim humiliation, distress or alarm. It is an offence to operate equipment for the purpose of Upskirting. **“Operating equipment”** includes enabling, or securing, activation by another person without that person's knowledge, e.g. a motion-activated camera. Anyone, including pupils and staff, of any gender can be a victim of Upskirting. Upskirting will not be tolerated by the school. Any incidents of Upskirting will be reported to the DSL, who will then decide on the next steps to take, which may include police involvement.

For the purposes of this policy, the **“consensual and non-consensual sharing of nude and semi-nude images and/or videos”**, colloquially known as **“sexting”**, is defined as the sharing between pupils of sexually explicit content, including indecent imagery. For the purposes of this policy, **“indecent imagery”** is defined as an image which meets one or more of the following criteria:

- Nude or semi-nude sexual posing
- A child touching themselves in a sexual way
- Any sexual activity involving a child
- Someone hurting a child sexually
- Sexual activity that involves animals

## Acronyms

- This policy contains a number of acronyms used in the Education sector. These acronyms are listed below alongside their descriptions.

Acronym	Long form	Description
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CCE	Child criminal exploitation	A form of abuse where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into taking part in criminal activity in exchange for something the victim needs or wants, for the financial advantage or other advantage of the perpetrator or facilitator, and/or through violence or the threat of violence.
CSCS	Children's social care services	The branch of the local authority that deals with children's social care.
CSE	Child sexual exploitation	A form of sexual abuse where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into sexual activity in exchange for something the victim needs or wants, for the financial advantage, increased status or other advantage of the perpetrator or facilitator, and/or through violence or the threat of violence.
DBS	Disclosure and barring service	The service that performs the statutory check of criminal records for anyone working or volunteering in a school.
DfE	Department for Education	The national government body with responsibility for children's services, policy and education, including early years, schools, higher and further education policy, apprenticeships and wider skills in England.
DPO	Data protection officer	The appointed person in school with responsibility for overseeing data protection strategy and implementation to seek to ensure compliance with the UK GDPR and Data Protection Act.
DSL	Designated safeguarding lead	A member of the senior leadership team who has lead responsibility for safeguarding and child protection throughout the school.
EEA	European Economic Area	The Member States of the European Union (EU) and three countries of the European Free Trade Association (EFTA) (Iceland, Liechtenstein and Norway; excluding Switzerland).
EHC plan	Education, health and care plan	A funded intervention plan which coordinates the educational, health and care needs for pupils who have significant needs that impact on their learning and access to education. The plan identifies any additional support needs or interventions and the intended impact they will have for the pupil.
ESFA	Education and Skills Funding Agency	An agency sponsored by the Department for Education with accountability for funding education and skills training for children, young people and adults.
FGM	Female genital mutilation	All procedures involving the partial or total removal of the external female genitalia or other injury to the female genital organs. FGM is illegal in the UK and a form of child abuse with long-lasting harmful consequences.
UK GDPR	UK General Data Protection Regulation	Legislative provision designed to strengthen the safety and security of all data held within an organisation and seek to ensure that procedures relating to personal data are fair and consistent.
HBA	'Honour-based' abuse	So-called 'honour-based' abuse involves crimes that have been committed to defend the honour of the family and/or community.
HMCTS	HM Courts and Tribunals Service	HM Courts and Tribunals Service is responsible for the administration of criminal, civil and family courts and tribunals in England and Wales. HMCTS is an executive agency, sponsored by the Ministry of Justice.

IICSA	Independent Inquiry into Child Sexual Abuse	The Independent Inquiry into Child Sexual Abuse is analysing case files from the Disclosure and Barring Service to learn more about the behaviours of perpetrators who have sexually abused children in institutions, and to understand institutional responses to these behaviours.
KCSIE	Keeping children safe in education	Statutory guidance setting out schools and colleges' duties to safeguard and promote the welfare of children.
LA	Local authority	A local government agency responsible for the provision of a range of services in a specified local area, including education.
LAC	Looked-after children	Children who have been placed in local authority care or where children's services have looked after children for more than a period of 24 hours.
LGBTQ+	Lesbian, gay, bisexual, transgender and queer plus	Term relating to a community of people, protected by the Equality Act 2010, who identify as lesbian, gay, bisexual or transgender, or other protected sexual or gender identities.
NPCC	The National Police Chiefs' Council	The National Police Chiefs' Council is a national coordination body for law enforcement in the United Kingdom and the representative body for British police chief officers.
PLAC	Previously looked-after children	Children who were previously in local authority care or were looked after by children's services for more than a period of 24 hours. PLAC are also known as care leavers.
PSHE	Personal, social and health education	A non-statutory subject in which pupils learn about themselves, other people, rights, responsibilities and relationships.
PHE	Public Health England	An executive agency of the Department of Health and Social Care which aims to protect and improve the nation's health and wellbeing.
RSHE	Relationships, sex and health education	A compulsory subject from Year 7 for all pupils. Includes the teaching of sexual health, reproduction and sexuality, as well as promoting positive relationships.
SCR	Single central record	A statutory secure record of recruitment and identity checks for all permanent and temporary staff, proprietors, contractors, external coaches and instructors, and volunteers who attend the school in a non-visitor capacity.
SENCO	Special educational needs coordinator	A statutory role within all schools maintaining oversight and coordinating the implementation of the school's special educational needs policy and provision of education to pupils with special educational needs.
SLT	Senior leadership team	Staff members who have been delegated leadership responsibilities in a school.
TRA	Teaching Regulation Agency	An executive agency of the DfE with responsibility for the regulation of the teaching profession.
VSH	Virtual school head	Virtual school heads are in charge of promoting the educational achievement of all the children looked after by the local authority they work for, and all children who currently have, or previously had, a social worker.



## **Organisation specific Acronyms**

NAS(AT) refers to National Autistic Society Independent schools and National Autistic Society Academy Trust Free schools

EQD – Education Quality Development Subcommittee of the Board of Trustees

CH – Children's Home

RSS – Residential Special School

LGB – Local Governing Body

HOSI – Head of School Improvement

EDL – Education Development Lead

DoE – Director of Education

RI / NI – Responsible Individual / Nominated Individual

DSL – Designated Safeguarding Lead

CPO – Child Protection Officer

## Appendix 1: Essential Contact Information

Please complete with your local procedures and display

Our school / service contact number is: xxxxxxxxxxxxxxxx	
Designated Safeguarding Lead / Child Protection Officer	Name xxxxxxxx
Deputy Designated Safeguarding lead	Name xxxxxxxx
Additional staff who are trained Designated Safeguarding Leads	Name xxxxxxxx Name xxxxxxxx
Designated person for Online Safety	
Mental Health Lead	
Designated Teacher for Looked after Children	
The named personnel with Designated Responsibility regarding Allegations against staff/those working in the school are:	
Nominated governor for Safeguarding and Child Protection	
Chair of Governors	
Safeguarding of children concerns	
Children living in x local authority	
Children living in x local authority	
Children living in x local authority	
Children Living in x local authority	
Local authority Designated Officer (LADO) for Allegations against an adult working with children	
Police (Emergency)	999
Police (Non-Emergency)	101
Department for Education helpline contact details for extremism / radicalisation concerns:	020 7340 7264
Local authority Channel Referral Contact Details	
NSPCC	<a href="http://www.nspcc.org.uk">www.nspcc.org.uk</a> 0808 800 5000
NSPCC Whistleblowing helpline	0800 028 0285
ChildLine	<a href="http://www.childline.org.uk">www.childline.org.uk</a> Telephone: 0800 1111
Safecall (independent whistleblowing point of contact)	0800 915 1571 <a href="http://www.safecall.co.uk/reports">www.safecall.co.uk/reports</a> Email - <a href="mailto:nas@safecall.co.uk">nas@safecall.co.uk</a>
The Forced Marriage Unit:	<a href="http://www.gov.uk/stop-forced-marriage">www.gov.uk/stop-forced-marriage</a> Email - <a href="mailto:fmufco@fco.gov.uk">fmufco@fco.gov.uk</a> 020 7008 0151
CEOP, the Child Exploitation and Online Protection Centre	<a href="http://www.ceop.police.uk">www.ceop.police.uk</a>

## Appendix 2: Definitions and indicators of abuse and neglect

Abuse and neglect are signs of maltreatment of a child or young person. Somebody may abuse or neglect a child either directly by inflicting harm, or indirectly, by failing to act to prevent harm. Children may be abused in a family or in an institutional or community setting; by those known to them; or, more rarely, by a stranger. They may be abused by an adult or adults, or another child or children.

All staff should be aware that safeguarding incidents and/or behaviours can be associated with factors outside the school or children's service and/or can occur between children outside of these environments. All staff, but especially the Designated Safeguarding Lead (and deputies) should consider whether children are at risk of abuse or exploitation in situations outside their families. Extra-familial harms take a variety of different forms and children can be vulnerable to multiple harms including (but not limited to) sexual exploitation, criminal exploitation, and serious youth violence.

**All** staff / volunteers should have an awareness of safeguarding issues, some of which are listed below. Staff should be aware that behaviours linked to the likes of drug taking, alcohol abuse, truanting and sexting put children in danger.

**All** staff / volunteers should be aware that safeguarding issues can manifest themselves via peer on peer abuse. This is most likely to include, but may not be limited to, bullying (including cyberbullying), gender-based violence/sexual assaults and sexting.

There are features of autism that may make it harder to truly identify whether abuse is taking place or for the child themselves to understand that they are being abused and these could include:

- Finding it particularly difficult to communicate that they are subject to abuse, especially if they have limited communication skills.
- Some typical indicators of abuse may be a consequence of the child's autism, such as self-injury or withdrawal from social situations.
- Conversely, indicators of actual abuse may be falsely explained as a consequence of the child's autism.
- Where a child is experiencing physical and/or psychological injury as a consequence of behaviours arising from his/her autism, it may be considered neglectful not to pursue reasonable interventions to reduce this behaviour.
- Autistic children sometimes demonstrate behaviour that challenges those around them and are vulnerable to experiencing interventions that are inappropriate, disproportionate or abusive.
- Autistic children often share environments with children who may demonstrate challenging behaviour. It is not acceptable for children to be abused by other children.
- Children with autism struggle to manage changes so any transitions that the child goes through may bring about new or challenging behaviours.
- Even subtle changes in behaviour may be a child communicating that something is wrong and/or that they are being abused.
- There is an increased risk of professionals becoming overfamiliar with the behaviour that a child with autism exhibits. They are then at risk of failing to pick up other concerns, or seeing new behaviour as an extension of behaviour they have already observed.
- A clear understanding of autism and its impact on a child is imperative, as is the ability to recognise subtle changes or other indicators, and remaining open to the possibility of abuse. A clear understanding of how autism impacts upon each individual child is crucial in determining an appropriate response to indicators of abuse.
- There is need to have balance between knowing the child well and recognising that any change in behaviour may be indicative that something is wrong and not being complacent that behaviour is just a child's "autism" and not reporting anything that may be an indicator of abuse.

## DEFINITIONS

There are four types of child abuse.

1. Physical abuse
2. Emotional abuse
3. Sexual abuse
4. Neglect

In addition, children with disabilities are more likely to be subject to other forms of abusive practice:

- force feeding
- physical interventions (including restraint) which are not carried out in line with the local policy, procedures and guidance
- inappropriate behaviour modification including the deprivation of liquid, medication, food or clothing
- misuse of medication, sedation, heavy tranquilisation
- invasive procedures which are unnecessary or carried out against the child's will, or by people without the right skills or support
- being denied access to medical treatment and deliberate failure to follow medically recommended regimes
- ill-fitting equipment, such as callipers, sleep boards which may cause injury or pain, inappropriate splinting
- misappropriation or misuse of a child's finances – financial abuse
- failure to meet the communication needs of a child with a hearing impairment to the point where his or her development is impaired
- a parent seeking residential schooling to exclude the child from an ordinary family life
- being denied mobility, communication or other equipment
- being denied access to education, play and leisure opportunities

### **Physical Abuse**

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

Most children will collect cuts and bruises as part of the rough and tumble of daily life. Injuries should always be interpreted in light of the child's medical and social history, developmental stage and explanation given. Most accidental bruises are seen over bony parts of the body, e.g. knees elbows, shins, and are often on the front of the body. Some children, however, will have bruising that is more than likely inflicted rather than accidental. Important indicators of physical abuse are bruises or injuries that are either unexplained or inconsistent with the explanation given, or visible on the 'soft' parts of the body where accidental injuries are unlikely, e.g. cheeks, abdomen, back and buttocks. A delay in seeking medical attention when it is obviously necessary is also a cause for concern, although this can be more complicated with burns, as these are often delayed in presentation due to blistering taking place sometime later.

Physical abuse can happen in any family, but children may be more at risk if their parents have problems with drugs, alcohol and mental health or if they live in a home where domestic abuse happens. Babies and disabled children also have a higher risk of suffering abuse. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child. Physical abuse can also occur outside of the family environment.

The physical signs of abuse may include:

- Unexplained bruising, marks or injuries on any part of the body
- Multiple bruises – in clusters, often on the upper arm, outside of the thigh
- Cigarette burns
- Human bite marks
- Broken bones
- Scalds, with upward splash marks
- Multiple burns with a clearly demarcated edge

Changes in behaviour that can also indicate physical abuse:

- Fear of parents/carers being approached for an explanation
- Aggressive behaviour or severe temper tantrums
- Flinching when approached or touched
- Reluctance to get changed, for example in hot weather
- Depression
- Withdrawn behaviour
- Running away from home

### **Sexual Abuse**

Sexual abuse involves forcing or enticing a child or young person to take part in sexual activities, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include non-contact activities, such as involving and encouraging children or young people in looking at, or in the production of, sexual images, watching sexual activities, encouraging children or young people to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (including via the internet).

Adults who use children and young adults to meet their own sexual needs abuse both boys and girls of all ages, including infants and toddlers. Usually, in cases of sexual abuse it is the child's behaviour that may cause you to become concerned, although physical signs may also be present. In all cases, children who disclose any details of sexual abuse do so because they want it to stop. It is important, therefore, that they are listened to and taken seriously.

The physical signs of sexual abuse may include:

- Pain or itching near the genital area
- Bruising or bleeding near the genital area
- Sexually transmitted disease
- Vaginal discharge or infection
- Stomach pains
- Discomfort when walking or sitting down
- Pregnancy
- Changes in behaviour which can also indicate sexual abuse include:
- Sudden or unexpected changes in behaviour e.g. becoming aggressive or withdrawn
- Fear of being left with a specific person or group of people
- Having nightmares
- Running away from home
- Sexual knowledge which is beyond their age, or developmental level
- Sexual drawings or language
- Bedwetting
- Eating problems such as overeating or anorexia
- Self-harm or mutilation, sometimes leading to suicide attempts

- Saying they have secrets they cannot tell anyone about
- Substance or drug abuse
- Suddenly having unexplained sources of money
- Not allowed to have friends
- Acting in a sexually explicit way towards adults

### **Emotional abuse**

Emotional abuse is the persistent emotional ill-treatment of a child causing severe and persistent adverse effects on the child or young person's emotional development. It may involve making the child or young person feel they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of the other person. It may include not giving the child opportunities to express their views, deliberately silencing them or ridiculing them in what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children and young people, causing children to feel frequently feel frightened.

These may include interactions that are beyond the child's developmental capability, as well as overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction. It may involve serious bullying (including cyberbullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, though it may occur alone.

Emotional abuse can be difficult to measure, as there are often no outward physical signs. There may be a developmental delay due to a failure to thrive and grow, although this will usually only be evident if the child puts on weight in other circumstances, e.g. when hospitalised or away from the parent/carers care. Even so, children who appear well-cared for may nevertheless be emotionally abused by being taunted, put down or belittled. They may receive little or no love, affection or attention from their parents or carers. Emotional abuse can also take the form of children not being allowed to mix or play with other children.

Changes in behaviour which can indicate emotional abuse include:

- Being unable to play
- Fear of making mistakes
- Sudden speech disorders
- Self-harm
- Fear of parent being approached regarding their behaviour
- Developmental delay in terms of emotional progress

### **Neglect**

Neglect is the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in serious impairment or the child's health or development. Neglect may occur during pregnancy as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to:

- Provide adequate food, clothing and shelter
- Protect a child from physical and emotional harm or danger
- Seek to ensure adequate supervision
- Seek to ensure access to appropriate medical care or treatment

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

Neglect can be a difficult form of abuse to recognise, yet have some of the most lasting and damaging effects on children.

The physical signs of neglect may include:

- Constant hunger, sometimes stealing food from other children
- Constantly dirty or 'smelly'
- Loss of weight, or being constantly underweight
- Inappropriate clothing for the conditions

Changes in behaviour which can also indicate neglect may include:

- Complaining of being tired all the time
- Not requesting medical attention and/or failing to attend appointments
- Mentioning being left alone or unsupervised

## Appendix 3: Specific Safeguarding Issues

### 1.1 Bullying

Bullying, according to the Children's Act 1989/2004, should be addressed as a child protection concern when there is 'reasonable cause to suspect that a child is suffering, or is likely to suffer, significant harm.' Bullying may be defined as deliberately hurtful behaviour, usually repeated over a period of time, where it is difficult for those bullied to defend themselves. It can take many forms, but the three main types are physical, verbal and emotional.

If an autistic child bullies another child or children, careful consideration should be given to the possible reasons. Some autistic children find it difficult to understand or control their emotions or behaviour and may have little or no concept of the consequences of their actions. They might not have the insight or language to describe their feelings of frustration, may lack the empathy to appreciate the impact of their words or behaviour on others, or may be perpetrating the bullying that they are experiencing from others. The possibility that the autistic child is being coerced by others, as in mate crime for example, should also be explored.

**Cyber-bullying** is also an area of bullying and is an increasing problem in the light of developing technology.

The damage inflicted by bullying can frequently be underestimated. It can cause considerable distress to children to the extent that it affects their health and development or, at the extreme, cause them significant harm (including self-harm). All settings in which children are provided with services or are living away from home should have in place rigorously enforced anti-bullying strategies.

Bullying is not always easy to recognise as it can take a number of forms. A child may encounter bullying attacks that are:

- Physical: pushing, kicking, hitting, pinching and other forms of violence or threats
- Verbal: name-calling, sarcasm, spreading rumours, persistent teasing
- Emotional: excluding, tormenting, ridiculing, humiliating
- Cyber: abusive comments, rumours and gossip, blackmail, threats, nasty pictures, stolen identity through emails, texts, social networking sites

Persistent bullying can result in:

- Depression
- Low self-esteem
- Shyness
- Poor academic achievement
- Isolation
- Threatened or attempted suicide

Signs that a child may be being bullied can be:

- Coming home with cuts and bruises
- Torn clothes
- Broken or missing possessions
- Losing dinner money
- Falling out with previously good friends
- Being moody and bad tempered
- Wanting to avoid leaving their home
- Changes in behaviour – becoming aggressive at home
- Worrying about going to school
- Suddenly doing less well at school
- Sleep problems



- Wetting the bed
- Changes in eating habits
- Complaining of headaches or stomach aches
- Anxiety
- Becoming withdrawn – not talking, or spending more time alone

These definitions and indicators are not meant to be definitive, but only serve as a guide to assist staff. When considering the protection of autistic children, there are key points to remember.

Working with autistic children can be a complex job. A clear understanding of how autism impacts upon each individual child is crucial in order to then consider whether there are significant safeguarding or child protection concerns.

Many of the traits associated with autism, if viewed in isolation, could be seen as fitting the standard indicators of child abuse, for example self-injurious behaviours and withdrawal from social situations. There is a risk that associated traits can be misinterpreted as indicators of abuse, or that abuse is missed because a child has autism. There is an increased risk of professionals becoming over-familiar with the behaviour that an autistic child exhibits. They are then at risk of failing to pick up other concerns, or seeing new behaviour as an extension of behaviour they have already observed. This can lead to the professional missing signs and indicators of abuse. While a clear understanding of autism and its impact on a child is imperative, so too is the ability to recognise subtle changes or other indicators, and remaining open to the possibility of abuse or neglect.

Where staff have any suspicion of bullying, they need to record this on CPOMS.

The Department of Education has published advice and guidance on Preventing and Tackling Bullying, Mental Health and Behaviour in School.

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

Both CSE and CCE are forms of abuse and both occur where an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a child into sexual or criminal activity. 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. In some cases, the abuse will be in exchange for something the victim needs or wants and/or will be to the financial benefit or other advantage (such as increased status) of the perpetrator or facilitator. The abuse 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. It can involve force and/or enticement-based methods of compliance and may, or may not, be accompanied by violence or threats of violence. Victims can be exploited even when activity appears consensual and it should be noted exploitation as well as being physical can be facilitated and/or take place online.

**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.
- c) Through violence or the threat of violence

It should be recognised that CSE can occur over time or be a one-off occurrence, and may happen without the child or young person's immediate knowledge or physical contact, e.g. through others sharing videos or images of them on social media. The school will recognise that CSE can affect any child or young person who has been coerced into engaging in sexual activities, even if the activity appears consensual; this includes pupils aged 16 and above who can legally consent to sexual activity. The victim may not realise they are being exploited e.g. they believe they are in a genuine romantic relationship 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.

Sexual exploitation of children and young people has been identified throughout the UK, in both rural and urban areas. It affects boys and young men as well as girls and young women. A significant number of children who are victims of sexual exploitation go missing from home, care and education at some point.

There are three different models of child sexual exploitation which are not exhaustive but show a spectrum of exploitation.

- Inappropriate relationships - Usually involves one perpetrator who has inappropriate power or control over a young person. There may be a significant age gap. The young person may believe that they have a genuine friendship/ loving relationship with the abuser.
- 'Boyfriend' or peer exploitation - The perpetrator grooms the victim by initiating a normal relationship and then goes onto coerce or force them to have sex with friends or associates. The victim may also be required to introduce their friends as new victims.
- Organised/networked sexual exploitation or trafficking - victims are passed through networks possibly over geographical distances, where they may be coerced/forced into sexual activity with multiple men. This often occurs at 'sex parties' and victims may be used to recruit others into the network. This serious organised activity can involve the buying and selling of young people.

Trafficking also includes the movement of children and young people within small geographical areas such as between addresses within an area or a county.

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

- Children who appear with unexplained gifts or new possessions
- Children who associate with other young people involved in exploitation

- Children who have older boyfriends or girlfriends
- Children who suffer from sexually transmitted infections or become pregnant
- Children who suffer from changes in emotional well-being
- Children who misuse drugs and alcohol
- Children who go missing for periods of time or regularly come home late
- Children who regularly miss school or education or don't take part in education
- Displaying sexual behaviours beyond expected sexual development.
- Becoming pregnant.
- 

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

**Action:**

Where CSE, or the risk of it, is suspected, staff will discuss the case with the DSL. If after discussion a concern remains, local safeguarding procedures will be triggered, including referral to the LA. The LA and all other necessary authorities will then handle the matter to conclusion. The school will cooperate as needed.

If a child is in immediate risk of harm, a referral should be made to the police.

**Child Criminal Exploitation** 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:

- in exchange for something the victim needs or wants, and/or
- for the financial or other advantage of the perpetrator or facilitator and/or
- through violence or the threat of violence

It should be recognised that children and young people involved in CCE are victims themselves, regardless of whether they have committed crimes. It should be recognised that victims can be of any gender. The experiences of girls being criminally exploited can be very different to boys, indicators of CCE may also be different for girls. 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.

Specific forms of CCE can include:

- Being forced or manipulated into transporting drugs or money through county lines.
- Working in cannabis factories.
- Shoplifting or pickpocketing.
- Committing vehicle crime.
- Committing, or threatening to commit, serious violence to others.

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

**Action:**

Any practitioner working with a child who they think may be at risk of child criminal exploitation should follow the guidance set out in Working Together and share this information with local authority children's social care.

You should refer any concerns about a child's welfare to local authority children's social care. If you believe a child is in immediate risk of harm, you should contact the police.

**1.3 County lines**

County lines refers to gangs and organised criminal networks exploiting children to move, store or sell drugs and money into one or more areas, locally and/or across the UK.

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 seek to ensure compliance of victims. Children can be targeted and recruited into county lines in a number of locations including special educational needs schools, children's homes and care homes.

As well as the general indicators for CCE, school staff will be aware of the specific indicators that a pupil may be involved in county lines, including:

- Going missing and subsequently being found in areas away from their home.
- Having been the victim or perpetrator of serious violence, e.g. knife crime.
- Receiving requests for drugs via a phone line.
- Moving drugs.
- Handing over and collecting money for drugs.
- Being exposed to techniques such as 'plugging', where drugs are concealed internally to avoid detection.
- Being found in accommodation they have no connection with or a hotel room where there is drug activity.
- Owing a 'debt bond' to their exploiters.
- Having their bank account used to facilitate drug dealing.

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.

Staff will be made aware of pupils with missing episodes who may have been trafficked for the purpose of transporting drugs. Staff members who suspect a pupil may be vulnerable to, or involved in, county lines activity will immediately report all concerns to the DSL.

The DSL will consider referral to the National Referral Mechanism on a case-by-case basis and consider involving local services and providers who offer support to victims of county lines exploitation.

One of the ways of identifying potential involvement in county lines are missing episodes (both from home and school), when the victim may have been trafficked for the purpose of transporting drugs and a referral to the National Referral Mechanism should be considered. If a child is suspected to be at risk of or involved in county lines, a safeguarding referral should be made.

**1.4 Fabricated or Induced Illness**

This is a rare form of child abuse. It occurs when a parent or carer, exaggerated or deliberately causes symptoms of illness in the child. In fabricated or induced illness, the parent may present the child as ill when

they are healthy, deliberately induce symptoms of illness, manipulate test results, or exaggerate or lie about symptoms.

Some of the indicators of fabricated or induced illness, include:

- the medical history doesn't make sense
- treatment is ineffective
- the symptoms disappear when the carer isn't around, and
- they can be seen repeatedly by different professionals looking for different things

In all cases, the child's normal life is restricted. Cases of fabricated or induced illness are very complex. Where fabricated and induced illness is suspected, referrals should be made without alerting the child's carer.

### 1.5 Faith Abuse

Some faiths believe that spirits and demons can possess people (including children) and that prayer can help. The NAS are aware that ANY emotional or physical violence used as part of the above is unacceptable. This is abuse even if the intention is to help the child and as such we will report any concerns to the appropriate agency.

### 1.6 Domestic abuse

For the purposes of this policy, and in line with the Domestic Abuse Act 2021, "**domestic abuse**" is defined as abusive behaviour of a person towards another person (including conduct directed at someone else, e.g. the person's child) where both are aged 16 or over and are personally connected. "**Abusive behaviour**" includes physical or sexual abuse, violent or threatening behaviour, controlling or coercive behaviour, economic abuse, psychological or emotional abuse, or another form of abuse. "**Personally connected**" includes people who:

- Are, have been, or have agreed to be married to each other.
- Are, have been, or have agreed to be in a civil partnership with each other.
- Are, or have been, in an intimate personal relationship with each other.
- Each have, or had, a parental relationship towards the same child.
- Are relatives.

The school will recognise the impact of domestic abuse on children, as victims in their own right, if they see, hear or experience the effects of domestic abuse. All staff will be aware of the signs of domestic abuse and follow the appropriate safeguarding procedures where concerns arise.

Domestic abuse/violence has a significant impact on the physical health and emotional wellbeing of children, and therefore on their ability to enjoy and achieve and to learn.

The main characteristic of domestic abuse is that the behaviour is intentional; it forms a pattern of coercive and controlling behaviour and is calculated to exercise power and control within a relationship.

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 can affect a child's ability to reach their full potential emotionally, physically, socially and academically.

- Children experiencing Domestic Abuse may have a disruptive effect on other pupils, through violent outbursts or bullying
- Schools can provide a safe environment where positive relationships with adults and peers can be modelled
- NAS Schools and children's services may be the place where families seek advice and support

The NAS will report any concerns about the child's welfare to the relevant children's social services department.

In any incidences of known domestic abuse, the service will have clear guidelines for all staff to keep safe if they have to handle situations involving Domestic Abuse perpetrators.

### **Key Features of Domestic Abuse**

Domestic Abuse can best be understood as a coercive pattern of control, usually involving a range of abusive behaviours that typically escalate in frequency and severity over time.

Some examples of these behaviours include:

- Psychological/emotional abuse: intimidation and threats (e.g. to kill or maim, to report victim to agencies, to remove or hurt the children or family pets), social isolation, verbal abuse, humiliation, constant criticism, enforced trivial routines, over-intrusiveness, etc.
- Physical abuse: slapping, pushing, kicking, stabbing, damage to property or items of sentimental value, attempted murder or murder, etc.
- Physical restriction of freedom: controlling who the mother or child/ren see/s or where they go, what they wear or do, stalking, imprisonment, forced marriage etc.
- Sexual abuse: any non-consensual sexual activity, including rape, sexual assault, coercive sexual activity or refusing safer sex, verbal sexual remarks etc.
- Financial abuse: stealing, depriving or taking control of money, running up debts, withholding benefits books or bank cards, etc.

### **1.7 "Honour based" Violence**

So-called 'honour-based' violence (HBV) 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 HBV are abuse (regardless of the motivation) and should be handled and escalated as such. If in any doubt, staff should speak to the designated safeguarding lead (or deputy). Professionals in all agencies, and individuals and groups in relevant communities, need to be alert to the possibility of a child being at risk of HBV, or already having suffered HBV.

#### **Actions:**

If staff have a concern regarding a child that might be at risk of HBV, they should activate local safeguarding procedures, using existing national and local protocols for multi-agency liaison with police and children's social care.

### 1.8 Female genital mutilation (FGM)

This is child abuse and a form of violence against women and girls. 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 consequences.

Professionals in all agencies, and individuals and groups in relevant communities, need to be alert to the possibility of a girl or woman being at risk of FGM, or already having undergone FGM.

If staff have any concerns regarding the potential for FGM to take place they should activate local safeguarding procedures, using existing national and local protocols from multi-agency liaison with police and children's social care. Where a staff member discovers that an act of FGM appears to have been carried out on a girl who is aged under 18, there is a statutory duty upon that individual to report it to the police. (Mandatory Reporting Duty Section 5B of the Female Genital Mutilation Act 2003, as inserted by section 74 of the Serious Crime Act 2015).

As outlined in Section 5B of the Female Genital Mutilation Act 2003 (as inserted by section 74 of the Serious Crime Act 2015), teachers are **legally required** to report to the police any discovery, whether through disclosure by the victim or visual evidence, of FGM on a pupil under the age of 18. Teachers failing to report such cases may face disciplinary action. Teachers will not examine pupils, and so it is rare that they will see any visual evidence, but they must personally report to the police where an act of FGM appears to have been carried out. Unless the teacher has a good reason not to, they should also consider and discuss any such case with the DSL and involve CSCS as appropriate. **NB:** This does not apply to any suspected or at-risk cases, nor if the individual is over the age of 18. In such cases, local safeguarding procedures will be followed.

There are a range of potential indicators that a child or young person may be at risk of FGM, which individually may not indicate risk but if there are two or more indicators present this could signal a risk to the child or young person. Victims of FGM are likely to come from a community that is known to practise FGM. Provided that the mutilation takes place in the UK, the nationality or residence status of the victim is irrelevant. Professionals should also note that the girls and women at risk of FGM may not yet be aware to the practice or that it may be conducted on them, so sensitivity should always be shown when approaching the subject.

Specific factors that may heighten a girl's or woman's risk of being affected by FGM:

- The position of the family and the level of integration within UK society – it is believed that communities less integrated into British society are more likely to carry out FGM
- Any girl born to a woman who has been subjected to FGM must be considered to be at risk of FGM, as must other female children in the extended family
- Any girl who has a sister who has already undergone FGM must be considered to be at risk of FGM, as must other female children in the extended family
- Any girl withdrawn from Personal, Social and Health Education or Personal and Social Education may be at risk as a result of her parents wishing to keep her uninformed about her body and rights

Indications that FGM may be about to take place soon:

- The age at which girls undergo FGM varies enormously according to the community. The procedure may be carried out when the girl is new-born, during childhood or adolescence, at marriage or during the first pregnancy. However, the majority of cases of FGM are thought to take place between the ages of 5 and 8 and therefore girls within that age bracket are at a higher risk.
- It is believed that FGM happens to British girls in the UK as well as overseas. Girls of school age who are subjected to FGM overseas are thought to be taken abroad at the start of the school holidays, particularly in the summer holidays, in order for there to be sufficient time for her to recover before returning to her studies.

There can also be clearer signs when FGM is imminent:

- It may be possible that families will practise FGM in the UK when a female family elder is around, particularly when she is visiting from a country of origin.
- A professional may hear reference to FGM in conversation, for example a girl may tell other children about it
- A girl may confide that she is to have a 'special procedure' or to attend a special occasion to 'become' a woman.
- A girl may request help from a teacher or another adult if she is aware or suspects that she is at immediate risk
- Parents state that they or a relative will take the child out of the country for a prolonged period
- A girl may talk about a long holiday to her country of origin or another country where the practice is prevalent
- Parents seeking to withdraw their children from learning about FGM
- Indication that FGM may have already taken place
- A girl or young woman may have difficulty walking, sitting or standing and may even look uncomfortable
- A girl or woman may spend longer than normal in the bathroom or toilet due to difficulties in urinating
- A girl may spend long periods of time away from a classroom during the day with bladder or menstrual problems
- A girl or woman may have frequent urinary, menstrual problems
- There may be prolonged or repeated absences from school
- A prolonged absence from school with noticeable behaviour changes on the girl's return could be an indication that a girl has recently undergone FGM
- A girl or woman may be particularly reluctant to undergo normal medical examinations
- A girl or woman may confide in a professional
- A girl or woman may ask for help, but may not be explicit about the problem due to embarrassment or fear
- A girl may talk about pain or discomfort between her legs

FGM is included in the definition of “**honour-based' abuse (HBA)**”, which involves crimes that have been committed to defend the honour of the family and/or community. All forms of HBA are forms of abuse and will be treated and escalated as such. Staff will be alert to the signs of HBA, including concerns that a child is at risk of HBA, or has already suffered from HBA, and will consult with the DSL who will activate local safeguarding procedures if concerns arise.

### 1.9 Breast Ironing

Breast Ironing is practiced in some African countries, notably Cameroon. Girls aged between 9 and 15 have hot pestles, stones or other implements rubbed on their developing breast to stop them growing further. In the vast majority of cases breast ironing is carried out by mothers or grandmothers and the men in the family are unaware.



The practice of breast ironing is seen as a protection to girls by making them seem 'child-like' for longer and reduce the likelihood of pregnancy. Once girls' breasts have developed, they are at risk of sexual harassment, rape, forced marriage and kidnapping; consequently, breast ironing is more prevalent in cities.

Breast ironing is a form of physical abuse that has been condemned by the United Nations and identified as Gender-based Violence. Breast ironing does not stop the breasts from growing, but development can be slowed down. Damage caused by the 'ironing' can leave women with malformed breasts, difficulty breastfeeding or producing milk, severe chest pains, infections and abscesses. In some cases, it may be related to the onset of breast cancer.

### 1.10 Forced marriage

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

Forced marriage is a crime in the UK and a form of HBA.

If you suspect someone has been forced into marriage:

- Do not treat allegations merely as a domestic issue and send the young person back to the family home
- Don't ignore what the young person has told you or dismiss out of hand the need for immediate protection
- Follow-up the allegation
- Do not approach the young person's family or those with influence within the community
- Do not contact the family in advance of any enquiries by the police, the Forced Marriage Unit, adult or children's social care, either by telephone or letter
- Do not attempt to be a mediator or encourage mediation, reconciliation, arbitration or family counselling
- Activate local child safeguarding procedures and seek advice from the Forced Marriage Unit.

All staff will be alert to the indicators that a pupil is at risk of, or has undergone, forced marriage, including, but not limited to, the pupil:

- Becoming anxious, depressed and emotionally withdrawn with low self-esteem.
- Showing signs of mental health disorders and behaviours such as self-harm or anorexia.
- Displaying a sudden decline in their educational performance, aspirations or motivation.
- Regularly being absent from school.
- Displaying a decline in punctuality.
- An obvious family history of older siblings leaving education early and marrying early.

Staff who have any concerns regarding a pupil who may have undergone, is currently undergoing, or is at risk of forced marriage will speak to the DSL and local safeguarding procedures will be followed – this could include referral to CSCS, the police or the Forced Marriage Unit

### 1.11 A child missing from education

All children, regardless of their circumstances, are entitled to a full-time education, which is suitable to their age, ability, aptitude and any special educational needs they may have. Local authorities have a duty to establish, as far as it is possible to do so, the identity of children of compulsory school age who are missing education in their area. Effective information sharing between parents, schools, colleges and local authorities is critical to ensuring that all children are safe and receiving suitable education.

A child going missing from education is a potential indicator of abuse or neglect and such children are at risk of being victims of harm, exploitation or radicalisation. School staff should follow their procedures for unauthorised absence and for dealing with children that go missing from education, particularly on repeat occasions, to help identify the risk of abuse and neglect, including sexual exploitation, and to help prevent the risks of going missing in future.

Schools should have appropriate protection plans and responses documented for children who go missing from education, particularly on repeat occasions. It is essential that all staff are alert to signs to look out for and the individual triggers to be aware of when considering the risks of potential safeguarding concerns such as travelling to conflict zones, female genital mutilation and forced marriage.

Further information about children at risk of missing education can be found in the Children Missing Education guidance.

Under Section 175 of the Education Act 2002 we have a duty to investigate any unexplained absences especially as a child going missing from education is a potential indicator of abuse or neglect. Schools and services will follow their local authority procedures for dealing with children that go missing from lessons and /or school.

. All staff are aware that children going missing, particularly repeatedly, can act as a vital warning sign of a range of safeguarding possibilities. This may include abuse and neglect, which may include sexual abuse or exploitation and child criminal exploitation. It may indicate mental health problems, risk of substance abuse, risk of travelling to conflict zones, risk of female genital mutilation or risk of forced marriage.

We also seek to ensure that we are rigorous in our attendance procedures; these are outlined in our attendance policy. Where a child's destination is unknown when they have left our school, we seek to ensure we carry out all necessary checks and refer them as Children Missing Education (CME), using local authority procedures / forms. Staff are aware of the trafficking of children and the importance of rigour around our attendance procedures to reduce this as a threat to our children's safety.

### 1.12 Mental Health

We recognise that schools have an important role to play in supporting the mental health and wellbeing of their pupils.

We seek to ensure we have specific training and clear systems and processes in place for identifying possible mental health problems, including routes to escalate and clear referral and accountability systems.

All staff should also be aware that mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation.

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

Where children have suffered abuse and neglect, or other potentially traumatic adverse childhood experiences, this can have a lasting impact throughout childhood, adolescence and into adulthood. It is key that staff are aware of how these children's experiences, can impact on their mental health, behaviour and education.

Staff who have a mental health concern about a pupil that is also a safeguarding concern will act in line with this policy and speak to the DSL or deputy DSL(s).

The school will access a range of advice to help them identify pupils in need of additional mental health support, including working with external agencies.

Early intervention to identify issues and provide effective support is crucial. The school/service role in supporting and promoting mental health and wellbeing can be summarised as:

- **Prevention:** creating a safe and calm environment where mental health problems are less likely, improving the mental health and wellbeing of the whole school population, and equipping pupils to be resilient so that they can manage the normal stress of life effectively. This will include teaching pupils about mental wellbeing through the curriculum and reinforcing this teaching through school activities and ethos;
- **Identification:** recognising emerging issues as early and accurately as possible;
- **Early support:** helping pupils to access evidence based early support and interventions; and
- **Access to specialist support:** working effectively with external agencies to provide swift access or referrals to specialist support and treatment

If staff have a mental health concern about a child that is also a safeguarding concern, immediate action should be taken by speaking to the Designated Safeguarding Lead or a deputy.

Schools and services can access a range of advice to help them identify children in need of extra mental health support, this includes working with external agencies. More information can be found in the mental health and behaviour in schools guidance, colleges may also wish to follow this guidance as best practice. Public Health England has produced a range of resources to support secondary school teachers to promote positive health, wellbeing and resilience among children. Rise Above may also provide a useful resource for materials and lesson plans.

### 1.13 Peer on peer abuse

**Peer-on-peer abuse** is defined as abuse between children.

The school has a zero-tolerance approach to abuse, including peer-on-peer abuse

All staff should recognise that children are capable of abusing their peers. Abuse is abuse and should never be tolerated or passed off as "banter", "just having a laugh" or "part of growing up". Abuse should also not be excused as part of behaviours associated with their diagnosis. All staff will understand the importance of challenging inappropriate behaviours.

Peer-on-peer abuse can occur between pupils of any age and gender, both inside and outside of school, as well as online. All staff will be aware of the indicators of peer-on-peer abuse, how to identify it, and how to respond to reports. All staff will also recognise that even if no cases have been reported, this is not an

indicator that peer-on-peer abuse is not occurring. All staff will speak to the DSL if they have any concerns about peer-on-peer abuse.

Peer on peer abuse is more likely to be perpetrated by boys and girls are more likely to be victims, but that all peer on peer abuse is unacceptable and will be taken seriously.

Peer on peer abuse can take different forms, such as:

- Bullying, including cyberbullying and prejudice-based or discriminatory bullying.
- Abuse in intimate personal relationships between peers.
- Physical abuse – this may include an online element which facilitates, threatens and/or encourages physical abuse.
- Sexual violence – this may include an online element which facilitates, threatens and/or encourages sexual violence.
- Sexual harassment, including online sexual harassment, which may be standalone or part of a broader pattern of abuse.
- Causing someone to engage in sexual activity without consent.
- The consensual and non-consensual sharing of nude and semi-nude images and/or videos.
- Upskirting.
- Initiation- and hazing-type violence and rituals, which can include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group, and may also include an online element.

All staff will be clear as to the school's policy and procedures regarding peer-on-peer abuse and the role they have to play in preventing it and responding where they believe a child may be at risk from it. Schools and services can be proactive in preventing by:

- Challenging any form of derogatory or sexualised language or behaviour help prevent problematic, abusive and/or violent behaviour in the future
- Being vigilant to issues that particularly affect different genders – for example, sexualised or aggressive touching or grabbing towards female pupils, and initiation and hazing type violence with respect to boys.
- Ensuring their SRE curriculum helps to educate pupils about appropriate behaviour and consent.
- Ensuring pupils know they can talk to staff confidentially through our key worker scheme, and safeguarding posters.
- Seek to ensure staff are trained to understand that a pupil harming a peer could be a sign that the child is being abused themselves, and that this would fall under the scope of this policy.

All staff will be made aware of the heightened vulnerability of those with SEND, who evidence suggests are more likely to be abused than their peers. Staff will not assume that possible indicators of abuse relate to the pupil's SEND and will always explore indicators further.

All staff will be made aware of the heightened vulnerability of LGBTQ+ children and young people, who evidence suggests are also more likely to be targeted by their peers. In some cases, pupils who are perceived to be LGBTQ+, regardless of whether they are LGBTQ+, can be just as vulnerable to abuse as LGBTQ+ pupils. The school's response to sexual violence and sexual harassment between pupils of the same sex will be equally as robust as it is for incidents between children of the opposite sex.

Children and young people will be made aware of how to raise concerns or make a report and how any reports will be handled. This includes the process for reporting concerns about friends or peers. Pupils will also be reassured that they will be taken seriously, be supported, and kept safe.

Where peer on peer abuse is identified all services will put in place:

- A plan to minimise the risk of further peer on peer abuse;
- Record all allegations of peer on peer abuse and seek to ensure they are investigated and dealt with;
- Seek to ensure that victims, perpetrators and any other child affected by peer on peer abuse will be supported and discussion will be recorded on the best way that this can occur

In NAS(AT) services peer on peer abuse in the form of incidents of physical aggression toward one child to another can be common due to the child not understanding the impact of their actions on another. This must be recorded as a peer on peer incident and monitored, with regular review of incidents and safeguarding alerts to reduce the risk.

#### **1.14 Sexual violence and sexual harassment between children**

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

Children who are victims of sexual violence and sexual harassment will likely find the experience stressful and distressing. This 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.

Schools and colleges should consider the following:

- it is more likely that girls will be the victims of sexual violence and more likely that sexual harassment will be perpetrated by boys
- 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 (which are potentially criminal in nature), such as grabbing bottoms, breasts and genitalia. Dismissing or tolerating such behaviours risks normalising them

Children with Special Educational Needs and Disabilities (SEND) can be especially vulnerable. Disabled and deaf children are three times more likely to be abused than their peers. Additional barriers can sometimes exist when recognising abuse in SEND children. These can include:

1. assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's disability without further exploration;
2. the potential for children with SEND being disproportionately impacted by behaviours such as bullying and harassment, without outwardly showing any signs; and
3. communication barriers and difficulties overcoming these barriers

Children who are Lesbian, Gay, Bi, or Trans (LGBT) can be targeted by their peers. In some cases, a child who is perceived by their peers to be LGBT (whether they are or not) can be just as vulnerable as children who identify as LGBT.

All NAS(AT) Schools and Children's Services must:

- consider the makeup of the student body, including the gender and age range of pupils, and whether additional support for children with protected characteristics - who are potentially at greater risk - is appropriate
- consider what we can do to foster healthy and respectful relationships between boys and girls including through relationship and sex education (RSE) and personal, social, health and economic education (PSHE)
- Seek to ensure that their response to boy on boy and girl on girl sexual violence and sexual harassment is equally robust as it is for sexual violence and sexual harassment between children of the opposite sex

Following a report of sexual violence or harassment then the normal safeguarding processes (including contacting the police) must be followed and parents informed unless this will put the victim at further risk

Following reports of rape and assault by penetration, while the school or college establishes the facts of the case and starts the process of liaising with children's social care and the police, the guidance states that:

- the alleged perpetrator should be removed from any classes they share with the victim
- the school or college should also consider how best to keep the victim and alleged perpetrator a reasonable distance apart on school or college premises and on transport to and from the school or college.
- For other reports of sexual violence and sexual harassment, the proximity of the victim and alleged perpetrator and considerations regarding shared classes, sharing school or college premises and school or college transport, should be considered immediately
- In all but the most exceptional of circumstances, the rape or assault is likely to constitute a serious breach of discipline and lead to the view that allowing the perpetrator to remain in the same school or college would seriously harm the education or welfare of the victim and potentially other pupils.

In all cases, schools and colleges should record and be able to justify their decision making. All of the above should be considered with the needs and wishes of the victim at the heart of the process, supported by parents and carers as required. Any arrangements should be kept under review.

The NAS has evaluated the extent to which peer on peer abuse may be occurring within its Education and Children's Services provision. That evaluation of peer on peer abuse will be continuous within schools and services. That evaluation will inform amendments to and development of policy and procedures.

### **1.15 Youth produced sexual imagery "Sexting"**

All staff should be aware to treat the sharing of indecent images, including through sexting, as a safeguarding concern

Youth Produced Imagery is the exchange of self-generated sexually explicit images, nude or semi-nude images, videos or live streams online by young people under the age of 18. This could be through mobile picture messages, gaming platforms, chat apps or webcams over the internet. It could also involve sharing between devices via services like Apple's Airdrop which work offline.

The motivations for taking and sharing nude and semi-nude images, videos and live streams are not always sexually or criminally motivated.

Young people may also call it:

- Cybersex
- Sending a nudie, picture or selfie
- Dick pics
- Pics

Consensual image sharing, especially between older children of the same age must be seen as a safeguarding concern because whilst consensual it is still illegal. If non-consensual it is both illegal and abusive.

'Sexting' is often seen as flirting by children and young people who feel that it's a part of normal life.

The types of incidents which this covers are:

- A person under the age of 18 creates and shares sexual imagery of themselves with a peer under the age of 18
- A person under the age of 18 shares sexual imagery created by another person under the age of 18 with a peer under the age of 18 or an adult
- A person under the age of 18 is in possession of sexual imagery created by another person under the age of 18

This does not cover:

- **The sharing of sexual imagery of people under 18 by adults as this constitutes child sexual abuse and the police should always be informed**
- Young people under the age of 18 sharing adult pornography or exchanging sexual texts which don't contain imagery.

When images are stored or shared online they become public. They can be deleted on social media or may only last a few seconds on apps like Snapchat, but images can still be saved or copied by others. These images may never be completely removed and could be found in the future, for example when applying for jobs or university.

Having possession, or distributing, indecent images of a person under 18 on to someone else are offences under the Sexual Offences Act 2003.

Young people may think 'sexting' is harmless but it can leave them vulnerable to:

- **Blackmail** - An offender may threaten to share the pictures with the child's family and friends unless the child sends money or more images
- **Bullying** - If images are shared with their peers or in school, the child may be bullied
- **Unwanted attention** - Images posted online can attract the attention of sex offenders, who know how to search for, collect and modify images.
- **Emotional distress** - Children can feel embarrassed and humiliated. If they are very distressed this could lead to suicide or self-harm

Staff will receive appropriate training regarding child sexual development and will understand the difference between sexual behaviour that is considered normal and expected for the age of the pupil, and sexual behaviour that is inappropriate and harmful. Staff will receive appropriate training around how to deal with instances of sexting in the school community, including understanding motivations, assessing risks posed to pupils depicted in the images, and how and when to report instances of sexting.

Staff will be aware that creating, possessing, and distributing indecent imagery of children is a criminal offence, regardless of whether the imagery is created, possessed, and distributed by the individual depicted; however, staff will seek to ensure that pupils are not unnecessarily criminalised.

**Actions:**

When an incident involving youth produced sexual imagery comes to your attention:

- The incident should be referred to the Designated Safeguarding Lead as soon as possible
- Consideration must be given to contacting the police to discuss the potential for criminality
- The Designated Safeguarding Lead should hold an initial review meeting with appropriate school staff
- Never view, copy, print, share, store or save the imagery yourself, or ask a child to share or download – this is illegal. If you have already viewed the imagery by accident (e.g. if a young person has showed it to you before you could ask them not to), report this to the DSL and seek support.
- Do not delete the imagery or ask the young person to delete it.
- Do not ask the child/children or young person(s) who are involved in the incident to disclose information regarding the imagery. This is the responsibility of the DSL
- Do not share information about the incident with other members of staff, the young person(s) it involves or their, or other, parents and/or carers.
- Do not say or do anything to blame or shame any young people involved.  
Do explain to them that you need to report it and reassure them that they will receive support and help from the DSL.

Actions for the DSL

The initial review should consider the initial evidence and aim to establish:

- Whether there is an immediate risk to a young person or young people
- If a referral should be made to the police and/or children's social care
- If it is necessary to view the imagery in order to safeguard the young person –in most cases, imagery should not be viewed
- What further information is required to decide on the best response
- Whether the imagery has been shared widely and via what services and/or platforms. This may be unknown
- Whether immediate action should be taken to delete or remove images from devices or online services
- What education and support should be given to those involved
- Any relevant facts about the young people involved which would influence risk assessment
- If there is a need to contact another school, college, setting or individual Whether to contact parents or carers of the pupils involved - in most cases parents should be involved

An immediate referral to police and/or children's social care should be made if at this initial stage:

- The incident involves an adult
- There is reason to believe that a young person has been coerced, blackmailed or groomed, or if there are concerns about their capacity to consent (for example owing to special educational needs)
- What you know about the imagery suggests the content depicts sexual acts which are unusual for the young person's developmental stage, or are violent
- The imagery involves sexual acts and any young person in the imagery is under 13
- You have reason to believe a pupil or pupil is at immediate risk of harm owing to the sharing of the imagery, for example, the young person is presenting as suicidal or self-harming



If none of the above apply then it may be appropriate to decide to respond to the incident without involving the police or children's social care (a school can choose to escalate the incident at any time if further information/concerns come to light). The decision to respond to the incident without involving the police or children's social care would be made in cases when the DSL is confident that they have enough information to assess the risks to pupils involved and the risks can be managed via pastoral support and disciplinary framework and if appropriate local network of support.

- There should be subsequent interviews with the young people involved (if appropriate)
- Parents should be informed at an early stage and involved in the process unless there is good reason to believe that involving parents would put the young person at risk of harm
- At any point in the process if there is a concern a young person has been harmed or is at risk of harm a referral should be made to children's social care and/or the police immediately

If a child was forced by another child into sending the image or video:

- Contact the local Police. Officers may be able to prevent the image from being circulated and take the appropriate action to safeguard the child

If a child shared the image or video willingly with another child:

- Talk to the child about the risks of sexting
- Think about contacting the other child or their parents to discuss the situation and make sure that the image is not circulated

If the image or video has been shared with an adult:

- Report it to CEOP, the Child Exploitation and Online Protection Centre. CEOP are the national policing lead for online child sexual exploitation.

If the child believes the image or video has been circulated online (by a child or adult):

- The child can contact ChildLine who may be able to make a report (with their consent) to the Internet Watch Foundation to get the image removed from the internet

CEOP's [Thinkuknow](#) give advice for parents, as well as children and young people of different ages, on staying safe online. Thinkuknow have created [short videos](#) regarding why children 'sext', how to talk to them about it and what to do if their child is affected.

## 1.16 Radicalisation

Indicators of Vulnerability to Radicalisation:

- **Radicalisation** refers to the process by which a person comes to support terrorism and forms of extremism associated with terrorist groups .
- **Extremism** is defined by the Government in the Prevent Strategy as: Vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs. We also include in our definition of extremism calls for the death of members of our armed forces, whether in this country or overseas Extremism is defined by the Crown Prosecution Service as: The demonstration of unacceptable behaviour by using any means or medium to express views which:
  - Encourage, justify or glorify terrorist violence in furtherance of particular beliefs;
  - Seek to provoke others to terrorist acts;

- Encourage other serious criminal activity or seek to provoke others to serious criminal acts;  
or
- Foster hatred which might lead to inter-community violence in the UK
- There is no such thing as a "typical extremist". Those who become involved in extremist actions come from a range of backgrounds and experiences, and most individuals, even those who hold radical views, do not become involved in violent extremist activity
- **Terrorism** refers to an action that endangers or causes serious violence to a person or people, serious damage to property, or seriously interferes with or disrupts an electronic system. The use or threat of these actions must be designed to influence the government or intimidate the public, and be made for the purpose of advancing a political, religious or ideological cause.

Protecting children and young people from the risk of radicalisation is part of our schools and services wider safeguarding duties. Staff will actively assess the risk of pupils being radicalised and drawn into extremism and/or terrorism. Staff will be alert to changes in pupils' behaviour which could indicate that they may need help or protection. Staff will use their professional judgement to identify pupils who may be at risk of radicalisation and act appropriately, which may include contacting the DSL or making a Prevent referral. The school will work with local safeguarding arrangements as appropriate.

Staff will seek to ensure that they engage with parents and families, as they are in a key position to spot signs of radicalisation. In doing so, the school will assist and advise family members who raise concerns and provide information for support mechanisms. Any concerns over radicalisation will be discussed with the pupil's parents, unless the school has reason to believe that the child would be placed at risk as a result.

The DSL will undertake Prevent awareness training to be able to provide advice and support to other staff on how to protect pupils against the risk of radicalisation. The DSL will hold formal training sessions with all members of staff to seek to ensure they are aware of the risk indicators and their duties regarding preventing radicalisation

Young people may become susceptible to radicalisation through a range of social, personal and environmental factors - it is known that violent extremists exploit vulnerabilities in individuals to drive a wedge between them and their families and communities. It is vital that NAS(AT) staff are able to recognise those vulnerabilities.

Indicators of vulnerability include:

- Identity Crisis – the young person is distanced from their cultural / religious heritage and experiences discomfort about their place in society;
- Personal Crisis – the young person may be experiencing family tensions; a sense of isolation; and low self-esteem; they may have dissociated from their existing friendship group and become involved with a new and different group of friends; they may be searching for answers to questions about identity, faith and belonging;
- Personal Circumstances – migration; local community tensions; and events affecting the young person's country or region of origin may contribute to a sense of grievance that is triggered by personal experience of racism or discrimination or aspects of Government policy;
- Un-met Aspirations – the young person may have perceptions of injustice; a feeling of failure; rejection of civic life;
- Experiences of Criminality – which may include involvement with criminal groups, imprisonment, and poor resettlement / reintegration;
- Autism or Special Educational Needs – the young person may experience difficulties with social interaction, empathy with others, understanding the consequences of their actions and awareness

of the motivations of others. Some autistic young people may also have a very clear sense of what they perceive to be justice / injustice and this may make them more vulnerable to radicalisation

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

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

If staff have any concerns regarding a particular pupil they should activate local safeguarding procedures, using existing national and local protocols from multi-agency liaison with police and children's social care.

The Department for Education has dedicated a telephone helpline (020 7340 7264) to enable staff and governors to raise concerns relating to extremism directly. Concerns can also be raised by email to [counter.extremism@education.gov.uk](mailto:counter.extremism@education.gov.uk). Please note that the helpline is not intended for use in emergency situations, such as a child being at immediate risk of harm or a security incident, in which case the normal emergency procedures should be followed.

(Section 26 of the Counter-Terrorism and Security Act 2015 (the Act) places a duty on certain bodies ("specified authorities" listed in Schedule 6 to the Act), in the exercise of their functions, to have "due regard to the need to prevent people from being drawn into terrorism". This guidance is issued under section 29 of the Act. The Act states that the authorities subject to the provisions must have regard to this guidance when carrying out the duty).

### **The Prevent duty**

Under section 26 of the Counter-Terrorism and Security Act 2015, all schools are subject to a duty to have "due regard to the need to prevent people from being drawn into terrorism", known as "**the Prevent duty**". The Prevent duty will form part of the school's wider safeguarding obligations and schools will have appropriate procedures in place for carrying out the Prevent duty, including how it will engage and implement the Channel programme.

#### **1.17 Private Fostering**

Private fostering is when child might be cared for, as part of a private arrangement by someone who is not their parent or a 'close relative'. This constitutes private fostering when the following conditions are met:

- A child is under 16 years of age – 18 if they have a disability
- The arrangement is for 28 days or longer
- The child's new carer does not have parental responsibility for the child and is not a close relative

Close relatives are defined as step-parents, grandparents, brothers, sisters, uncles, aunts (whether of full-blood, half blood or marriage/affinity). Other people, such as neighbours, friends or more distant relatives

need to have an assessment. Following a successful assessment, the child must be visited by the local authority at least every 90 days to seek to ensure they are and remain safe.

Regardless of the reason, any child separated from their parents is potentially vulnerable. We all therefore have responsibilities to seek to ensure the alternative care any privately fostered child receives meets their welfare and safety needs. Whilst most private fostering cases are established for good reasons, we must also be open to the possibility that the child may have been a victim of trafficking. All Schools must know who has parental responsibility for a child:

- Is the child new to the school?
- Has the child said that they are no longer living with their parents?
- Is their carer vague about routines, needs and the child's education?
- Who accompanies the child to school – is it someone different to their known carer?
- Do you know who is looking after the child and what their relationship to the child is?
- Do you know who has parental responsibility for the child?

By law parents and carers must notify the local authority of private fostering arrangements to safeguard and protect the child's welfare as well as ensuring the child, carer and parent are receiving appropriate support and help.

As an organisation, if we do become aware that a child or young person is being privately fostered, we will inform the carer/parent of their legal duty to inform the Local Authority Social Care Team, we will follow this up by contacting Children's Social Care directly.

### 1.18 Serious Violence

There are a number of areas in which young people are put at risk by gang activity, both through participation in and as victims of gang violence which can be in relation to their peers or to a gang-involved adult in their household. A child who is affected by gang activity or serious youth violence may have suffered, or may be likely to suffer, significant harm through physical, sexual and emotional abuse.

Gang membership is not illegal, but once involved members are more likely to commit robbery, assault or drug offences and to carry or use knives and guns.

They may take risks with their physical safety and sexual health and are far more likely to become victims of crime and risk serious injury or even death.

It is not only boys who join gangs. Young women can be involved as gang members or associates and they are particularly vulnerable to becoming involved in risky sexual behaviour.

**Overlapping issues** - Children and young people who are involved in gang activity or serious youth violence often also experience criminal exploitation. These young people will often go missing for days at a time, as they are trafficked around the country by gangs. The number of children who go missing and are exploited through 'county lines' is not known. Some of them may not even be reported as missing to the police because of fear of gangs.

Through training, all staff will be made aware of the indicators which may signal a pupil is at risk from, or is involved with, serious violent crime. These indicators include, but are not limited to:

- Increased absence from school.
- A change in friendships.
- Relationships with older individuals or groups.

- A significant decline in academic performance.
- Signs of self-harm.
- A significant change in wellbeing.
- Signs of assault.
- Unexplained injuries.
- Unexplained gifts or new possessions.

Staff will be made aware of some of the most significant risk factors that could increase a pupil's vulnerability to becoming involved in serious violence. These risk factors include, but are not limited to:

- Being male.
- Having been frequently absent from school.
- Having been permanently excluded from school.
- Having experienced child maltreatment.
- Having been involved in offending, such as theft or robbery.

If staff have concern that children and young people are at risk from or involved with serious crime, then, normal safeguarding procedures should be followed. Additional advice can be found in the GOV.UK guidance: Advice to schools and colleges on gangs and youth violence.

### 1.19 Homelessness

The DSL and deputy DSL(s) will be aware of the contact details and referral routes into the Local Housing Authority so that concerns over homelessness can be raised as early as possible.

Indicators that a family may be at risk of homelessness include:

- Household debt.
- Rent arrears.
- Domestic abuse.
- Anti-social behaviour.
- Any mention of a family moving home because "they have to".

**Referrals to the Local Housing Authority do not replace referrals to CSCS where a child is being harmed or at risk of harm. For 16- and 17-year-olds, homelessness may not be family-based and referrals to CSCS will be made as necessary where concerns are raised.**

### 1.20 Child abduction and community safety incidents

Child abduction is defined as the unauthorised removal or retention of a child from a parent or anyone with legal responsibility for the child. Child abduction can be committed by parents and other relatives, other people known to the victim, and strangers.

All staff will be alert to community safety incidents taking place in the vicinity of the school that may raise concerns regarding child abduction, e.g. people loitering nearby or unknown adults conversing with pupils.

Pupils will be provided with practical advice and lessons to seek to ensure they can keep themselves safe outdoors

### 1.21 Modern Slavery

**Modern slavery** encompasses human trafficking and slavery, servitude, and forced or compulsory labour. This can include CCE, CSE, and other forms of exploitation.

All staff will be aware of and alert to the signs that a pupil may be the victim of modern slavery. Staff will also be aware of the support available to victims of modern slavery and how to refer them to the National Referral Mechanism.

### 1.22 Cyber-crime

Cyber-crime is defined as criminal activity committed using computers and/or the internet. This includes 'cyber-enabled' crimes, i.e. crimes that can happen offline but are enabled at scale and at speed online, and 'cyber-dependent' crimes, i.e. crimes that can be committed only by using a computer. Crimes include:

- Unauthorised access to computers, known as 'hacking'.
- Denial of Service attacks, known as 'booting'.
- Making, supplying or obtaining malicious software, or 'malware', e.g. viruses, spyware, ransomware, botnets and Remote Access Trojans with the intent to commit further offence.

All staff will be aware of the signs of cyber-crime and follow the appropriate safeguarding procedures where concerns arise. This may include the DSL referring pupils to the National Crime Agency's Cyber Choices programme.

### 1.23 Children and young people with family members in prison

Children and young people with a family member in prison will be offered pastoral support as necessary. Staff will use developmentally appropriate resources to support as necessary. Where appropriate they will receive a copy of '[Are you a young person with a family member in prison?](#)' from Action for Prisoners' Families where appropriate and allowed the opportunity to discuss questions and concerns

### 1.24 Children and young people required to give evidence in court

Where children and young people are required to give evidence in criminal courts, either for crimes committed against them or crimes they have witnessed, will be offered appropriate pastoral support. Staff will use developmentally appropriate resources to support. These may include or be guided by :

**[Primary schools only]** Pupils will be provided with the booklet '[Going to Court](#)' from HMCTS where appropriate and allowed the opportunity to discuss questions and concerns.

**[Secondary schools and post-16 settings only]** Pupils will be provided with the booklet '[Going to Court and being a witness](#)' from HMCTS where appropriate and allowed the opportunity to discuss questions and concerns.

## Appendix 4 – Principles and Standards for Child Protection - NAS Services in Scotland

### Core principles

Core principles, values and shared standards of practice form the foundation for effective, collaborative child protection activity. While different agencies will have differing codes of practice and responsibilities, a shared approach to values and standards will bring clarity and purpose to single agency, multi-agency and inter-agency working.

Paramount among these principles is that child protection must be seen within the wider context of supporting families and meeting children's needs through GIRFEC.

GIRFEC:

- puts children's needs first;
- seeks to ensure that children are listened to and understand decisions that affect them; and
- seeks to ensure that they get the appropriate co-ordinated support needed to promote, support and safeguard their wellbeing, health and development

**GIRFEC** requires that all services for children and young people and adult services working with parents and carers of children and young people - including social work, health, education, police, housing and third sector services - adapt and streamline their systems and practices so that, where necessary, they can work together better to support children and young people. This includes strengthening arrangements for information-sharing. The approach encourages earlier intervention by practitioners to avoid crisis situations at a later date and seeks to ensure that children and young people get the help they need when they need it. With its emphasis on shared assessment based on common language, it facilitates information-sharing and stresses the importance of understanding risks and needs across all aspects of the child's wellbeing.

The Children and Young People (Scotland) Act 2014 sets out duties on a range of public bodies to report on how they are taking forward children's rights as set out in the UN Convention on the Rights of the Child. Moreover, ratified by the UK Government in 2009, the UN Convention on the Rights of Persons with Disabilities stipulates that in order for disabled children to be able to realise the rights mentioned above, they need to be provided with disability and age-appropriate assistance.

**The Children's Charter and the Framework for Standards** - In addition to the Convention, the Children's Charter was drawn up following consultation with children and young people as part of the Scottish Government's child protection reform programme. The Charter sets out a list of demands children should feel entitled to make:

- get to know us;
- speak with us;
- listen to us;
- take us seriously;
- involve us;
- respect our privacy;
- be responsible to us;
- think about our lives as a whole;
- think carefully about how you use information about us;
- put us in touch with the right people;
- use your power to help;
- make things happen when they should; and
- help us be safe

The Charter reflects children and young people's own views regarding what they need and the standard of care they expect when they have problems or are in difficulty and need to be protected. It shows that children and young people place more value on relationships and attitudes than processes and events. This should be reflected in the planning and implementation of all child-focused interventions.

**The Framework for Standards** - is the detailed means for translating the commitments made in the Children's Charter into practice. In working with children and their families, all practitioners should strive to adhere to the following best practice standards.

**Children get the help they need when they need it** - Intervention should be proportionate and timely and a holistic approach should be taken to identifying and responding to a child's wellbeing needs, as well as any risks they may face. Early intervention, preventative work and the provision of universal services, such as health and education, should seek to ensure a timely response. Agencies working with children and their families should consider not only immediate needs but also longer-term needs that may arise. Child protection investigations may highlight significant unmet needs for support and services among children and families. These should always be considered, even where concerns about significant harm are not substantiated. Equally, family support services should always be alert to potential indicators of abuse and neglect. It must be remembered that early intervention and Compulsory Measures of Supervision are not mutually exclusive, early use of Compulsory Measures of Supervision may help to seek to ensure compliance and prevent concerns from escalating.

**Professionals take timely and effective action to protect children** - Practitioners should be alert to a child's wellbeing needs. If they are concerned about a child, they should seek all the information they need to inform their assessment of a child's circumstances and this should include any protective factors in the child's life. Practitioners should be clear about who they can discuss their concerns with and what action may be required to best support and protect the child. Joint planning and intervention across agencies will help seek to ensure that risks are thoroughly assessed. The Named Person will be key to ensuring that all the information available is coordinated in order to arrive at a holistic assessment of the child's needs.

**Professionals seek to ensure children are listened to and respected** - Children should be listened to and their views should always inform any decisions made about them. Children and their carers should also be able to expect honesty and to be given explanations for actions or decisions taken. In some instances, urgent, immediate action will be needed to seek to ensure the child's protection. In most cases, however, the child will be able to remain in the care of their family. It is especially important, therefore, that practitioners strive to achieve a good working relationship with parents/carers to seek to ensure the best welfare of the child.

**When involved in child protection work, agencies should seek to ensure that:**

- wherever possible, parents/carers are given full information about the nature of the concerns;
- wherever possible, the child and their parents/carers have the opportunity to either give or withhold their consent to interviews and medical examinations.
- the child and family are consulted on and given explanations for any actions/decisions taken. Where necessary, explanations should be given more than once and/or in writing, as the stressful nature of investigations can make it difficult to take information in;
- children and their families should be involved, wherever possible, in planning to meet the child's needs, both in the short and longer term. Children and their families are often best placed to know 'what works' for them;
- the religious and cultural background of the child and family are taken into consideration when any decisions are being taken; and
- where a child has learning disabilities or additional support needs with communication, consideration is given to the best way to involve and communicate with the child.



**Agencies and professionals share information about children where this is necessary to protect them -**

Sharing relevant information is an essential part of protecting children. Although those providing services to adults and children may be concerned about balancing their duty to protect children from harm and their general duty towards their patient or service user, the over-riding concern must always be the safety of the child but concerns about a child's safety will always take precedence over the 'public interest' in maintaining confidentiality; for example, when referring a child to the Children's Reporter when there might be a need for Compulsory Measures of Supervision, or for the prevention and detection of crime. It should be borne in mind that a fairly minor wellbeing concern raised by one agency may, when combined with information from other agencies, point to much more serious concerns. Under present Data Protection law, it is perfectly acceptable and lawful for services to share information, where there is an indication that a child's wellbeing is at risk. Under such circumstances consent is not required and should not be sought as the holder of the information can rely on alternative and more appropriate conditions from schedules 2 and 3 of the Data Protection Act 1998.

**Agencies and professionals work together to assess needs and risks and develop effective plans –**

Practitioners involved with a potential child protection case will, first and foremost, need to seek to ensure the safety of the child, initially by assessing any risks and then by taking any immediate steps required to address those risks. Although the child's safety must be the primary consideration, agencies also need to take a wider view of the overall wellbeing needs of the child and family in line with the GIRFEC approach. Positive strengths and protective factors must be considered and assessments should clearly identify the impact of both protective and adverse factors on the child. Any subsequent interventions, including Child Protection Plans, should be clearly focused on improving outcomes for the child. All agencies involved, along with the child and family, should clearly understand each other's roles and the contributions everyone will make to seek to ensure the successful delivery of the plan. Timescales for intervention should be clear and those involved with the plan should be alert to changes in circumstances and how these may affect the child and family.

**Professionals are competent and confident -**

All staff who work with children and or their families must understand their role in meeting children's needs and be alert to concerns about a child's wellbeing. Practitioners who work with children and their families should be able to demonstrate collaborative practice, both with other agencies and with children and their families. Specialist skills and training should be available to staff undertaking joint investigations and assessments. Training should recognise and support the unique contribution each service has to meeting children's wellbeing needs and protecting them; equally, multi-agency training should be widely available for local services, including managers and leaders as well as direct practitioners.

**Agencies work in partnership with members of the community to protect children -**

All services that work with children and/or their families are responsible for promoting, supporting and safeguarding the wellbeing of all children and ensuring that members of the public know who to contact if they are concerned about a child. This may include raising public awareness of the role of Named Person and promoting community responsibility for child protection. Child protection must be seen as the responsibility not only of the statutory agencies but also of the wider public. Local services should be accessible, transparent and accountable to the general public.

**Agencies, individually and collectively, demonstrate leadership and accountability for their work and its effectiveness -**

Effective service delivery requires effective leadership at both strategic and operational levels. Chief Officers are responsible for ensuring that the appropriate mechanisms are in place for the delivery of their service and that the appropriate links between planning and strategic fora are established and operating effectively. Services need to seek to ensure that they have robust quality assurance and self-evaluation mechanisms in place so that the impact of service delivery can be measured. Practitioners

involved in child protection often face complex and demanding challenges and senior managers must have an understanding of their staff's needs, and provide supervision and support.

**Resources**

- [National Guidance for Child Protection in Scotland 2014 \(refer to part 1\)](#)
- [Safeguarding Scotland's vulnerable children from child abuse: A review of the Scottish system 2014](#)
- [How Safe Are Our Children? NSPCC Scotland Briefing 2015](#)
- [Children's Experiences of Domestic Violence 2015](#)
- [Child Abuse and Neglect: A resource for primary schools 2013](#)
- [Child Abuse and Neglect: A resource for secondary schools 2013](#)
- [GIRFEC information & resources](#) Scottish Government

## Appendix 5 – Principles and Standards for Child Protection - NAS Services in Wales

### Reporting in Wales

The Social Services and Well-being (Wales) Act 2014 came into force in April 2016. It provides the legal framework for social service provision in Wales and The Wales Safeguarding Procedures outlines roles and responsibilities and outlines which organisation, team or practitioner has lead responsibility for safeguarding as well as the precise roles of everyone involved.

At a local level, regional safeguarding children boards co-ordinate and seek to ensure the effectiveness of work to protect and promote the welfare of children. They are responsible for local child protection policy, procedure and guidance.

Each board includes any:

- Local authority
- Chief Officer of Police
- Local health board NHS Trust
- Provider of probation services that falls within the safeguarding board area

### Reporting Concerns

#### How to report a concern

If you think a child is in immediate danger, contact the police on 999. If you are worried about a child, but they are not in immediate danger, you should share your concerns.

#### Follow the NAS Safeguarding Children policy

Contact your local child protection services. Their contact details can be found on the website for the local authority the child lives in. Contact the police. Services will risk assess the situation and take action to protect the child as appropriate, either through statutory involvement or other support. This may include making a referral to the local authority.

#### Duty to report

Section 130 of the Social Services and Well-being (Wales) Act 2014 requires health and social care professionals and teachers to inform the local authority if they have reasonable cause to suspect a child is at risk of experiencing abuse, neglect or other types of harm.

It is mandatory for all regulated health and social care professionals and teachers in Wales to report 'known cases' of female genital mutilation (FGM) in under 18s to the police (Home Office, 2016).

#### Referrals and investigations

The local authority child protection team has a legal duty to investigate any concerns referred to them.

They will first assess if the child is at immediate risk of danger. If the child is in immediate danger the local authority or an authorised person (including the NSPCC) can take the following action through the courts:

- An emergency protection order can be issued to immediately remove a child to a place of safety
- An exclusion order can be issued to remove the abuser from the family home
- A child assessment order can be issued for a children's social worker to assess the child's needs without the parents' or carers' consent
- The police can remove a child to a place of safety for up to 72 hours without obtaining a court order
- A female genital mutilation protection order (FGMPO) can be applied for through a family court and offers the means of protecting actual or potential victims from FGM under the civil law

If the child is not in immediate danger, there will be an initial assessment of the child's needs.

**Under Section 21 of the Social Services and Well-being (Wales) Act 2014, the local authority has a statutory duty to assess the needs of a child if they appear to need additional support to that provided by their family.**

If a child appears to be suffering or at risk of suffering significant harm, the local authority has a duty to investigate under Section 47 of the Children Act 1989.

After these investigations, they will decide how to act. They may:

- Take no further child protection action if the child has not been harmed and is not considered to be at risk of harm
- Assess the child as a person who has a need for care and support. A child is assessed as in need of care and support if:
  - The need arises from circumstances such as their age or health, and:
  - It relates to their personal wellbeing outcomes
  - It cannot be met by their parents, wider family or community services
  - It can only be met by their local authority arranging or providing the service or making direct payments

If a child is eligible for a service, a care and support plan must be agreed. This is required under Section 54 of the Social Services and Well-being (Wales) Act 2014.

### **Case Conferences**

A case conference is held if the child is at risk of significant harm. At the case conference, relevant professionals can share information, identify risks and outline what needs to be done to protect the child. In Wales, this must happen within 15 working days from the start of the assessment.

If professionals at the initial case conference decide a child is at risk of significant harm, they will add the child to the child protection register and draw up a child protection plan.

Case conferences will continue at regular intervals, until the child is no longer considered at risk of significant harm, or until they are taken into care.

### **Child Protection Register**

In Wales, the Child Protection Register (CPR) is a confidential list of all children in the local area who have been identified as being at risk of significant harm. It allows authorised individuals to check if a child they are working with is known to be at risk.

If a child is added to the CPR, they must also have a child protection plan, which sets out what action needs to be taken by whom and when, in order to safeguard the child and promote their welfare.

### **Resources**

- The Social Services and Well-being (Wales) Act 2014
- All Wales Child Protection Review Group (2008)
- Welsh Government (2015) Programme for Children and Young People
- Welsh Government (2016) Working Together to safeguard people
- Welsh Government (2017) Codes of practice and statutory guidance

## Appendix 6 – Principles and Standards for Child Protection - NAS Services in Northern Ireland

The Northern Ireland Executive, through the Department of Health, is responsible for child protection in Northern Ireland.

The Safeguarding Board for Northern Ireland (SBNI) co-ordinates and seeks to ensure the effectiveness of work to protect and promote the welfare of children

### **Reporting Concerns**

If you think a child is in immediate danger, contact the police on 999. If you're worried about a child but they are not in immediate danger, you should share your concerns.

### **Follow the NAS Safeguarding Children policy.**

Contact the relevant Health and Social Care Trust (HSCT) Gateway Services team. In circumstances that are not an emergency, the HSCT gateway services team is the first point of contact for all new referrals to children's social services.

Contact the Police Service of Northern Ireland (PSNI). The police can make an emergency protective response if there is an immediate concern about the safety of a child.

**Services will risk assess the situation and take action to protect the child as appropriate either through statutory involvement or other support. This may include making a referral to the local authority.**

**Not reporting a relevant offence to the police, including those against children, is an offence in Northern Ireland.**

### **Referrals and investigations**

When the Health and Social Care Trust (HSCT) Gateway Service receives a referral about a child, they will first assess if the child is at immediate risk of danger.

**If the child is not in immediate danger**, the HSCT Gateway Service should carry out an initial assessment within 10 working days. They will use all the available information to decide what further action is required.

As part of this process, they must consider whether the Joint Protocol should be implemented. This is a framework for joint investigative working between the police and social workers.

Following the results of the assessment, the HSCT Gateway Service may:

- take no further child protection action if the child hasn't been harmed and isn't considered to be at risk of harm. They may offer additional support instead
- make the child 'a child in need'. This means the child and their family are entitled to receive extra support from the relevant agencies
- provide additional social work support to the child and their family. A pathway assessment will be carried out to give an in-depth assessment of their needs
- provide time-limited intervention.

Where there are allegations of abuse and neglect, or if a crime is suspected, the HSCT Gateway Service must report the referral to Police Service of Northern Ireland (PSNI) and a strategy discussion must take place within 24 hours to decide how to proceed.

The strategy discussion may involve a range of professionals working with the family. Its purpose is to seek to ensure an early exchange of information and clarify what action needs to be taken by the PSNI and the HSCT (either separately or together).

### **Case conferences**

If the child is at risk of significant harm, a case conference is held. Relevant professionals can then share information, identify risks and outline what needs to be done to protect the child.

The initial case conference should take place within 15 working days of the child protection referral. At this point the responsibility of the case is transferred to the Family Intervention Team.

If professionals at the initial case conference decide a child is at risk of significant harm they will add the child to the child protection register, and draw up a child protection plan.

Case conferences should continue at regular intervals until either:

- the child is no longer considered at risk of significant harm; or
- until the child is taken into care

### **Child protection register (CPR)**

In Northern Ireland the child protection register (CPR) is a confidential list of all children in the local area who have been identified as being at risk of significant harm. It allows authorised individuals to check if a child they are working with is known to be at risk.

If a child is added to the CPR they must also have a child protection plan, which sets out what action needs to be taken by whom and when, in order to safeguard the child and promote their welfare.

### **Resources**

- The legislative framework for Northern Ireland's child protection system is set out in The Children (Northern Ireland) Order 1995.
- The Children's Services Co-operation Act (Northern Ireland) 2015 requires public authorities to co-operate in contributing to the wellbeing of children and young people, in the areas of:
  - physical and mental health
  - enjoyment of play and leisure
  - learning and achievement
  - living conditions, rights, and economic wellbeing.
- Under Section 5 of the Criminal Law Act (Northern Ireland) 1967, it is an offence not to report a 'relevant offence' to the police. This includes offences against children.
- Children and young people's strategy 2017-2027: working together to improve the well-being of children and young people living in Northern Ireland, delivering positive, long-lasting outcomes (Department for Education, 2016)

This states that children should:

- be living in a society which respects their rights
  - be healthy
  - enjoy learning and achieving
  - have safety and stability
  - have economic and environmental wellbeing
  - be contributing positively to the community and society
- Revised regional core child protection policies and procedures for Northern Ireland (Safeguarding Board for Northern Ireland, 2018)

This explains the actions that must be taken when there are concerns about the welfare of a child/young person, including:

- core procedures
- individuals who pose a risk to children and young people
- learning and improvement to support and develop child protection
- the roles and responsibilities of the Safeguarding Board for Northern Ireland
- interagency guidance and protocols

## Appendix 7- Myth-busting guide to information sharing

See also the following guidance:

<https://www.gov.uk/government/publications/safeguarding-practitioners-information-sharing-advice>

Sharing information enables practitioners and agencies to identify and provide appropriate services that safeguard and promote the welfare of children. Below are common myths that may hinder effective information sharing.

### **Data protection legislation is a barrier to sharing information**

No – the Data Protection Act 2018 and GDPR do not prohibit the collection and sharing of personal information, but rather provide a framework to seek to ensure that personal information is shared appropriately. In particular, the Data Protection Act 2018 balances the rights of the information subject (the individual whom the information is about) and the possible need to share information about them.

### **Consent is always needed to share personal information**

No – you do not necessarily need consent to share personal information. Wherever possible, you should seek consent and be open and honest with the individual from the outset as to why, what, how and with whom, their information will be shared. You should seek consent where an individual may not expect their information to be passed on. When you gain consent to share information, it must be explicit, and freely given. There may be some circumstances where it is not appropriate to seek consent, because the individual cannot give consent, or it is not reasonable to obtain consent, or because to gain consent would put a child's or young person's safety at risk.

### **Personal information collected by one organisation/agency cannot be disclosed to another**

No – this is not the case, unless the information is to be used for a purpose incompatible with the purpose for which it was originally collected. In the case of children in need, or children at risk of significant harm, it is difficult to foresee circumstances where information law would be a barrier to sharing personal information with other practitioners.

### **The common law duty of confidence and the Human Rights Act 1998 prevent the sharing of personal information**

No – this is not the case. In addition to the Data Protection Act 2018 and GDPR, practitioners need to balance the common law duty of confidence and the Human Rights Act 1998 against the effect on individuals or others of not sharing the information.

### **IT Systems are often a barrier to effective information sharing**

No – IT systems, such as the Child Protection Information Sharing project (CP-IS), can be useful for information sharing. IT systems are most valuable when practitioners use the shared data to make more informed decisions about how to support and safeguard a child.

## Appendix 8 – When to call the police

### Guidance for schools & colleges

<https://www.npcc.police.uk/documents/Children%20and%20Young%20people/When%20to%20call%20the%20police%20guidance%20for%20schools%20and%20colleges.p>

#### Who is this for?

This advice is for school and college staff with responsibility or behaviour management, including Designated Safeguarding Leads (DSLs), their deputies, head teachers and senior leadership teams in schools and colleges in England.

#### What does this advice cover?

This advice covers incidents on school and college premises where students have potentially committed a crime. It provides guidance on what schools and colleges should bear in mind when considering contacting the police. This advice covers the following situations:

- Assault
- Criminal damage
- Cyber crime
- Drugs
- Harassment
- Sexual offences
- Theft
- Weapons

This advice aims to support schools and college to make defensible decisions when considering whether to involve the police.

#### Safeguarding incidents

This advice does not cover safeguarding incidents. Where a child is suffering, or is likely to suffer from harm, it is important that a referral to children's social care (and if appropriate the police) is made immediately.

Referrals should follow the local referral process.



## Appendix 9 - Contacts and Advice

### Expert organisations

- [Barnardo's](#)
- [Lucy Faithfull Foundation](#)
- [NSPCC](#)
- [Rape Crisis](#)
- [University of Bedfordshire: Contextual Safeguarding](#)
- [UK Safer Internet Centre](#)

### Support for victims

- [Anti-Bullying Alliance](#)
- [MoJ Victim Support](#)
- [Rape Crisis](#)
- [The Survivor's Trust](#)
- [Victim Support](#)

### Toolkits

- [Brook](#)
- [NSPCC](#)
- [Safeguarding Unit, Farrer and Co, and Carlene Firmin, MBE, University of Bedfordshire](#)

### Further information on confidentiality and information sharing

- [Gillick Competency Fraser Guidelines](#)
- [Government Information Sharing Advice](#)
- [Information Commissioner's Office: Education](#)
- [NSPCC: Things to Know and Consider](#)

### Further information on sexting

- [UK Council for Child Internet Safety: Sexting Advice](#)
- [London Grid for Learning – Collection of Advice](#)

### Support for parents

- [Parentzone](#)
- [Parentsafe – London Grid for Learning](#)
- [CEOP Thinkuknow – Challenging Harmful Sexual Attitudes and their Impact](#)
- [CEOP Thinkuknow – Supporting Positive Sexual Behaviour](#)