

Stronger Together



**BRADGATE**  
Education Partnership

**POLICY:**

# **Safeguarding & Child Protection Policy 2024-2025**

## **The Merton Primary School**



The Merton Primary School  
*To be the best we can be.*

Approved: September 2024  
Review Date: September 2025  
Responsible Officer: Director of Education

Ambitious  
Collaborative  
Ethical



**BRADGATE**  
Education Partnership

## MISSION:

Through strong collaboration between our schools, Bradgate Education Partnership is committed to providing an ambitious and inclusive education for all.

We want our children and young people to realise their full potential academically, socially and personally. We celebrate the distinctive ethos of each individual school. We ensure that all who are part of our Trust have a deep sense of belonging and a supportive opportunity to grow.



## Stronger Together



## VALUES:



### Ambitious

We aim high and are aspirational for all.



### Collaborative

We work closely together to encourage, support, challenge and share.



### Ethical

We treat everyone fairly, within a culture of kindness and respect.

## VISION:



### PUPILS

All our pupils are equipped with the knowledge, skills, values and attitudes to thrive in life and make a positive difference.



### SCHOOLS

All our schools provide a safe and happy space where pupils study an ambitious curriculum which unlocks their personal potential so that they achieve exceptional outcomes.



### WORKFORCE

All staff have positive impact in their roles whilst feeling supported and valued both personally and professionally.



### COMMUNITY

All our schools embrace the local area they serve within a deeply embedded culture of community partnership.



### WIDER WORLD

All our pupils and staff understand, respect and embrace the diversity of the wider world in which they live.



### SUSTAINABILITY

Across our partnership, everything we do is aligned to meet the needs of the present without compromising a sustainable future.

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- Code of Conduct
- Disciplinary Policy
- Whistleblowing Policy
- General Data Protection Policy (GDPR)
- School CPOMS protocol
- Alternative Provision policy
- Physical intervention and the use of reasonable force
- Behaviour
- Personal and intimate care
- Complaints procedure
- Tackling bullying
- Physical contact
- Safe working practice
- Whistleblowing
- SEN
- Missing children
- Recruitment and selection
- Safeguarding concerns and allegations made about staff, supply staff, contractors and volunteers, including low level concerns guidance
- Grievance and disciplinary
- Staff/pupil online communication
- Handheld devices
- Confidentiality and information sharing



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Local Authority Designated Officer (LADO)	<a href="mailto:CFS-LADO@leics.gov.uk">CFS-LADO@leics.gov.uk</a> LADO service is available office hours only: Monday-Thursday, 8.30am - 5.00 pm and Friday, 8.30am - 4.30pm	Allegations Line: 0116 3054141 <a href="mailto:CFS-LADO@leics.gov.uk">CFS-LADO@leics.gov.uk</a> emails for referral forms. Outside of office hours, contact the Leicestershire First Response Children's Duty Team: 0116 305 0005
First Response	For urgent concerns about a child who needs a social worker or police officer today	0116 305 0005
Police	To report a crime and immediate risk of harm or abuse to child	Tel: 101 In an emergency 999 (only)





## **1.0 Bradgate Education Partnership Safeguarding Principles**

- 1.1 At Bradgate Education Partnership, we believe in fostering a child centred and coordinated approach to safeguarding and child protection in all our schools. Our strategic safeguarding model promotes a consistent and co-ordinated approach to policy and practice across the trust.
- 1.2 We recognise it is both our statutory and moral duty to promote the safety and welfare of all children in our trust and prepare them well for the next phase of their life.
- 1.3 Our trust Safeguarding and Child Protection policy supports consistency across the trust, and schools use this as a model to develop their own personalised policy specific to their context and local priorities.

## **2.0 Our Trust supports safeguarding by:**

- 2.1 Providing direction and guidance from the trust safeguarding team
- 2.2 Proactively analysing trends and priorities
- 2.3 Offering professional development and training on common themes
- 2.4 Coordinating a half termly Designated Safeguarding Leads group that shares best practice, offers advice and ensures consistency
- 2.5 Implementing a robust timetable of audits and reviews:
  - 2.5.1 Annual SCR audit
  - 2.5.2 Annual safeguarding compliance audit
  - 2.5.3 Annual safeguarding review
- 2.6 Establishing DSL triads to support good decision making and networking
- 2.7 Providing professional supervision, mentoring and/or support to DSLs and D/DSL.
- 2.8 Ensuring consistency in all aspects of safeguarding

## **3.0 Core Principles**

- 3.1 Safeguarding is everyone's responsibility
- 3.2 All staff always act in the best interest of the child
- 3.3 We encourage professional curiosity and a culture of vigilance
- 3.4 We are committed to creating a culture of safeguarding where children feel safe and can thrive
- 3.5 Through our trust and school systems, we support each other in careful decision making
- 3.6 As a trust, we are committed to safer recruitment
- 3.7 Through our trust and our schools, we are committed to providing high quality professional development on safeguarding for all our staff
- 3.8 We are committed to partnership working, both within our trust and outward looking
- 3.9 Our Headteachers know their children and community and are supported to develop their own safeguarding culture and curriculum
- 3.10 **Appendix 1** outlines the four categories of abuse that all employees should be aware of.

## **4.0 Safeguarding and child protection at The Merton Primary School**

Safeguarding is everyone's responsibility, and it is the duty of all staff to safeguard and promote the welfare of our children. We focus on providing a safe and welcoming



environment for all of our children regardless of age, ability, culture, race, language, religion, gender identity or sexual identity. All of our children have equal rights to support and protection.

## **5.0 Scope and Principles**

- 5.1 One of the cornerstones of our safeguarding culture is this policy and the procedures contained within it. This policy applies to all staff, volunteers, local advisory board members and trustees, all of whom are trained upon its contents and on their safeguarding duties. We update this policy at least annually to reflect changes to law and guidance and best practice.
- 5.2 This policy should be read alongside our other trust policies as outlined at the beginning of this document.

## **6.0 Our School Safeguarding Priorities**

- 6.1 **Safeguarding Priority 1 – Online safety and appropriate use of social media.**
- 6.2 **Safeguarding Priority 2 – Domestic abuse and also turbulence in the home and the impact on children's well-being and mental health.**
- 6.3 **Safeguarding Priority 3 – Awareness and understanding of cultural diversity.**

## **7.0 Safeguarding for our pupils**

- 7.1 We work with our local safeguarding partners to promote the welfare of children and protect them from harm. This includes providing a co-ordinated offer of early help when additional needs of children are identified and contributing to inter-agency plans which provide additional support to the child.
- 7.2 All of our staff have an equal responsibility to act on any suspicion or disclosure that may indicate that a child is at risk of harm, both inside and outside of their home, including online. Any pupils or staff involved in child protection or safeguarding issue will receive appropriate support as soon as problems emerge.
- 7.3 Our strong safeguarding culture ensures that we treat all pupils with respect and involve them in decisions that affect them. We encourage positive, respectful and safe behaviour among pupils and we set a good example by conducting ourselves appropriately.
- 7.4 Identifying safeguarding and child protection concerns often begin with recognising changes in pupils' behaviour and knowing that these changes may be signs of abuse, neglect or exploitation. Challenging behaviour may be an indicator of abuse.
- 7.5 All of our staff will reassure children that their concerns and disclosures will be taken seriously and that they will be supported and kept safe.

## **8.0 Safeguarding Legislation and Guidance**

- 8.1 The following safeguarding legislation and guidance has been considered when drafting this policy:



- 8.1.1 Keeping Children Safe in Education (2024) DfE: Keeping Children Safe in Education 2024 (KCSiE) in force from 1 September 2024.
- 8.1.2 Working Together to Safeguarding Children (2023) HM Government: Working Together to Safeguard Children, published December 2023.
- 8.1.3 What to do if you're worried a child is being abused (2015)
- 8.1.4 The Teacher Standards 2012
- 8.1.5 The Safeguarding Vulnerable Groups Act 2006
- 8.1.6 Section 157 of the Education Act 2002
- 8.1.7 The Education (Independent School Standards) Regulations 2014
- 8.1.8 The Domestic Abuse Act 2021
- 8.1.9 PACE Code C 2019
- 8.1.10 Information sharing: advice for practitioners providing safeguarding services (2024) <https://www.gov.uk/guidance/data-protection-in-schools>
- 8.1.11 [[EYFS ONLY Secondaries to remove] Statutory Framework for the Early Years Foundation Stage (EYFS)]

## **9.0 Roles and responsibilities**

### **9.1 The Designated Safeguarding Lead**

The designated safeguarding lead takes lead responsibility for safeguarding and child protection (including online safety) at The Merton Primary School. The DSL duties include:

- 9.1.1 ensuring safeguarding and child protection policies are known, understood and used appropriately by staff;
- 9.1.2 working with the Director of Education (Trust DSL), the board of trustees and the local advisory board, to ensure that the child protection policies are reviewed annually and that the procedures are reviewed regularly
- 9.1.3 acting as a source of support, advice and expertise for all staff on child protection and safeguarding matters
- 9.1.4 liaising with the headteacher regarding ongoing enquiries under section 47 of the Children Act 1989 and police investigations and be aware of the requirement for Children to have an Appropriate Adult in relevant circumstances.
- 9.1.5 acting as a point of contact with the three safeguarding partners
- 9.1.6 making and managing referrals to children's social care, the police, or other agencies
- 9.1.7 taking part in strategy discussions and inter-agency meetings
- 9.1.8 liaising with the "case manager" and the designated officer(s) at the local authority if allegations are made against staff
- 9.1.9 making staff aware of training courses and the latest local safeguarding arrangements available through the local safeguarding partner arrangements
- 9.1.10 transferring the child protection file to a child's new school
- 9.1.11 to ensure that the relevant staffing ratios are met, where applicable, such as in EYFS
- 9.1.12 To ensure that each EYFS child is assigned a key person

### **9.2 The Deputy Designated Safeguarding Lead**





9.2.1 Our Deputy DSL(s) is/are trained to the same level as the DSL and support(s) the DSL with safeguarding matters on a day-to-day basis. The ultimate lead responsibility for child protection remains with the DSL.

9.2.2 The Deputy DSL will deputise in the absence of the DSL.

### 9.3 **The Safeguarding Trustee**

9.3.1 The role of the safeguarding trustee is to provide support and challenge to both the Director of Education (Trust DSL) and the school DSL. The safeguarding trustee will scrutinise the management of safeguarding so that the safety and wellbeing of the children can continuously improve. Key roles includes:

- 9.3.1.1 understanding the requirements of the Keeping Children Safe in Education 2024
- 9.3.1.2 supporting and challenging the standards of safeguarding trust wide
- 9.3.1.3 confirming that consistent and compliant safeguarding practice takes place across the trust
- 9.3.1.4 reporting to the board of trustees about the standard of safeguarding in the trust

9.3.2 The Director of Education (Trust DSL) and the safeguarding trustee meet on a regular basis to discuss safeguarding issues and to agree steps to continuously improve safeguarding practices at the trust.

### 9.4 **Trust Safer Recruitment Lead**

The Director of HR will undertake the role of the Trust's Safer Recruitment Lead, key responsibilities include:

- 9.4.1 Setting the Trust's approach to safer recruitment
- 9.4.2 Oversight of the Trust's Single Central Records (SCRs)
- 9.4.3 Providing Safer Recruitment Training to key colleagues within the organisation
- 9.4.4 Being the main point of contact for allegations of harm and allegations management providing advice and guidance to Headteachers and the Executive Leadership Team

## 10.0 **Children who may be particularly vulnerable**

10.1 Some children are at greater risk of abuse. This increased risk can be caused by many factors including social exclusion, isolation, discrimination and prejudice. To ensure that all of our pupils receive equal protection, we give special consideration to children who:

- 10.1.1 are vulnerable because of their race, ethnicity, religion, disability, gender identity or sexuality;
- 10.1.2 are vulnerable to being bullied, or engaging in bullying;
- 10.1.3 are at risk of sexual exploitation, forced marriage, female genital mutilation, or being drawn into extremism;
- 10.1.4 live in chaotic or unsupportive home situations;



- 10.1.5 live transient lifestyles or live away from home or in temporary accommodation;
- 10.1.6 are affected by parental substance abuse, domestic violence or parental mental health needs;
- 10.1.7 do not have English as a first language;

#### **11.0 Children with special educational needs and disabilities**

- 11.1 Children with special educational needs (SEN) and disabilities can face additional safeguarding challenges. Additional barriers can exist when recognising abuse and neglect in this group of children, which can include:
  - 11.1.1 assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's disability without further exploration;
  - 11.1.2 being more prone to peer group isolation than other children;
  - 11.1.3 the potential for children with SEN and disabilities being disproportionately impacted by behaviours such as bullying, without outwardly showing any signs; and
  - 11.1.4 communication barriers and difficulties in overcoming these barriers.
- 11.2 Our staff are trained to be aware of and identify these additional barriers to ensure this group of children are appropriately safeguarded.

#### **12.0 Children who are absent or missing from education**

- 12.1 Children being absent from education for prolonged periods and/or on repeat occasions, and children missing education, can be an indicator of abuse and neglect, including sexual abuse or exploitation, child criminal exploitation, mental health problems, risk of travelling to conflict zones, risk of female genital mutilation or risk of forced marriage. Our staff are alert to these risks.
- 12.2 We closely monitor attendance, absence and exclusions and our DSL will take appropriate action including notifying the local authority, particularly where children go missing on repeated occasions and/or are missing for periods during the school day.

#### **13.0 Mental health**

- 13.1 Schools have an important role to play in supporting the mental health and wellbeing of their pupils. School takes a universal approach to the mental health of both children and staff. The Deputy Headteacher and SENCO are suitably trained as senior mental health leaders. They work closely with the pastoral lead to ensure positive mental health is promoted through: PSHE sessions, pastoral & ELSA support, specific provisions and making links to outside agencies including Charnwood Mental Health Team, Early Help and the School Nurse.
- 13.2 All staff are aware that mental health problems can be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation. Staff are also aware that where children have suffered adverse childhood experiences those experiences can impact on their mental health, behaviour and education.
- 13.3 Where staff are concerned that a child's mental health is also a safeguarding concern, they will discuss it with the DSL or a Deputy.

#### **14.0 Children who are lesbian, gay, bi or trans (LGBT)**



- 14.1 The fact that a child or a young person may be LGBT is not in itself an inherent risk factor for harm. Unfortunately, children who are LGBT, or are simply perceived to be LGBT, can be targeted by other children. The risk to these children can be compounded where children who are LGBT lack a trusted adult with whom they can be open.
- 14.2 Our staff endeavour to reduce the barriers and provide a safe space for those children to speak out or share their concerns with them.
- 14.3 Our staff recognise the many unknowns about the impact of social transitioning, and staff carefully consider the broad range of needs that children may have. This is done in partnership with parents "other than in the exceptionally rare circumstances where involving parents would constitute a significant risk of harm to the child". (NB, this amendment will remain under review pending the outcome of the consultation).

## **15.0 Child-on-child abuse**

- 15.1 Child-on-child abuse – children harming other children - is unacceptable and will be taken seriously; it will not be tolerated or passed off as 'banter', 'just having a laugh', 'part of growing up' or 'boys being boys'. It is more likely that boys will be perpetrators of child-on-child abuse and girls victims, but allegations will be dealt with in the same manner, regardless of whether they are made by boys or girls.
- 15.2 All staff should be clear about the school's policy and procedures for addressing child-on-child abuse and maintain an attitude of 'it could happen here'.
- 15.3 Child-on-child abuse can take many forms, including:
  - 15.3.1 physical abuse such as shaking, hitting, biting, kicking or hair pulling
  - 15.3.2 bullying, including cyberbullying, prejudice-based and discriminatory bullying
  - 15.3.3 sexual violence and harassment such as rape and sexual assault or sexual comments and inappropriate sexual language, remarks or jokes
  - 15.3.4 causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party
  - 15.3.5 up skirting, which involves taking a picture under a person's clothing without their knowledge for the purposes of sexual gratification or to cause humiliation, distress or alarm
  - 15.3.6 consensual and non-consensual sharing of nude and semi-nude images and/or videos (also known as sexting or youth produced sexual imagery) including pressuring others to share sexual content
  - 15.3.7 abuse in intimate personal relationships between peers (also known as teenage relationship abuse) - such as a pattern of actual or threatened acts of physical, sexual or emotional abuse
  - 15.3.8 initiation/hazing – used to induct newcomers into sports team or school groups by subjecting them to potentially humiliating or abusing trials with the aim of creating a bond
- 15.4 Different gender issues can be prevalent when dealing with child-on-child abuse, for example girls being sexually touched/assaulted or boys being subject to initiation/hazing type violence.



- 15.5 All staff recognise that that even if there are no reported cases of child-on-child abuse, such abuse may still be taking place but is not being reported.
- 15.6 Minimising Risk:  
We take the following steps to minimise or prevent the risk of child-on-child abuse: amend or add to the points below as required:
- 15.6.1 Promoting an open and honest environment where children feel safe and confident to share their concerns and worries
  - 15.6.2 Using assemblies to outline acceptable and unacceptable behaviour
  - 15.6.3 Using RSE and PSHE to educate and reinforce our messages through stories, role play, current affairs and other suitable activities
  - 15.6.4 Ensuring that the school is well supervised, especially in areas where children might be vulnerable.
- 15.7 Investigating allegations:  
All allegations of child-on-child abuse should be passed to the DSL immediately who will investigate and manage the allegation as follows:
- 15.7.1 Gather information - children and staff will be spoken with immediately to gather relevant information.
  - 15.7.2 Decide on action - if it is believed that any child is at risk of significant harm, a referral will be made to children's social care. The DSL will then work with children's social care to decide on next steps, which may include contacting the police. In other cases, we may follow our behaviour policy alongside this Child Protection and Safeguarding Policy.
  - 15.7.3 Inform parents - we will usually discuss concerns with the parents. However, our focus is the safety and wellbeing of the pupil and so if the school believes that notifying parents could increase the risk to a child or exacerbate the problem, advice will first be sought from children's social care and/or the police before parents are contacted.
  - 15.7.4 Recorded – all concerns, discussions and decisions made, and the reasons for those decisions will be recorded in writing, kept confidential and stored securely on the school's child protection and safeguarding systems and/or in the child's separate child protection file. The record will include a clear and comprehensive summary of the concern, details of how the concern was followed up and resolved, and a note of the action taken, decisions reached and the outcome.
- 15.8 Where allegations of a sexual nature are made, the school will follow the statutory guidance set out in Part 5 of Keeping Children Safe in Education 2024.
- 15.9 Children can report allegations or concerns of child-on-child abuse to any staff member and that staff member will pass on the allegation to the DSL in accordance with this policy. To ensure children can report their concerns easily, the school has the following system in place for children to confidently report abuse:



- All classrooms have worry monsters for children to confidentially alert their class teacher to a concern.
- Safeguarding posters throughout school that highlight the DSL/DDSLs that make up the safeguarding team.
- Regular reminders in safety assemblies to inform children that any member of staff can be approached to share a concern.
- PSHE curriculum, through Jigsaw, regularly teaches children how to keep safe and share worries or concerns.

- 15.10 Our staff reassure all victims that they are being taken seriously, regardless of how long it has taken them to come forward, and that they will be supported and kept safe. Our staff will never give a victim the impression that they are creating a problem by reporting sexual violence or sexual harassment, nor will victims be made to feel ashamed for making a report.
- 15.11 Abuse that occurs online or outside of school will not be downplayed and will be treated equally seriously. We recognise that sexual violence and sexual harassment occurring online can introduce a number of complex factors. Amongst other things, this can include widespread abuse or harm across a number of social media platforms that leads to repeat victimisation.
- 15.12 The support required for the pupil who has been harmed will depend on their particular circumstance and the nature of the abuse. The support we provide could include:
- Counselling
  - Pastoral support such as ELSA, drawing and talking, social communication groups
  - Support from outside agencies, such as Charnwood Mental Health Team
  - Liaison with parents and families
- 15.13 Support may also be required for the pupil that caused harm. We will seek to understand why the pupil acted in this way and consider what support may be required to help the pupil and/or change behaviours. The consequences for the harm caused or intended will be addressed.

## **16.0 Serious Violence**

- 16.1 All staff are made aware of indicators that children are at risk from or are involved with serious violent crime. These include increased absence, a change in friendships or relationships with older individuals or groups, a significant decline in performance, signs of self-harm or a significant change in wellbeing, or signs of assault or unexplained injuries. Unexplained gifts could also indicate that children have been approached by or are involved with individuals associated with criminal gangs.
- 16.2 All staff are made be aware of the range of risk factors which increase the likelihood of involvement in serious violence, such as being male, having been frequently absent or permanently excluded from school, having experienced maltreatment and having been involved in offending, such as theft or robbery.





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

- 17.1 Both CCE and CSE are forms of abuse and both occur where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into taking part in sexual or criminal activity in exchange for something the victim needs or wants, and/or for the financial advantage or increased status of the perpetrator or facilitator and/or through violence or the threat of violence. This power imbalance can be due to a range of factors, including:
  - 17.1.1 Age
  - 17.1.2 Gender
  - 17.1.3 Sexual identity
  - 17.1.4 Cognitive ability
  - 17.1.5 Physical strength
  - 17.1.6 Status
  - 17.1.7 Access to economic or other resources
- 17.2 The abuse can be perpetrated by individuals or groups, males or females, and children or adults. They can be one-off occurrences or a series of incidents over time and may or may not involve force or violence. Exploitation can be physical and take place online.
- 17.3 Child Criminal Exploitation (CCE)
  - 17.3.1 CCE can include children being forced or manipulated into transporting drugs or money through county lines, working in cannabis factories, shoplifting or pickpocketing, being forced or manipulated into committing vehicle crime or threatening/committing serious violence to others.
  - 17.3.2 Children can become trapped by this exploitation as perpetrators can threaten victims (and their families) with violence or entrap and coerce them into debt. They may be coerced into carrying weapons such as knives or carry a knife for a sense of protection.
  - 17.3.3 Children involved in criminal exploitation often commit crimes themselves. They may still have been criminally exploited even if the activity appears to be something they have agreed or consented to.
  - 17.3.4 It is important to note that the experience of girls who are criminally exploited can be very different to that of boys and both boys and girls being criminally exploited may be at higher risk of sexual exploitation.
  - 17.3.5 CCE indicators can include children who:
    - 17.3.5.1 appear with unexplained gifts or new possessions
    - 17.3.5.2 associate with other young people involved in exploitation
    - 17.3.5.3 suffer from changes in emotional well-being
    - 17.3.5.4 misuse drugs or alcohol
    - 17.3.5.5 go missing for periods of time or regular return home late
    - 17.3.5.6 regularly miss school or education or do not take part in education



#### 17.4 Child Sexual Exploitation (CSE)

- 17.4.1 CSE is a form of child sexual abuse which may involve physical contact, including assault by penetration (for example, rape or oral sex) or nonpenetrative acts such as masturbation, kissing, rubbing and touching outside clothing. It may include non-contact activities, such as involving children in the production of sexual images, forcing children to look at sexual images or watch sexual activities, encouraging children to behave in sexually inappropriate ways or grooming a child in preparation for abuse.
- 17.4.2 CSE can occur over time or be a one-off occurrence and may happen without the child's immediate knowledge e.g. through others sharing videos or images of them on social media.
- 17.4.3 CSE can affect any child, who has been coerced into engaging in sexual activities. This includes 16 and 17 year olds who can legally consent to have sex. Some children may not realise they are being exploited e.g. they believe they are in a genuine romantic relationship.
- 17.4.4 Sexual exploitation is a serious crime and can have a long-lasting adverse impact on a child's physical and emotional health. It may also be linked to child trafficking.
- 17.4.5 CSE indicators can include:
  - 17.4.5.1 Those listed above
  - 17.4.5.2 Children who have older boyfriends/girlfriends
  - 17.4.5.3 suffer sexually transmitted infections or become pregnant
  - 17.4.5.4 We include the risks of criminal and sexual exploitation in our RSE and health education curriculum. It is often the case that the child does not recognise the coercive nature of the exploitative relationship and does not recognise themselves as a victim.
  - 17.4.5.5 Victims of criminal and sexual exploitation can be boys or girls and it can have an adverse impact on a child's physical and emotional health.
  - 17.4.5.6 All staff are aware of the indicators that children are at risk of or are experiencing CCE or CSE. All concerns are reported immediately to the DSL. Staff must always act on any concerns that a child is suffering from or is at risk of criminal or sexual exploitation.

### 18.0 County Lines

- 18.1 County lines is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs around the country using dedicated mobile phone lines. Children and vulnerable adults are exploited to move, store and sell drugs and money, with offenders often using coercion, intimidation, violence and weapons to ensure compliance of victims.
- 18.2 County lines exploitation can occur where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child. This power



imbalance can be due to the same range of factors set out at paragraph 17.0 of this policy.

- 18.3 Children can be targeted and recruited into county lines in a number of locations, including schools and colleges. Indicators of county lines include those indicators set out at 17.0 of this policy, with the main indicator being missing episodes from home and/or school.
- 18.4 Additional specific indicators that may be present where a child is criminally exploited include children who:
  - 18.4.1 go missing and are subsequently found in areas away from home
  - 18.4.2 have been the victim or perpetrator of serious violence (e.g. knife crime)
  - 18.4.3 are involved in receiving requests for drugs via a phone line, moving drugs, handing over and collecting money for drugs
  - 18.4.4 are exposed to techniques such as 'plugging', where drugs are concealed internally to avoid detection
  - 18.4.5 are found in accommodation with which they have no connection or in a hotel room where there is drug activity
  - 18.4.6 owe a 'debt bond' to their exploiters
  - 18.4.7 have their bank accounts used to facilitate drug dealing.
- 18.5 All staff are aware of indicators that children are at risk from or experiencing criminal exploitation. The main indicator is increased absence during which time the child may have been trafficked for the purpose of transporting drugs or money.

## **19.0 Sharing nudes and semi-nudes**

- 19.1 Sharing photos, videos and live streams online is part of daily life for many children and young people, enabling them to share their experiences, connect with friends and record their lives. Sharing nudes and semi-nudes means the sending or posting online of nude or semi-nude images, videos or live streams by young people under the age of 18. This could be via social media, gaming platforms, chat apps or forums, or carried out offline between devices via services like Apple's AirDrop.
- 19.2 The term 'nudes' is used as it is most commonly recognised by young people and more appropriately covers all types of image sharing incidents. Alternative terms used by children and young people may include 'dick pics' or 'pics'. Other terms used in education include 'sexting', youth produced sexual imagery' and 'youth involved sexual imagery'.
- 19.3 The motivations for taking and sharing nudes and semi-nudes are not always sexually or criminally motivated. Such images may be created and shared consensually by young people who are in relationships, as well as between those who are not in a relationship. It is also possible for a young person in a consensual relationship to be coerced into sharing an image with their partner. Incidents may also occur where:
  - 19.3.1 children and young people find nudes and semi-nudes online and share them claiming to be from a peer



- 19.3.2 children and young people digitally manipulate an image of a young person into an existing nude online
- 19.3.3 images created or shared are used to abuse peers e.g. by selling images online or obtaining images to share more widely without consent to publicly shame
- 19.4 All incidents involving nude or semi-nude images will be managed as follows:
  - 19.4.1 The incident will be referred to the DSL immediately and the DSL will discuss it with the appropriate staff. If necessary, the DSL may also interview the children involved.
  - 19.4.2 Parents will be informed at an early stage and involved in the process unless there is good reason to believe that involving parents would put a child at risk of harm.
  - 19.4.3 At any point in the process, if there is a concern a young person has been harmed or is at risk of harm, we will refer the matter to the police and/or children's social care.
- 19.5 The UK Council for Internet Safety updated its advice for managing incidences of sharing nudes and semi-nudes in December 2020 - UKCIS advice 2020 . The school will have regard to this advice when managing these issues.

## **20.0 Online Safety**

- 20.1 It is essential that children are safeguarded from potentially harmful and inappropriate online material. As well as educating children about online risks, we have appropriate and effective filtering and monitoring systems in place to limit the risk of children being exposed to inappropriate content, subjected to harmful online interaction with other users and to ensure their own personal online behaviour does not put them at risk.
- 20.2 These filtering and monitoring systems block harmful and inappropriate content, and we take care to ensure that they do not unreasonably impact on teaching and learning. The systems are reviewed regularly (at least annually) to ensure their effectiveness, and staff have been identified and assigned suitable roles and responsibilities to manage these systems. We also have effective monitoring strategies in place to meet the safeguarding needs of our pupils.
- 20.3 We tell parents and carers what filtering and monitoring systems we use, so they can understand how we work to keep children safe.
- 20.4 We will also inform parents and carers of what we are asking children to do online, including the sites they need to access, and with whom they will be interacting online.
- 20.5 Online safety risks can be categorised into four areas of risk:
  - 20.5.1 Content: being exposed to illegal, inappropriate or harmful content such as pornography, fake news, misogyny, self-harm, suicide, radicalisation and extremism



- 20.5.2 Contact: being subjected to harmful online interaction with other users such as peer to peer pressure and adults posing as children or young adults to groom or exploit children
- 20.5.3 Conduct: personal online behaviour that increases the likelihood of, or causes, harm such as making, sending and receiving explicit images, sharing other explicit images and online bullying
- 20.5.4 Commerce: risks such as online gambling, inappropriate advertising, phishing or financial scams.

20.6 All staff are aware of these risk areas and should report any concerns to the DSL.

## **21.0 Handheld devices**

- 17.1 The Merton Primary School has a separate policy regarding the safe use of mobiles and cameras. This includes:
  - 21.1.1 Personal devices are only to be used by staff when on a designated break away from the pupils. At all other times, personal devices are to be switched off or on silent.
  - 21.1.2 At The Merton Primary School, devices are only to be used by staff for work purposes. Photographs and videos of the pupils are only to be taken on school devices.
  - 21.1.3 Images of the pupils will only be used in accordance with our Data Protection Policy

## **22.0 Domestic abuse**

- 22.1 The Domestic Abuse Act 2021 introduces a legal definition of domestic abuse and recognises the impact of domestic abuse on children if they see, hear or experience the effects of abuse.
- 22.2 Domestic abuse is any incident or pattern of incidents of controlling, coercive, threatening behaviour, violence or abuse, between those aged 16 or over who are, or have been, intimate partners or family members regardless of gender or sexuality. It includes people who have been or are married, are or have been civil partners, have agreed to marry one another or each have or have had a parental relationship in relation to the same child. It can include psychological, physical, sexual, financial and emotional abuse.
- 22.3 Anyone can be a victim of domestic abuse, regardless of sexual identity, age, ethnicity, socioeconomic status, sexuality or background and domestic abuse can take place inside or outside of the home. This means children can also be victims of domestic abuse.
- 22.4 Children can witness and be adversely affected by domestic violence in their home life. Experiencing domestic abuse and exposure to it can have a serious emotional and psychological impact on children, and in some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result. All of which can have a detrimental and long term impact on their health, well-being, development, and ability to learn. All our staff understand that seeing, hearing and





experiencing the effects of domestic abuse can have a significant impact on children.

- 22.5 Where police have been called to a domestic violence incident where children are in the household and experienced that incident, the police will inform the DSL. This ensures that the school has up to date safeguarding information about the child.
- 22.6 All staff are aware of the impact domestic violence can have on a child. If any of our staff are concerned that a child has witnessed domestic abuse, they will report their concerns immediately to the DSL.

### **23.0 Honour-based abuse (HBA) and violence**

- 23.1 So-called 'honour-based' abuse (HBA) encompasses actions taken 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.
- 23.2 Abuse committed in the context of preserving "honour" often involves a wider network of family or community pressure and can include multiple perpetrators. Our staff are aware of this dynamic and additional risk factors and we take them into consideration when deciding what safeguarding action to take.
- 23.3 If staff are concerned that a child may be at risk of HBA or who has suffered from HBA, they should speak to the designated safeguarding lead.
- 23.4 **Female Genital Mutilation**
  - 23.4.1 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 and a form of child abuse with long-lasting harmful consequences.
  - 23.4.2 FGM is carried out on females of any age, from babies to teenagers to women. Our staff are trained to be aware of risk indicators, including concerns expressed by girls about going on a long holiday during the summer break. If staff are concerned that a child may be at risk of FGM or who has suffered FGM, they should speak to the designated safeguarding lead. Teachers are also under legal duty to report to the police where they discover that FGM has been carried out on a child under 18. In such circumstances, teachers will personally report the matter to the police as well as informing the designated safeguarding lead.
- 23.5 **Forced Marriage**
  - 23.5.1 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. Coercion may include physical, psychological, financial, sexual and emotional pressure or abuse.
  - 23.5.2 Forced marriage is illegal. It is also illegal to carry out any conduct whose purpose is to cause a child to marry before their eighteenth birthday, even if violence, threats or another form of coercion are not used. As with the



existing forced marriage law, this applies to non-binding, unofficial 'marriages' as well as legal marriages.

23.5.3 Our staff are trained to be aware of risk indicators, which may include being taken abroad and not being allowed to return to the UK.

23.5.4 Forced marriage is not the same as arranged marriage, which is common in many cultures.

23.5.5 If staff are concerned that a child may be at risk of forced marriage, they should speak to the designated safeguarding lead.

## **24.0 Extremist ideology and radicalisation**

24.1 Extremism is defined 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. Radicalisation refers to the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups.

24.2 Children are vulnerable to extremist ideology and radicalisation. Whilst Islamic fundamentalism is the most widely publicised, extremism and radicalisation can occur in other cultures, religions and beliefs, including the far right and white supremacy. Our staff are trained to identify those at risk of being radicalised or drawn into extremism.

24.3 If staff are concerned that a child may be at risk of radicalisation or being drawn into extremism, they should speak to the designated safeguarding lead.

## **25.0 Staff/pupil relationships**

25.1 Staff are aware that inappropriate behaviour towards pupils is unacceptable and that it is a criminal offence for them to engage in any sexual activity with a pupil under the age of 18.

25.2 We provide our staff with advice regarding their personal online activity and we have clear rules regarding electronic communications and online contact with pupils. It is considered a serious disciplinary issue if staff breach these rules.

25.3 Our Code of Conduct sets out our expectations of staff and is signed by all staff members.

## **26.0 Allegations made about staff, supply staff, contractors and volunteers**

26.1 The Trust's procedures on dealing with allegations made against staff or workers is outlined at **Appendix 2**.

26.2 All staff and workers are expected to ensure their behaviour during the course of their employment within and outside of the workplace is consistent with the Trust's Code of Conduct.



- 26.3 If a safeguarding concern or allegation is made about a member of staff, supply staff, contractor or a volunteer, or relates to incidents that happened when an individual or organisation was using the school premises for the purposes of running activities for children, our set procedures outlined at **Appendix 2** must be followed.
- 26.4 The full procedure for managing such allegations or concerns are set out in Part Four of Keeping Children Safe in Education 2024.
- 26.5 The HR department must be consulted at all times in relation to allegations made against staff.
- 26.6 Safeguarding concerns or allegations made about staff who no longer work at the school will be reported to the police.
- 26.7 **Allegations that meet the harm threshold (against staff and workers)**
- 26.7.1 An allegation of harm is defined as:
- 26.7.1.1 behaved in a way that has harmed a child, or may have harmed a child and/or
  - 26.7.1.2 possibly committed a criminal offence against or related to a child, and/or
  - 26.7.1.3 behaved towards a child or children in a way that indicates he or she may pose a risk of harm to children, and/or
  - 26.7.1.4 behaved or may have behaved in a way that indicates they may not be suitable to work with children.
- 26.7.2 The Trust will ensure that in all of these circumstances the Local Authority Designated Officer is contacted for advice on how to proceed.
- 26.7.3 Allegations of harm will likely be dealt with in line with the Trust's Disciplinary Policy.
- 26.8 **Low Level Concerns (concerns that do not meet the harm threshold) (against staff and workers)**
- 26.8.1 Low level concerns are defined as:
- 26.8.1.1 Allegations that do not meet the harm threshold
  - 26.8.1.2 Behaviour that is inconsistent with the Trust's Code of Conduct
  - 26.8.1.3 Behaviour that causes a sense of unease or a 'nagging doubt'
- 26.8.2 More information about low level concerns is outlined at **Appendix 3**.
- 26.9 **Reporting Concerns (Allegations of Harm/Low Level Concerns)**
- 26.9.1 All staff and workers will never need to apologise for staying vigilant or reporting concerns.
- 26.9.2 No concern is too big or too small.
- 26.9.3 All staff must believe that 'it can happen here' to avoid complacency setting in.



26.9.4 Staff should ensure that if they are in doubt, they will report the concern anyway.

26.9.5 **Appendix 4** outlines **who** staff should report concerns should they arise.

26.9.6 Staff may also report their concerns directly to children's social care or the police if they believe direct reporting is necessary to secure action.

26.9.7 Staff will be provided appropriate feedback when they raise concerns so that they are reassured that their concern has been dealt with.

## **27.0 Safeguarding Training**

- 27.1 **Appendix 5** outlines the Trust's approach to providing training to new starters and employees.
- 27.2 Other workers, including our Trustees, are also provided with safeguarding training.
- 27.3 Annual safeguarding training includes changes to Keeping Children Safe in Education and then complemented by the Trust's safeguarding CPD plan throughout the academic year.
- 27.4 All staff receive ongoing safeguarding training throughout the year and set out in the school's safeguarding CPD plan.
- 27.5 New staff receive safeguarding training within the first week of their employment with the Trust. They are provided with:
  - 27.5.1 Online training that covers an introduction to safeguarding and the basic principles of safeguarding
  - 27.5.2 A new starter induction that includes detailed safeguarding training that covers statutory KCSiE information, Bradgate Safeguarding Principles and detailed information on internal safeguarding arrangements.
  - 27.5.3 Local safeguarding induction where staff are provided with information from the school DSL on local safeguarding arrangements to include information on the Safeguarding Policy, local safeguarding priorities, CPOMs protocol, identification of the safeguarding team and information on local reporting procedures.
- 27.6 Other workers are provided with safeguarding training locally so that they are aware of who the school safeguarding team is whilst on site and information on how to report safeguarding concerns should they arise.
- 27.7 Our local advisory board (LAB) members and trustees receive appropriate safeguarding and child protection (including online safety and an understanding of the expectations, applicable roles and responsibilities in relation to filtering and monitoring) training which equips them with the knowledge to provide strategic challenge to test and assure themselves that there is an effective whole trust approach to safeguarding. This training is updated **annually**.



- 27.8 Our safeguarding LAB member and trustee receives additional training to empower them to support and challenge the Designated Safeguarding Lead and support the delivery of high quality safeguarding across the trust.

## **28.0 Safer Recruitment**

- 28.1 The Trust's approach to safer recruitment is set out in the Trust's Safer Recruitment Policy, all those involved with the implementation of safer recruitment are required to adhere to this policy as part of their professional responsibilities.
- 28.2 The Trust's Safer Recruitment Policy is compliant with Keeping Children Safe in Education 2024 and is reviewed annually.
- 28.3 The Safer Recruitment Policy also includes our approach to ensuring that other workers such as volunteers, contractors etc are subject to the appropriate checks that are required in line with Keeping Children Safe in Education.
- 28.4 All relevant staff (involved in early years settings and/or before or after school care for children under eight) are made aware of the disqualification from childcare guidance and their obligations to disclose to us relevant information that could lead to disqualification.
- 28.5 No worker is allowed to start work within Bradgate Education Partnership unless they have been subject to the appropriate pre-employment checks. Any breach of this will be dealt with as a serious conduct issue.
- 28.6 The Trust ensures that each school maintains their own single central record.
- 28.7 The single central record will be formally reviewed and audited annually during the Autumn Term by the Director of HR alongside the Headteacher and Office Manager. In addition, Headteachers and Office Managers will implement best practice reviews of the SCR during Spring and Summer Term so that there at least three reviews annually of the SCR by the Headteacher.
- 28.8 In addition, members of the HR department review the SCR's regularly, with more detail outlined on this in the Trust's Safer Recruitment Policy.

## **29.0 Site Security**

- 29.1 Visitors are asked to sign in at the school reception and are given a badge, which confirms they have permission to be on site. If visitors have undergone the appropriate checks, they can be provided with unescorted access to the school site. Visitors who have not undergone the required checks will be escorted at all times.

## **30.0 Safeguarding and Child Protection Procedures**

### **30.1 Recognising abuse, neglect and exploitation**

- 30.1.1 Abuse, neglect and exploitation are forms of maltreatment. Somebody may abuse, neglect or exploit a child by inflicting harm or by failing to act to prevent harm. Abuse may be committed by adult men or women and by other children and young people.





30.1.2 Keeping Children Safe in Education 2024 refers to four categories of abuse. These are set out at Appendix One along with indicators of abuse.

## 30.2 **Taking Action**

30.2.1 Any child could become a victim of abuse. Key points for staff to remember for taking action are:

- 30.2.1.1 in an emergency take the action necessary to help the child, if necessary call 999
- 30.2.1.2 complete a record of concern form and report your concern to the DSL as soon as possible
- 30.2.1.3 share information on a need-to-know basis only and do not discuss the issue with colleagues, friends or family

## 30.3 **If you are concerned about a pupil's welfare**

30.3.1 Staff may suspect that a pupil may be at risk. This may be because the pupil's behaviour has changed, their appearance has changed or physical signs are noticed. In these circumstances, staff will give the pupil the opportunity to talk and ask if they are OK.

30.3.2 If the pupil does reveal that they are being harmed, staff should follow the advice below.

30.3.3 Staff are aware that children may not feel ready or know how to tell someone that they are being abused, exploited, or neglected, and/or they may not recognise their experiences as harmful. Children may feel embarrassed, humiliated, or being threatened, which could be due to their vulnerability, disability and/or sexual orientation or language barriers. This will not prevent our staff from having a professional curiosity and speaking to our DSL if they have concerns about a child.

## 30.4 **If a pupil discloses:**

30.4.1 If a pupil tells a member of staff about a risk to their safety or wellbeing, the staff member will:

- 30.4.1.1 remain calm and not overreact;
- 30.4.1.2 allow them to speak freely;
- 30.4.1.3 not be afraid of silences;
- 30.4.1.4 not ask investigative questions;
- 30.4.1.5 give reassuring nods or words of comfort – 'I'm so sorry this has happened', 'I want to help', 'This isn't your fault', 'You are doing the right thing in talking to me';
- 30.4.1.6 not automatically offer physical touch as comfort;
- 30.4.1.7 let the pupil know that in order to help them they must pass the information on to the DSL;
- 30.4.1.8 tell the pupil what will happen next;
- 30.4.1.9 complete the school reporting process (refer to CPOMS protocol) and pass it to the DSL as soon as possible;
- 30.4.1.10 report verbally to the DSL even if the child has promised to do it by themselves.



#### **30.4.2 Notifying parents/carers**

- 30.4.2.1 The school will normally seek to discuss any concerns about a pupil with their parents. If the school believes that notifying parents could increase the risk to the child or exacerbate the problem, advice will first be sought from children's social care and/or the police before parents are notified.

### **31.0 Referral to children's social care**

- 31.1 The DSL will make a referral to children's social care if it is believed that a pupil is suffering or is at risk of suffering significant harm. The pupil (subject to their age and understanding) and the parents will be told that a referral is being made, unless to do so would increase the risk to the child.

### **32.0 Reporting directly to child protection agencies**

- 32.1 Staff should follow the reporting procedures outlined in this policy. However, they may also share information directly with children's social care or the police if they are convinced that a direct report is required or if the Designated Safeguarding Lead, the deputies, the head teacher or the chair of governors are not available and a referral is required immediately.

### **33.0 Sharing information and confidentiality**

- 33.1 Child protection issues necessitate a high level of confidentiality. Staff should only discuss concerns with the Designated Safeguarding Lead, Headteacher, Director of Education (Trust DSL) or Safeguarding Trustee.

#### **33.2 Sharing Information**

- 33.2.1 The DSL will normally obtain consent from the pupil and/or parents to share child protection information. Where there is good reason to do so, the DSL may share information without consent, and will record the reason for deciding to do so.

- 33.2.2 Information sharing will take place in a timely and secure manner and only when it is necessary and proportionate to do so and the information to be shared is relevant, adequate and accurate.

- 33.2.3 Information sharing decisions will be recorded, whether or not the decision is taken to share.

- 33.2.4 The UK GDPR and the Data Protection Act 2018 do not prevent school staff from sharing information with relevant agencies, where that information may help to protect a child. If any member of staff receives a request from a pupil or parent to see child protection records, they will refer the request to the Data Protection Officer. Schools should refer to DfE Data Protection guidance for schools for more information in data protection compliance.

#### **33.3 Storing Information**

- 33.3.1 Child protection information will be stored separately from the pupil's school file and the school file will be 'tagged' to indicate that separate information



is held. It will be stored and handled in line with our Retention and Destruction Policy.

33.3.2 Our GDPR policy and our Retention and Destruction policy is available to parents and pupils on request.

## **34.0 Special Circumstances**

### **34.1 Looked After Children**

The most common reason for children becoming looked after is as a result of abuse or neglect. The school ensures that staff have the necessary skills and understanding to keep looked after children safe. Appropriate staff have information about a child's looked after status and care arrangements, including the level of authority delegated to the carer by the authority looking after the child. The designated teacher for looked after children and the DSL have details of the child's social worker and the name and contact details of the local authority's virtual head for children in care.

### **34.2 Children who have a social worker**

Children may need a social worker due to safeguarding or welfare needs. Local authorities will share this information with us, and the DSL will hold and use this information to inform decision about safeguarding and promoting the child's welfare.

### **34.3 Work Experience**

34.3.1 The school has detailed procedures to safeguard pupils undertaking work experience, including arrangements for checking people who provide placements and supervise pupils on work experience which are in accordance with statutory guidance.

### **34.4 Children staying with host families**

34.4.1 The school may make arrangements for pupils to stay with host families, for example during a foreign exchange trip or sports tour. When we do, we follow the guidance set out in the statutory guidance to ensure hosting arrangements are as safe as possible.

34.4.2 Schools cannot obtain criminal record information from the Disclosure and Barring Service about adults abroad. Where pupils stay with host families abroad we will agree with the partner schools a shared understanding of the safeguarding arrangements. Our Designated Safeguarding Lead will ensure the arrangements are sufficient to safeguard our pupils and will include ensuring pupils understand who to contact should an emergency occur or a situation arise which makes them feel uncomfortable. We will also make parents aware of these arrangements.



34.4.3 Some overseas pupils may reside with host families during school terms and we will work with the local authority to check that such arrangements are safe and suitable.

34.5 **Private fostering arrangements**

34.5.1 A private fostering arrangement occurs when someone other than a parent or a close relative cares for a child for a period of 28 days or more, with the agreement of the child's parents. It applies to children under the age of 16, or aged under 18 if the child is disabled. By law, a parent, private foster carer or other persons involved in making a private fostering arrangement must notify children's services as soon as possible.

34.5.2 Where a member of staff becomes aware that a pupil may be in a private fostering arrangement they will tell the DSL and the school will notify the local authority of the circumstances.



## Appendix 1 - Four categories of abuse

It is vital that staff are also aware of the range of behavioural indicators of abuse and report any concerns to the designated safeguarding lead. It is the responsibility of staff to report their concerns.

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

### 1. Physical abuse

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

- have bruises, bleeding, burns, bites, fractures or other injuries
- show signs of pain or discomfort
- keep arms and legs covered, even in warm weather
- be concerned about changing for PE or swimming
- an injury that is not consistent with the account given
- symptoms of drug or alcohol intoxication or poisoning
- inexplicable fear of adults or over-compliance
- violence or aggression towards others including bullying
- isolation from peers

### 2. Emotional abuse

Emotional abuse is the persistent emotional maltreatment of a child such as to cause severe and persistent adverse effects on the child's emotional development. It may involve conveying to 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 cyber bullying), 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. The following may be **indicators of emotional abuse**:

- the child consistently describes him/herself in negative ways
- over-reaction to mistakes
- delayed physical, mental or emotional development
- inappropriate emotional responses, fantasies
- self-harm
- drug or solvent abuse





- running away
- appetite disorders – anorexia nervosa, bulimia; or
- soiling, smearing faeces, enuresis

### 3. Sexual abuse

Sexual abuse involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example, rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse. Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children. The following may be **indicators of sexual abuse:**

- sexually explicit play or behaviour or age-inappropriate knowledge
- aggressive behaviour including sexual harassment or molestation
- reluctance to undress for PE or swimming
- anal or vaginal discharge, soreness or scratching
- bruises or scratches in the genital area
- reluctance to go home
- refusal to communicate
- depression or withdrawal
- isolation from peer group
- eating disorders, for example anorexia nervosa and bulimia
- self-harm
- substance abuse
- acquire gifts such as money or a mobile phone from new 'friends'

### 4. Neglect

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

- provide adequate food, clothing and shelter (including exclusion from home or abandonment);
- protect a child from physical and emotional harm or danger;
- ensure adequate supervision (including the use of inadequate care-givers); or
- ensure access to appropriate medical care or treatment.
- It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

#### **The following may be indicators of neglect:**

- Constant hunger or stealing, scavenging and/or hoarding food
- Frequent tiredness
- Frequently dirty or unkempt
- Poor attendance or often late
- Poor concentration
- Illnesses or injuries that are left untreated
- Failure to achieve developmental milestones or to develop intellectually or socially



- Responsibility for activity that is not age appropriate such as cooking, ironing, caring for siblings
- The child is left at home alone or with inappropriate carers

**The following may be indicators of exploitation:**

Common signs that may suggest someone is being exploited include the following:

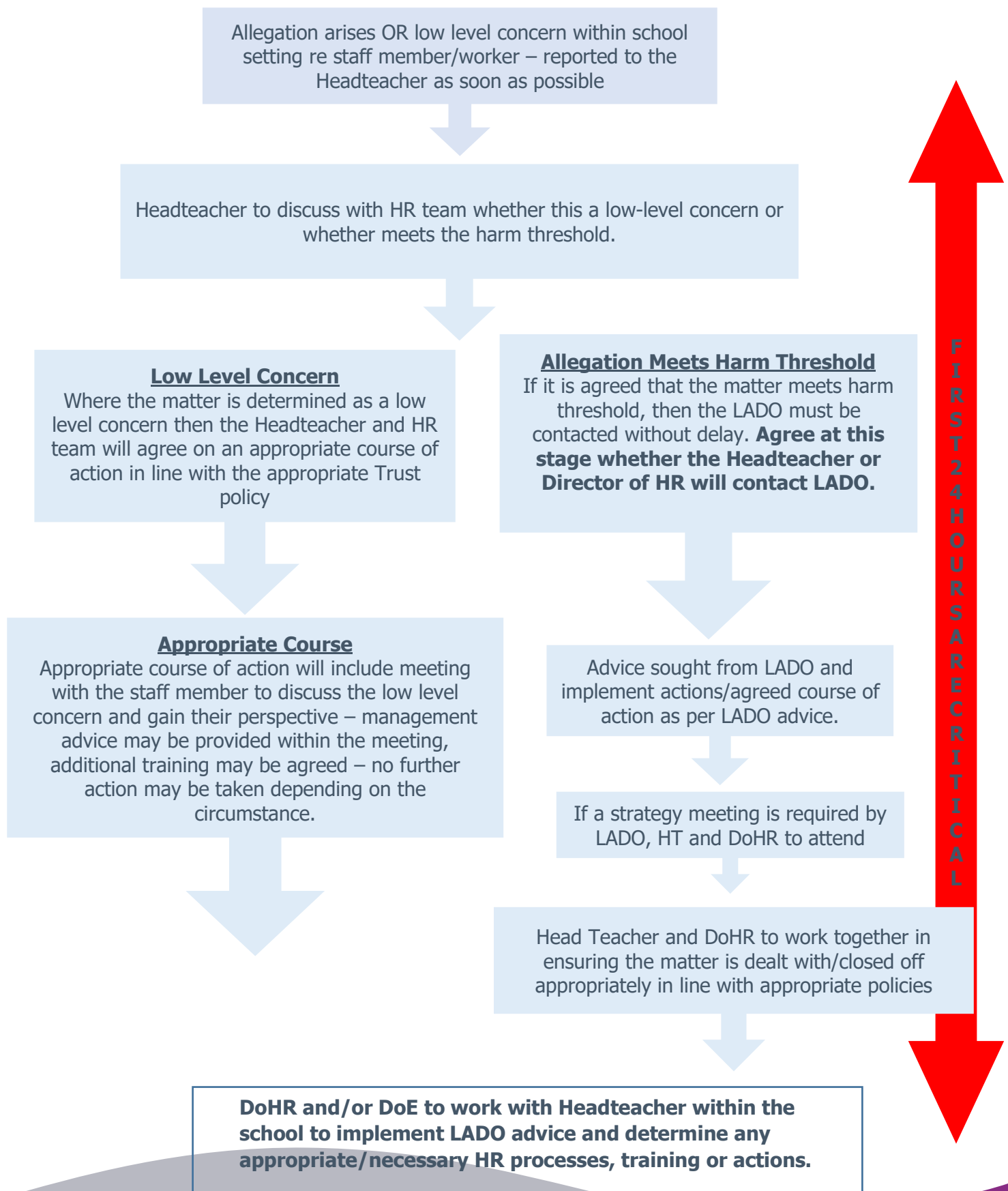
- friendships, relationships or association with controlling individuals or groups
- isolation from peers and social networks
- unexplained injuries, ill health, or suspicion of assault
- changes in emotional wellbeing
- changes in behaviour and lifestyle
- going missing
- secretiveness
- concerning use of the internet, social media or mobile phones
- unexplained acquisition, or loss, of money and personal items.

This is not an exhaustive list, and signs of concern will differ between people and situations

- grooming and exploitation are usually gradual processes – changes in someone's appearance, behaviour and personal circumstances are often small, gradual, and may not be noticed immediately.
- sometimes people may appear positive and confident – they may be unaware that they are being exploited or view their involvement positively, especially if they have been groomed.



## Appendix 2 – Allegations Management Process





## **Appendix 3 – Low level concerns guidance for staff**

All staff are expected to report concerns, no matter how small, about their own behaviour or that of another member of staff, volunteer, supply teacher, contractor or other person working in school. Leaders work with staff to actively create and embed a culture of openness, trust and transparency in which the clear values and expected behaviour set out in the “Guidance for safer working practice for those working with children and young people in education settings” is followed.

### **Definition of a low-level concern**

- Allegations that do not meet the harm threshold
- Behaviour that is inconsistent with the Trust’s Code of Conduct
- Behaviour that causes a sense of unease or a ‘nagging doubt’

### **Reporting a low level concern**

Where a low-level concern has been identified this will be reported as soon as possible to the Headteacher. However, it is never too late to share a low-level concern if this has not already happened. If the low level concern is about the Headteacher, Directors, Chief Executive Officer or the Trustees, **Appendix 4** provides information on who the most appropriate people are to report.

### **Recording concerns**

A summary of the low-level concern should be written down, signed, timed, dated and shared by the person bringing the information forward. Where concerns are reported verbally to the headteacher, the headteacher will ask the staff member to provide the concern in writing.

### **Responding to low-level concerns**

Where a low-level concern has been raised this will be taken seriously and dealt with promptly. The headteacher will:

- Seek advice from the HR team
- Speak to the person reporting the concern to gather all the relevant information and gain their response, The discussion may be held in line with the informal stages of the Disciplinary Policy.
- Where necessary further fact finding will be carried out to gather all relevant information. This may involve speaking to anyone else who may have been witness to the low level concern.
- Outline their expectations with the staff member moving forwards on correcting their behaviour
- Reissue them with a copy of the Code of Conduct and ask the staff member to re-familiarise themselves with the expectations of the document
- Implement any follow up actions, eg additional training/supervision required
- Follow up the discussion in writing and share this with the staff member
- The Headteacher should ensure that the employee understands that failure to improve or a repeat of the behaviour may lead to further action being taken.

### **Can the reporting person remain anonymous?**

The reporting member of staff can remain anonymous at the point of low level concerns reporting. However, they may be identifiable depending on the nature of the concern raised. No staff



member will be subject to detrimental treatment having raised concerns. If they are, they must report this immediately so that it can be dealt with by leaders.

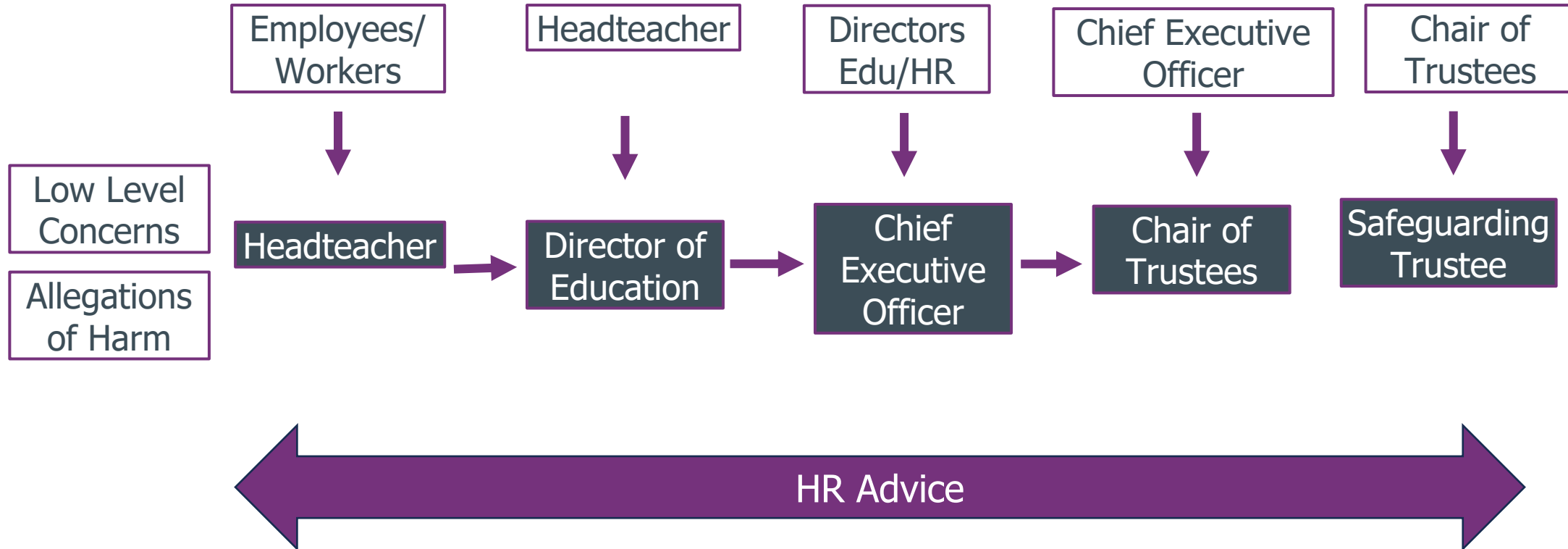
**Should staff report concerns about themselves (i.e. self-report)?**

It may be the case that a person finds themselves in a situation which could be misinterpreted, or might appear compromising to others; or they may have behaved in a manner which on reflection they consider falls below the standard set out in the Code of Conduct. In these circumstances they should self-report. This will enable a potentially difficult situation to be addressed at an early opportunity if necessary.





#### Appendix 4 – Reporting Low Level Concerns and Allegations Against Staff



## Appendix 5 – Safeguarding Training

