



Twyford School Child Protection Policy, Procedure and Guidance

T Parsons
DSL
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For review September 2022



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Twyford School Child Protection Policy

Policy Statement

We recognise our moral and statutory responsibility to safeguard and promote the welfare of all children.

We make every effort to provide a safe and welcoming environment underpinned by a culture of openness where both children and adults feel secure, able to talk and believe that they are being listened to and taken seriously.

We maintain an attitude of “it could happen here” where safeguarding is concerned.

The purpose of this policy is to provide staff, volunteers and governors with the framework they need in order to keep children safe and secure in our school and to inform parents and guardians how we will safeguard their children whilst they are in our care.

Specific guidance is available to staff within the procedure documents.

Definitions

Within this document:

Child protection is an aspect of safeguarding but is focused on how we respond to children who have been significantly harmed or are at risk of significant harm.

The term **staff** applies to all those working for or on behalf of the school, full time or part time, in either a paid or voluntary capacity. This also includes parents and governors.

Child refers to all young people who have not yet reached their 18 birthday. On the whole, this will apply to pupils of our school; however, the policy will extend to visiting children and students from other establishments

Parent refers to birth parents and other adults in a parenting role for example adoptive parents, step-parents, guardians and foster carers.

Abuse could mean neglect, physical, emotional or sexual abuse or any combination of these. Parents, carers and other people can harm children either by direct acts and/or failure to provide proper care. Explanations of these are given within the procedure document.

Aims

- To provide staff with the framework to promote and safeguard the wellbeing of children, and, in so doing, ensure they meet their statutory responsibilities
- To ensure consistent good practice across the school
- To demonstrate our commitment to protecting children

Principles and Values

- Children have a right to feel secure and cannot learn effectively unless they do so

- All children have a right to be protected from harm
- All staff have a key role in prevention of harm and an equal responsibility to act on any suspicion or disclosure that may indicate a child is at risk of harm, either in the school or in the community, taking into account *contextual safeguarding*, in accordance with the guidance
- We acknowledge that working in partnership with other agencies protects children and reduces risk and so we will engage in partnership working throughout the child protection process to safeguard children
- While the school will work openly with parents as far as possible, it reserves the right to contact Children's Social Care or the Police, without notifying parents if this is believed to be in the child's best interests
- As a School we educate and encourage pupils to recognise when they are at risk and how to Keep Safe through:
 - The content of the curriculum: in particular RSHE, e-safety taught in ICT lessons and reinforced in tutor time
 - A school ethos which promotes a positive, supportive and secure environment and gives pupils a sense of being valued
 - The creation of a culture that helps children to feel safe and able to talk freely about their concerns, believing that they will be listened to and valued
 - Reinforcing the fundamental British values of democracy, rule of law, freedom of speech and equality.

Leadership and Management

This policy covers all areas and operations within the school to include the Boarding House and EYFS/Pre-Prep which both fall under the whole school management approach to safeguarding and therefore both follow all of the procedures and guidance detailed in this policy.

We recognise that staff anxiety around child protection can compromise good practice and so have established clear lines of accountability, training and advice to support the process and individual staff within that process. In this school any individual can contact the Designated Safeguarding Lead (DSL) or the Deputy if they have concerns about a young person.

The Designated Safeguarding Lead (DSL) is *Mr Tom Parsons* and the Deputy DSLs are Mr Gary Crook, Miss Pippa Higham, Mr Dom Britt, Mr Gregg Lewis, Mrs Alison Thompson, Mrs Shirley Davies, Mrs Judith Ramshaw, Miss Claire Smith, Mr Simon Honey and *Mrs Karen Rogers (who is the nominated DSL for EYFS)*. There is a nominated safeguarding governor, ***Mr James Fox***, who will take leadership responsibility for safeguarding. The Chair of Governors ***Mr Colin Howman*** will receive reports of allegations against the Headmaster and act on the behalf of the Governing Body.

In the event of partial or full closure, including circumstances due to Covid-19, arrangements will be made to ensure there is effective DSL cover at all times. with a nominated lead if the DSL were not available.

As an employer we follow safer recruitment guidance as set out in KCSiE 2021. See Twyford School Safer Recruitment Policy for more details.

Training

All staff in our school are expected to be aware of the signs and symptoms of abuse and must be able to respond appropriately. Training is provided every term in the form of an update to staff from the DSL/Deputy DSLs at Inset, and all staff receive full safeguarding training every three years. Separate training is provided to all new staff on appointment, either at Inset, or before the staff member has contact with children (dependent on start date).

The DSL and Deputy DSLs will attend training at least every other year to enable them to fulfil their role, as well as taking opportunities to extend their knowledge and share best practice (via meetings with other DSLs, meeting LADOs, attendance at courses/conferences and reading online material) in the course of each academic year. The DSL shares initiatives and forthcoming developments that he is involved in for this purpose.

Any update in national or local guidance will be shared with all staff in briefings and then captured in the next whole school training. This policy will be updated during the year to reflect any changes brought about by new guidance.

Referral

Following any concerns raised, the DSL will assess the information and consider if significant harm has happened or there is a risk that it may happen. If the evidence suggests the threshold of significant harm, or risk of significant harm has been reached, or if it is not clear if the threshold is met, then the DSL will contact Children's Social Care and, if appropriate, the police. If the DSL/Deputy DSL is not available or there are immediate concerns, the staff member will refer directly to Children's Social Care and the police, if appropriate.

N.B. The exception to this referral process will be in those cases of known FGM where there is a mandatory requirement for the teacher to report directly to the police. The DSL should also be made aware.

Generally, the DSL will inform the parents prior to making a referral. However, there are situations where this may not be possible or appropriate, particularly when informing parents/carers may place the child at further risk.

Confidentiality

- We maintain that all matters relating to child protection are to be treated as confidential and only shared as per the 'Information Sharing Advice for Practitioners' (DfE 2015) guidance
- There is a lawful basis for child protection concerns to be shared with agencies who have a statutory duty for child protection.
- Information will be shared with individuals within the school who 'need to know'.
- All staff are aware that they cannot promise a child to keep a disclosure confidential.

Dealing with allegations against staff

If a concern is raised about the practice or behaviour of a member of staff, this information will be recorded and passed to the headteacher Andrew Harvey. The

headteacher will make an assessment to determine if the matter is a 'low level concern' or an 'allegation'. The Local Authority Designated Officer (LADO) will be contacted for all allegations and the relevant guidance will be followed. If the headteacher needs advice or guidance they will contact the LADO. If the allegation is against the headteacher, the person receiving the allegation will contact the LADO or Chair of Governors directly.

Dealing with allegations against pupils

Legal context

Section 175 of the Education Act 2002; The Education (Independent School Standards) Regulations 2014; The Non-Maintained Special Schools (England) Regulations; Children Act 2004 & 1989

Guidance

Hampshire Safeguarding Children Partnership protocols and guidance and their procedures

If a concern is raised that there is an allegation of a pupil abusing another pupil within the school, the 'Peer on Peer Abuse' guidance will be followed (Annex 6)

Working together to Safeguard Children (2018)

Keeping Children Safe in Education 2021

Disqualification Under the Childcare Act 2006 (2015)

FGM Act 2003 Mandatory Reporting Guidance (2020)

Prevent Duty: Part 5 of Counter – Terrorism and Security Act 2015

Annual review

As a school, we review this policy at least annually in line with DfE, HSCP and ISI requirements and other relevant statutory guidance. The Governing Body, as Proprietors, will usually undertake an annual review in its June Full Governing Body meeting of the School's Safeguarding Policy and procedures, and of the efficiency with which the related duties have been discharged. This discussion will be formally documented in the Minutes of the Full Governing Body Meeting. Any deficiencies or weaknesses recognised in arrangements or procedures will be remedied immediately and without delay. The discussion is led by the Safeguarding Governor, Mr James Fox.

We complete the Hampshire Safeguarding Children Partnership Annual Audit, and present this to Governors.

In response to changes to KCSIE in September 2021 we updated the Child Protection Policy and the Safeguarding Policy and will present these documents to the Governors for review in September 2021. We will complete the Hampshire Safeguarding Children partnership audit and return our identified priorities by September 30th 2021.

Roles and responsibilities within Twyford School

Staff responsibilities

All staff have a key role to play in identifying concerns early and in providing help for children. To achieve this, they will:

- Establish and maintain an environment where children feel secure, are encouraged to talk and are listened to.
- Ensure children know that there are adults in the school who they can approach if they are worried or have concerns.
- Plan opportunities within the curriculum for children to develop the skills they need to assess and manage risk appropriately and keep themselves safe.
- Attend training in order to be aware of and alert to the signs of abuse.
- Maintain an attitude of “it could happen here” with regards to safeguarding.
- Record their concerns if they are worried that a child is being abused and report these to the DSL as soon as practical that day. If the DSL is not contactable immediately a Deputy DSL should be informed
- Be prepared to refer directly to social care, and the police if appropriate, if there is a risk of significant harm and the DSL or their Deputy is not available.
- Follow the allegations procedures (Annex 5) if the disclosure is an allegation against a member of staff.
- Follow the procedures set out by the HSCP and take account of guidance issued by the DfE.
- Support pupils in line with their child protection plan.
- Treat information with confidentiality but never promising to “keep a secret”.
- Notify the DSL or their Deputy of any child on a child protection plan or child in need plan who has unexplained absence.
- Have an understanding of Early Help and be prepared to identify and support children who may benefit from early help.
- Liaise with other agencies that support pupils and provide early help.
- Ensure they know who the DSL and Deputy DSL are and know how to contact them
- Have an awareness of the Child Protection Policy, the Pupil Behaviour Policy, the Staff Code of Conduct, procedures relating to the safeguarding response for children who go missing from education (see Twyford School Safeguarding Policy) and the role of the DSL.

Senior Leadership Team responsibilities:

- Contribute to inter-agency working in line with Working Together to Safeguard Children 2018 guidance
- Provide a co-ordinated offer of early help when additional needs of children are identified
- Ensure staff are alert to the various factors that can increase the need for early help (*KCSiE 2021*)

- Working with Children's Social Care, support their assessment and planning processes including the school's attendance at conference and core group meetings.
- Carry out tasks delegated by the governing body such as training of staff, safer recruitment and maintaining a single central register.
- Provide support and advice on all matters pertaining to safeguarding and child protection to all staff regardless of their position within the school.
- Treat any information shared by staff or pupils with respect and follow agreed policies and procedures.
- Ensure that allegations or concerns against staff are dealt with in accordance with guidance from Department for Education (DfE), Hampshire Safeguarding Children Partnership (HSCP) procedures

Governing Body responsibilities

- Ensure the school has effective safeguarding policies and procedures including a Child Protection Policy, a Staff Behaviour Policy or Code of Conduct, a Behaviour Policy and a response to children who go missing from education (see Twyford School Safeguarding Policy).
- Ensure HSCP is informed in line with local requirements about the discharge of duties via the annual safeguarding audit
- Recruitment, selection and induction follows safer recruitment practice including all appropriate checks.
- Allegations against staff, which meet the harms threshold are dealt with by the headteacher. Allegations against the Headmaster are dealt with by the Chair of Governors.
- A member of the Senior Leadership Team is appointed as Designated Safeguarding Lead (DSL) and this is recorded in their job description. The DSL will deal with other adult related allegations that do not meet the harms threshold.
- Staff have been trained appropriately and this is updated in line with guidance
- Any safeguarding deficiencies or weaknesses are remedied without delay
- A nominated governor for safeguarding is identified

Designated Safeguarding Lead Responsibilities

In addition to the role of all staff and the senior management team the DSL will:

- Refer cases to social care, and the police where appropriate, in a timely manner avoiding any delay that could place the child at more risk.
- Assist the Governing Body in fulfilling their safeguarding responsibilities set out in legislation and statutory guidance
- Attend appropriate training and demonstrate evidence of continuing professional development to carry out the role.
- Ensure every member of staff knows who the DSL and the Deputies are, have an awareness of the DSL role and know how to contact them.
- Ensure all staff and volunteers understand their responsibilities in being alert to the signs of abuse and responsibility for referring any concerns about a child to

the DSL and concerns about an adult to the headmaster (Chair of Governors if Headmaster is subject of concern, without notifying Headmaster).

- Ensure whole school training occurs regularly with at least annual updates so that staff and volunteers can fulfil their responsibilities knowledgeably.
- Ensure any members of staff joining the school outside of the agreed training schedule receive induction prior to commencement of their duties
- Keep records of child protection concerns securely and separately from the main pupil file and use these records to assess the likelihood of risk
- Ensure that safeguarding records are transferred accordingly (separate from pupil files) and in a timely fashion when a child transfers school
- Ensure that where a pupil transfers school and is on a child protection plan or is a child looked after, their information is passed to the new school immediately and that the child's social worker is informed. Consideration is given to a transition meeting prior to moving if the case is complex or on-going.
- Have overall responsibility for on-line safety.
- Be aware of the training opportunities and briefings provided by HSCP to ensure staff are aware of the latest local guidance on safeguarding
- Develop, implement and review procedures in the school that enable the identification and reporting of all cases, or suspected cases, of abuse
- Meet any other expectations set out for DSLs in KCSiE 2021 e.g. Mental Health need.

Twyford School Child Protection Procedures

Overview

The following procedures apply to all staff working in the school and will be covered by training to enable staff to understand their role and responsibility.

The aim of our procedures is to provide a robust framework which enables staff to take appropriate action when they are concerned that a child is being harmed or is at risk of harm.

The prime concern at all stages must be the interests and safety of the child. Where there is a conflict of interest between the child and an adult, the interests of the child must be paramount.

All staff are aware that very young children with those with disabilities, special needs or with language delay may be more likely to communicate concerns with behaviours rather than words. Additionally staff will question the cause of knocks and bumps in children who have limited mobility.

If a member of staff suspects abuse, spots signs or indicators of abuse, or they have a disclosure of abuse made to them they must:

1. Make an initial record of the information on CPOMS or on the pink paper referral for if CPOMS is not available
2. Report it to the DSL immediately
3. The DSL will consider if there is a requirement for immediate medical intervention, however urgent medical attention should not be delayed if the DSL is not immediately available (see point 5 below)
4. Make an accurate record (which may be used in any subsequent court proceedings) as soon as possible and within 24 hours of the occurrence, of all that has happened, including details of:
 - Dates and times of their observations
 - Dates and times of any discussions in which they were involved
 - Any injuries
 - Explanations given by the child / adult
 - What action was taken
 - Any actual words or phrases used by the child

The records must be signed and dated by the author, or equivalent on electronic based records

5. In the absence of the DSL or their Deputies, a member of staff must be prepared to refer directly to Children's Social Care (and the police if appropriate) if there is the potential for immediate significant harm

Following a report of concerns the DSL must:

1. Decide whether or not there are sufficient grounds for suspecting significant harm in which case a referral must be made to Children's Social Care and the police if it is appropriate. The rationale for this decision should be recorded by the DSL
2. Normally the school should try to discuss any concerns about a child's welfare with the family and where possible to seek their agreement before making a referral to Children's Social Care. However, in accordance with DfE guidance, this should only be done when it will not place the child at increased risk or could impact a police investigation. Where there are doubts or reservations about involving the child's family, the DSL should clarify with Children's Social Care or the police whether the parents should be told about the referral and, if so, when and by whom. This is important in cases where the police may need to conduct a criminal investigation. The child's views should also be taken into account.
3. If there are grounds to suspect a child is suffering, or is likely to suffer, significant harm the DSL (or Deputy) must contact Children's Social Care via the Inter-Agency Referral Form (IARF) making a clear statement of:
 - i. the known facts
 - ii. any suspicions or allegations
 - iii. whether or not there has been any contact with the child's family

If there is indication that the child is suffering significant harm, a call will also be made to Children's Reception Team (CRT) on 01329 225379 or Hampshire Children's Services on 0300 555 1384

If a child is in immediate danger and urgent protective action is required, the police must be called. The DSL must then notify Children's Social Care of the occurrence and what action has been taken

4. When a pupil needs *urgent* medical attention and there is suspicion of parental abuse causing the medical need, the DSL or their Deputy should take the child to the accident and emergency unit at the nearest hospital, while Children's Social Care are informed. Advice should be sought from Children's Social Care about informing the parents, remembering that parents should normally be informed that a child requires urgent hospital attention.
5. If there is not a risk of significant harm, the DSL will either actively monitor the situation or consider the Early Help process

Early Help

It is well recognised that the provision of early help is more effective than reacting later. This requires identification and response to problems as soon as they emerge. Often this will be most effective within the school setting. Early help can lead to support plans being put in place to assist families in managing emerging problems.

All staff need to be alert to children who may benefit from early help, and how our procedures work.

Staff need to know that there is greater need for early help for a child who:

- is disabled and has specific additional needs;
- has special educational needs;
- is a young carer;
- is showing signs of engaging in anti-social or criminal behaviour;
- is in a family circumstance presenting challenges for the child, such as substance abuse, adult mental health problems and domestic violence;
- has returned home to their family from care; and/or
- is showing early signs of abuse and/or neglect.

The Common Assessment Framework (CAF) may provide the best way of assessing need of children and families where a range of agencies will be required. Effective inter-agency working is then essential.

In Hampshire a series of localised Early Help Hubs operate to provide support through the structures: Team Around the Family (TAF) and Team Around the Child (TAC). Prior to a family meeting with their local Early Help Hub, they will meet with a case worker, who will lead them through an assessment process that facilitates the support. With the TAF a family plan is constructed that details the support from various agencies that has been agreed. This is signed off by the Early Help Hub Coordinator, and is reviewed every 6-12 weeks. With the TAC the meetings and discussions are child-centred and are usually coordinated with the child's school.

Where need is relatively low level individual services and universal services may be able to take swift action. For other emerging needs a range of early help services may be required, coordinated through an early help assessment, as set out above. Where there are more complex needs, help may be provided under section 17 of the Children Act 1989 (children in need). Where there are child protection concerns (reasonable cause to suspect a child is suffering, or likely to suffer, significant harm) local authority social care services must make enquiries and decide if any action must be taken under section 47 of the Children Act 1989.

Hampshire Safeguarding Children Partnership publish a threshold document that describes the processes of assessment, and the criteria for when a case should be referred to the local authority children's social care for assessment and services under:

- section 17 of the Children Act 1989 (children in need);
- section 47 of the Children Act 1989 (reasonable cause to suspect children suffering or likely to suffer significant harm);
- section 31 (care orders); and
- section 20 (duty to accommodate a child) of the Children Act 1989

Early Help Procedures

Staff with concerns about the welfare of a child, but where it is *not* considered that the child may be a child in need as defined in the Children Act 1989, or that the child has suffered significant harm or is likely to do so, should discuss their concerns with Mr Dom Britt. Mr Britt is Head of Pastoral Care and has an overview of many elements of pupil welfare that do not meet the threshold of safeguarding. He has responsibility for individual welfare plans for pupils in the school and has regular meetings with the School Nurse on pupil welfare issues. All Heads of Years, Head of Boarding and individual tutors will bring pastoral concerns to him in his capacity as Head of Pastoral Care. Mr Britt is therefore, ideally placed to coordinate early help planning and assessments. In cases where inter-agency working is involved or safeguarding thresholds have been met, Mr Tom Parsons, as DSL, will take on the lead role. Both Mr Dom Britt and Mr Tom Parsons will keep the headmaster informed at all times of any pupil undergoing assessment or receiving support in this way.

It is essential that discussions take place early on with parents and the child concerned, as the processes may either not go forward without agreement of all parties, or they can be less effective, at least.

Mr Tom Parsons as DSL will contact the local authority (usually through the Multi-Agency Safeguarding Hub) to initiate the assessment process for an individual and family where it is decided that this is in the best interests of the child.

Children Missing from Education (See Safeguarding Policy for further information and links)

Patterns of children missing education can be an indicator of either abuse or safeguarding risks. A relatively short length of time a child is missing does not reduce risk of harm to that child, and all absence or non-attendance should be considered with other known factors or concerns. We recognise the need to ensure we have robust safeguarding responses to children who go missing from education, particularly on repeat occasions, to help identify the risk of abuse and neglect including sexual abuse or exploitation and to help prevent the risks of their going missing in future. All such indications of concern should immediately be treated as a safeguarding matter and raised with the DSL. We have regard to the statutory guidance 'Children Missing Education' (https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/550416/Children_Missing_Education_-_statutory_guidance.pdf DfE 2016). Although the definitions of 'children missing education' are normally associated with either their not being registered with a school, or not attending for a significant period (usually two months) without appropriate communication, this is relevant to us with regard to the risk of a child being exploited or trafficked. We are more likely to encounter 'children missing education' in a circumstance where a child has not taken up an allocated school place as expected, or has 10 or more days of continuous absence from school without explanation, or left school suddenly and the destination is unknown.

Within any case of children who are missing both push and pull factors will need to be considered.

Push factors include:

- Conflict with parents/carers
- Feeling powerless
- Being bullied/abused
- Being unhappy/not being listened to
- The Trigger Trio

Pull factors include:

- Wanting to be with family/friends
- Drugs, money and any exchangeable item (see County Lines in Safeguarding Policy)
- Peer pressure
- For those who have been trafficked into the United Kingdom as unaccompanied asylum-seeking children there will be pressure to make contact with their trafficker.

Children at particular risk of Missing Education include:

- Children missing from home or care
- Children who are at risk of exclusion
- Children who have previously been home educated
- Children who have medical or mental health needs (or in a home where a family member has mental health needs)
- Children who have behavioural difficulties in school
- Children at risk or harm/neglect

- Young Carers
- Students from high mobility families - Gypsy, Roma and Travellers (GRT)
- Children of migrant families
- Children of families in the Armed Forces

As a school we will inform all parents of children who are absent (unless the parent has informed us). If the parent is also unaware of the location of their child, and the definition of missing is met, we will either support the parent to contact the police to inform them or do so ourselves, according to our Missing Child Protocol.

The School will follow its robust procedures for registration and attendance to ensure the safety of the pupils and to carry out its duty of care. The School recognises that a child going missing from education could be a potential indicator of abuse or neglect, including sexual abuse and sexual exploitation. Therefore, members of staff will respond promptly to absences and follow the School's Missing Pupil procedures (which are in accordance with the requirements of Keeping Children Safe in Education (DfE, September 2020) as appropriate.

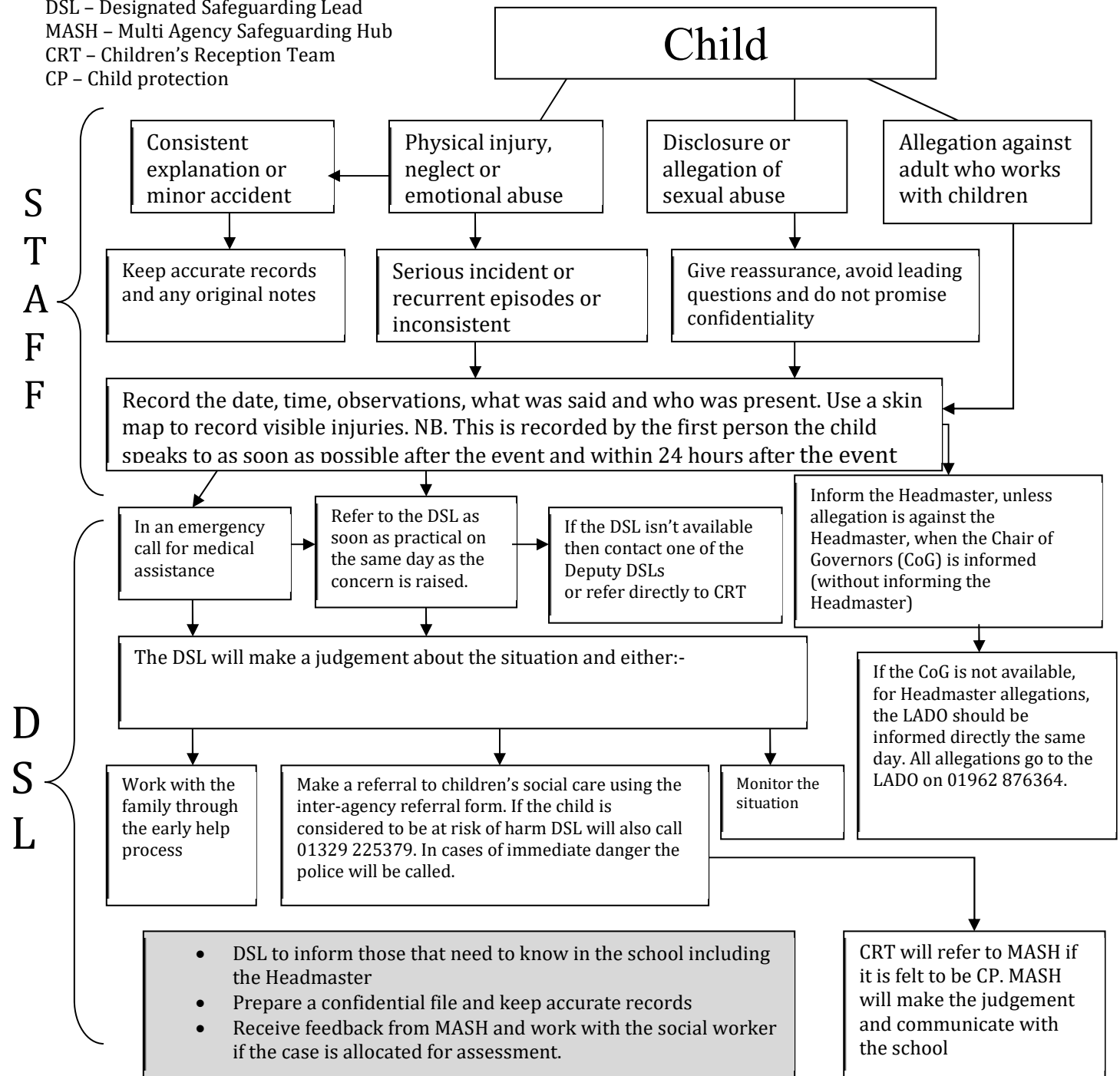
The DSL, in conjunction with the Headmaster and Matrons, will monitor any unauthorised or recurring absences. The School holds more than one emergency contact number for its pupils. The School recognises the duty to inform the local authority about any pupil who fails to attend school regularly or has been absent without the School's permission for a continuous period of 10 school days or more, at such intervals as are agreed between the School and the local authority (or in default of such agreement, at intervals determined by the Secretary of State).

The School also recognises the duty to inform the local authority when removing a child from the roll at non-standard transition points.

Children Missing Education can also be at significant risk of Trafficking and Exploitation. See Safeguarding Policy for further details and links on this subject.

Flowchart for child protection procedures

DSL - Designated Safeguarding Lead
 MASH - Multi Agency Safeguarding Hub
 CRT - Children's Reception Team
 CP - Child protection



** In the cases of known FGM, the teacher who was made aware will also make contact with the police*

Twyford School internal procedure for raising safeguarding concerns about a child

Concern reported to a member of staff

Issue to be referred to the DSL or a Deputy using CPOMS. If CPOMS not available, complete a pink concerns referral form, found in the staff room. If possible speak in person immediately to the DSL or a Deputy DSL. All paper notes/records taken to be passed to the DSL.

DSL investigates and assesses concern and decides if further action is required.

Further action required.

No further action required.

Internal action:
May include pastoral support; sanctions; time limited imposition of restrictions/conditions; discussion with parents; monitoring of specific individuals and situations.

External action:
School makes referral to Children's Social Care or other relevant agency.

Pastoral team and other relevant staff monitor and feedback to the DSL within an agreed timescale.

DSL to inform referrer of outcomes as appropriate
All relevant paper notes/records kept on file
DSL will write up concern on CPOMS if the referral was made on a concerns form.

TWYFORD SCHOOL CONCERNS FORM IF NO CPOMS ACCESS

SAFEGUARDING

OTHER CONCERN

Referral for: Child's Name:	Date:	Time:	
	Child's D.O.B.	Year Group:	Class:
	Name of adult raising concern:		
	Role of adult: SLT/Teacher/Learning Support/Lunchtime/ Estate/Admin / GAP/ Volunteer		

Nature of concern/including any record of what the child said to referring adult:
(Continue on separate sheet if necessary)

Date & time note of this concern was given to School's Safeguarding Lead:
C Poms check:

P.T.O.

Action Taken by Designated Safeguarding Lead:

Y Spoken to adult who recorded concern.

Y No action

Next steps internal:

Or

Next steps external:

Contact: Parents Police Children's Services MASH LCSP LADO

Child Protection Attendance Inclusion Service Other agency

Notes from contact with further agency following a concerns form

When:

Who to:

Further action required? Yes/No

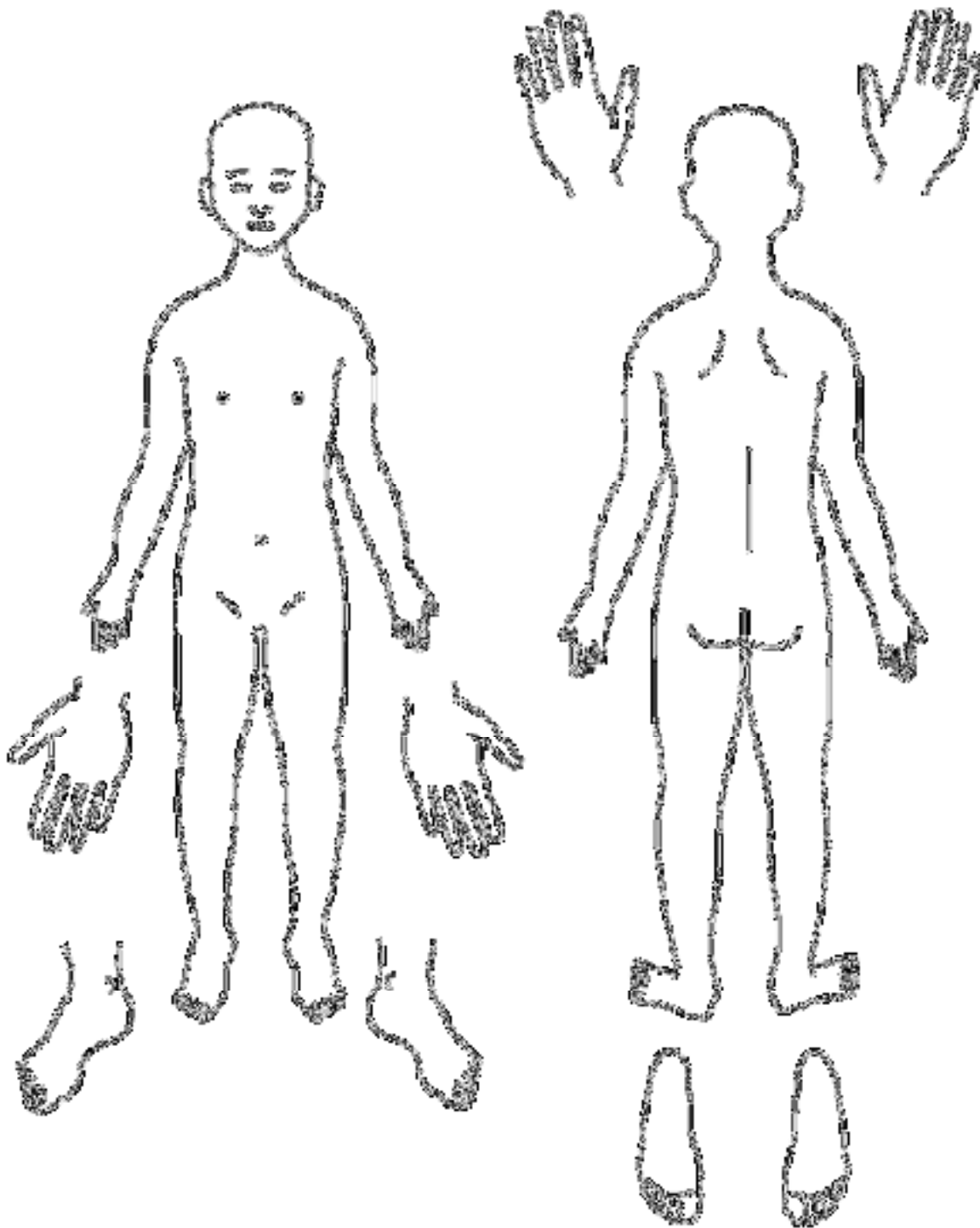
Who to tell?

CPoms log made? Yes/No

Copied to:

Annex 3

Skin map



Name of Child: _____

Date of birth: _____ Date of recording: _____

Name of completer: _____



Any additional information:

Dealing with disclosures

All staff should:

A member of staff who is approached by a child should listen positively and try to reassure them. They should always ensure that the child feels that he/she is being taken seriously and must not under any circumstances give the child the impression that he/she is causing a problem. They cannot promise complete confidentiality and should explain that they may need to pass information to other professionals to help keep the child or other children safe. The degree of confidentiality should always be governed by the need to protect the child.

Additional consideration needs to be given to children with communication difficulties and for those whose preferred language is not English. It is important to communicate with them in a way that is appropriate to their age, understanding and preference.

All staff should know who the DSL is and who to approach if the DSL is unavailable. Ultimately, all staff have the right to make a referral to the police or social care directly and should do this if, for whatever reason, there are difficulties following the agreed protocol, e.g. they are the only adult on the school premises at the time and have concerns about sending a child home.

Guiding principles, the seven R's

Receive

- Listen to what is being said, without displaying shock or disbelief
- Accept what is said and take it seriously
- Make a note of what has been said as soon as practicable

Reassure

- Reassure the pupil, but only so far as is honest and reliable
- Don't make promises you may not be able to keep e.g. 'I'll stay with you' or 'everything will be alright now' or 'I'll keep this confidential'
- Do reassure e.g. you could say: 'I believe you', 'I am glad you came to me', 'I am sorry this has happened', 'We are going to do something together to get help'

Respond

- Respond to the pupil only as far as is necessary for you to establish whether or not you need to refer this matter, but do not interrogate for full details
- Do not ask 'leading' questions i.e. 'did he touch your private parts?' or 'did she hurt you?' Such questions may invalidate your evidence (and the child's) in any later prosecution in court
- Do not ask the child why something has happened.
- Do not criticise the alleged perpetrator; the pupil may care about him/her, and reconciliation may be possible

- Do not ask the pupil to repeat it all for another member of staff. Explain what you have to do next and whom you have to talk to. Reassure the pupil that it will be a senior member of staff

Report

- Share concerns verbally with the DSL as soon as possible and record the concern CPOMS or a on pink referral form
- If you are not able to contact your DSL or the Deputy, and the child is at risk of immediate harm, contact the children's services department directly
- If you are dissatisfied with the level of response you receive following your concerns, you should press for re-consideration

Record

- If possible make some very brief notes at the time, and write them up as soon as possible
- Keep your original notes on file
- Record the date, time, place, persons present and noticeable nonverbal behaviour, and the words used by the child. If the child uses sexual 'pet' words, record the actual words used, rather than translating them into 'proper' words
- Complete a body map to indicate the position of any noticeable bruising
- Record facts and observable things, rather than your 'interpretations' or 'assumptions'

Remember

- Support the child: listen, reassure, and be available
- Complete confidentiality is essential. Share your knowledge only with appropriate professional colleagues
- Try to get some support for yourself if you need it

Review (led by DSL)

- Has the action taken provided good outcomes for the child?
- Did the procedure work?
- Were any deficiencies or weaknesses identified in the procedure? Have these been remedied?
- Is further training required?

What happens next?

It is important that concerns are followed up and it is everyone's responsibility to ensure that they are. The member of staff should be informed by the DSL what has happened following the report being made. If they do not receive this information they should be proactive in seeking it out.

If a staff member believes that their concerns have not been referred on or that the child remains at risk, they should initially ask the DSL to reconsider ensuring that the risks area understood. If this does not result in a satisfactory outcome, or the DSL rationale appears to miss the risk to the child, then the Whistleblowing procedures of the school should be followed. If the DSL is unhappy with the response from Childrens Social Care, they should consider following the HSCP escalation protocol.

Receiving a disclosure can be upsetting for the member of staff and schools should have a procedure for supporting them after the disclosure. This might include reassurance that they have followed procedure correctly and that their swift actions will enable the allegations to be handled appropriately.

In some cases additional counselling might be needed and staff should be encouraged to recognise that disclosures can have an impact on their own emotions.

Allegations against adults who work with children

Procedure for allegations that meet the harm threshold

This procedure should be used in all cases in which it is alleged a member of staff or volunteer in a school, or another adult who works with children, has behaved inappropriately towards a child. This would indicate that an adult has met the threshold of harm and has:

- **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; or**
- **behaved towards a child or children in a way that indicates he or she would pose a risk of harm to children**
- **behaved in a way that indicates that he or she is not fit to work with children**

If you believe an adult has behaved inappropriately towards a child or children, you must report this to the Headmaster, Mr Andrew Harvey, as soon as possible, certainly no later than 24 hours. He can be contacted on 07468 455864 (24 hours) or by email:

headmaster@twyfordschool.com.

- There may be situations when the Headmaster or Chair of Governors will want to involve the police immediately if the person is deemed to be an immediate risk to children or there is evidence of a possible criminal offence.
- Once an allegation has been received by the Headmaster or Chair of Governors they will contact the LADO on 01962 876364 or child.protection@hants.gov.uk as soon as possible and before carrying out any investigation into the allegation other than preliminary enquiries.
- Inform the parents of the allegation unless there is a good reason not to

In liaison with the LADO, the school will determine how to proceed and if necessary, the LADO will refer the matter to Children's Social Care and/or the police.

If the matter is investigated internally, the LADO will advise the school to seek guidance from their personnel/HR provider in following procedures set out in 'Keeping Children Safe in Education' (2021) and the HSCP procedures

When considering allegations of suitability, (the fourth criteria of the threshold of harm) the LADOs would consider the following situations:

- Parents of children who are placed on a CIN plan or are receiving Early Help;
- Arrests for offences against adults;

- Presentation to other professionals around mental health, domestic abuse and/or substance misuse;
- Extreme political or religious viewpoints which could be considered Hate Crime;
- Concerns about behaviour in their private lives which may impact on children

In any of these situations the LADO criteria for intervention will be assessed against the likelihood and impact of transferable risk to children.

In line with our referral process:

- Staff will report any concerns about the conduct of any member of staff, supply staff or volunteer to the headteacher as soon as possible.
- If an allegation is made against the headteacher, the concerns need to be raised with the Chair of Governors as soon as possible. If the Chair of Governors is not available, then the LADO should be contacted directly.
- There may be situations when the headteacher or Chair of Governors will want to involve the police immediately, if the person is deemed to be an immediate risk to children or there is evidence of a possible criminal offence.
- Once an allegation has been received by the headteacher or Chair of Governors, they will contact the LADO on 01962 876364 or child.protection@hants.gov.uk as soon as possible and before carrying out any investigation into the allegation.
- Inform the parents of the allegation unless there is a good reason not to

Low level safeguarding concerns about an adult

Low level concern does not mean it is insignificant, it means that the behaviour towards a child does not meet the threshold of harm. Twyford School's Low Level Concerns policy encourages an open and transparent culture, which enables school staff to identify concerning, problematic or inappropriate behaviour at an early stage. 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 Twyford School, may have acted in a way that:

- Is inconsistent with Staff Code of Conduct Policy, including inappropriate conduct outside of work, and
- Does not meet the harms threshold or is otherwise not considered serious enough to consider a referral to the LADO
- Paragraph 410 in KCSIE 2021 gives examples of such low-level concerns. Staff are expected to share any low-level safeguarding concerns with the headmaster.
- If an allegation is made against the headmaster, the concerns need to be raised with the Chair of Governor as soon as possible, without making the headmaster aware of the referral. If the Chair of Governors is not available, then the LADO should be contacted directly.

Concerns be considered as 'low level' would include:

- Inappropriate use of language, shouting or swearing
- Discussing personal or sexual relationships with, or in the presence of, children
- Making (or encouraging others to make) unprofessional comments which scapegoat, demean or humiliate children, or might be interpreted as such
- Behaving towards a child in any way that could indicate he or she would pose a risk of harm to children

In the event that a low-level concern has been raised by a third party, the headteacher will collect as much evidence as possible by speaking where possible with the person who raised the concern, to the individual involved and to any witnesses.

Reports of low-level concerns will be recorded in writing, with details of the concern, the context within which it arose, and the action taken. The name of the person raising the concern will be noted, respecting wishes to remain anonymous as far as reasonably possible. Records of low-level concerns will be reviewed so that potential patterns of concerning or problematic or inappropriate behaviour can be identified and responded to.

Where a pattern of behaviour is identified the school will decide on a course of action. This might be internal disciplinary procedures, or referral to the LADO if the harms threshold is met.

In such cases, the school will consider if any wider cultural issues in school enabled the behaviour to occur and if appropriate policies could be revised or extra training delivered to minimise the risk of recurrence.

Concerns and complaints about adults

Working Together to Safeguard Children (2018) states that organisations should have clear policies in line with those from HSCP for dealing with allegations against people who work with children. Those policies should make a clear distinction between an allegation, a complaint or a concern about the quality of care or practice.

Allegations as defined by KCSiE 2021 should be reported to the Local Authority Designated Officer, without delay and usually within one working day. We will not undertake our own investigations of allegations without prior consultation with the LADO(s), or in the most serious cases, the police, so as not to jeopardise statutory investigations. In borderline cases, discussions with the LADO(s) can often be held informally and without naming the school or individual. Immediate contact will be made with the LADO(s) to discuss any allegation, consider the nature, content and context of the allegation and agree a course of action including any involvement of the police. GDPR cannot be allowed to stand in the way of safeguarding children. Discussions should be recorded in writing, and any communication with both the individual and the parents of the child/children agreed. We will consider carefully whether the circumstances of the case warrant suspension or whether alternative arrangements should be put in place. In cases where an allegation has been made against an adult who is normally resident on the school premises, the school will normally make arrangements for them to reside elsewhere while investigation is undertaken, with no implication of guilt or otherwise inferred. Records concerning allegations of abuse must be preserved for the term of the Independent inquiry into Child Sexual Abuse and at least until the accused has reached normal pension age or for 10 years from the date of the allegation if it is longer.

From 1 October 2012, there are restrictions on the reporting or publishing of allegations against teachers, and so we will make every effort to maintain confidentiality and guard against unwanted publicity. These restrictions apply up to the point where the accused person is charged with an offence, or the DfE/TRA publish information about an investigation or decision in a disciplinary case.

We undertake to report promptly to the DBS any person (whether employed, contracted, a volunteer or student) whose services are no longer used for regulated activity and the DBS referral criteria are met, that is, they have caused harm or posed a risk of harm to a child.

For the purposes of this regulation, ceasing to use a person's services includes: dismissal; non-renewal of a fixed-term contract; no longer engaging/refusing to engage a supply teacher provided by an employment agency; terminating the placement of a student teacher or other trainee; no longer using staff employed by contractors; no longer using volunteers; resignation; and voluntary withdrawal from supply teaching, contract working, a course of initial teacher training, or volunteering. It is important that reports include as much evidence about the circumstances of the case as possible. Failure to make a report when required constitutes an offence. 'Compromise agreements' cannot be used to prevent a referral being made to the DBS when it is legally required, nor can an individual's refusal to cooperate with an investigation. Proprietors of independent schools have a legal duty to respond to requests from the DBS for information they hold already, but they do not have to find it from other sources.

Independent schools are also under a duty to consider making a referral to the Teaching Regulation Agency (TRA) where a teacher has been dismissed (or would have been dismissed had he/she not resigned) and a prohibition order may be appropriate, and should make reference to this in their policies. The reasons such an order would be considered are: 'unacceptable professional conduct', 'conduct that may bring the profession into disrepute' or a 'conviction, at any time, for a relevant offence'. Advice about whether an allegation against a teacher is sufficiently serious to refer to the TRA can be found in '*Teacher misconduct: the prohibition of teachers*' (October 2015). Further guidance is published on the TRA website.

Complaints or concerns can be managed independently by the school or college under internal procedures. But these will always be considered in the light of whether they constitute a safeguarding allegation that needs to be reported to the LADO.

Complaints could include:-

- Breaches of the code of Conduct
- Failure to follow policy, procedure or guidance
- Any breach of data protection or confidentiality
- Poor behaviour management
- Inappropriate use of social media
- Misadministration of medication

Concerns could include:-

- Inappropriate use of language, shouting or swearing
- Discussing personal or sexual relationships with, or in the presence, of pupils
- Making (or encouraging others to make) unprofessional comments which scapegoat, demean or humiliate children, or might be interpreted as such.

Allegations against Supply Staff

Whilst schools and colleges are not the employer of supply teachers, we will ensure allegations are dealt with properly. In no circumstances will we decide to cease to use a supply teacher due to safeguarding concerns, without finding out the facts and liaising with the LADO to determine a suitable outcome. Our governing body would discuss with the supply agency or agencies where the supply teacher is working across a number of schools or colleges, whether it is appropriate to suspend the supply teacher, or redeploy them to another part of the school whilst they carry out their investigation.

Agencies should be fully involved and co-operate with any enquiries from the LADO, police and/or children's social care. Twyford School would usually take the lead because agencies do not have direct access to children or other school or college staff, so they will not be able to collect the facts when an allegation is made, nor do they have all the relevant information required by the LADO as part of the referral process. Supply teachers, whilst not employed by Twyford School, are under the supervision, direction and control of our governing body and leadership team when working in the school or college. 359.

When using a supply agency, Twyford School will inform the agency of its process for managing allegations but also take account of the agency's policies and their duty to refer to the DBS as personnel suppliers. This should include inviting the agency's human resource manager or equivalent to meetings and keeping them up to date with information about its policies.

Sexual violence and sexual harassment between children in schools and colleges

Peer on Peer Abuse Policy

Sexual violence and sexual harassment between children needs to be considered in a way so as to fit the age and development stage and understanding of the pupil group. Additional areas for consideration can be found in the Sexual Violence and Sexual Harassment Between Children in Schools and Colleges guidance document (DfE2018). Further information is given in the expectations set out in KCSIE 2020)

Context

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

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

Reports of sexual violence and sexual harassment are extremely complex to manage. It is essential that victims are protected, offered appropriate support and every effort is made to ensure their education is not disrupted. It is also important that other children, adult students and school and college staff are supported and protected as appropriate.

Forms that peer-on peer abuse can take

The different forms that peer-on-peer abuse can take include:

- Bullying, including cyber-bullying, prejudice-based and discriminatory bullying
- Abuse in intimate personal relationships between peers
- Physical abuse which can include hitting, kicking, shaking, biting, shaking, hair pulling, or otherwise causing physical harm
- Sexual violence and sexual harassment
- Consensual and non-consensual sharing of nude and semi-nude images and/or videos (sexting or youth-produced sexual imagery)
- 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
- Upskirting
- Initiation/hazing type violence/rituals

Policy

We believe that all children have a right to attend school and learn in a safe environment. Children should be free from harm by adults in the school and other children.

We recognise that children are capable of abusing their peers and this will be dealt with under our child protection policy and in line with KCSiE (2021)

We are clear that sexual violence and sexual harassment is not acceptable, will never be tolerated and is not an inevitable part of growing up

We will minimise the risk of peer on peer abuse by:-

Prevention:

- Taking a whole school approach to safeguarding and child protection
- Providing training to staff.
- Providing a clear set of values and standards, underpinned by the school's behaviour policy and pastoral support system, and by a planned programme of evidence-based content delivered through the curriculum.
- Engaging with specialist support and interventions.
- Adopting a **ZERO TOLERANCE** approach to peer on peer sexual abuse and harassment.
- Being vigilant for any signs of peer on peer sexual abuse and harassment and treating it seriously, whilst not dismissing it as 'banter' or an inevitable part of growing up.
- Recognising that peer on peer abuse is harmful sexual behaviour that must be addressed to help prevent problematic, abusive and/or violent behaviour in the future.
- Making staff aware that technology is a significant component in many safeguarding and well-being cases of peer-on-peer sexual harm and abuse. Children can abuse their peers online and this can take the form of abusive, harassing and misogynistic messages, the non-consensual sharing of indecent images, especially around chat groups and the sharing of abusive images and pornography, to those who do not want to receive such content

Responding to reports of sexual violence and sexual harassment:

- Children making a report of sexual violence or sexual harassment will be taken seriously, kept safe and be well supported. A victim will never be given the impression that they are causing a problem or made to feel ashamed when making their disclosure.
- Children are able to report abuse confidentially through speaking to one of a number of people available to help. Posters are displayed in all form rooms so that children know how to report any such concerns.
- Staff receiving the concern will treat it seriously and the child will not be made to feel that they are causing a problem by reporting it.
- If the report includes an online element staff will be mindful of the Searching, Screening and Confiscation: advice for schools (DfE 2018) guidance.
- Staff taking the report will inform the DSL or their Deputy as soon as practicably possible but at least within 24 hours.

- Staff taking a report will never promise confidentiality.
- Staff taking a report should ensure that the child's wishes and feelings are taken into account when determining what action to take and what services to provide.
- Parents or carers will normally be informed (unless this would put the child at greater risk).
- If a child is at risk of harm, is in immediate danger, or has been harmed, a referral will be made to Children's Social Care (01329 225379).
- Young people and adults can contact the NSPCC helpline, Report Abuse in Education on [0800 136 663](tel:0800136663) or email help@nspcc.org.uk

Risk Assessment:

Following a report, the DSL will make an immediate risk and needs assessment on a case-by-case basis.

The Risk assessment will consider:

- The victim, especially their protection and support.
- The alleged perpetrator, their support needs and any discipline action.
- All other children at the school.
- The victim and the alleged perpetrator sharing classes and space at school.

The risk assessment will be recorded and kept under review. Where there has been other professional intervention and/or other specialist risk assessments, these professional assessments will be used to inform the school's approach to supporting and protecting pupils.

Action: The DSL will consider:

- The wishes of the victim.
- The nature of the incident including whether a crime has been committed and the harm caused.
- Ages of the children involved.
- Developmental stages of the children.
- Any power imbalance between the children.
- Any previous incidents.
- Ongoing risks.
- Other related issues or wider context.

Options: The DSL will manage the report with the following options:

- Manage internally
- Early Help
- Refer to Childrens Social Care
- Report to the police (generally in parallel with a referral to Social Care)

Ongoing Response:

- The DSL will manage each report on a case by case basis and will keep the risk assessment under review.

- Where there is a criminal investigation into a rape, assault by penetration or sexual assault, the alleged perpetrator should be removed from any classes they share with the victim.
- The DSL will consider how best to keep the victim and perpetrator a reasonable distance apart on school premises and on transport where appropriate.
- Where a criminal investigation into a rape or assault by penetration leads to a conviction or caution, the school will take suitable action. 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 or students).
- Where a criminal investigation into sexual assault leads to a conviction or caution, the school or college will, if it has not already, consider any suitable sanctions in light of their behaviour policy, including consideration of permanent exclusion. Where the perpetrator is going to remain at the school or college, the principle would be to continue keeping the victim and perpetrator in separate classes and continue to consider the most appropriate way to manage potential contact on school and college premises and transport. The nature of the conviction or caution and wishes of the victim will be especially important in determining how to proceed in such cases.
- The victim, alleged perpetrator and other witnesses (children & adults) will receive appropriate support and safeguards on a case-by-case basis.
- The school will take any disciplinary action against the alleged perpetrator in line with behaviour and discipline in schools.
- The school recognises that taking disciplinary action and providing appropriate support are not mutually exclusive actions and will occur at the same time if necessary.

Physical Abuse

While a clear focus of peer on peer abuse is around sexual abuse and harassment, physical assaults and initiation rituals and/or violence from pupils to pupils can also be abusive. These are equally not tolerated at Twyford School and will be treated both as a safeguarding matter and will give rise to disciplinary action. If it is believed that a crime has been committed, will be reported to the police. The principles from the anti-bullying policy will be applied in these cases, with recognition that any police investigation will need to take priority.

Sexting - Youth produced sexual imagery

(Advice from [Sexting in schools and colleges: responding to incidents and safeguarding young people 2016](#). UK Council for Child and Internet Safety July 2016)

It is essential for staff in schools to have a good understanding of the issues arising from young people sharing imagery. Sharing photos and videos online is part of daily life for many people, enabling them to share their experiences, connect with friends and record their lives. Photos and videos can be shared as text messages, email, posted on social media or increasingly via mobile messaging apps, such as Snapchat, WhatsApp or Facebook Messenger. 90% of 16 - 24 year olds and 69% of 12 - 15 year olds own a smartphone, giving them the ability to quickly and easily create and share photos and videos.

A 2016 NSPCC / Office of the Children's Commissioner England study found that just over one in ten boys and girls (13%) had taken topless pictures of themselves (around one in four of those were girls) and 3% had taken fully naked pictures. Of those who had taken sexual images, 55% had shared them with others. 31% of this group had also shared the image with someone that they did not know.

The Law

Much of the complexity in responding to youth produced sexual imagery is due to its legal status. Making, possessing and distributing any imagery of someone under 18 which is 'indecent' is illegal. This includes imagery of yourself if you are under 18. The relevant legislation is contained in the Protection of Children Act 1978 (England and Wales) as amended in the Sexual Offences Act 2003 (England and Wales). Specifically:

- It is an offence to possess, distribute, show and make indecent images of children.
- The Sexual Offences Act 2003 (England and Wales) defines a child, for the purposes of indecent images, as anyone under the age of 18.

'Indecent' is not defined in legislation. When cases are prosecuted, the question of whether any photograph of a child is indecent is for a jury, magistrate or District Judge to decide based on what is the recognised standard of propriety 13. For most purposes, if imagery contains a naked young person, a topless girl, and/or displays genitals or sex acts, including masturbation, then it will be considered indecent. Indecent images may also include overtly sexual images of young people in their underwear.

The law criminalising indecent images of children was created long before mass adoption of the internet, mobiles and digital photography. It was also created to protect children and young people from adults seeking to sexually abuse them or gain pleasure from their sexual abuse. It was not intended to criminalise children. Despite this, young people who share sexual imagery of themselves, or peers, are breaking the law. We should not, however, unnecessarily criminalise children. Children with a criminal record face stigma and discrimination in accessing education, training, employment, travel and housing and these obstacles can follow a child into adulthood. Whilst young people creating and sharing sexual imagery can be very risky, it is often the result of young people's natural curiosity about sex and their exploration of relationships. Often, young people need education, support or safeguarding, not criminalisation.

The National Police Chiefs Council (NPCC) has made clear that incidents involving youth produced sexual imagery should primarily be treated as safeguarding issues. Schools may respond to incidents without involving the police. Advice on the circumstances in which this would be appropriate can be found in the [UKCCIS advice](#) Section 2. The police may, however, need to be involved in cases to ensure thorough investigation including collection of all evidence (for example, through multi-agency checks), and there are incidents, highlighted in this advice, which should always be referred to the police (see Section 2). Even when the police are involved, however, a criminal justice response and formal sanction against a young person would only be considered proportionate in certain circumstances.

Whilst professionals refer to the issue as 'sexting' there is no clear definition of 'sexting'. Many professionals consider sexting to be 'sending or posting sexually suggestive images, including nude or semi-nude photographs, via mobiles or over the Internet.' Yet when young people are asked 'What does sexting mean to you?' they are more likely to interpret sexting as 'writing and sharing explicit messages with people they know'. Similarly, many parents think of sexting as flirty or sexual text messages rather than images. This advice only covers the sharing of sexual imagery by young people. Creating and sharing sexual photos and videos of under-18s is illegal and therefore causes the greatest complexity for schools and other agencies when responding. It also presents a range of risks which need careful management. On this basis this advice introduces the phrase 'youth produced sexual imagery' and uses this instead of 'sexting.' This is to ensure clarity about the issues this advice addresses.

This increase in the speed and ease of sharing imagery has brought concerns about young people producing and sharing sexual imagery of themselves. This can expose them to risks, particularly if the imagery is shared further, including embarrassment, bullying and increased vulnerability to sexual exploitation. Producing and sharing sexual images of under-18s is also illegal. Although the production of such imagery will likely take place outside of school, these issues often manifest in schools, colleges and organisations working with children and young people. Schools, colleges and other organisations need to be able to respond swiftly and confidently to ensure that children are safeguarded, supported and educated. This advice aims to support schools in developing procedures to respond to incidents involving youth produced sexual imagery. It also signposts sources of resources and support.

'Youth produced sexual imagery' best describes the practice because:

- 'Youth produced' includes young people sharing images that they, or another young person, have created of themselves.
- 'Sexual' is clearer than 'indecent.' A judgement of whether something is 'decent' is both a value judgement and dependent on context.
- 'Imagery' covers both still photos and moving videos.

The types of incidents which this advice 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 advice does not cover:

- The sharing of sexual imagery of people under 18 by adults as this constitutes child sexual abuse and schools should always inform the police.

- Young people under the age of 18 sharing adult pornography or exchanging sexual texts which don't contain imagery.

Disclosure about sexting / youth produced sexual imagery

Procedures at Twyford School

All incidents involving youth produced sexual imagery will be responded to in line with the school's safeguarding and child protection policy. Disclosures about youth produced sexual imagery can happen in a variety of ways. The young person affected may inform a class teacher, tutor, Matron, School/Independent Listener, DSL, or any member of the school staff. They may report through an existing reporting structure (eg worried@twyfordschool.com or bullying@twyfordschool.com emails), or a friend or parent may inform someone in school or inform the police directly. All members of staff (including volunteers, governors or contractors) should be made aware of how to recognise and refer any disclosures of incidents involving youth produced sexual imagery. This will be covered within staff training and within the school's child protection policy.

When an incident involving youth produced sexual imagery comes to the school's attention:

- The incident should be referred to the DSL as soon as possible.
- The DSL should hold an initial review meeting with appropriate school staff.
- 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.
- It is likely that the DSL will discuss the case with the LADO.

Any direct disclosure by a young person should be taken very seriously. A young person who discloses they are the subject of sexual imagery is likely to be embarrassed and worried about the consequences. It is likely that disclosure in school is a last resort and they may have already tried to resolve the issue themselves.

Advice from UKCCIS suggests: 'If a young person has shared imagery consensually, such as when in a romantic relationship, or as a joke, and there is no intended malice, it is usually appropriate for the school to manage the incident directly. In contrast any incidents with aggravating factors, for example, a young person sharing someone else's imagery without consent and with malicious intent, should generally be referred to police and/or children's social care. If you have any doubts about whether to involve other agencies, you should make a referral to the police'.

The DSL will assess risk:

- Why was the imagery shared? Was the young person coerced or put under pressure to produce the imagery?
- Who has shared the imagery? Where has the imagery been shared? Was it shared and received with the knowledge of the pupil in the imagery?
- Are there any adults involved in the sharing of the imagery?
- What is the impact on the young people involved?
- Do the young people involved have additional vulnerabilities?

- Does the young person understand consent?
- Has the young person taken part in this kind of activity before?

Parents or carers will be informed at an early stage unless informing the parent will put the child at risk of harm. Any decision not to inform parents will be taken in conjunction with other agencies such as Children's Social Care/Police.

Searching devices, viewing and deleting imagery

Adults should **not** view youth produced sexual imagery unless there is good and clear reason to do so. Under no circumstances should such imagery be sent on to another address. Wherever possible, responses to incidents should be based on what DSLs have been told about the content of the imagery. The decision to view imagery should be based on the professional judgement of the DSL and should always comply with the child protection policy and procedures of the school or college. Imagery should never be viewed if the act of viewing will cause significant distress or harm to the pupil. If a decision is made to view imagery, the DSL would need to be satisfied that viewing:

- is the only way to make a decision about whether to involve other agencies (i.e. it is not possible to establish the facts from the young people involved)
- is necessary to report the image to a website, app or suitable reporting agency to have it taken down, or to support the young person or parent in making a report
- is unavoidable because a young person has presented an image directly to a staff member or the imagery has been found on a school device or network

If it is necessary to view the imagery, then the DSL should:

- Never copy, print or share the imagery; this is illegal
- Discuss the decision to view with the Headmaster
- Ensure viewing is undertaken by the DSL or another member of the safeguarding team with delegated authority from the Headmaster
- Ensure viewing takes place with another member of staff present in the room, ideally the Headmaster or a member of the senior leadership team. This staff member does not need to view the images.
- Wherever possible ensure viewing takes place on school or college premises, ideally in the Headmaster or a member of the senior leadership team's office.
- Ensure wherever possible that images are viewed by a staff member of the same gender as the young person in the imagery
- Record the viewing of the imagery in the school's safeguarding records including who was present, why the image was viewed and any subsequent actions. Ensure this is signed and dated and meets the wider standards set out by Ofsted and ISI for recording safeguarding incidents

The Education Act 2011 amended the power in the Education Act 1996 to provide that when an electronic device, such as a mobile phone, has been seized, a teacher who has been formally authorised by the Headmaster can examine data or files, and delete these, where there is good reason to do so. However, advice here is that no imagery should be deleted except at the specific instruction of the Headmaster, who may have consulted the Police or LADO first. This power applies to all schools and there is no need to have parental consent to search through a young person's mobile phone. If during a search a teacher finds material which concerns them and they reasonably suspect the material has been or could be used to cause harm or commit an offence, they should immediately inform the Headmaster before taking action to view the material. It is likely that it will need to be retained as evidence in case there has been a

criminal offence or a breach of school discipline. The Headmaster will decide whether the material is of such seriousness that the police need to be involved.

Educating young people about youth produced sexual imagery

Teaching about safeguarding issues in the classroom can prevent harm by providing young people with skills, attributes and knowledge to help them navigate risks. Addressing sensitive issues promotes a whole school approach to safeguarding, giving young people the space to explore key issues and the confidence to seek the support of adults should they encounter problems. Keeping Children Safe in Education (September 2020) statutory guidance states that schools 'should ensure children are taught about safeguarding, including online, through teaching and learning opportunities'. In line with this, schools should provide young people with opportunities to learn about the issue of youth produced sexual imagery.

How should we teach young people about youth produced sexual imagery?

Learning about youth produced sexual imagery cannot be taught in isolation. Learning will be located within a developmental PSHE education programme, as well as in the school's IT teaching programme. Teaching should also reflect the principles articulated in 'Key principles of effective prevention education' - produced by the PSHE Association on behalf of NCA-CEOP. Given the potential sensitivity of these lessons it is essential that this issue is taught within an emotionally safe classroom climate where clear ground rules have been negotiated and established and where boundaries around teacher confidentiality have been clarified. If during any lesson teachers suspect any child or young person is vulnerable or at risk the school's safeguarding protocols should always be followed. Schools should consider:

1. What specific learning is provided in the curriculum about youth produced sexual imagery? This focuses on factual information and will include:
 - what it is
 - how it is most likely to be encountered or the consequences of requesting, forwarding or providing such images, including when it is and is not abusive
 - issues of legality
 - the risk of damage to peoples' feelings and reputation
2. What specific learning is provided to ensure children and young people have the strategies and skills required to manage:
 - specific requests or pressure to provide (or forward) such images
 - the receipt of such images

This will include who to tell; what to say; what to do; what not to do and where to get support from within and outside of the school.
3. What underpinning protective learning is being provided by the school's planned PSHE education programme and wider curriculum? This will include work on:
 - communication
 - understanding healthy relationships including trust
 - understanding and respecting the concept of genuine consent
 - understanding our rights (especially our collective right to be safe and to feel safe)
 - recognising abusive and coercive language and behaviours
 - accepting our responsibilities (especially our responsibility to respect others trust and protect their right to be physically, emotionally and reputationally safe)

Without this underpinning learning, specific learning about sexting may have limited impact.

References:

KCSiE (DfE 2020)

Sexual Violence and Sexual Harassment between Children in Schools and Colleges (DfE 2018)

Sexting in Schools and Colleges: responding to incidents and safeguarding young people (2016)

Brook sexual behaviours traffic light tool

Mr Tom Parsons, DSL, completed training in the use of the Brook Traffic Light Tool September 2021.

Behaviours: age 0 to 5

All green, amber and red behaviours require some form of attention and response. It is the level of intervention that will vary.

What is a green behaviour?

Green behaviours reflect safe and healthy sexual development. They are displayed between children or young people of similar age or developmental ability. They are reflective of natural curiosity, experimentation, consensual activities and positive choices

What can you do?

Green behaviours provide opportunities to give positive feedback and additional information.

Green behaviours

- holding or playing with own genitals
- attempting to touch or curiosity about other children's genitals
- attempting to touch or curiosity about breasts, bottoms or genitals of adults
- games e.g. mummies and daddies, doctors and nurses
- enjoying nakedness
- interest in body parts and what they do
- curiosity about the differences between boys and girls

What is an amber behaviour?

Amber behaviours have the potential to be outside of safe and healthy behaviour. They may be of potential concern due to age, or developmental differences. A potential concern due to activity type, frequency, duration or context in which they occur.

What can you do?

Amber behaviours signal the need to take notice and gather information to assess the appropriate action.

Amber behaviours

- preoccupation with adult sexual behaviour
- pulling other children's pants down/skirts up/trousers down against their will
- talking about sex using adult slang
- preoccupation with touching the genitals of other people
- following others into toilets or changing rooms to look at them or touch them
- talking about sexual activities seen on TV/online

What is a red behaviour?

Red behaviours are outside of safe and healthy behaviour. They may be excessive, secretive, compulsive, coercive, degrading or threatening and involving significant age, developmental, or power differences. They may pose a concern due to the activity type, frequency, duration or the context in which they occur

What can you do?

Red behaviours indicate a need for immediate intervention and action.

Red behaviours

- persistently touching the genitals of other children
- persistent attempts to touch the genitals of adults
- simulation of sexual activity in play
- sexual behaviour between young children involving penetration with objects
- forcing other children to engage in sexual play

This is intended to be used as a guide only. Please refer to the guidance at <https://www.brook.org.uk/our-work/the-sexual-behaviours-traffic-light-tool> for further information.

Behaviours: age 5 to 9 and 9 to 13

All green, amber and red behaviours require some form of attention and response. It is the level of intervention that will vary.

What is a green behaviour?

Green behaviours reflect safe and healthy sexual development. They are displayed between children or young people of similar age or developmental ability and reflective of natural curiosity, experimentation, consensual activities and positive choices

What can you do?

Green behaviours provide opportunities to give positive feedback and additional information.

Green behaviours 5-9

- feeling and touching own genitals
- curiosity about other children's genitals
- curiosity about sex and relationships, e.g. differences between boys and girls, how sex happens, where babies come from, same-sex relationships
- sense of privacy about bodies
- telling stories or asking questions using swear and slang words for parts of the body

Green behaviours 9-13

- solitary masturbation
- use of sexual language including swear and slang words
- having girl/boyfriends who are of the same, opposite or any gender
- interest in popular culture, e.g. fashion, music, media, online games, chatting online
- need for privacy
- consensual kissing, hugging, holding hands with peers

What is an amber behaviour?

Amber behaviours have the potential to be outside of safe and healthy behaviour. They may be of potential concern due to age, or developmental differences. A potential concern due to activity type, frequency, duration or context in which they occur.

What can you do?

Amber behaviours signal the need to take notice and gather information to assess the appropriate action.

Amber behaviours 5-9

- questions about sexual activity which persist or are repeated frequently, despite an answer having been given
- sexual bullying face to face or through texts or online messaging
- engaging in mutual masturbation
- persistent sexual images and ideas in talk, play and art
- use of adult slang language to discuss sex

Amber behaviours 9-13

- uncharacteristic and risk-related behaviour, e.g. sudden and/or provocative changes in dress, withdrawal from friends, mixing with new or older people, having more or less money than usual, going missing
- verbal, physical or cyber/virtual sexual bullying involving sexual aggression
- LGBT (lesbian, gay, bisexual, transgender) targeted bullying
- exhibitionism, e.g. flashing or mooning
- giving out contact details online
- viewing pornographic material
- worrying about being pregnant or having STIs

What is a red behaviour?

Red behaviours are outside of safe and healthy behaviour. They may be excessive, secretive, compulsive, coercive, degrading or threatening and involving significant age, developmental, or power differences. They may pose a concern due to the activity type, frequency, duration or the context in which they occur

What can you do?

Red behaviours indicate a need for immediate intervention and action.

Red behaviours 5-9

- frequent masturbation in front of others
- sexual behaviour engaging significantly younger or less able children
- forcing other children to take part in
- sexual activities
- simulation of oral or penetrative sex
- sourcing pornographic material online

Red behaviours 9-13

- exposing genitals or masturbating in public
- distributing naked or sexually provocative images of self or others
- sexually explicit talk with younger children
- sexual harassment
- arranging to meet with an online acquaintance in secret
- genital injury to self or others
- forcing other children of same age, younger or less able to take part in sexual activities
- sexual activity e.g. oral sex or intercourse
- presence of sexually transmitted infection (STI)
- evidence of pregnancy

Behaviours: age 13 to 17

All green, amber and red behaviours require some form of attention and response. It is the level of intervention that will vary.

What is a green behaviour?

Green behaviours reflect safe and healthy sexual development. They are displayed between children or young people of similar age or developmental ability and reflective of natural curiosity, experimentation, consensual activities and positive choices

What can you do?

Green behaviours provide opportunities to give positive feedback and additional information.

Green behaviours

- solitary masturbation
- sexually explicit conversations with peers
- obscenities and jokes within the current cultural norm
- interest in erotica/pornography
- use of internet/e-media to chat online
- having sexual or non-sexual relationships
- sexual activity including hugging, kissing, holding hands
- consenting oral and/or penetrative sex with others of the same or opposite gender who are of similar age and developmental ability
- choosing not to be sexually active

What is an amber behaviour?

Amber behaviours have the potential to be outside of safe and healthy behaviour. They may be of potential concern due to age, or developmental differences. A potential concern due to activity type, frequency, duration or context in which they occur.

What can you do?

Amber behaviours signal the need to take notice and gather information to assess the appropriate action.

Amber behaviours

- accessing exploitative or violent pornography
- uncharacteristic and risk-related behaviour, e.g. sudden and/or provocative changes in dress,
- withdrawal from friends, mixing with new or older people, having more or less money than usual, going missing
- concern about body image
- taking and sending naked or sexually provocative images of self or others
- single occurrence of peeping, exposing, mooning or obscene gestures
- giving out contact details online
- joining adult- only social networking sites and giving false personal information
- arranging a face to face meeting with an online contact alone

What is a red behaviour?

Red behaviours are outside of safe and healthy behaviour. They may be

excessive, secretive, compulsive, coercive, degrading or threatening and involving significant age, developmental, or power differences. They may pose a concern due to the activity type, frequency, duration or the context in which they occur

What can you do?

Red behaviours indicate a need for immediate intervention and action.

Red behaviours

- exposing genitals or masturbating in public
- preoccupation with sex, which interferes with daily function
- sexual degradation/humiliation of self or others
- attempting/forcing others to expose genitals
- sexually aggressive/exploitative behaviour
- sexually explicit talk with younger children
- sexual harassment
- non-consensual sexual activity
- use of/acceptance of power and control in sexual relationships
- genital injury to self or others
- sexual contact with others where there
- is a big difference in age or ability
- sexual activity with someone in authority and in a position of trust
- sexual activity with family members
- involvement in sexual exploitation and/or trafficking
- sexual contact with animals
- receipt of gifts or money in exchange for sex

Annex 8

Briefing sheet for temporary contractors and supply staff

While working at **Twyford School**, you have a duty of care towards the children/pupils/students on the school site. This means that at all times, you should act in a way that is consistent with their safety and welfare.

In addition, **if at any time you have a concern about a child or young person, particularly if you think they may be at risk of abuse or neglect, it is your responsibility to share that concern with the school designated safeguarding lead (DSL), who is *Mr Tom Parsons* and can be contacted by phone on 07904635770, 01962 779824 and email: sjohnston@twyfordschool.com**

You may have become concerned as a result of:

- Observing a physical injury, which you think may have been non-accidental
- Observing something in the appearance of a child or young person which suggests they are not being sufficiently well cared for
- Observing behaviour that leads you to be concerned about a child or young person
- A child or young person telling you that they have been subjected to some form of abuse
- Being made aware that a child is being abused by another child (peer on peer abuse)

In any of the circumstances listed here, you must write down what you saw or heard, date and sign your account, and give it to the **DSL** as soon as possible and no later than 24 hours. This may be the beginning of a legal process – it is important to understand that legal action against a perpetrator can be seriously damaged by any suggestion that the child has been led in any way.

If a child talks to you about abuse, you should follow these guidelines:

- Rather than directly questioning the child, just listen and be supportive
- Never stop a child who is freely recalling significant events, but don't push the child to tell you more than they wish
- Make it clear that you may need to pass on information to staff in other agencies who may be able to help – do not promise confidentiality. You are obliged to share any information relating to abuse or neglect
- Write an account of the conversation immediately, as close to verbatim as possible. Put the date and timings on it, and mention anyone else who was present. Then sign it and give your record to the **DSL** who will contact Children's Social Care if appropriate

The school has a policy on safeguarding children and young people which you can find, together with the local procedures to be followed by all staff, in **the School Office**.

If you believe an adult has behaved inappropriately towards a child or children, you must report this to the Headmaster, Mr Andrew Harvey, as soon as possible, certainly no later than 24 hours. He can be contacted on 07468 455864 (24 hours) or by email: headmaster@twyfordschool.com.

Concerns that meet the threshold of harm include:-

- Inappropriate use of language, shouting or swearing
- Discussing personal or sexual relationships with, or in the presence of, children
- Making (or encouraging others to make) unprofessional comments which scapegoat, demean or humiliate children, or might be interpreted as such
- Behaving towards a child in any way that could indicate he or she would pose a risk of harm to children

Low level safeguarding concerns

Low level concern does not mean it is insignificant, it means that the behaviour towards a child does not meet the threshold of harm. 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 Twyford School, may have acted in a way that:

- Is inconsistent with Staff Code of Conduct Policy, including inappropriate conduct outside of work, and

- Does not meet the harms threshold or is otherwise not considered serious enough to consider a referral to the LADO
- Paragraph 410 in KCSIE 2021 gives examples of such low- level concerns. Staff are expected to share any low -level safeguarding concerns with the headmaster.

IF YOU ARE CONCERNED ABOUT THE WELFARE OF A CHILD, OR THE BEHAVIOUR OF AN ADULT TOWARDS A CHILD, YOU MUST REPORT IT.

IF YOU CANNOT MAKE CONTACT WITH THE APPROPRIATE PERSON, AND YOU BELIEVE A CHILD IS AT RISK OF SIGNIFICANT HARM, YOU MUST REPORT IT TO CHILDREN'S SOCIAL CARE YOURSELF: **Children's Reception Team (CRT) on 01329 225379 – THEN ALSO REPORT IT TO THE DSL/HEADMASTER AS APPROPRIATE**

KEEPING YOURSELF SAFE

Ensure that at all times nothing in your behaviour could be misunderstood, leading to allegations being made against you with regard to safeguarding the welfare of children. This includes:

- Not engaging children in conversation or allowing them to draw you into conversation
- Not using mobile phones anywhere near children, and certainly not taking photos on the school site at any time
- Not entering areas of the school that are for the use of children, especially changing rooms/toilets. You will be told which staff only facilities you may use
- DO NOT establish or seek to establish social contact with pupils, including e-mail, social networking and mobile telephones
- DO NOT pass your home address, phone number, e-mail address or other personal details to pupils/children

Remember, if you have a concern about the welfare of a child, you MUST report it to the DSL, Mr Tom Parsons as soon as possible.

T Parsons
Sept 2021

Sexual Violence and Sexual Harassment between Children Risk and Needs Assessment Template

(This template is offered as a framework and should be seen as a starting point for development to fit your school's individual context. Each reported incident should be managed on a case-by-case basis)

EXAMPLE assessment

Brook Traffic Light Assessment	What are the risks? Who might be harmed & how?	Action	Action by Whom?	Action by when?	Action status or Date Completed & Outcome including further actions	
Red Behaviour:						
		Community Impact Assessment				
		Media				
		Information Sharing.				
	Social Media					

Whistleblowing in a safeguarding context

While the school has a separate whistleblowing policy, detailed in the Staff Code of Conduct, this is a summary sheet that outlines the process when there is a concern that safeguarding issues have not been reported or followed correctly.

This does not replace the whistle blowing policy and should be read in conjunction with the school policy.

Whistleblowing is a term that is used when staff want to report a concern within their organisation that involves their manager or a person senior to them in the organisation which may prevent them from following the normal reporting systems.

There are a limited number of areas that can be called Whistleblowing, and the policy protects staff from being punished for raising concerns.

At Twyford School, the Headmaster, Mr Andrew Harvey, is the senior manager and responsible for all staff. If you are concerned that any member of staff within the school is not following safeguarding processes or behaving in a way that is placing children at risk, you should in the first place make the Headmaster aware.

If your concern is about the head teacher then you would raise this with the Chair of Governors by email, or via the Bursar.

If you would prefer to raise your concerns outside of the school then you are able to contact the **NSPCC whistleblowing line** on 0800 028 0285 or email help@nspcc.org.uk for national organisations.

If you believe that a member of the school staff is harming a child (an allegation) and this has been reported to the Headteacher and no action has been taken, or the member of staff you have concerns about is the Headteacher, then you are able to contact the Local Authority Designated Officers (LADOs) on 01962 876364 or child.protection@hants.gov.uk

If you believe that a child is being abused by individuals outside of the school, then you are able to make a direct referral to Childrens Social Care by calling 0300 555 1384 (office hours) or 0300 555 1373 (outside of office hours). In this case you should also inform the Headmaster.

What is child abuse?

The following definitions are taken from *Working Together to Safeguard Children* HM Government (2018). In addition to these definitions, it should be understood that children can also be abused by being sexually exploited, honour based violence, forced marriage or female genital mutilation.

What is abuse and neglect?

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. 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.

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.

Emotional abuse

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.

Sexual abuse

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

Neglect

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

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

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

To support the local context, all staff have access to the Hampshire Safeguarding Children Partnership (HSCP) neglect threshold chart

Indicators of abuse

Neglect

The nature of neglect

Neglect is a lack of parental care but poverty and lack of information or adequate services can be contributory factors.

Far more children are registered to the category of neglect on child protection plans than to the other categories. As with abuse, the number of children experiencing neglect is likely to be much higher than the numbers on the plans.

Neglect can include parents or carers failing to:

- provide adequate food, clothing and shelter
- protect a child from physical and emotional harm or danger
- ensure adequate supervision or stimulation
- ensure access to appropriate medical care or treatment.

NSPCC research has highlighted the following examples of the neglect of children under 12:

- frequently going hungry
- frequently having to go to school in dirty clothes
- regularly having to look after themselves because of parents being away or having problems such as drug or alcohol misuse
- being abandoned or deserted
- living at home in dangerous physical conditions
- not being taken to the doctor when ill
- not receiving dental care.

Neglect is a difficult form of abuse to recognise and is often seen as less serious than other categories. It is, however, very damaging: children who are neglected often develop more slowly than others and may find it hard to make friends and fit in with their peer group.

Neglect is often noticed at a stage when it does not pose a risk to the child. The duty to safeguard and promote the welfare of children (*What to do if You're Worried a Child is Being Abused* DfE 2015) would suggest that an appropriate intervention or conversation at this early stage can address the issue and prevent a child continuing to suffer until it reaches a point when they are at risk of harm or in significant need.

Neglect is often linked to other forms of abuse, so any concerns school staff have should at least be discussed with the DSL.

Indicators of neglect

The following is a summary of some of the indicators that may suggest a child is being abused or is at risk of harm. It is important to recognise that indicators alone cannot confirm whether a child is being abused. Each child should be seen in the context of their family and wider community and a proper assessment carried out by appropriate persons. What is important to keep in mind is that if you feel unsure or concerned, do something about it. Don't keep it to yourself. The HSCP neglect strategy provides a more detailed list of indicators of neglect and is available to all staff

Physical indicators of neglect

- Constant hunger and stealing food
- Poor personal hygiene - unkempt, dirty or smelly
- Underweight
- Dress unsuitable for weather
- Poor state of clothing
- Illness or injury untreated

Behavioural indicators of neglect

- Constant tiredness
- Frequent absence from school or lateness
- Missing medical appointments
- Isolated among peers
- Frequently unsupervised
- Stealing or scavenging, especially food
- Destructive tendencies

Emotional abuse

The nature of emotional abuse

Most harm is produced in *low warmth, high criticism* homes, not from single incidents.

Emotional abuse is difficult to define, identify/recognise and/or prove.

Emotional abuse is chronic and cumulative and has a long-term impact.

All kinds of abuse and neglect have emotional effects although emotional abuse can occur by itself.

Children can be harmed by witnessing someone harming another person – as in domestic violence.

It is sometimes possible to spot emotionally abusive behavior from parents and carers to their children, by the way that the adults are speaking to, or behaving towards children. An appropriate challenge or intervention could affect positive change and prevent more intensive work being carried out later on.

Indicators of emotional abuse

Developmental issues

- Delays in physical, mental and emotional development
- Poor school performance
- Speech disorders, particularly sudden disorders or changes.

Behaviour

- Acceptance of punishment which appears excessive
- Over-reaction to mistakes
- Continual self-deprecation (I'm stupid, ugly, worthless etc)
- Neurotic behaviour (such as rocking, hair-twisting, thumb-sucking)
- Self-mutilation
- Suicide attempts
- Drug/solvent abuse
- Running away
- Compulsive stealing, scavenging
- Acting out
- Poor trust in significant adults
- Regressive behaviour – e.g., wetting
- Eating disorders
- Destructive tendencies
- Neurotic behaviour
- Arriving early at school, leaving late

Social issues

- Withdrawal from physical contact
- Withdrawal from social interaction
- Over-compliant behaviour
- Insecure, clinging behaviour
- Poor social relationships

Emotional responses

- Extreme fear of new situations
- Inappropriate emotional responses to painful situations (“I deserve this”)
- Fear of parents being contacted
- Self-disgust
- Low self-esteem
- Unusually fearful with adults
- Lack of concentration, restlessness, aimlessness
- Extremes of passivity or aggression

Physical abuse

The nature of physical abuse

Most children collect cuts and bruises quite routinely as part of the rough and tumble of daily life. Clearly, it is not necessary to be concerned about most of these minor injuries. But accidental injuries normally occur on the *bony prominences* – e.g., shins. Injuries on the *soft* areas of the body are more likely to be inflicted intentionally and should therefore make us more alert to other concerning factors that may be present.

A body map (annex 3) can assist in the clear recording and reporting of physical abuse. The body map should only be used to record observed injuries and no child should be asked to remove clothing by a member of staff of the school.

Indicators of physical abuse / factors that should increase concern

- Multiple bruising or bruises and scratches (especially on the head and face)
- Clusters of bruises – e.g., fingertip bruising (caused by being grasped)
- Bruises around the neck and behind the ears – the most common abusive injuries are to the head
- Bruises on the back, chest, buttocks, or on the inside of the thighs
- Marks indicating injury by an instrument – e.g., linear bruising (stick), parallel bruising (belt), marks of a buckle
- Bite marks
- Deliberate burning may also be indicated by the pattern of an instrument or object – e.g., electric fire, cooker, cigarette
- Scalds with upward splash marks or *tide marks*
- Untreated injuries
- Recurrent injuries or burns
- Bald patches.

In the social context of the school, it is normal to ask about a noticeable injury. The response to such an enquiry is generally light-hearted and detailed. So, most of all, concern should be increased when:

- the explanation given does not match the injury
- the explanation uses words or phrases that do not match the vocabulary of the child (adults words)
- no explanation is forthcoming
- the child (or the parent/carer) is secretive or evasive
- the injury is accompanied by allegations of abuse or assault

You should be concerned if the child or young person:

- is reluctant to have parents/carers contacted
- runs away or shows fear of going home
- is aggressive towards themselves or others
- flinches when approached or touched
- is reluctant to undress to change clothing for sport
- wears long sleeves during hot weather
- is unnaturally compliant in the presence of parents/carers.
- has a fear of medical help or attention
- admits to a punishment that appears excessive.

Sexual abuse

The nature of sexual abuse

Sexual abuse is often perpetrated by people who are known and trusted by the child – e.g., relatives, family friends, neighbours, babysitters, people working with the child in school, faith settings, clubs or activities. Children can also be subject to child sexual exploitation.

Sexual exploitation is seen as a separate category of sexual abuse. Indicators of CSE can be found in the school's safeguarding policy and KCSiE 2020.

Characteristics of child sexual abuse:

- it is often planned and systematic – people do not sexually abuse children by accident, though sexual abuse can be opportunistic
- grooming the child – people who abuse children take care to choose a vulnerable child and often spend time making them dependent
- grooming the child's environment – abusers try to ensure that potential adult protectors (parents and other carers especially) are not suspicious of their motives.

Most people who sexually abuse children are men, but some women and young people (including other children) sexually abuse too.

Indicators of sexual abuse

Physical observations

- Damage to genitalia, anus or mouth
- Sexually transmitted diseases
- Unexpected pregnancy, especially in very young girls
- Soreness in genital area, anus or mouth and other medical problems such as chronic itching
- Unexplained recurrent urinary tract infections and discharges or abdominal pain

Behavioural observations

- Sexual knowledge inappropriate for age
- Sexualised behaviour or affection inappropriate for age
- Sexually provocative behaviour/promiscuity
- Hinting at sexual activity Inexplicable decline in school performance
- Depression or other sudden apparent changes in personality as becoming insecure or clinging
- Lack of concentration, restlessness, aimlessness
- Socially isolated or withdrawn
- Overly compliant behaviour
- Acting out, aggressive behaviour
- Poor trust or fear concerning significant adults
- Regressive behaviour,
- Onset of wetting, by day or night; nightmares
- Onset of insecure, clinging behaviour
- Arriving early at school, leaving late, running away from home
- Suicide attempts, self-mutilation, self-disgust
- Suddenly drawing sexually explicit pictures
- Eating disorders or sudden loss of appetite or compulsive eating
- Regressing to younger behaviour patterns such as thumb sucking or bringing out discarded cuddly toys
- Become worried about clothing being removed
- Trying to be 'ultra-good' or perfect; overreacting to criticism.

The Prevent Duty

The Prevent duty is the duty in the Counter Terrorism and Security Act 2015 on specified authorities, in the exercise of their functions, to have due regard to the need to prevent people from being drawn into terrorism. It is essential that staff are able to identify children who may be vulnerable to radicalisation and know what to do when they are identified. Protecting children from the risk of radicalisation is seen as part of Twyford's wider safeguarding duties, and is similar in nature to protecting children from other harms (e.g. drugs, gangs, neglect, sexual exploitation), whether these come from within their family or are the product of outside influences. General safeguarding principles apply to keeping children safe from the risk of radicalisation as set out in the relevant statutory guidance: *Working together to safeguard children* (2018) and *Keeping Children Safe in Education* (2019).

We build pupils' resilience to radicalisation by promoting fundamental British values and enabling them to challenge extremist views. It is important to emphasise that the Prevent duty is not intended to stop pupils debating controversial issues.

Staff should understand when it is appropriate to make a referral to the Channel programme. Channel is a programme which focuses on providing support at an early stage to people who are identified as being vulnerable to being drawn into terrorism. It provides a mechanism for schools to make referrals if they are concerned that an individual might be vulnerable to radicalisation. Channel provides a programme of support for individuals who are vulnerable to being drawn into terrorism. It has existed since 2012, administered through multi-agency panels at local level. Channel can provide theological and ideological mentoring.

There are several strands to the Duty:

1. Risk Assessment

Assess the general level of risk, depending on geographical area or intake, of pupils being subject to radicalisation or drawn into terrorism/extremist activity. We consider the general context of Twyford School and its parent/pupil/staff community to be low risk, but alert.

Put in place means to identify individual children who may be at risk of radicalisation or being drawn into terrorism/extremist activity.

The general risks affecting children and young people may vary from area to area, and according to their age. Schools and childcare providers are in an important position to identify risks within a given local context. It is important that schools and childcare providers understand these risks so that they can respond in an appropriate and proportionate way. At the same time schools and childcare providers should be aware of the increased risk of online radicalisation, as terrorist organisations such as ISIL seek to radicalise young people through the use of social media and the internet. The local authority and local police will be able to provide contextual information to help schools and childcare providers understand the risks in their areas.

There is no single way of identifying an individual who is likely to be susceptible to a terrorist ideology. As with managing other safeguarding risks, staff should be alert to changes in children's behaviour which could indicate that they may be in need of help or protection. Children at risk of radicalisation may display different signs or seek to hide their views. School staff should use their professional judgement in identifying children who might be at risk of radicalisation and act proportionately. Even very young children may be vulnerable to radicalisation by others, whether in the family or outside, and display concerning behaviour. Children influenced in this way by family attitudes are sometimes referred to as 'terror tots'. The Prevent duty does not require teachers or childcare providers to carry out unnecessary intrusion into family life but as with any other safeguarding risk, they must take action when they observe behaviour of concern.

A Vulnerability Assessment Framework can be used to assess whether an individual pupil is at risk of being drawn into extremism, based on: 1. Engagement with a group, cause or ideology (The engagement factors are sometimes referred to as 'psychological hooks'. They include the needs, susceptibilities, motivations and contextual influences that together can map an individual's pathway into terrorism) 2. Intent to cause harm (Intent factors describe the mind-set that is associated with a readiness to use violence and address what the individual would do and to what end) 3. Capability to cause harm (Plots to cause widespread damage take a high level of personal capability, resources and networking to be successful. What an individual is capable of is therefore a key consideration for those who are tasked with assessing the risk of harm to the public).

2. Policies and Procedures

We have clear safeguarding policies and procedures in place to identify children at risk and protect them. Our safeguarding policies include when it is appropriate to make a referral about a child at risk, whether to Children's Services in the normal way or to make a referral to the Channel programme, for early intervention. We refer any concerns to the DSL, who will decide which course of action is most appropriate. We provide for a single point of contact to oversee and coordinate the school's implementation of the Prevent duty - at Twyford this is the Designated Safeguarding Lead, Mrs Sally Johnston.

We include protocols to ensure that visiting speakers, whether invited by staff or pupils, are suitably assessed via internet or other background check and are fully supervised while on the premises. Any speaker invited to Twyford must be approved by the Headmaster, who will have reviewed the assessed risk. Due diligence is done on contractors and those hiring venues.

3. Training

All staff have received initial introductory training on the Prevent duty, via Inset or when first employed (if this does not overlap with the start of a term), and subsequently via the Educare online Prevent Duty qualification. Headmaster and Bursar have undertaken (College of Policing) specific training on the Prevent Duty.

We utilise resources available through Hampshire Safeguarding Children Partnership and websites such as Educate Against Hate (<http://educateagainsthate.com/>).

4. Building Resilience to Radicalisation

We provide pupils with the knowledge, skills and understanding to prepare them to play a full and active part in society. It should equip pupils to explore political and social issues critically, to weigh evidence, to debate, and to make reasoned arguments. In PSHEE, pupils learn about democracy, government and how laws are made and upheld. Pupils are also taught about the diverse national, regional, religious and ethnic identities in the United Kingdom and the need for mutual respect and understanding. Within the PSHEE syllabus we teach pupils to manage risk, resist pressure, make safer choices and seek help if necessary. In religious studies and other relevant subject syllabus/opportunity with focus on democracy, diversity, mutual respect and managing debate of contentious issues.

5. IT Policies and Training

We ensure that children are safe from terrorist and extremist material when accessing the internet in school. We ensure that children are not exposed to illegal, inappropriate or harmful material, through rigorous filtering (but being conscious of 'over blocking' that can restrict what children can be taught). We regularly check filters and review ICT acceptable use policies. We ensure that children are not subjected to harmful online interaction with other users. We equip (ie train) children to stay safe online, both in school and outside of school. This education is to prevent online behaviour that increases the likelihood of, or causes, harm. We ensure teaching staff are aware of the risks posed by online activity of extremist and terrorist groups. Circulation of the Home Office briefing note for schools *How Social Media is used to encourage travel to Syria and Iraq* to teaching staff have been additional and effective way of doing this.

6. Working in Partnership

We liaise with the HCSB to establish what advice and support they can provide and for their assessment of general levels of risk within the local area. Effective engagement with parents / the family is also important as they are in a key position to spot signs of radicalisation. It is important to assist and advise families who raise concerns and be able to point them to the right support mechanisms. Jo Lappin is the Chair of the Hampshire Prevent Strategy Group, coordinated through HSCP.

What to do if you have a concern

Remember that we consider that this is a safeguarding matter, and therefore our existing robust procedures should be followed. Refer to the DSL within 24 hours. The DSL will initiate a pastoral discussion (Head of Pastoral Care, Headmaster and individual Tutor) in order to decide the correct course of action: Hants Direct, Police, Channel or DfE.

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.gsi.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 safeguarding procedures should be followed.

Useful contacts

Key Personnel	Name (s)	Telephone No.
DSL	Mr Tom Parsons	Mobile 07904635770 Home 01264 861404 School 01962 712269
Deputy DSL(s)	Miss Pippa Higham Mr Dom Britt Mr Gary Crook Mrs Karen Rogers <i>(Mrs Rogers is the nominated DSL for EYFS)</i> Mr Gregg Lewis Mrs Shirley Davies Mrs Alison Thompson Mrs Judith Ramshaw Mr Simon Honey Miss Claire Smith	07722 984723 07960 954893 07706 006414 School 01962 712269
School's named "Prevent" lead	Mr Andrew Harvey	Mobile 07468 455864 School 01962 712269
Nominated Safeguarding Governor	Mr James Fox	School 01962 621301
Chair of Governors	Mr Colin Howman	01962 71226
Children's Reception Team		01329 225379
Out of hours social care		0300 555 1373
Police		101 or in emergencies 999
Safeguarding advisors / Local Authority Designated Officers (LADOs)	Barbara Piddington Fiona Armfield Mark Blackwell	HCC Safeguarding Unit 01962 876364

School nurse	Mrs Alison Thompson/Mrs Trish Bell	01962 712269
Boarding Matron	Mrs Caroline Matravers-Scott	01962 712269