



# Safeguarding (Child Protection) Policy

This policy was approved and ratified by the Board of Trustees at

Cox Green School

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## Contents

Number	Item	Page
1	Introduction and Background	3
2	Aims	4
3	Procedures	6
4	Confidentiality	6
5	Information Sharing	7
6	Supporting Staff	8
7	Allegations Against Staff	8
8	Whistleblowing	9
9	Physical Intervention	9
10	Anti-Bullying	10
11	Racist Incidents	11
12	Special Educational Needs and Alternative Provision	11
13	Prevention	11
14	Health & Safety	12
15	Roles and Responsibilities	12
16	The Single Central Record	15
17	Disclosure and Barring Service (DBS) Checks	15
18	Safer Recruitment	17
19	Communication of Policy	18
20	Review of Policy	18
21	Post Holders 2023 - 2024 Academic Year	19
22	Key Contacts	19
	<b>Appendices</b>	
1	Recognising Signs of Child Abuse	20
	Child Sexual Exploitation	24
	Child Criminal Exploitation	26
	County Lines	27
	Online Safety	28
	Child on Child Abuse	30
	Sexual Violence and Sexual Harassment Between Children in Schools	31
	Police	32
2	Forced Marriage and Female Genital Mutilation (FGM)	33
	Preventing Radicalisation and Extremism	35
	Private Fostering	37
3a	Further Advice on Child Protection	38
3b	Sexting and Cox Green's Responses	39
4	What To Do If You Have an E-Safety Concern	44
5	Cox Green School - Child Protection Procedures	45
6	Safeguarding Procedures – Visitors Expression of Concern Record	46
7	Confidentiality and Information Sharing	47
8	Flowchart of When and How to Share Information (DfE Information Sharing March 2015)	48
9	Flowchart of Actions When There are Concerns About a Child – Local Authority Procedure	49
10	Alternative Provision Evaluation Form	50
11	Attendance Procedures	52
12	Individual Student Behaviour Risk Audit	54



## Safeguarding (Child Protection) Policy

### 1. Introduction and Background

- 1.1 Children can be abused in any section of our society. Abuse occurs in all groups, and in all classes. Children may suffer abuse by a family member or family friend, by professionals, by those who are in a caring role and by strangers. It can take many forms – see Appendix 1 and 2.
- 1.2 Responding to and managing suspicions and allegations of child abuse demands much of professionals. They have to be sensitive both to the child's needs and to the distress which investigations are likely to arouse in families; these may be conflicting. They have to recognise that our society embraces a variety of child rearing practices, and be able to be both sensitive to and tolerant of customs and views which may be held by minority groups, whilst at the same time distinguishing what is an acceptable level of difference and what is not.
- 1.3 The Trustee Board of Cox Green School, takes seriously its responsibility under section 175 of the Education Act 2002 to safeguard and promote the welfare of children; and to work together with other agencies to ensure adequate arrangements within our school to identify, assess, and support those children who are suffering harm.

Cox Green School has charitable status and the Charity Commission guidance on charity and trustee duties to safeguard children is available at <https://www.gov.uk/guidance/safeguarding-duties-for-charity-trustees>. Cox Green School Trustees are required to read and familiarise themselves with this guidance.

- 1.4 The policy applies to all our students, including those in post-16 provision at Cox Green School and Sports Academy and has been developed in accordance with the principles established by the Children Act 1989 and 2004; the Education Act 2002, and in line with government publications:
  - Working Together to Safeguard Children, 2023;
  - Framework for the Assessment of Children in Need and Their Families, 2000;
  - What To Do If You Are Worried A Child Is Being Abused, 2015;
  - Berkshire Local Safeguarding Children Boards – Child Protection Procedures;
  - Keeping Children Safe in Education 2024
  - Information Sharing, 2018;
  - The Counter Terrorism & Security Act 2015;
  - January 2014, Ofsted “Private Fostering: Better Information, Better Understanding”;
  - Sexual Violence and Sexual Harassment Between Children in Schools and Colleges, 2021;
  - Review of Sexual Abuse in Schools and Colleges, 2021

This policy should be read in conjunction with the school's Staff Code of Conduct Policy and all policies relating to Internet and social media use.

- 1.5 We fully understand that all staff and Trustees have a full and active part to play in protecting students from harm, and the child's welfare is our paramount concern. They will ensure that mechanisms are in place to assist staff to understand and discharge their role and responsibilities.



## 2. Aims

- 2.1 At Cox Green school we are committed to safeguarding children and young people and we expect everyone who works in our school to share this commitment.
- 2.2 All staff should be aware that safeguarding incidents and/or behaviours can be associated with factors outside the school or college and/or can occur between children outside of these environments. All staff, but especially the Designated Safeguarding Lead (and deputies) should consider whether children are at risk of abuse or exploitation in situations outside their families and a contextual safeguarding approach underpins our practice. Extra-familial harms take a variety of different forms and children can be vulnerable to multiple harms including (but not limited to) sexual exploitation, criminal exploitation, and serious youth violence.
- 2.3 Adults in our school take all welfare concerns seriously and encourage children and young people to talk to us about anything that worries them. All staff believe that our school should provide a safe, caring, positive and stimulating environment that promotes social, physical and moral development of the individual child. All staff recognise when young people are at risk and how to get help when they need it.
- 2.4 Safeguarding and promoting welfare of children is defined as:
- Providing help and support to meet the needs of children as soon as problems emerge
  - Protecting the child from maltreatment, whether that is within or outside the home, including online;
  - Preventing the impairment of children's mental and physical health or development;
  - Ensuring that children grow up in circumstances consistent with the provision of safe and effective care;
  - Take action to ensure that all children have the best outcomes.
- 2.5 Child Protection is a part of Safeguarding and promoting welfare. It refers to the activity that is undertaken to protect specific children who are suffering, or are likely to suffer, significant harm.
- 2.6 Effective child protection is essential as part of wider work to safeguard and promote the welfare of children. However, all agencies and individuals should aim to proactively safeguard and promote the welfare of children so that the need for action to protect children from harm is reduced.
- 2.7 This policy sets out the procedures and systems in place in Cox Green School to ensure:
- We aim to prevent students from being influenced by extremist doctrine and to follow British values;
  - We practise safe recruitment in checking the suitability of staff and volunteers who work with our students;
  - We raise awareness of child protection issues and equipping children with the skills needed to keep them safe;
  - We develop and implement procedures for identifying and reporting cases, or suspected cases, of abuse;
  - We support students who have been abused in accordance with their agreed child protection plan;
  - We establish a safe environment in which students can learn and develop.



2.8 The aims of this policy are:

- To support the child's development in ways that will foster security, confidence and independence;
- To provide an environment in which children and young people feel safe, secure, valued and respected, and feel confident, and know how to approach adults if they are in difficulties, believing they will be effectively listened to;
- To raise the awareness of all teaching and non-teaching staff of the need to safeguard children and of their responsibilities in identifying and reporting possible cases of abuse (Reference Appendices 1 and 2);
- To provide a systematic means of monitoring children known or thought to be at risk of harm, and ensure we, the school, contribute to assessments of need and support packages for those children;
- To emphasise the need for good levels of communication between all members of staff.
- To develop a structured procedure within the school which will be followed by all members of the school community in cases of suspected abuse;
- To develop and promote effective working relationships with other agencies, especially the Police and Social Care;
- To ensure that all staff working within our school who have substantial access to children have been checked as to their suitability, including verification of their identity, qualifications, and a satisfactory DBS check (according to guidance), and a central record is kept for audit.
- To ensure that all staff understand their duty to have due regard to the need to prevent people from being drawn into terrorism. Being drawn into terrorism includes not just violent extremism but also non-violent extremism, which can create an atmosphere conducive to terrorism and can popularise views which terrorists exploit;
- To ensure staff have the skills to create safe spaces in which children and young people can understand and discuss sensitive topics, including terrorism and the extremist ideas that are part of terrorist ideology, and learn how to challenge these ideas. The Prevent duty of staff is not intended to limit discussion of these issues. Staff should, however, be mindful of their existing duties to forbid political indoctrination and secure a balanced presentation of political issues.

2.9 Children who are abused or witness violence may find it difficult to develop a sense of self-worth. They may feel helplessness, humiliation and some sense of blame. The school may be the only stable, secure and predictable element in the lives of children at risk. When at school their behaviour may be challenging and defiant or they may be withdrawn.

2.10 We will be alert to the potential need for early help for a child who:

- Is disabled and has additional needs;
- Has a special educational need;
- Has specific health conditions
- 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, domestic violence;
- Is showing early signs of abuse/neglect;
- Is at risk of radicalisation;
- Is at risk of sexual exploitation;
- Is at risk of criminal exploitation;
- Is at risk of child on child abuse, including sexual violence or sexual harassment;
- Is at risk of online abuse.



2.11 The school will endeavour to support the student through:

- The content of the curriculum, including opportunities in assemblies, and the Personal Development programme, in order that students can develop the skills they need to recognise and stay safe from abuse;
- The school ethos, promoting a supportive and secure environment and giving the student a sense of being valued;
- A school Behaviour Policy which is aimed at supporting all students in the school;
- Liaison with outside agencies that support the student such as SPA, Early Help Hub, Safeguarding and Social Care, PCAMHs, Education Welfare Service and Educational Psychology Service.

### 3. Procedures

- 3.1 All parents/carers are made aware of the school's responsibilities in regard to child protection procedures through publication of the school's Safeguarding Policy on the school website.
- 3.2 Our Lettings Policy will seek to ensure the suitability of adults working with children on school sites at any time and that any providers are following the Keeping Children Safe in Out of School Settings Guidance.
- 3.3 Community users organising activities for children are aware of and understand the need for compliance with the school's child protection guidelines and procedures. If any allegations are made related to an incident that happened when school premises were being used for the purposes of running activities for children, these will be investigated and acted upon in accordance with the school's own safeguarding policy and procedures. This will include informing the LADO, where necessary.
- 3.4 Our selection and Recruitment Policy includes all checks on staff and regular volunteers' suitability including Disclosure and Baring checks as recommended by the LA and in accordance with current legislation.
- 3.5 Where a teacher's employer, including an agency, dismisses or ceases to use the services of a teacher because of serious misconduct, or might have dismissed them or ceased to use their services had they not left first, they must consider whether to refer the case to the Secretary of State (via the Teaching Regulation Agency)
- 3.6 Our procedures will be annually reviewed and up-dated.
- 3.7 The name of the Safeguarding Lead will be clearly shown in the school, with a statement explaining the School's role in referring and monitoring cases of suspected abuse.
- 3.8 Contracts with external providers will comply with our school policies.

### 4. Confidentiality

- 4.1 We recognise that all matters relating to child protection are confidential. The Headteacher, Designated Safeguarding Lead or Designated Safeguarding Officer will disclose personal information about a student to other members of staff on a need to know basis only.



- 4.2 However, all staff must be aware that they have a professional responsibility to share information with other agencies in order to safeguard children and to balance the risk of sharing with the risk of not sharing.
- 4.3 All staff must be aware that they cannot promise a child to keep secrets which might compromise the child's safety or well-being or that of another.
- 4.4 We will always undertake to share our intention to refer a child to SPA or Early Help with their parents/carers unless to do so could put the child at greater risk of harm, or impede a criminal investigation. (See Appendix 7).

## 5. Information Sharing

- 5.1 The DfE issued guidance Information Sharing March 2018. This refers to the seven golden rules of information sharing (also see Appendix 8):
- The Data Protection Act 2018 and GDPR do not prevent or limit the sharing of information for the purposes of keeping children safe. This includes allowing practitioners to share information without consent;
  - Trustee Boards and proprietors should ensure relevant staff have due regard to the relevant data protection principles, which allow them to share (and withhold) personal information, as provided for in the Data Protection Act 2018 and the GDPR;
  - Be open and honest with the individual (and/or their family where appropriate) from the outset about why, what, how and with whom information will, or could be shared, and seek their agreement, unless it is unsafe or inappropriate to do so;
  - Seek advice from other practitioners if there is any doubt about sharing the information concerned, without disclosing the identity of the individual where possible;
  - Share with informed consent where appropriate and, where possible, respect the wishes of those who do not consent to share confidential information. Information may still be shared without consent if, there is good reason to do so, such as where safety may be at risk. Judgement should be based on the facts of the case. When sharing or requesting personal information, the basis upon which it is being done must be certain. (See Appendix 8);
  - Consider safety and well-being: Information sharing decisions should be based on considerations of the safety and well-being of the individual and others who may be affected by their actions;
  - Necessary, proportionate, relevant, adequate, accurate, timely and secure: Ensure that the information shared is necessary for the purpose for which it is being shared, is shared only with those individuals who need to have it, is accurate and up-to-date, is shared in a timely fashion, and is shared securely;
  - A record must be kept of the decision and the reasons for it – whether it is to share information or not. A record should also be kept of what has been shared, with whom and for what purpose.
- 5.2 Cox Green School also works collaboratively with the appropriate Local Authority in order to share information about the attendance and/or absences of that child as the Local Authority deems necessary. This is set out in departmental advice: 'Enrolment of 14 to 16 year olds in full time further education.' The school also informs the relevant Local Authority immediately if a child is removed from roll so that the Local Authority can as part of their duty, identify children of compulsory school age who are absent from education.



## 6. Supporting Staff

- 6.1 We recognise that staff working in the school who have become involved with a child who has suffered harm, or appears to be likely to suffer harm may find the situation stressful and upsetting.
- 6.2 We will support such staff by providing an opportunity to talk through their anxieties with the Safeguarding Lead and to seek further support. This could be provided by the Headteacher or another trusted colleague, Occupational Health, the employee assistance programme and/or a representative of a professional body or trade union, as appropriate.
- 6.3 In consultation with all staff, we have adopted a Code of Conduct for staff at our school. This forms part of staff induction and is in the handbook of staff personnel policies. We understand that staff should have access to advice on the boundaries of appropriate behaviour.

## 7. Allegations Against Staff

- 7.1 All staff must ensure that they do not endanger children by:
- Behaving in a way that has harmed a child, or may have harmed a child;
  - Possibly committing a criminal offence against or related to a child;
  - Behaving towards a child or children in a way that indicates he or she may pose a risk of harm to children; or
  - Behaving in a way that indicates they may not be suitable to work with children.
- 7.2 All school staff should take care not to place themselves in a vulnerable position with a child.
- 7.3 All staff should be aware of the school's Behaviour for Learning Policy and the Berkshire Local Safeguarding Children Board's Allegations against Staff Policy adopted by the school. All concerns about members of staff, including low level concerns, should be reported and actioned in line with this policy.
- 7.4 We understand that a student may make an allegation against a member of staff. If such an allegation is made, the member of staff receiving the allegation will immediately inform the Headteacher or the most senior leader if the Headteacher is not present.
- 7.5 The Headteacher/Senior Leader on all such occasions will discuss the content of the allegation with the Designated Officer or Team at the Local Authority (previously referred to as the LADO).
- 7.6 If the allegation made to a member of staff concerns the Headteacher or the Designated Safeguarding Lead, the person receiving the allegation will immediately inform the Chair of Trustees or the Designated Officer or team at the Local Authority (previously known as the LADO), without notifying the Headteacher first. If the allegation involves the Chair of Trustees then this should be reported to directly to the Designated Officer or Team at the Local Authority (previously referred to as the LADO).
- 7.7 The school will follow the LA procedures for managing allegations against staff which can be found on the Windsor and Maidenhead Local Safeguarding Children Board's website [http://www.proceduresonline.com/berks/windsor\\_maidenhead/p\\_alleg\\_against\\_staff.html?zoom](http://www.proceduresonline.com/berks/windsor_maidenhead/p_alleg_against_staff.html?zoom) or [http://rbwm.proceduresonline.com/chapters/p\\_lado.html#introduction](http://rbwm.proceduresonline.com/chapters/p_lado.html#introduction)
- 7.8 Suspension of the member of staff against whom an allegation has been made needs careful consideration, and we will consult with the Designated Officer or Team at the Local Authority (previously referred to as the LADO) in making this decision.





- 7.9 Our lettings agreement for other users requires that the organiser will follow LA procedures for managing allegations against staff and, where necessary, the suspension of adults from school premises. The school will also follow our own Safeguarding Policy and procedures in response to these allegations, including involving the LADO where appropriate.
- 7.10 The following definitions should be used when determining the outcome of allegation investigations:
- **Substantiated:** there is sufficient evidence to prove the allegation;
  - **Malicious:** there is sufficient evidence to disprove the allegation and there has been a deliberate act to deceive;
  - **False:** there is sufficient evidence to disprove the allegation;
  - **Unsubstantiated:** there is insufficient evidence to either prove or disprove the allegation. The term, therefore, does not imply guilt or innocence;
  - **Unfounded:** there is no evidence or proper basis which supports the allegation being made, that the person making the allegation misinterpreted the incident or was mistaken about what they saw or may not have been aware of all the circumstances.
- 7.11 These processes apply to allegations against supply staff and contractors.

## 8. Whistleblowing

- 8.1 We recognise that children cannot be expected to raise concerns in an environment where staff fail to do so.
- 8.2 All staff should be aware of their duty to raise concerns, where they exist, about the management of child protection, which may include the attitude or actions of colleagues. If it becomes necessary to consult outside the school, they should speak in the first instance, to the Area Education Officer/Designated Officer or Team at the Local Authority (previously referred to as the LADO) following the Whistleblowing Policy.
- 8.3 Whistle-blowing issues with regard to the Headteacher should be made to the Chair of the Board of Trustees whose contact details are readily available to staff (as pertinent to setting).

## 9. Physical Intervention

- 9.1 Our policy on physical intervention by staff is set out separately in our Reasonable Force Policy within the Behaviour Policy, which complies with DfE Guidance. Appendix 12 outlines Cox Green School's Risk assessment audit that is used to minimise the use of reasonable force where possible by identifying possible trigger points and mitigating against them.
- 9.2 This policy states that staff must only ever use physical intervention as a last resort, e.g. when a child is endangering themselves or others and that, at all times it must be the minimal force necessary to prevent injury to another person.



- 9.3 Such events should be recorded and signed by a witness.
- 9.4 We understand that physical intervention of a nature which causes injury or distress to a child may be considered under child protection or disciplinary procedures.
- 9.5 We recognise that touch is appropriate in the context of working with children, and all staff have been given 'Safe Practice' guidance to ensure they are clear about their professional boundary.

## 10. Anti-Bullying

- 10.1 Our school policy on anti-bullying is set out in a separate document and acknowledges that to allow or condone bullying may lead to consideration under child protection procedures (See Appendix 5). This includes all forms e.g. cyber, racist, homophobic and gender related bullying. We keep a record of known bullying incidents. All staff are aware that children with SEND and/or differences/perceived differences are more susceptible to being bullied/victims of child abuse.
- 10.2 All staff are made aware that safeguarding issues can manifest themselves via child on child abuse. This is most likely to include, but not limited to: bullying (including cyber bullying), physical abuse, gender-based violence/sexual assaults, sexual harassment, sexting, physical abuse, initiating/hazing type violence and rituals.
- 10.3 Abuse is abuse and should never be tolerated or passed off as "banter" or "part of growing up". Different gender issues can be prevalent when dealing with child on child abuse. This could for example include girls being sexually touched/assaulted or boys being subject to initiation-type violence.
- 10.4 At Cox Green School 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 students.
- 10.5 We recognise that some students will sometimes negatively affect the learning and wellbeing of others and their behaviour will be dealt with under the school's Behaviour Policy.
- 10.6 Occasionally, allegations may be made against students by others in the school, which are of a safeguarding nature. Safeguarding issues raised in this way may include physical abuse, emotional abuse, sexual abuse and sexual exploitation. It is likely that to be considered a safeguarding allegation against a pupil, some of the following features will be found.

### The allegation:

- Is made against an older pupil and refers to their behaviour towards a younger pupil or a more vulnerable pupil;
  - Is of a serious nature, possibly including a criminal offence;
  - Raises risk factors for other pupils in the school;
  - Indicates that other pupils may have been affected by this student;
  - Indicates that young people outside the school may be affected by this student.
- 10.7 At Cox Green School we will support the victims of child on child abuse and this is clearly set out in the school Anti-Bullying Policy.
- 10.8 In addition, any incidences of sexting will be dealt with in accordance with government guidelines. See Appendix 3b.



## **11. Racist Incidents**

11.1 Our policy on racist incidents is set out separately, and acknowledges that repeated racist incidents or a single serious incident may lead to consideration under child protection procedures. We keep a record of racist incidents.

## **12. Special Educational Needs and Alternative Provision**

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

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

12.2 At Cox Green School we identify pupils who might need more support to be kept safe or to keep themselves safe by regular monitoring using the Inclusion Team, the SAFE Team and Achievement Leaders. Further we ask staff that with students who have SEN and where there are noticeable changes in behaviour, mood or injury, we explore the possibility that this maybe as a result of possible abuse and not just their SEN or disability.

12.3 Cox Green School recognises that students, whose needs are better met through attendance at an alternative provision, either on a full-time or part-time basis, may also be more vulnerable to risk of harm. Any alternative provision will undergo a safeguarding evaluation (see Appendix 10) and attendance monitored.

## **13. Prevention**

13.1 We recognise that the school plays a significant part in the prevention of harm to our children by providing children with good lines of communication with trusted adults, supportive friends and an ethos of protection.

13.2 The school community will therefore:

- Work to establish and maintain an ethos where children feel secure and are encouraged to talk and are always listened to;
- Include regular consultation with students e.g. through safety questionnaires, participation in anti-bullying week, asking students to report any concerns;
- Ensure that all children know there is an adult in the school whom they can approach if they are worried or in difficulty;
- Include safeguarding across the curriculum, including Personal Development and RSE, opportunities which equip children with the skills they need to stay safe from harm and to know to whom they should turn for help. In particular this will include anti-bullying work, e-safety, and how to report their concerns around safeguarding;
- Ensure all staff are aware of school guidance for their use of mobile technology and have discussed safeguarding issues around the use of mobile technologies and their associated risks;



- Ensure that all staff have read the “Student ICT and Mobile Device Use” Policy that refers to the use of mobile devices, when students are asked to access online content in class using their own mobile network;
- Ensure that, where possible, the school has access to two emergency contacts for each child.

#### **14. Health & Safety**

14.1 Our Health & Safety Policy, set out in a separate document, reflects the consideration we give to the protection of our children both physically within the school environment, and for example in relation to internet use, and when away from the school and when undertaking school trips and visits.

#### **15. Roles and Responsibilities**

15.1 The school will ensure the designation of a Designated Safeguarding Lead, (Charlotte Morgan-Russell) and a Designated Safeguarding Officer, (Sharon Phelps) and a Trustee responsible for child protection (Wendy Esterhuysen). See Appendix 1 for the role of Designated Person for Child Protection.

15.2 Other staff will also carry responsibility for Child Protection to ensure cover if the Designated Safeguarding Lead or Officer is not available (SAFE Managers - Amiee Morris, Daisy Last, Sophie Bell, Margaret Cowling).

#### **15.3 All Staff**

Due to day to day contact with students, staff are well placed to observe the outward signs of abuse. Staff should not await a disclosure from a student if they have any concerns from their own observations or if they have had information shared with them by others which suggest a safeguarding concern. Initial response to any safeguarding concern is critical to identifying potential issues, staff are well placed to observe possible signs and are encouraged to act immediately should they be worried. Students will often identify with an adult in the school someone who will listen to their concerns and be supportive. All staff should therefore:

- Keep the student’s welfare as paramount;
- Establish and maintain an environment where students feel secure, are encouraged to talk, and are listened to;
- Ensure students know that there are adults in the school whom they can approach if they are worried;
- Make it clear at disclosure by a student that not all issues can be kept confidential as staff have a duty of care and must report any issues of alleged abuse or at-risk behaviour;
- Report any issues to the members of staff responsible for Child Protection and complete a concern on our electronic system CPOMS. For visitors without access to CPOMS an expression of concern form is available (Appendix 6) and a supply of these are freely available within the safeguarding folder at reception;
- Receive regular safeguarding and child protection updates as required, but at least annually, to provide them with relevant skills and knowledge to safeguard children effectively;
- Refer a child to Social Care if there are concerns about possible abuse, neglect or exploitation. Anyone can make a referral and if for any reason a staff member thinks a referral is appropriate and one hasn’t been made they can and should consider making a referral themselves. (See Appendix 9);
- If a child is in immediate danger or is at risk of harm, contact should be made with the SAFE team at Cox Green and a referral should be made to children’s social care and/or the police immediately;
- All staff should also be familiar with 'What to do if you're worried a child is being abused'.



#### 15.4 Pastoral Staff

Pastoral Staff receive information about students in their year group. They have the opportunity to build strong relationships with students and families. In addition to responsibilities as a member of staff, Heads of Year and SAFE Managers must:

- Work in partnership with internal and external agencies by sharing information;
- Attend meetings bringing to the attention of the group any issues related to individual students and to provide updates regarding progress. Issues include behaviour, attendance (See Appendix 11), self-harming and other areas of concern;
- Ensure the completion of SPA referrals in relation to students requiring referral to outside agencies;
- Refer a child to Social Care if there are concerns about possible abuse or neglect;
- Liaise with families to discuss any concerns and where deemed appropriate, advise them of the intention to refer to Safeguarding and Social Care through SPA;
- Ensure that the child's wishes and feelings are taken into account when determining what action to take and what services to provide;
- Attend case conferences and safeguarding meetings with appropriate agencies relating to individual issues and child protection plans;
- Keep accurate records on individual concerns using CPOMS, the secure electronic Child Protection system used by the school. Each student on a CP/CIN Plan should have a Child Protection file in addition to their school file. The Child Protection files are securely and electronically recorded on CPOMS (Child Protection Online Management System);
- Ensure that, where a student on a Child Protection Plan leaves, their information is transferred to the new school immediately and that the student's social worker is informed;
- Ensure that CP files are securely transferred and that confirmation of their receipt is obtained.
- Notify Safeguarding and Social Care if there is an unexplained absence of a student who is subject to a Child Protection Plan; the school will undertake a home visit, where possible, for any student whose absence has not been verified. Where the student's safety cannot be determined, school will notify Social Care and/or the Police to request a welfare check.

#### 15.5 Senior Leader: Designated Safeguarding Lead

The Designated Safeguarding Lead is responsible for safeguarding and child protection at Cox Green School. The key role of the Designated Safeguarding Lead is to:

- Manage referrals from school staff or any others from outside the school;
- Work with external agencies and professionals on matter of safety and safeguarding;
- Refer a child if there are concerns about possible abuse to the Children's Services Area Team, and act as a focal point for staff to discuss concerns. Referrals should be made in writing using the correct form and method required by the child's Local Authority;
- Ensure that either they or the relevant SAFE Manager attend case conferences, core groups, or other multi-agency planning meetings, contribute to assessments, and provide a report which has been shared with the parents;
- Keep written records of concerns about a child even if there is no need to make an immediate referral;
- Undertake training; attend training every two years; and in addition to formal training, knowledge and skills should be refreshed at regular intervals, at least annually;
- Raise awareness of safeguarding and child protection amongst the staff and parents;
- Ensure that child protection information is transferred to the pupil's new school;
- Designated Safeguarding Lead and Deputies must be aware of the Working Together document and liaise with the 3 safeguarding partners as appropriate;
- Lead responsibility for ensuring that Filtering and Monitoring of online content is effective and regularly reviewed.



The Senior Safeguarding Lead for Child Protection is the senior designated member of staff for Child Protection and must therefore:

- Work in liaison with all the internal and external agencies related to Child Protection to ensure a good level of support for all individual students raising concern;
- Ensure that every member of staff (including temporary and supply staff and volunteers) and Board of Trustees knows the name of the Safeguarding Lead responsible for child protection and their role;
- Ensure all staff and volunteers understand their responsibilities in being alert to the signs of abuse and responsibility for referring any concerns to the designated person responsible for child protection;
- Share information as appropriate with SAFE managers, Heads of Year and the Senior Leadership Team;
- Oversee the school's liaison with Safeguarding and Social Care, CAMHS, Education Welfare Service, behaviour and child protection services;
- Liaise with the Trustee designated with responsibility for Child Protection and to act as Safeguarding Lead;
- Ensure that all records are kept confidentially and securely and are separate from pupil records, until the child's 26th birthday, and are copied on to the child's next school or college;
- Liaise with other agencies and professionals; Including the Virtual School Head, to discuss how that funding can be best used to support the progress of children looked after in the school and meet the needs identified. This will be carried out by Sian Hughes, named teacher for the CLA;
- Ensure that any pupil currently with a child protection plan who is absent in the educational setting without explanation is referred to their key worker's Social Care Team and a welfare check requested;
- Organise child protection induction, and update training every year, for all school staff;
- Provide, with the Headteacher, an annual report for the Board of Trustees, detailing any changes to the policy and procedures; training undertaken by the Safeguarding Lead, and by all staff and Trustees; number and type of incidents/cases, and number of children on the Child Protection Register (anonymised);

If the DSO isn't available for any reason, the other members of the SAFE team will work alongside the DSL.

#### 15.6 The Headteacher

The Headteacher has the ultimate responsibility for ensuring the school provides a safe and secure environment for all students and must therefore:

- Ensure that parents have an understanding of the responsibility placed on the school and staff for Child Protection by setting out its obligations in the school prospectus;
- Ensure the designation of a senior member of staff responsible for Child Protection;
- Follow procedures where an allegation is made against a member of staff or volunteer;
- Ensure safe recruitment practices are followed.

#### 15.7 Trustee Responsible for Safeguarding

Cox Green School will ensure that all members of the Board of Trustees understand and fulfil their responsibilities, namely to ensure that:

- There is a Safeguarding Policy together with a Staff Behaviour (Code of Conduct) Policy;
- The school operates Safer Recruitment procedures by ensuring that there is at least one person on every recruitment panel that has completed Safer Recruitment training;



- The school has procedures for dealing with allegations of abuse against staff and volunteers and to make a referral to the DBS if a person in regulated activity has been dismissed or removed due to safeguarding concerns, or would have had they not resigned;
- A Senior Leader has Safeguarding Lead responsibility;
- On appointment, the Safeguarding Lead undertakes interagency training (SSCB Modules 1&2) and also undertake DCPO 'New to Role' and the 'Update' Course every 2 years;
- All other staff have Safeguarding training updated as appropriate;
- Any weaknesses in Child Protection are remedied immediately;
- A member of the Board of Trustees, usually the Chair, is nominated to liaise with the LA on Child Protection issues and in the event of an allegation of abuse made against the Headteacher;
- Child Protection policies and procedures are reviewed annually and that the Child Protection policy is available on the school website or by other means;
- The Board of Trustees considers how children may be taught about safeguarding. This may be part of a broad and balanced curriculum covering relevant issues through the personal development programme, including Relationship and Sex Education (RSE) and Health Education;
- The Board of Trustees ensure there is in place appropriate safeguarding responses to children who are absent from education, particularly on repeat occasions or for prolonged periods, to help identify the risk of abuse and neglect including sexual abuse or exploitation and to help prevent the risks of their being absent from education again in future;
- That enhanced DBS checks and Barred list checks are in place for Chairs of the Board of Trustees of independent, academies, non-maintained special schools;
- Ensure that designated staff take responsibility for filtering and monitoring of online content to ensure relevant standards are met.

## **16. The Single Central Record**

16.1 Safeguarding Children and Safer Recruitment in Education determines (in paragraphs 4.49 and 4.50) which staff schools should list on the single central record. Cox Green School keeps and maintain a single central record of recruitment and vetting checks on the following people:

- All staff who are employed as supply staff to the school whether employed directly by the school or through an agency;
- All staff employed by the school on a permanent, fixed term or casual contract;
- Any volunteers that the school or college has recruited to work regularly with children and for whom DBS checks have been requested because they are working unsupervised;
- People brought into the school or college to provide regular additional teaching or instruction for pupils but who are not staff members; for example, a specialist sports coach or artist.

16.2 Where the school uses an alternative provider of education, the school continues to be responsible for the safeguarding of that pupil. The school will obtain written confirmation on headed paper from the alternative provider that the appropriate safeguarding checks have been carried out on individuals working at that establishment to the level at which the school carries out checks on its own staff. Appendix 10 is the format in which information from the provider should be collected.

16.3 The single central record will be audited regularly by a Trustee, usually the Safeguarding Trustee.

## **17. Disclosure and Barring Service (DBS) Checks**

17.1 Our selection and Recruitment Policy includes all checks on staff and volunteer's suitability who carry out any regulated activity including Disclosure and Barring Service checks as recommended by the LA and in accordance with current legislation.



### 17.2 DBS checks are further applied in the following way:

- Visitors - DBS checks are not required for visitors who do not have unsupervised access to children;
- Volunteers - Checks are required only for those who have regular and unsupervised access to children and young people. Anyone who will be visiting once a week, or more than 4 times in a 30-day period will be deemed to be regular and carrying out any regulated activity. However, a risk assessment will be carried out where necessary on any volunteers to see if they meet the criteria for the standard or enhanced DBS;
- Observation Placements – Those on observation placements will be supervised at all times and have a Barred list check completed;
- External Staff and Agencies – For visiting staff who do have unsupervised regular access to children and young people – such as educational psychologists, social workers, supply teachers, trainee teachers, nurses, sports coaches, MOD personnel and inspectors – their ‘providing’ organisation (for example, the supply agency, the university, primary care trust, Local Authority and so on) should request the check. It is sufficient, for schools and colleges to seek written confirmation that appropriate checks, including DBS checks have been carried out and by whom;
- Other Third Party Contracted Staff – Contracted staff that come into regular contact with children and young people – such as kitchen staff – should be included on the single central record as in the case of agency supply staff, written assurances from the providing organisation;
- Part- Time Staff with Two or More Posts – Part-time staff may use the same DBS check for two or more posts as long as they are at a similar level and the school has satisfied itself about their veracity and appropriateness;
- Police Officers and Police Staff – These people undergo more stringent checks than those for DBS and that an enhanced DBS disclosure certificate is not required in most circumstances. Police officers and staff who are visiting schools in their professional capacity are only required to produce some form of endorsement of their status and their identity. Their official warrant card or identity card showing the appropriate photographic evidence would be quite sufficient in these circumstances;
- The school has a legal duty to refer to the DBS anyone who has harmed, or poses a risk of harm, to a child, or if a member of staff has committed one of a number of listed offences, and has been removed from paid or unpaid work in regulated activity;
- Portable DBS checks can be presented and will be checked for compliance;
- Relevant staff have a Prohibition from teaching check;
- Relevant staff and others as described below have a Section 128 check;
- Home-stays – if students are staying with families as part of a foreign exchange then an enhanced DBS will be sought for all persons over the age of 18 in the house, and Cox Green School will make a decision on those who are over 16, but under 18.

### 17.3 Barred List Checks

Separate barred list checks must only be carried out in the following circumstances:

- For newly appointed staff who are engaging in regulated activity, pending the receipt of an Enhanced Certificate with Barred List information from the Disclosure and Barring Service (DBS) and where all other relevant checks have been carried out; or,
- Where an individual has worked in a post in a school or college that brought them into regular contact with children or young persons which ended not more than three months prior to that





person's appointment to the organisation and where all other relevant checks have been carried out.

#### 17.4 Section 128 Checks

A section 128 direction prohibits or restricts an unsuitable individual from participating in the management of an independent school, including academies and free schools. An individual who is subject to a section 128 direction is unable to:

- Take up a management position in an independent school, academy, or in a free school as an employee;
- Be a trustee of an academy or free school trust; a Trustee or member of a proprietor body of an independent school; or
- Be a Trustee on any Trustee Board in an independent school, academy or free school that retains or has been delegated any management responsibilities.

### 18. Safer Recruitment

18.1 Cox Green School is committed to the principles of Safer Recruitment and every recruitment panel must include at least one member of staff who has completed the training. Cox Green School uses the 12 steps to Safer Recruitment in all its recruitment process as developed by the Children's Workforce Development Council.

18.2 Steps to Safer Recruitment - before you release your post:

- Ensure that you have an up to date Recruitment and Selection policy that describes the process and roles before you begin;
- Ensure that your organisation has a Safeguarding Policy and that a statement about the organisation's commitment to safeguarding is included in all recruitment and selection materials;
- Ensure that you have an up to date job description and person specification for the role(s) you wish to recruit to, that have been agreed with the recruiting manager;
- Ensure that you have an appropriate advertisement prepared that contains all necessary information about the role, timetable for recruitment and your commitment to safeguarding;
- Ensure that you have compiled a suitable candidate information pack containing all the required information about the organisation, role, recruitment timetable, safeguarding policy/statement and application form interview;
- Ensure that each application received is scrutinised in a systematic way by the shortlisting panel in order to agree your shortlist before sending invitations to interview;
- Ensure that all appropriate checks have been undertaken on your shortlisted candidates, including references;
- Ensure that all shortlisted candidates receive the same letter of invitation to interview, supplying them with all necessary information before you select your preferred candidate;
- Ensure that a face-to-face interview is conducted for ALL shortlisted candidates based on an objective assessment of the candidate's ability to meet the person specification and job description;
- Ensure that all specific questions designed to gain required information about each candidate's suitability have been asked, including those needed to address any gaps in information supplied in the application form before you formally appoint;



- Ensure that you are able to make a confident selection of a preferred candidate based upon their demonstration of suitability for the role;
- Ensure that your preferred candidate is informed that the offer of employment (including volunteer positions) is conditional on receiving satisfactory information from all necessary checks.

18.4 All offers of appointment will be conditional until satisfactory completion of the mandatory pre-employment checks.

18.5 Cox Green School must:

- Verify a candidate's identity, this includes being aware of the potential for individuals changing their name. Best practice is checking the name on their birth certificate;
- Obtain (via the applicant) an enhanced DBS check (including children's barred list information, for those who will be engaging in regulated activity with children);
- Obtain a separate children's barred list check if an individual will start work in regulated activity with children before the DBS certificate is available;
- Verify the candidate's mental and physical fitness to carry out their work responsibilities;
- Verify the person's right to work in the UK, including EU nationals;
- if the person has lived or worked outside the UK, make any further checks the school or college consider appropriate. These checks could include, where available:
  - Criminal records checks for overseas applicants - Home Office guidance can be found on GOV.UK; and for teaching positions;
  - Obtaining a letter (via the applicant) from the professional regulating authority in the country (or countries) in which the applicant has worked confirming that they have not imposed any sanctions or restrictions, and or that they are aware of any reason why they may be unsuitable to teach. Applicants can find contact details of regulatory bodies in the EU/EEA and Switzerland on the Regulated Professions database.
- Verify professional qualifications, as appropriate (The Teaching Regulation Agency's (TRA) Employer Access Service should be used to verify any award);
- Check that a person taking up a management position is not subject to a section 128 direction made by the Secretary of State;
- All schools must ensure that an applicant to be employed to carry out teaching work is not subject to a prohibition order issued by the Secretary of State.

## 19. Communication of Policy

19.1 The policy will be communicated via the school website and the staff intranet.

## 20. Review of Policy

20.1 This policy shall be reviewed every year by the People & External Relations Committee and thereafter approved by the Board of Trustees.

20.2 This policy also links to our policies on:

- Behaviour and Suspension Policy;
- Staff Behaviour Policy/Code of Conduct;



- Whistleblowing;
- Anti-bullying;
- Health & Safety;
- Allegations Against Staff;
- Attendance and Punctuality;
- Curriculum.

20.3 The Basis of Cox Green Policy is based upon 4 very clear steps:

- Recognise;
- Respond;
- Refer;
- Reflect.

**21. Post Holders 2024 - 2025 Academic Year:**

Designated Safeguarding Lead:	Charlotte Morgan-Russell	<a href="mailto:c.morganrussell@coxgreen.com">c.morganrussell@coxgreen.com</a>
Headteacher:	Danny Edwards	<a href="mailto:d.edwards1@coxgreen.com">d.edwards1@coxgreen.com</a>
Designated Safeguarding Officer:	Sharon Phelps	<a href="mailto:s.phelps@coxgreen.com">s.phelps@coxgreen.com</a>

SAFE Managers: Amiee Morris; Daisy Last; Sophie Bell; Margaret Cowling

Safeguarding Trustee: Wendy Esterhuysen

**22. Key Contacts**

LADO 0208 8917370 or 07774 332675 Email: [LADO@achievingforchildren.org.uk](mailto:LADO@achievingforchildren.org.uk)  
MASH RBWM 01628 683150  
Bucks 01753 383962  
Slough 01753 875362



## **Appendix 1: Recognising Signs of Child Abuse**

### **Categories of Abuse:**

- Physical Abuse;
- Emotional Abuse (including Domestic Abuse);
- Sexual Abuse;
- Neglect.

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

### **Signs of Abuse in Children:**

The following non-specific signs may indicate something is wrong:

- Significant change in behaviour;
- Extreme anger or sadness;
- Aggressive and attention-seeking behaviour;
- Suspicious bruises with unsatisfactory explanations;
- Lack of self-esteem;
- Self-injury;
- Depression;
- Student absent from the education setting;
- Age inappropriate sexual behaviour;
- Child Sexual Exploitation, Child Criminal Exploitation.

### **Risk Indicators**

The factors described in this section are frequently found in cases of child abuse or exploitation. Their presence is not proof that abuse has occurred, but:

- Must be regarded as indicators of the possibility of significant harm;
- Justifies the need for careful assessment and discussion with designated/named/lead person, manager, (or in the absence of all those individuals, an experienced colleague);
- May require consultation with and/or referral to Children's Services.

The absence of such indicators does not mean that abuse or neglect has not occurred.

In an abusive relationship the child may:

- Appear frightened of the parent/s;
- Act in a way that is inappropriate to her/his age and development (though full account needs to be taken of different patterns of development and different ethnic groups).

The parent or carer may:

- Persistently avoid child health promotion services and treatment of the child's episodic illnesses;
- Have unrealistic expectations of the child;
- Frequently complain about/to the child and may fail to provide attention or praise (high criticism/low warmth environment);
- Be absent or misusing substances;
- Persistently refuse to allow access on home visits;
- Be involved in domestic abuse.

Staff should be aware of the potential risk to children when individuals, previously known or suspected to have abused children, move into the household.



## Recognising Physical Abuse

The following are often regarded as indicators of concern:

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

## Bruising

Children can have accidental bruising, but the following must be considered as non-accidental unless there is evidence or an adequate explanation provided:

- Any bruising to a pre-crawling or pre-walking baby;
- Bruising in or around the mouth, particularly in small babies which may indicate force feeding;
- Two simultaneous bruised eyes, without bruising to the forehead, (rarely accidental, though a single bruised eye can be accidental or abusive);
- Repeated or multiple bruising on the head or on sites unlikely to be injured accidentally;
- Variation in colour possibly indicating injuries caused at different times;
- The outline of an object used e.g. belt marks, hand prints or a hair brush;
- Bruising or tears around, or behind, the earlobe/s indicating injury by pulling or twisting;
- Bruising around the face;
- Grasp marks on small children;
- Bruising on the arms, buttocks and thighs may be an indicator of sexual abuse.

## Bite Marks

Bite marks can leave clear impressions of the teeth. Human bite marks are oval or crescent shaped. Those over 3 cm in diameter are more likely to have been caused by an adult or older child.

A medical opinion should be sought where there is any doubt over the origin of the bite.

## Burns and Scalds

It can be difficult to distinguish between accidental and non-accidental burns and scalds, and will always require experienced medical opinion. Any burn with a clear outline may be suspicious e.g.:

- Circular burns from cigarettes (but may be friction burns if along the bony protuberance of the spine);
- Linear burns from hot metal rods or electrical fire elements;
- Burns of uniform depth over a large area;
- Scalds that have a line indicating immersion or poured liquid (a child getting into hot water is his/her own accord will struggle to get out and cause splash marks);
- Old scars indicating previous burns/scalds which did not have appropriate treatment or adequate explanation.

Scalds to the buttocks of a small child, particularly in the absence of burns to the feet, are indicative of dipping into a hot liquid or bath.



## Fractures

Fractures may cause pain, swelling and discolouration over a bone or joint.

Non-mobile children rarely sustain fractures.

There are grounds for concern if:

- The history provided is vague, non-existent or inconsistent with the fracture type;
- There are associated old fractures;
- Medical attention is sought after a period of delay when the fracture has caused symptoms such as swelling, pain or loss of movement;
- There is an unexplained fracture in the first year of life.

## Scars

A large number of scars or scars of different sizes or ages, or on different parts of the body, may suggest abuse.

## Recognising Emotional Abuse

Emotional abuse may be difficult to recognise, as the signs are usually behavioural rather than physical. The manifestations of emotional abuse might also indicate the presence of other kinds of abuse.

The indicators of emotional abuse are often also associated with other forms of abuse.

The following may be indicators of emotional abuse:

- Developmental delay;
- Abnormal attachment between a child and parent/carer e.g. anxious, indiscriminate or not attachment;
- Indiscriminate attachment or failure to attach;
- Aggressive behaviour towards others;
- Scapegoated within the family;
- Frozen watchfulness, particularly in pre-school children;
- Low self-esteem and lack of confidence;
- Withdrawn or seen as a “loner” – difficulty relating to others.

## Recognising Signs of Sexual Abuse

Boys and girls of all ages may be sexually abused and are frequently scared to say anything due to guilt and/or fear. This is particularly difficult for a child to talk about and full account should be taken of the cultural sensitivities of any individual child/family.

Recognition can be difficult, unless the child discloses and is believed. There may be no physical signs and indications are likely to be emotional/behavioural.

Some behavioural indicators associated with this form of abuse are:

- Inappropriate sexualised conduct;
- Sexually explicit behaviour, play or conversation, inappropriate to the child’s age;
- Continual and inappropriate or excessive masturbation;
- Self-harm (including eating disorder), self-mutilation and suicide attempts;
- Involvement in prostitution or indiscriminate choice of sexual partners;



- An anxious unwillingness to remove clothes e.g. for sports events (but this may be related to cultural norms or physical difficulties).

Some physical indicators associated with this form of abuse are:

- Pain or itching of genital area;
- Blood on underclothes;
- Pregnancy in a younger girl where the identity of the father is not disclosed;
- Physical symptoms such as injuries to the genital or anal area, bruising to buttocks, abdomen and thighs, sexually transmitted disease, presence of semen on vagina, anus, external genitalia or clothing.

### **Sexual Abuse by Young People**

DfE advice, when referring to sexual violence refers to sexual offences as described under the Sexual Offences Act 2003. This includes: rape, assault by penetration and sexual assault. Sexual harassment is explained as ‘unwanted conduct of a sexual nature’ that can occur online and offline. It is likely to violate a student’s dignity, and/or makes them feel intimidated, degraded or humiliated and/or creates a hostile, offensive or sexualised environment.

The boundary between what is abusive and what is part of normal childhood or youthful experimentation can be blurred. The determination of whether behaviour is developmental, inappropriate or abusive will hinge around the related concepts of true consent, power imbalance and exploitation. This may include children and young people who exhibit a range of sexually problematic behaviour such as indecent exposure, obscene telephone calls, fetishism, bestiality and sexual abuse against adults, peers or children.

Developmental Sexual Activity encompasses those actions that are to be expected from children and young people as they move from infancy through to an adult understanding of their physical, emotional and behavioural relationships with each other. Such sexual activity is essentially information gathering and experience testing. It is characterised by mutuality and of the seeking of consent.

Inappropriate Sexual Behaviour can be inappropriate socially, inappropriate to development, or both. In considering whether behaviour fits into this category, it is important to consider what negative effects it has on any of the parties involved and what concerns it raises about a child or young person. It should be recognised that some actions may be motivated by information seeking, but still cause significant upset, confusion, worry, physical damage, etc. It may also be that the behaviour is “acting out” which may derive from other sexual situations to which the child or young person has been exposed.

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

Abusive sexual activity included any behaviour involving coercion, threats, aggression together with secrecy, or where one participant relies on an unequal power base.

### **“Up Skirting”**

The Voyeurism (offences) Act 2019 criminalises the act of “up skirting”. This is defined as the action of placing equipment such as a camera or mobile phone beneath a person’s clothing to take a voyeuristic photograph without permission. It is not confined to people wearing skirts or dresses but is equally applied when men or women are wearing kilts, cassocks, shorts or dresses.



## Assessment

In order to more fully determine the nature of the incident the following factors should be given consideration. The presence of exploitation in terms of:

- Equality – consider differentials of physical, cognitive and emotional development, power and control and authority, passive and assertive tendencies;
- Consent – agreement including all the following;
- Understanding that is proposed based on age, maturity, development level, functioning and experience;
- Knowledge of society’s standards for what is being proposed;
- Awareness of potential consequences and alternatives;
- Assumption that agreements or disagreements will be respected equally;
- Voluntary decision;
- Mental competence
- Coercion – the young perpetrator who abuses may use techniques like bribing, manipulation and emotional threats of secondary gains and losses that is loss of love, friendship, etc. Some may use physical force, brutality or the threat of these regardless of victim resistance.

In evaluating sexual behaviour of children and young people, the above information should be used only as a guide. Further information and advice is available from RBWM Local Safeguarding Children Board. Assessment, Consultation and Therapy (ACT) 01306 745310 can also assist professionals in identifying sexual behaviour of concern in children and adolescents.

## Recognising Neglect

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

- Failure by parents or carers to meet the basic essential needs e.g. adequate food, clothes, warmth, hygiene and medical care;
- A child seen to be listless, apathetic and irresponsible with no apparent medical cause;
- Failure of child to grow within normal expected pattern, with accompanying weight loss;
- Child thrives away from home environment;
- Child frequently absent from school;
- Child left with adults who are intoxicated or violent;
- Child abandoned or left alone for excessive periods.

## Child Sexual Exploitation

Statutory definition of Child Sexual Exploitation (CSE):

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

Sexual exploitation can take many forms ranging from the seemingly ‘consensual’ relationship where sex is exchanged for affection or gifts, to serious organised crime by gangs and groups. What marks out exploitation is an imbalance of power in the relationship. The perpetrator always holds some kind of power over the victim which increases as the exploitative relationship develops.





Sexual exploitation involves varying degrees of coercion, intimidation or enticement, including unwanted pressure from peers to have sex, sexual bullying including cyberbullying and grooming. It does not always involve physical contact; it can also occur through the use of technology. However, it is also important to recognise that some young people who are being sexually exploited do not exhibit any external signs of this abuse.

Staff are aware of the key indicators of children being sexually exploited which can include:

- Going missing for periods of time or regularly coming home late;
- Regularly being absent from education, particularly on repeat occasions or for prolonged periods, or not taking part in education;
- Appearing with unexplained gifts, money or new possessions;
- Associating with other young people involved in exploitation;
- Having older boyfriends or girlfriends;
- Suffering from sexually transmitted infections;
- Mood swings or changes in emotional wellbeing;
- Drug and alcohol misuse; and
- Displaying inappropriate sexualised behaviour.

Staff should also be aware that many children and young people who are victims of sexual exploitation do not recognise themselves as such.

There are three main types of child sexual exploitation:

#### **Inappropriate Relationships:**

Usually involves just one abuser who has inappropriate power – physical, emotional or financial – or control over a young person. The young person may believe they have a genuine friendship or loving relationship with their abuser.

#### **Boyfriend/Girlfriend:**

The abuser grooms the victim by striking up a normal relationship with them, giving them gifts and meeting in cafés or shopping centres. A seemingly consensual sexual relationship develops but later turns abusive. Victims are required to attend parties and sleep with multiple men/women and threatened with violence if they try to seek help.

#### **Organised Exploitation and Trafficking:**

Victims are trafficked through criminal networks – often between towns and cities – and forced or coerced into sex with multiple men. They may also be used to recruit new victims. This serious organised activity can involve the buying and selling of young people.

The following list of indicators is not exhaustive or definitive but it does highlight common signs which can assist professionals in identifying children or young people who may be victims of sexual exploitation.

Signs include:

- Underage sexual activity;
- Inappropriate sexual or sexualised behaviour;
- Sexually risky behaviour, 'swapping' sex;
- Repeat sexually transmitted infections;
- In girls, repeat pregnancy, abortions, miscarriage;



- Receiving unexplained gifts or gifts from unknown sources;
- Having multiple mobile phones and worrying about losing contact via mobile;
- Having unaffordable new things (clothes, mobile) or expensive habits (alcohol, drugs);
- Changes in the way they dress;
- Going to hotels or other unusual locations to meet friends;
- Seen at known places of concern;
- Moving around the country, appearing in new towns or cities, not knowing where they are;
- Getting in/out of different cars driven by unknown adults;
- Having older boyfriends or girlfriends;
- Contact with known perpetrators;
- Involved in abusive relationships, intimidated and fearful of certain people or situations;
- Hanging out with groups of older people, or anti-social groups, or with other vulnerable peers;
- Associating with other young people involved in sexual exploitation;
- Recruiting other young people to exploitative situations;
- Truancy, exclusion, disengagement with school, opting out of education altogether;
- Unexplained changes in behaviour or personality (chaotic, aggressive, sexual);
- Mood swings, volatile behaviour, emotional distress;
- Self-harming, suicidal thoughts, suicide attempts, overdosing, eating disorders;
- Drug or alcohol misuse;
- Getting involved in crime;
- Police involvement, police records;
- Involved in gangs, gang fights, gang membership;
- Injuries from physical assault, physical restraint, sexual assault.

### **Child Criminal Exploitation**

Child Criminal Exploitation (CCE) is a form of abuse and occurs when an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a child into criminal activity. Children can be exploited by adult males or females, as individuals or in groups. They may also be exploited by other children, who themselves are experiencing exploitation – in such cases it is important that the child perpetrator is also identified as a victim.

It is important to note that the experience of girls who are criminally exploited can be very different to that of boys. The indicators may not be the same, however professionals should be aware that girls are at risk of criminal exploitation too. It is also important to note that both boys and girls being criminally exploited may be at higher risk of sexual exploitation.

Factors which may make a child more vulnerable to CCE include:

- Gender;
- Sexual identity;
- Poor familial attachments;
- Cognitive ability;
- Learning difficulties;
- Communication difficulties;
- Physical strength;
- Status and access to economic or other resources.

Children can become trapped by this type of exploitation as perpetrators can threaten victims (and their families) with violence, or entrap or coerce them into debt. They may be coerced into carrying weapons for a sense of protection from others. As victims of CCE often commit crimes themselves, they are not always



seen as victims by professionals or adults. CCE often appears to be consensual criminal activity and, as such, victims may not be recognised as having been exploited.

Both girls and boys experience CCE, all who are victims of CCE are also at higher risk of CSE.

Some specific forms of CCE can include:

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

### County-Lines

'County-lines' is a form of modern-day slavery, where a young person has power exerted over them due to an imbalance in a relationship. It often begins with grooming, whereby a young person is given gifts or special treatment over a period of time (which can be days or months). At a point in the relationship the abuser asks for return payment, and the young person is now effectively in bondage to the abuser. Typically, a young person holds drugs for a person and issues them, they earn money in this way, until they are robbed of the drugs they are holding at which point they are now indebted to the abuser. The young person will be asked to travel to different locations around the country to traffic drugs and hand them over to buyers using a mobile they have been given. Signs of such abuse include: changes in routine, changes in behaviour, looking dishevelled, mood-swings, tiredness, talk about travel, unexplained journeys, missing episodes, sudden & unexplained wealth. The victim should always go to the Police, who will consider the individual as a victim, rather than a perpetrator.

Staff are aware of the key indicators of children being criminally exploited which can include:

- Unexplained gifts, money or new possessions;
- Associating with other children involved in exploitation;
- Suffering from changes in emotional well-being;
- Misuse of drugs and alcohol;
- Going missing for periods of time or come home late; or are subsequently found in areas away from their home;
- Regularly absent from school or education and do not take part in education;
- Being found in areas away from their home;
- Being the victim or perpetrator of serious violence (knife crime);
- Being involved in receiving requests for drugs via a phone line, moving drugs, handing over and collecting money for drugs;
- Being exposed to techniques such as 'plugging', where drugs are concealed internally to avoid detection;
- Being found in accommodation that they have no connection with, such as a hotel room where there is drug activity (trap house or cuckooing);
- Owing a 'debt bond' to their exploiters;
- Having their bank accounts used to facilitate drug dealing;
- Showing signs of affiliation with gangs.

Students in RBWM are referred to the EMRAC panel by our SAFE team if it is thought they are involved in this type of exploitation, either as a victim or perpetrator. However, there is also a national referral mechanism which can be found using the following, National Crime Agency (NCA) link: <http://www.nationalcrimeagency.gov.uk/about-us/what-we-do/specialist-capabilities/uk-human-trafficking-centre/national-referral-mechanism>



## Online Safety

School has a separate policy 'Student ICT and Mobile Device Use Policy' which covers student use in school. However, it is essential that children are safeguarded from potentially harmful and inappropriate online material, as well as exposure to child protection issues via social media, through the filtering and monitoring systems in place.

The breadth of issues classified within online safety is considerable, but can be categorised into four main areas of risk:

- **Content:** exposure to illegal, inappropriate or harmful content, for example, pornography, fake news, racism, misogyny, self-harm, suicide, anti-Semitism, radicalisation and extremism;
- **Contact:** being subjected to harmful online interaction with other users; for example: peer to peer pressure, commercial advertising and adults posing as children of young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes;
- **Conduct:** personal online behaviour that increases the likelihood of, or causes harm, for example, making, sending and receiving explicit images (e.g. consensual and non-consensual sharing of nudes or semi-nudes and/or pornography, sharing other explicit images) and online bullying;
- **Commerce:** risks such as online gambling, inappropriate advertising, phishing and or financial scams.

School will provide students with a safe environment in which to learn and has appropriate monitoring systems in place to limit children's exposure to the above risks wherever possible. The SAFE Team will also follow up with any student identified via monitoring processes as having undertaken inappropriate activity on the school's ICT system and consider whether further support or action is necessary, making the relevant referrals to secure support from external bodies as required, including Prevent, Early Help. Parents will also be contacted where deemed necessary.

The school's PD curriculum will include education on online safety, safeguarding and social media usage. School will also seek to provide support, guidance and information to parents on keeping their children safe online and healthy digital usage.

## Filtering and Monitoring

The school will use a filtering and monitoring system to block harmful and inappropriate content without unreasonably impacting teaching and learning.

The filtering will apply to:

- All users, including guest accounts;
- All school owned devices;
- All devices using the school broadband connection.

Staff will receive training in this area and be made aware of their duty to report any instances where they are aware that unsuitable and/or unsafe material has been accessed. They should also inform the relevant staff where curriculum content may lead to an increase in the accessing of particular types of content for a short period of time.



## Domestic Abuse/Violence

'Domestic abuse and violence' is defined as any incident or pattern of incidents of controlling, coercive, threatening behaviour, violence or abuse between those aged 16 or over who are, or have been, intimate partners or family members regardless of gender or sexuality. The abuse is not limited to just psychological, physical, sexual, financial, or emotional. The damage as a result of this abuse is often serious and long-lasting and the child may even blame themselves.

If a young person is exposed to the 'toxic trio' of domestic abuse/violence, there is mental ill-health in the home and there is drug and alcohol misuse, then this is an indicator of increased risk of harm to the young person and needs to be raised as a serious safeguarding concern.

## Skin Betting

Skin betting is a growing problem where children win virtual items, like online weapons in games (the item is known as a 'skin') which can then be sold for real money. It is estimated that 370,000 children between the ages of 11-16 on a weekly basis, spend their own money on purchasing such items. This can obviously lead to significant debt and lead to further vulnerability, e.g. from gangs.

## Children and the Court System

There are a growing number of children who have to give evidence as witnesses in a crown, magistrate or youth court and this can have a significant impact on their family relationships, education, behaviour and general well-being. We have a SAFE team that can support such children and have experience in doing so. Child witnesses often feel they have some form of guilt as they are being asked to go to court and are often unaware how common it is for children to be witnesses.

The following link gives some guidance for 12-17 year olds about being a child witness.

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/708093/ywp-12-17-eng.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/708093/ywp-12-17-eng.pdf)

## Children with Family Members in Prison

There are a growing number of children who have family members in prison as a result of continued rise in prison populations. Such an event can be traumatic for the child and can often leave them with vulnerable care arrangements and no one looking out for them. Further, communication between the Courts/Police/Social Services and the school may not be joined up due to the privacy surrounding cases.

The following link gives some guidance to any of our students who find themselves in this position.

<https://www.nicco.org.uk/userfiles/downloads/5ad4850cb565e-action-for-prisoners-families-young-peoples-booklet.pdf>

The following link may also be useful for those in school supporting any of our students experiencing this:

<https://www.nicco.org.uk/>

## Homelessness

Unfortunately, through no fault of their own, a number of our students can find themselves facing the prospect of being homeless as their parents/carers fall into debt, are victims of domestic abuse, or as a result of anti-social behaviour. Staff should remain alert to these possibilities and inform the SAFE team should this be of concern. As a school we are able to work with the Local Authority on raising concerns at the



earliest opportunity and asking for early intervention to reduce the possibility of homelessness. This is a particular tricky topic to navigate in our context where siblings may have chosen to live with different parents, or they may have been placed with other family members. Those who are 16 or 17 may also be living independently or with partners in their family settings.

The following link gives more advice and guidance around this topic.

<https://www.gov.uk/government/publications/homelessness-reduction-bill-policy-factsheets>

### **Mental Health**

All staff should also be aware that mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation. Only appropriately trained professionals should attempt to make a diagnosis of a mental health problem. Staff however, are well placed to observe children day-to-day and identify those whose behaviour suggests that they may be experiencing a mental health problem or be at risk of developing one.

**Mental Health First Aid Trained:** Sharon Phelps, Karen Warner, Jack Mitchell, Ruth Middleton, Olivia Basher Emma Doyle and Peter Okello.

### **Child on Child Abuse**

Staff are aware that children can abuse each other and this can happen both inside and outside of school, as well as online. Staff also recognise that it is more likely that girls will be victims and boys perpetrators, however, all child on child abuse is unacceptable and will be taken seriously. Child on child abuse is most likely to include, but may not be limited to:

- Bullying (including cyberbullying, prejudice-based and discriminatory bullying);
- Abuse in intimate personal relationships between peers;
- Physical abuse such as hitting, kicking shaking, biting, hair pulling, or otherwise causing physical harm (this may include an online element which facilitates, threatens and/or encourages physical abuse);
- Sexual violence, such as rape, assault by penetration and sexual assault; (this may include an online element which facilitates, threatens and/or encourages sexual violence);
- Sexual harassment, such as sexual comments, remarks, jokes and online harassment, which may be standalone or part of a broader pattern of abuse;
- 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;
- Consensual and non-consensual sharing of nudes and semi-nude images and or videos;
- Up-skirting;
- Initiation/hazing type violence and rituals (including online).

School operates a zero-tolerance approach to child on child abuse and all staff have a duty to act immediately should they become aware of any concerns. Any reports from students regarding child on child abuse will be taken seriously and the matter reported to the DSL or SAFE Team. All students should feel confident to report incidents of child on child abuse and know that they will be taken seriously. Students should never be made to feel ashamed of making a report or that they are being a nuisance.

Staff will challenge behaviours of child on child abuse to promote a safe and respectful environment for all students. School will maintain a record of sexual harassment incidents and analysis of data will be undertaken to identify potential patterns of concerning, problematic or inappropriate behaviour.



School will:

- Investigate any reported incident of child on child abuse in line with school procedures;
- Consider whether those involved, including the alleged perpetrator would benefit from further in-house interventions or Early Help support;
- Consider the wider contextual safeguarding needs of the students involved and make referrals as necessary to secure support for those involved;
- Where a criminal offence is deemed to have taken place, for example an incident of sexual violence, school will contact the police and parents;
- Record incidents of sexual harassment and sexual violence so that further analysis of data can be undertaken and appropriate action taken where a need is identified;
- Ensure students know how to report incidents in school, facilitating ease of reporting where face to face disclosure is too difficult;
- Provide information and education through RHSE programme and assemblies;
- Promote a zero-tolerance ethos.

### **Sexual Violence and Sexual Harassment Between Children in Schools**

Sexual violence and sexual harassment can occur between two children of any age and sex. It can occur through a group of children sexually assaulting or sexually harassing a single child or group of children. It can also occur online and face to face (both physically and verbally) and are never acceptable. Evidence shows that some groups are potentially more at risk, being girls, children with special educational needs and disabilities (SEND) and LGBT children.

Staff are aware of the importance of:

- Challenging inappropriate behaviours;
- Making clear that sexual violence and sexual harassment is not acceptable and will not be tolerated;
- Not dismissing sexual violence or sexual harassment as ‘banter’ ‘part of growing up’ or ‘just having a laugh’;
- Challenging physical behaviours such as grabbing bottoms, breasts and genitalia, pulling down trousers, flicking bras and lifting up skirts.

It is also important to note the following:

- A child under the age of 13 can never consent to any sexual activity;
- The age of consent is 16;
- Sexual intercourse without consent is rape.

### **Sexual Harassment**

At Cox Green School, we believe that addressing inappropriate behaviour (even if it appears to be relatively innocuous) can be an important intervention that helps prevent problematic, abusive and/or violent behaviour in the future. We have a zero-tolerance approach to sexual violence and sexual harassment and work on the proviso that it is never acceptable, and it will not be tolerated or passed off as “banter”, “just having a laugh”, “part of growing up” or “boys being boys”. Dismissing or tolerating behaviours such as grabbing bottoms, breasts and genitalia, pulling down trousers, flicking bras and lifting up skirts risks normalising them.

The term sexual violence refers to but is not limited to:

- Rape;
- Assault by penetration;
- Sexual assault;
- Causing someone to engage in sexual activity without consent.



The term sexual harassment refers to but is not limited to:

- Unwanted conduct of a sexual nature both online and offline;
- Sexual comments, such as: telling sexual stories, making lewd comments, making sexual remarks about clothes and appearance and calling someone sexualised names;
- Sexual “jokes” or taunting;
- Physical behaviour such as: deliberately brushing against someone, interfering with someone’s clothes;
- Online sexual harassment including:
  - Sharing of nudes/semi-nudes;
  - Sharing of unwanted explicit content;
  - Up skirting;
  - Sexualised online bullying;
  - Unwanted sexual comments and messages;
  - Sexual exploitation; coercion and threats.

Students are provided with education on the topic of sexual harassment and sexual violence through the Personal Development curriculum. They are taught that they can confidently report abuse, sexual violence and sexual harassment and that their concerns will be treated seriously, and that they can safely express their views and give feedback.

Students can report incidents of sexual harassment and sexual violence to any member of staff, who have received training on all aspects of safeguarding. We recognise that students may not find it easy to tell staff about their abuse verbally and can show signs or act in ways that they hope adults will notice and react to.

All school staff will operate a ‘see, hear, believe, do something’ approach to safeguarding.

### **Police**

When Police Officers visit Cox Green School, they will be asked to sign in and record their badge number. When appropriate parents will be informed of Police visiting and meeting with students prior to this happening. When appropriate, parents will be invited in to be present during the meeting. If it is not appropriate for parents to be present (for example, safeguarding concerns or group work) or parents are unable to be present, an Appropriate Adult will be in attendance at all times.

### **The Role of the Appropriate Adult is:**

- To understand and explain the purpose of the Police visit;
- To challenge where appropriate;
- To ask questions to fully understand;
- Acknowledge the purpose and planned actions;
- To keep a detailed write up of the visit.

### **In Cox Green School the Appropriate Adults are:**

- **The Designated Safeguarding Lead**
- **The Designated Safeguarding Officer**
- **Any member of the SAFE Team**
- **The Sixth Form Mentor**





## **Appendix 2: Forced Marriage and Female Genital Mutilation (FGM)**

### **Forced Marriage (FM)**

This is an entirely separate issue from arranged marriage. It is a human rights abuse and falls within the Crown Prosecution Service definition of domestic violence. Young men and women can be at risk in affected ethnic groups. Whistle-blowing may come from younger siblings. Other indicators may be detected by changes in adolescent behaviours. Never attempt to intervene directly as a school or through a third party. Always call either the Contact Centre or the Forced Marriage Unit 020 7008 0151.

### **Female Genital Mutilation (FGM)**

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

The school recognises and reinforces through staff training that there is a mandatory duty for teachers to report disclosures on FGM about females under 18 years of age. The Serious Crime Act 2015 sets out a duty on professionals (including teachers) to notify police when they discover that FGM appears to have been carried out on a girl under 18. Teachers must personally report to the police cases where they discover that an act of FGM appears to have been carried out; and discuss any such cases with the Safeguarding Lead and children's social care.

What is FGM?

It involves procedures that intentionally alter/injure the female genital organs for non-medical reasons.

#### **4 Types of Procedure:**

- Type 1 Clitoridectomy – partial/total removal of clitoris;
- Type 2 Excision – partial/total removal of clitoris and labia minora;
- Type 3 Infibulation entrance to vagina is narrowed by repositioning the inner/outer labia;
- Type 4 all other procedures that may include: pricking, piercing, incising, cauterising and scraping the genital area.

Why is it carried out?

Belief that:

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

#### **Is FGM legal?**

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

Circumstances and occurrences that may point to FGM happening are:

- Child talking about getting ready for a special ceremony;



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

**Signs That May Indicate A Child Has Undergone FGM:**

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

**The 'One Chance' rule**

As with Forced Marriage there is the 'One Chance' rule. It is essential that settings/schools/colleges take action without delay and call the Contact centre.

**'Honour-Based' Abuse**

So-called 'honour-based' abuse (HBA) encompasses crimes which have been committed to protect or defend the honour of the family and/or the community, including Female Genital Mutilation (FGM), forced marriage, and practices such as breast ironing. All forms of so called HBA are abuse (regardless of the motivation) and should be handled and escalated as such.

Where staff are concerned that a child might be at risk of HBA, they must contact the Designated Safeguarding Lead as a matter of urgency.



### **Preventing Radicalisation and Extremism**

The Prevent strategy identifies that young people are more likely to be susceptible to violent extremist or terrorist narratives. Schools have a duty of care to their pupils and staff which includes safeguarding them from the risk of being drawn into terrorism. Being drawn into terrorism includes not just violent extremism but also non-violent extremism, which can create an atmosphere conducive to terrorism and can popularise views which terrorists exploit.

Extremism - is 'vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs. The definition of extremism also includes calls for the death of members of our armed forces, whether in this country or overseas'.

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

As part of the Counter Terrorism and Security Act 2015, schools have a duty to 'prevent people being drawn into terrorism'. This has become known as the 'Prevent Duty'.

The Prevent duty does not require staff to carry out unnecessary intrusion into family life, but as with any other safeguarding risk, you must take action if you observe behaviour that concerns you. This means that you must be able to demonstrate both a general understanding of the risks affecting children and young people in the area and a specific understanding of how to identify individual children who may be susceptible to radicalisation and what to do to support them.

Staff are in an ideal position to build children's resilience to radicalisation by promoting fundamental British values and challenging extremist views; for example, in PD, SMSC and citizenship lessons. Children can be taught to recognise and manage risk, make safer choices and recognise when pressure from others threatens their personal safety and wellbeing, including knowing when, where and how to get help.

Where staff are concerned that children and young people are developing extremist views or show signs of becoming radicalized, they should discuss this with the Designated Safeguarding Lead.

The Designated Safeguarding Lead has received training about the Prevent duty and tackling extremism and is able to support staff with any concerns they may have.

We use the curriculum to ensure that children and young people understand how people with extreme views share these with others, especially using the internet.

We are committed to ensuring that our pupils are offered a broad and balanced curriculum that aims to prepare them for life in modern Britain. Teaching the school's core values alongside the fundamental British Values supports quality teaching and learning, whilst making a positive contribution to the development of a fair, just and civil society.

### **Recognising Extremism**

Early indicators of radicalisation or extremism may include:

- Showing sympathy for extremist causes;
- Glorifying violence, especially to other faiths or cultures;
- Making remarks or comments about being at extremist events or rallies outside school;
- Evidence of possessing illegal or extremist literature;
- Advocating messages similar to illegal organisations or other extremist groups;



- Out of character changes in dress, behaviour and peer relationships (but there are also very powerful narratives, programmes and networks that young people can come across online so involvement with particular groups may not be apparent.);
- Secretive behaviour;
- Online searches or sharing extremist messages or social profiles;
- Intolerance of difference, including faith, culture, gender, race or sexuality;
- Graffiti, art work or writing that displays extremist themes;
- Attempts to impose extremist views or practices on others;
- Verbalising anti-Western or anti-British views;
- Advocating violence towards others.

Cox Green School demonstrates activity in the following areas:

- Assessing the risk of children being drawn into terrorism;
- Demonstrate that we are protecting children and young people from being drawn into terrorism by having robust safeguarding policies;
- Ensure that our safeguarding arrangements take in to account the policies and procedures of the Local Safeguarding Children Board;
- Ensure that staff have training that gives them the knowledge and confidence to identify children susceptible to being drawn in to terrorism, and to challenge extremist ideas which can be used to legitimise terrorism;
- Ensure children are safe from terrorist and extremist material when accessing the internet in school.

**Students Who are Most Susceptible to Radicalisation and Extremism May Have:**

- Feelings of anger, grievance and injustice;
- Feelings of threat and insecurity;
- Need for an identity, meaning and belonging;
- Need for status;
- Need for excitement, comradeship and adventure;
- Dominance and control;
- Susceptibility to indoctrination, group thinking;
- Political and moral motivation;
- Opportunistic involvement;
- Family or friends who support extremism;
- Transitional period in life;
- Group influence and control;
- Mental Health Issues.



## Private Fostering

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

Parents and private foster carers both have a legal duty to inform the relevant Local Authority at least six weeks before the arrangement is due to start; not to do so is a criminal offence.

Whilst most privately fostered children are appropriately supported and looked after, they are a potentially susceptible group who should be monitored by the Local Authority, particularly when the child has come from another country. In some cases, privately fostered children are affected by abuse and neglect, or be involved in trafficking, child sexual exploitation or modern-day slavery.

Schools have a mandatory duty to report to the Local Authority where they are aware or suspect that a child is subject to a private fostering arrangement. Although schools have a duty to inform the Local Authority, there is no duty for anyone, including the private foster carer or social workers to inform the school. However, it should be clear to the school who has parental responsibility.

School staff should notify the Designated Safeguarding Lead when they become aware of private fostering arrangements. The Designated Safeguarding Lead will speak to the family of the child involved to check that they are aware of their duty to inform the LA. The school itself has a duty to inform the Local Authority of the private fostering arrangements.

On admission to the school, we will take steps to verify the relationship of the adults to the child who is being registered.

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

- Children from other countries sent to live in the UK with extended family;
- Host families for language schools;
- Parental ill-health;
- Where parents who have moved away, but the child stays behind (eg. to stay at the same school to finish exams);
- Teenagers estranged from their families.

## The Duty to Refer to the Local Authority

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

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

Other professionals, for example GPs surgeries and schools, also have a duty to report to the Local Authority where they are aware or suspect that a child is subject to a private fostering arrangement.



### **Appendix 3a: Further Advice on Child Protection**

NSPCC: <http://www.nspcc.org.uk/>

Childline: <http://www.childline.org.uk/pages/home.aspx>

CEOPSThinkuknow: <https://www.thinkuknow.co.uk/>

Anti-Bullying Alliance: <http://anti-bullyingalliance.org.uk/>

Beat Bullying: <http://www.beatbullying.org/>



### **Appendix 3b: Sexting and Cox Green's Response**

#### **Sharing of Nude and Semi-Nude Images**

Previously referred to as 'sexting', the sharing of nude or semi-nude images, whether consensual or non-consensual, can be a sign that a child is at risk. The school has defined sexting as:

- The sharing of sexual imagery by young people;
- Creating and sharing sexual photos and videos.

#### **How the School will Handle an Incident**

All incidents involving youth produced sexual imagery will be responded to in line with the school's safeguarding and 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 and 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.

Disclosures about youth produced sexual imagery can happen in a variety of ways. The young person affected may inform a class teacher, the DSL in school, or any member of the school or college staff. They may report through an existing reporting structure, or a friend or parent may inform someone in school, or inform the police directly.

All members of staff (including non-teaching) are made aware of how to recognise and refer any disclosures of incidents involving youth produced sexual imagery. This is covered within staff training and within the school or college's child protection policy.

Any direct disclosure by a young person is 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.

#### **Initial Review Meeting**

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

- Whether there is an immediate risk to a young person or young people;
- If a referral should be made to the police and/or children's social care;
- If it is necessary to view the imagery in order to safeguard the young person – in most cases, imagery **should not be** viewed;
- What further information is required to decide on the best response;



- Whether the imagery has been shared widely and via what services and/or platforms. This may be unknown;
- Whether immediate action should be taken to delete or remove images from devices or online services;
- Any relevant facts about the young people involved which would influence risk assessment
- If there is a need to contact another school, college, setting or individual;
- Whether to contact parents or carers of the pupils involved - in most cases parents should be involved.

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

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

If none of the above apply then the school may decide to respond to the incident without involving the police or children's social care (a school can choose to escalate the incident at any time if further information/concerns come to light).

The decision to respond to the incident without involving the police or children's social care would be made in cases when the DSL is confident that they have enough information to assess the risks to pupils involved and the risks can be managed within the school's pastoral support and disciplinary framework and if appropriate local network of support.

The decision will be made by the DSL with input from the Headteacher and input from other members of staff if appropriate. The decision will be recorded in line with school policy.

The decision will be made in line with the school's child protection procedures and will be based on consideration of the best interests of the young people involved. This will take into account proportionality as well as the welfare and protection of the young people. The decision will be reviewed throughout the process of responding to the incident.

### **How the School will Assess the Risk**

The circumstances of incidents can vary widely. If at the initial review stage, a decision has been made not to refer to police and/or children's social care, the DSL should conduct a further review (including an interview with the young people involved) to establish the facts and assess the risks.

When assessing the risks, the following should be considered:

- 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 imagery?
- What is the impact on the pupils involved?
- Do the pupils involved have additional vulnerabilities?
- Does the young person understand consent?
- Has the young person taken part in this kind of activity before?

DSLs should always use their professional judgement in conjunction with their colleagues to assess incidents.

### **Informing Parents (or Carers)**

Parents (or carers) will be informed and involved in the process at an early stage unless informing the parent will put the young person at risk of harm. Any decision not to inform the parents will generally be made in conjunction with other services such as children's social care and/or the police, who would take the lead in deciding when the parents should be informed.

DSLs may work with the young people involved to decide on the best approach for informing parents. In some cases, DSLs may work to support the young people to inform their parents themselves.

### **Reporting Incidents to the Police**

If it is necessary to refer to the police, contact will be made through existing arrangements. This may be through a Safer Schools officer, a PCSO (Police Community Security Officer), local neighbourhood police or by dialing 101.

Once a report is made to the police, the report has to be recorded, and the police will conduct an investigation. This may include seizure of devices and interviews with the young people involved.

### **Securing and Handing Over Devices to the Police**

If any devices need to be seized and passed onto the police then the device(s) may be confiscated and the police will be called. The device will be turned off and placed under lock and key until the police are able to come and retrieve it.

### **Children's Social Care Contact and Referrals**

If the DSL is aware that children's social care is currently involved with a young person involved in an incident of youth produced sexual imagery then they will contact children's social care. They will also contact children's social care if they believe they may be involved, or have been involved with a young person in the past.

If as a result of the investigation the DSL believes there are wider issues which meet the threshold for children's social care involvement, then they should make a referral in line with their child protection procedures.

DSLs will ensure that they are aware of, and familiar with, any relevant local policies, procedures and contact points/names which are available to support schools in responding to youth produced sexual imagery.

Cox Green will make the initial referral to the relevant Borough (RBWM/Bucks/Slough) Single Point of Access (SPA).



### Searching Devices, Viewing and Deleting Imagery

Adults should not view youth produced sexual imagery unless there is good and clear reason to do so. 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. A “good reason” to examine or erase the data on an electronic device would be that the DSL reasonably suspects that the data or file in question has been/could be used to commit an offence, cause harm, to disrupt teaching, or break the school rules.

If a decision is made to view imagery the DSL needs 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 pupil 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 will:

- Never copy, print or share the imagery; this is illegal.
- Discuss the decision with the Headteacher.
- Ensure viewing is undertaken by the DSL or another member of the Safeguarding Team with delegated authority from the Headteacher.
- Ensure viewing takes place with another member of staff present in the room, ideally the Headteacher 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 Headteacher or a member of the Senior Leadership Team’s office.
- Ensure wherever possible that images are viewed by a staff member of the same sex 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 for recording safeguarding incidents.

If youth produced sexual imagery has been unavoidably viewed by a member of staff, either following a disclosure from a young person, or as a result of a member of staff undertaking their daily role (such as IT staff monitoring school systems) then DSLs should ensure that the staff member is provided with appropriate support. Viewing youth produced sexual imagery can be distressing for both young people and adults and appropriate emotional support may be required.

### Deletion of Images

If the school has decided that other agencies do not need to be involved, then consideration should be given to deleting imagery from devices and online services to limit any further sharing of the imagery. If however,



the material on the device is suspected to be evidence relevant to an offence, it should not be deleted prior to giving to the police.

The Searching, Screening and Confiscation advice highlights that schools have the power to search pupils for devices, search data on devices, and delete youth produced sexual imagery.

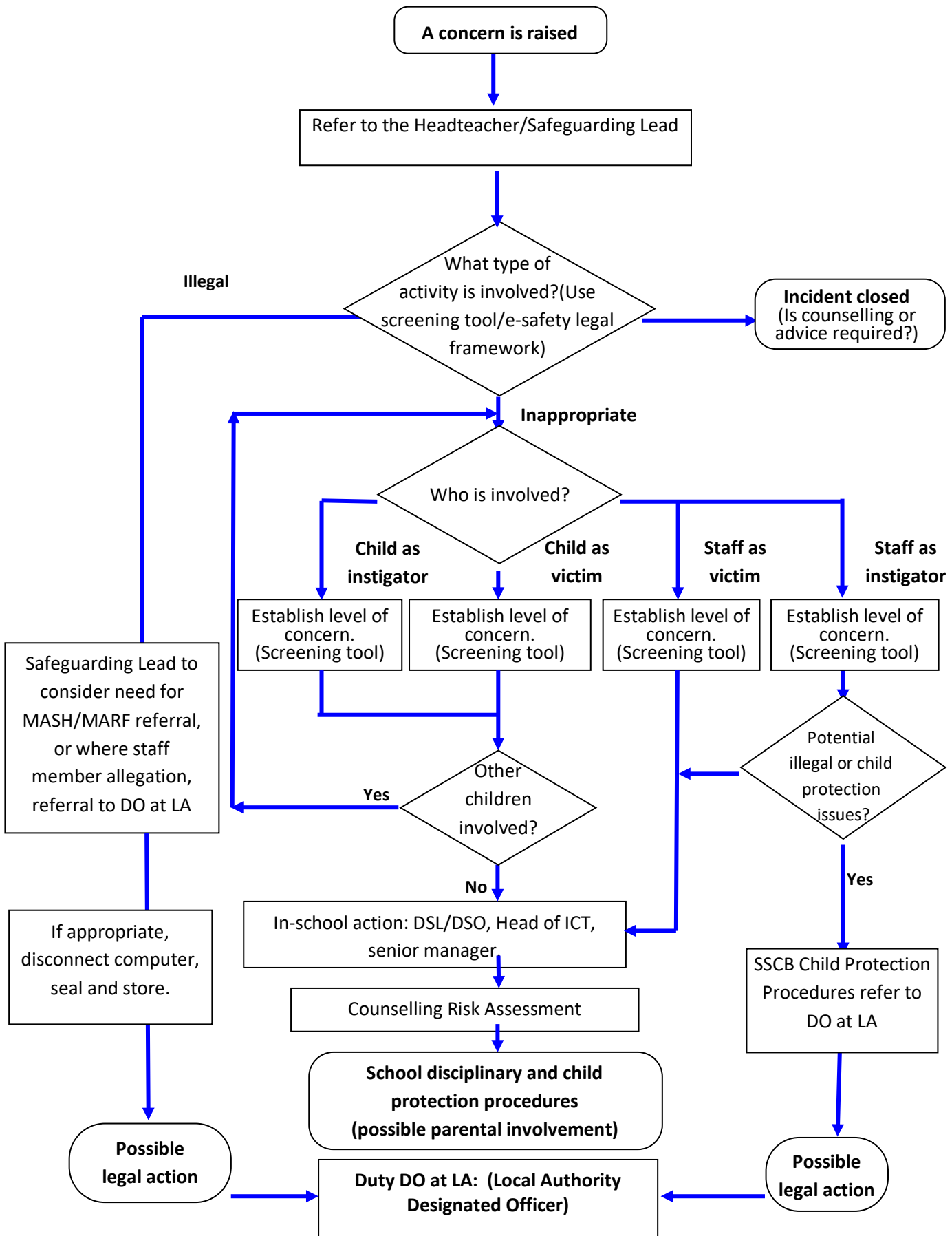
### **Further Guidance**

The school will adhere to additional guidance set out in:

[https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/551575/6.2439\\_KG\\_NC\\_A\\_Sexting\\_in\\_Schools\\_WEB\\_1\\_.PDF](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/551575/6.2439_KG_NC_A_Sexting_in_Schools_WEB_1_.PDF)

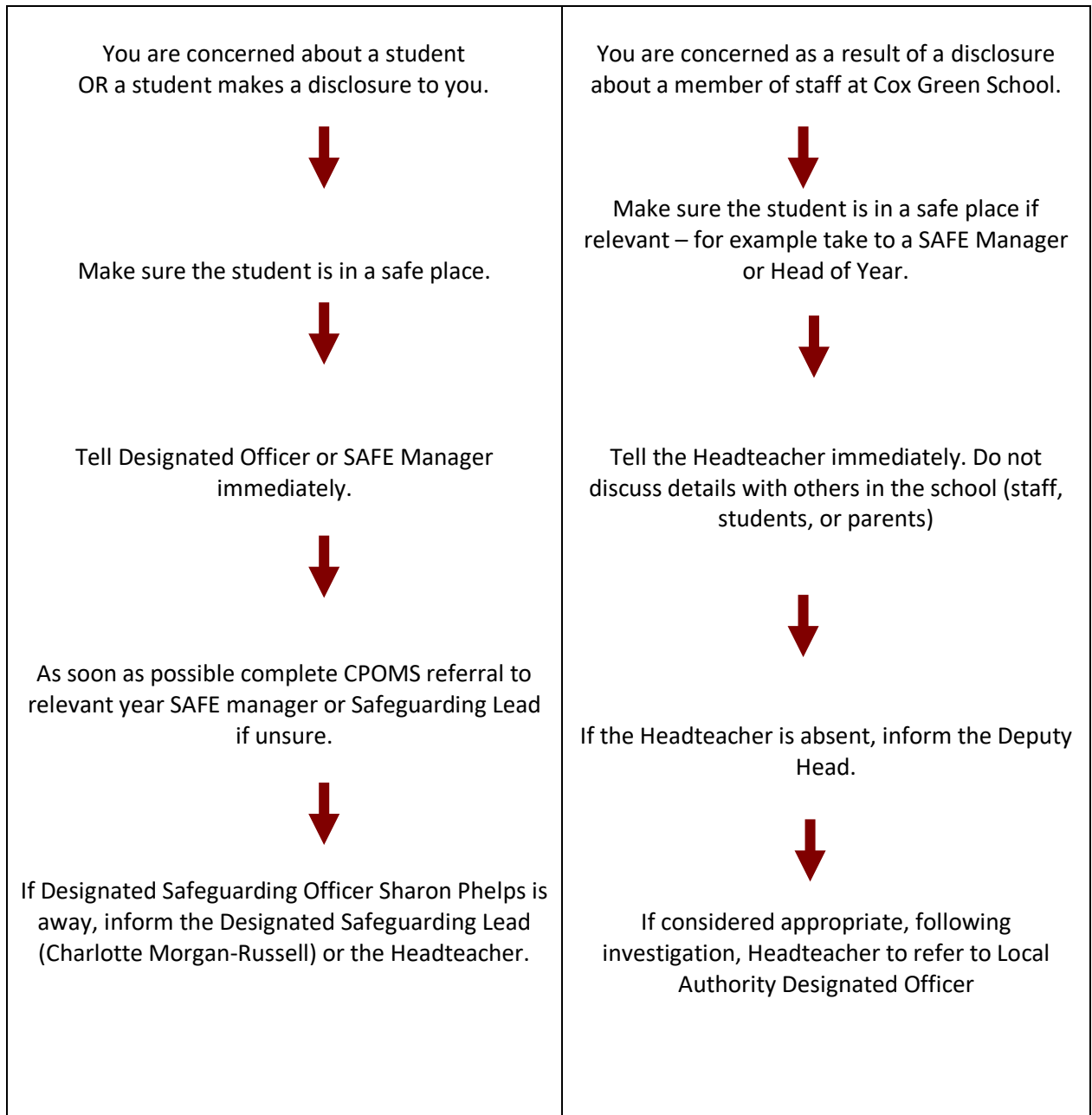


**Appendix 4: What To Do If You Have an E-Safety Concern**





**Appendix 5: Cox Green School - Child Protection Procedures**





**Appendix 6 - Safeguarding Procedures – Visitors Expression of Concern Record**



**Safeguarding Procedures - Visitors  
Expression of Concern Record**

Use this form to make a record of the concern you have and pass this to the Designated Safeguarding Lead as soon as possible on the day on which your concern arose.

Your Name:

Date:

Student/s of Concern:

Tutor Group (if known):

Situation during which your concern arose:

Please describe as accurately as possible what was said/overheard which causes you to be concerned about this student:

Please note the action you have taken as a result of your concern (include any discussions you have had and actions taken):



## **Appendix 7: Confidentiality and Information Sharing**

### **Guidance from Safeguarding Board**

All information obtained by school staff about a student and their family is confidential and will be shared with other professionals and agencies once the family have been informed.

If the child is under 12, consent to share information about them must be obtained from their parents or carers. Young people aged 12 to 15 may give their own consent to information sharing if they have sufficient understanding of the issues. Young people aged 16 or over are able to give their own consent

Where a child is at risk of suffering significant harm, schools have a legal duty to share this information with SSC and make appropriate referrals. Equally, where a child is subject to a child protection investigation, schools must share any information about the child requested by SSC.

Parental consent to making a child protection referral should be sought but if withheld, the referral must still be made and parents just made aware of this.

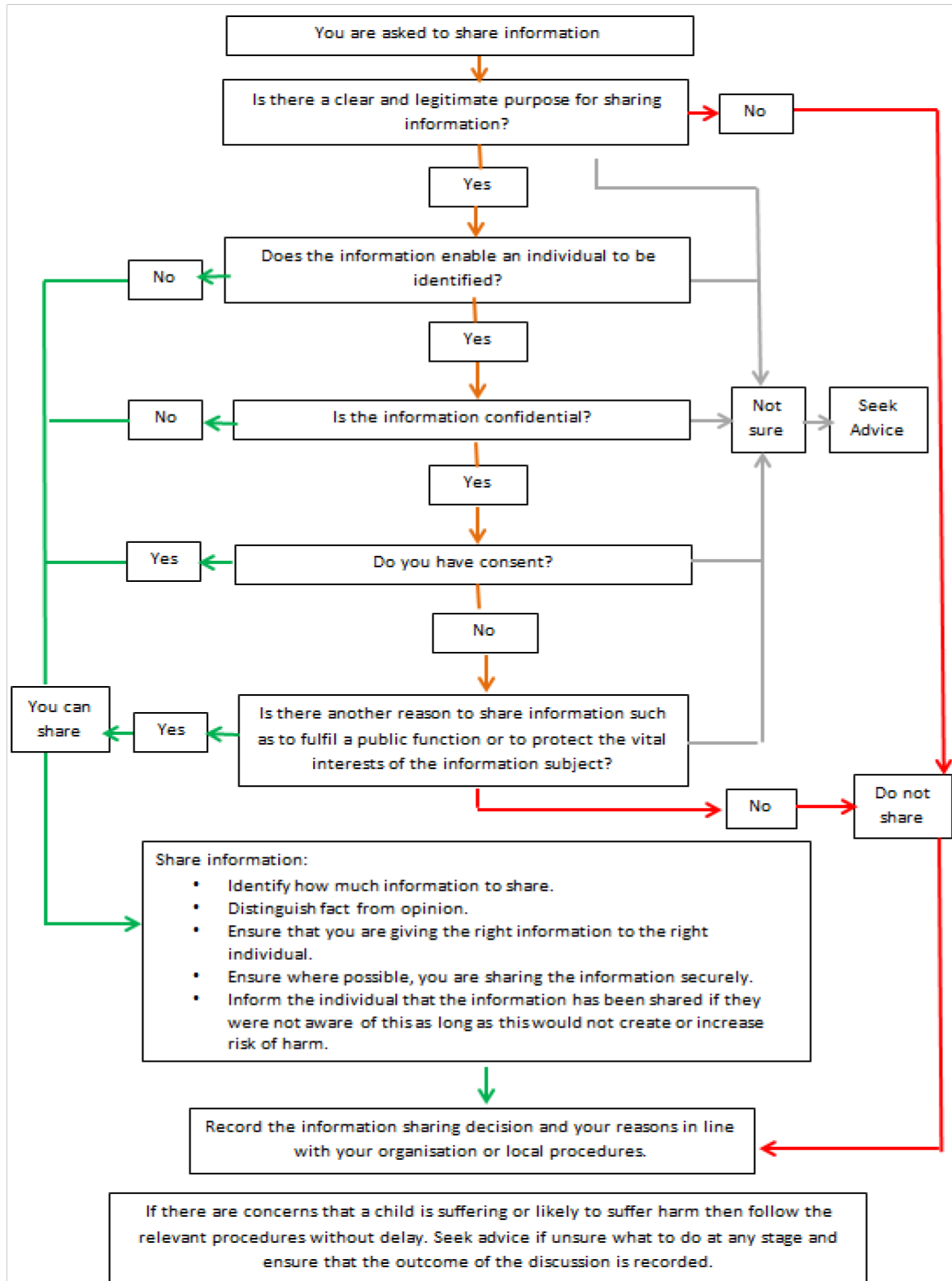
Only relevant information should be disclosed, and only to those professionals who need to know. Staff should consider the purpose of the disclosure, and remind recipients that the information is confidential and only to be used for the stated purpose.

In the event that a child makes a disclosure of neglect or abuse, staff cannot guarantee them confidentiality, but must explain why they have to pass the information on, to whom and what will happen as a result. Parents should also be made aware of the school's duty to share information.

Staff should discuss any concerns or difficulties around confidentiality or information sharing with the Designated Safeguarding Lead.



**Appendix 8: Flowchart of When and How to Share Information (DfE Information Sharing March 2015)**

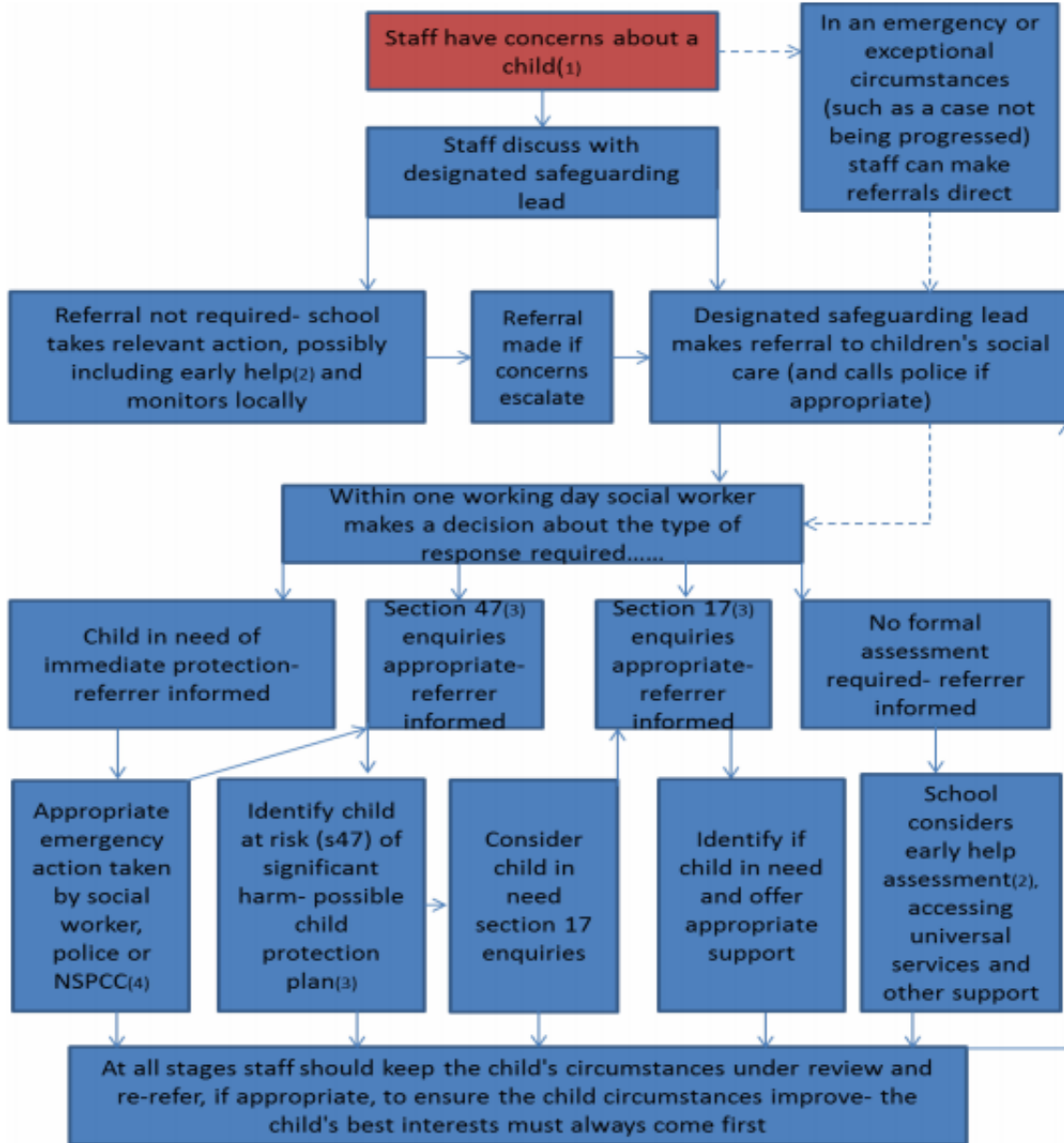






**Appendix 9: Flowchart of Actions When There Are Concerns About a Child – Local Authority Procedure**

**Actions when there are concerns about a child**



(1) In cases which also involve an allegation of abuse against a staff member, see Part four of this guidance.  
 (2) Early help means providing support as soon as a problem emerges at any point in a child's life. Where a child would benefit from coordinated early help an early help inter-agency assessment should be arranged. Chapter one of [Working together to safeguard children](#) provides detailed guidance on the early help process.  
 (3) Under the Children Act 1989, local authorities are required to provide services for children in need for the purposes of safeguarding and promoting their welfare. This can include section 17 assessments of children in need and section 47 assessment of children at risk of significant harm- full details in Chapter one of [Working together to safeguard children](#).  
 (4) This could include applying for an Emergency Protection Order (EPO).



**Appendix 10: Alternative Provision Evaluation Form**

	<b>Answers</b>
Name of Cox Green School member of staff carrying out the evaluation	
Date of Evaluation	
Name of Alternative Provider (circle)	Haybrook Harmony The Link (Manor Green) The Green Room College Hall Other: _____
Is the alternative provider registered as an independent school? (It must be if caters full-time for 5 or more pupils of compulsory school age, or 1 pupil who is looked after or has an EHCP) NB: Typically, unregistered providers will be visited by inspectors.	
Name of key contact at alternative provision. (Make this person aware that if the school is called for a section 5 inspection, then we will let them know as they could be spoken to by the Ofsted inspectors.)	
Contact's Address	
Contact's Email Address	
Contact's Telephone Number	
Confirm written confirmation on headed paper has been obtained from the alternative provider that appropriate safeguarding checks have taken place on individuals working in the establishment? (This should be scanned and stored electronically by the DSL, SLT member overseeing safeguarding and the individual overseeing the SCR). An updated copy should be sought each academic year.	See KWA to check SCR and that this has been obtained for the current academic year.



The below areas need to be tracked rigorously and as frequently as they are at Cox Green School, e.g. attendance on a daily basis and progress on a half-termly basis.

Academic Year: _____						
	Term 1	Term 2	Term 3	Term 4	Term 5	Term 6
Attendance of pupil %						
Behaviour of pupil 1-4 <i>(1 – Outstanding 2 – Good 3 – Requires Improvement 4 – Serious Concern)</i>						
Progress/Achievement of pupil						
Add name of qualification and level (BTEC, GCSE, Entry level, etc.)						
9; 9-; 8+; 8; 8-; 7+; 7; 7-; 6+; 6; 6-; 5+; 5; 5-; 4+; 4; 4-; 3+; 3; 3-; 2+; 2; 2-; 1+; 1; 1-; Tr6+; tr6; Tr6-; Tr5+; Tr5; Tr5-; U; N/A; Absent						
Pupil voice (discuss pupil views on their progress) include any work samples the pupil is particularly proud of/indicates quality of provision						
Pupil voice on their safety and welfare in alternative provision						
Name(s) of pupils at the provider						
CGS member of staff responsible for monitoring attendance				Attendance Officer		
CGS member of staff responsible for monitoring behaviour and learning						



### **Appendix 11: Attendance Procedures**

We aim to keep students safe by having clear knowledge of where Cox Green Students are at all times.

After AM registration, the Attendance Officer will:

1. Ensure all AM registers are complete;
2. Ensure Fire Evacuation daily registers are ready;
3. Ensure absence codes and messages are entered on system;
4. Send absence text messages to Priority 1 contact(s);

(At CGS a termly report will be run on the contact list to ensure we have a minimum of two contact numbers for each student on our roll, and ideally four. Where a parent or carer declines to give no more than one a letter, email, or note of a phone call should be made and put on that student's file evidencing the parent/carers request).

5. Follow up unexplained absences report;
6. Liaise with SAFE team to make home visits if any are required;
7. Liaise with children's services and/or the police if a welfare visit requested.

**Appendix 12 – Individual Student Behaviour Risk Audit**

**RISK ASSESSMENT FORM - CONFIDENTIAL**

**NAME:**

**Date created:**

**Date updated:**



Hazard	Who is at risk	What is done now	Original Risk Likelihood x Severity – Risk level	What needs to be done	Target date	Residual Risk Likelihood x Severity – Risk level

**Risk Calculation:**

**Likelihood Rating** (1 = Highly improbable, 2 = Remotely possible, 3 = Occasionally, 4 = Fairly frequent, 5 = Frequent or regular, 6 = Certainty)

**Severity Rating** (1 = Negligible injury, 2 = Minor injury (singular or repetitive), 3 = Major injury, 4 = Fatality, 5 = multiple fatalities, 6 = catastrophic fatalities)

**Likelihood x Severity = Risk Rating**                      Low = 1 – 5                      Medium = 6 – 10                      High = 10+