



Simul autem et crescere luceat
Together we grow and shine

Fountain Head House School Child Protection and Safeguarding Policy

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| Review due | September 2025 |
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| Reviewed by | Dan Turner Safeguarding Lead (DSL) |
| Approved by | Julie Smith Chair of the School Board |

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Safeguarding Statement

Fountain Head House School recognise our moral and statutory responsibility to safeguard and promote the welfare of all pupils and expects all staff, governors, and volunteers to share this commitment. We recognise that all children, regardless of age, disability, gender reassignment, race, religion or belief, sex, sexual orientation or SEND have an equal right to protection from all types of harm or abuse. We endeavour to provide a safe and welcoming environment where children are respected and valued. We are alert to the signs of abuse, neglect and exploitation and follow our procedures to ensure that children receive effective support, protection, and justice. We listen to our pupils and take seriously what they tell us, children are aware of the adults they can talk to if they have a concern. When there are concerns for a child's welfare, we may need to share information and work in partnership with other agencies. We will ensure concerns are discussed with parents/carers first unless we have reason to believe that by doing so would be contrary to the child's welfare. This Child Protection and Safeguarding policy underpins and guides our safeguarding procedures and protocols.

Terminology

Safeguarding and promoting the welfare of children is defined as:

- providing help and support to meet the needs of children as soon as problems emerge.
- protecting children from maltreatment, whether that is within or outside the home, including online.
- preventing impairment of children's mental and physical health or development.
- ensuring that children grow up in circumstances consistent with the provision of safe and effective care.
- promoting the upbringing of children with their birth parents, or otherwise their family network through a kinship care arrangement, whenever possible and where this is in the best interests of the children.
- taking action to enable all children to have the best outcomes in line with the outcomes set out in the Children's Social Care National Framework.

(Working Together to Safeguard Children)

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. This includes harm that occurs inside or outside the home, including online.

Staff refers to all those working for or on behalf of the school, full or part time, temporary or permanent, in either a paid or voluntary capacity.

Child includes everyone under the age of 18 or 25 if a care leaver.

Parents refers to birth parents and other adults who are in a parenting role, for example step-parents, foster carers, adoptive parents, and LA corporate parents.

Safeguarding legislation and guidance

The Department for Education (DfE) has published the latest updated version of the statutory safeguarding and child protection guidance for schools in England, Keeping Children Safe in Education (KCSIE) 2024. This 2024 guidance will replace Keeping Children Safe in Education (KCSIE) 2023 when it comes into force on 1 September 2024.

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

- [Education Act 2002 Section 175 \(maintained schools only\)](#)
- [Education Act 2002 Section 157 \(Independent schools incl Academies and CTC's\)](#)
- [The Education \(Independent School Standards\) \(England\) Regulations 2003](#)
- [The Safeguarding Vulnerable Groups Act 2006](#)
- [Teachers' Standards \(Guidance for school leaders, school staff and governing bodies\)](#)
- [Working Together to Safeguarding Children](#)
- [Keeping Children Safe in Education](#)
- [Information Sharing 2018](#)
- [What to do if you're worried a child is being abused](#)
- [Filtering and monitoring standards in schools and colleges \(DfE\)](#)
- [The School Staffing \(England\) Regulations 2009](#)
- [Non-Maintained Special Schools \(England\) Regulations 2015](#)
- [Statutory guidance on FGM](#)
- [The Children Act 1989](#)
- [Statutory guidance on the Prevent duty \(2023\)](#)
- [The Public Sector Equality Duty \(PSED\)](#)
- [Statutory framework for the Early Years Foundation Stage](#)

Policy Principles, aims and values

The welfare of the child is paramount

- All children regardless of age, disability, gender reassignment, race, religion or belief, sex, sexual orientation or SEND have equal rights to protection, safeguarding and opportunities.
- We recognise that all adults, including temporary staff¹, volunteers and governors, have a duty to protect our pupils from harm and have an equal responsibility to act on any suspicion or disclosure that may suggest a child is at risk of harm.
- All staff believe that our school should provide a caring, positive, safe, and stimulating environment that promotes the social, physical, mental wellbeing and moral development of the individual child.
- Pupils and staff involved in child protection issues will receive appropriate support and supervision.

¹ Wherever the word "staff" is used, it covers ALL staff on site, including ancillary supply and self-employed staff, contractors, volunteers working with children etc. and governors.

This policy aims to

- Raise the awareness of all staff of the need to safeguard children.
- Provide all staff with guidance on the procedures they should adopt in the event that they suspect a child, young person may be experiencing, or be at risk of experiencing, harm. Including (by DSL/DDSL) consideration of the use of appropriate assessments, resources and agency support.
- Provide an environment in which children and young people feel safe, secure, valued, and respected, and that they will be listened to should they make a disclosure.
- Raise awareness that abuse can be both Familial and/or Contextual; and abusers can be both adult/s to child/ren or child/ren to child/ren.
- Demonstrate the school's commitment to safeguarding and child protection of pupils, parents and other partners.
- Provide a systematic means of monitoring children known or thought to be at risk of harm.
- To emphasise the need for high levels of communication between staff and the designated safeguarding leads internally, and with external agencies and partners, including our contribution to assessments, referrals, and support plans.
- To develop and promote effective working relationships with other partnership agencies, particularly Children's Social Care, Police and Health.
- Support children's development in ways that will foster security, confidence, and independence.
- 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)², and a single central record is kept for audit.
- Provide clarity and expectations on professional behaviours and code of conduct including lone working requirements.

Supporting and protecting children

- We recognise that a child who is abused or witnesses violence may feel helpless and humiliated and could experience barriers to making a disclosure. We understand that the behaviour of a child in these circumstances may range from that which is perceived to be normal to aggressive or withdrawn as well as exhibiting signs of mental health problems. We understand the impact on a child's mental health, behaviour, and education from familial and/or contextual abuse. School may not only provide stability in the lives of children who have been abused or who are at risk of harm, but it plays a significant part in the prevention of harm to our children.

Our school will support children by

- Encouraging self-esteem and self-assertiveness, through the curriculum as well as our relationships, whilst not condoning aggression or bullying (incl. Cyber bullying).
- Promoting a caring, safe, and positive environment within the school and providing children with good lines of communication with trusted adults, supportive friends, and an ethos of protection.
- Responding sympathetically to any requests for time out to deal with distress and anxiety.
- Offering details of helplines, counselling, or other avenues of external support.
- Liaising and working together with all other settings, support services and those agencies involved in the safeguarding of children.
- Notifying children's social care as soon as there is a significant concern.
- Ensuring appropriate information is shared confidentially at key transition points in a child's journey to ensure continues support (incl. School medical records).
- Children are taught to understand and manage risk through our personal, social, health and economic (PSHE) education and relationship and sex education (RSE) and through all aspects of school life. This includes online safety.
- By accessing and utilising the necessary resources, guidance, and toolkits to support the identification of children requiring mental health support, support services and assessments.
- Reassuring victims that they are being taken seriously and that they will be supported and kept safe.

The school community will protect children by

- Working to establish and maintain an ethos where children feel secure, are encouraged to talk, and are always listened to.
- Ensuring that all children know there are adults in the school whom they can approach if they are worried or in difficulty.
- Including regular consultation with children, parents, and staff, gathering their voice.
- Including safeguarding across the curriculum to equip children with the skills they need to stay safe from harm and to know to whom they should turn for help; this will, for example include anti-bullying work, information about child on child abuse (sexual harassment and sexual violence, consent), online-safety, road safety, pedestrian and cycle training; provide focussed activities to prepare key year groups for transition to new settings and/or key stages e.g. More personal safety/independent travel; and
- Ensuring all staff, pupils and parents are aware of school guidance for their use of mobile technology and the safeguarding issues around the use of mobile technologies, including the use of social media and their associated risks have been shared.

Safe School, Safe Staff

We will ensure that staff, Governors, School and parents:

Roles and responsibilities

We will follow the statutory guidance as set out in the latest Keeping Children Safe in Education (and associated documents and guidance), adhering to the roles, responsibilities and expectations identified for:

- Governing bodies, proprietors, and management committees.
- The headteacher
- The designated safeguarding lead
- The deputy designated safeguarding lead/s
- Staff

Safeguarding and child protection is **everyone's** responsibility. This policy applies to all staff, volunteers and governors in the school and is consistent with the procedures of the 3 safeguarding partners. Our policy and procedures also apply to extended school and off-site activities.

The school plays a crucial role in preventative education. This is in the context of a whole-school approach to preparing pupils for life in modern Britain, and a culture of zero tolerance of sexism, misogyny/misandry, homophobia, biphobia, transphobia and sexual violence/harassment. This will be underpinned by our:

- Positive Behaviour Support Policy
- Pastoral support system
- Planned programme of relationships, sex and health education (RSHE), which is inclusive and delivered regularly, tackling issues such as:
 - Healthy and respectful relationships
 - Boundaries and consent
 - Stereotyping, prejudice and equality
 - Body confidence and self-esteem
 - How to recognise an abusive relationship (including coercive and controlling behaviour)
 - The concepts of, and laws relating to, sexual consent, sexual exploitation, abuse, grooming, coercion, harassment, rape, domestic abuse, so-called honour-based violence such as forced marriage and FGM and how to access support
 - What constitutes sexual harassment and sexual violence and why they're always unacceptable

All staff will

- Read, understand and follow the Department for Education's statutory safeguarding guidance, **Keeping Children Safe in Education, Part 1 and Annex B**, and review this guidance at least annually
- Sign a declaration at the beginning of each academic year to say that they have reviewed the guidance
- Reinforce the importance of online safety when communicating with parents and carers. This includes making parents and carers aware of what we ask children to do online (e.g. sites they need to visit or who they'll be interacting with online)
- Provide a safe space for pupils who are LGBTQ+ to speak out and share their concerns
- All staff will be aware of:
 - Our systems which support safeguarding, including this Safeguarding and Child Protection Policy, the Staff Code of Practice, the role and identity of the Designated Safeguarding Lead (DSL), the Deputy Designated Safeguarding Lead (DDSL) and the members of the Safeguarding Team, the Positive Behaviour Support Policy, the Online Safety Policy which includes the expectations and responsibilities in relation to filtering and monitoring, and the safeguarding response to children who are absent from education

All staff will

- The Early Help process for both LAs (Cornwall and Plymouth) and their role in it, including identifying emerging problems, liaising with the DSL, and sharing information with other professionals to support early identification and assessment
- The process for making referrals to local authority children's social care and for statutory assessments that may follow a referral, including the role they might be expected to play
- What to do if they identify a safeguarding issue or a child tells them they are being abused or neglected, including specific issues such as FGM, and how to maintain an appropriate level of confidentiality while liaising with relevant professionals
- The signs of different types of abuse and neglect, as well as specific safeguarding issues, such as child-on-child abuse, child sexual exploitation (CSE), child criminal exploitation (CCE), indicators of being at risk from or involved with serious violent crime, FGM, radicalisation and serious violence (including that linked to county lines)
- The importance of reassuring victims that they are being taken seriously and that they will be supported and kept safe
- The fact that children can be at risk of harm inside and outside of their home, at school and online
- The fact that children who are (or who are perceived to be) lesbian, gay, bi or trans (LGBTQ+) can be targeted by other children
- What to look for to identify children who need help or protection

Designated Safeguarding Lead

The DSL is a member of the senior leadership team. Our DSL is Dan Turner.

The DSL takes lead responsibility for child protection and wider safeguarding in the school. This includes online safety, and understanding our filtering and monitoring processes on school devices and school networks to keep pupils safe online. The DSL delegates aspects of safeguarding to the Deputy Designated Safeguarding Lead (DDSL) and to members of the Safeguarding Team.

During term time, the DSL will be available during school hours for staff to discuss any safeguarding concerns.

The DSL can also be contacted out of school hours if necessary on 07821 679783 or by email at dan.turner@fhhschools.com.

When the DSL is absent, the Deputy DSL, Thereza De Lucca – Headteacher will act as cover.

If the DSL and Deputy DSL are not available, there will information clearly stated via email regarding reporting any urgent safeguarding concerns and where possible a rota will be in place with a named member of the Safeguarding Team to be contacted during the holiday periods.

The DSL will be given the time, funding, training, resources and support to:

- Provide advice and support to other staff on child welfare and child protection matters
- Take part in strategy discussions and inter-agency meetings and/or support other staff to do so
- Contribute to the assessment of children
- Refer suspected cases, as appropriate, to the relevant body (local authority children's social care, Channel programme, Disclosure and Barring Service, and/or police), and support staff who make such referrals directly
- Have a good understanding of harmful sexual behaviour

Designated Safeguarding Lead

- Have a good understanding of the filtering and monitoring systems and processes in place at our school

The DSL will also

- Keep the headteacher informed of any issues
- Liaise with local authority case managers and designated officers for child protection concerns as appropriate
- Discuss the local response to sexual violence and sexual harassment with police and local authority children's social care colleagues to prepare the school's policies
- Be confident that they know what local specialist support is available to support all children involved (including victims and alleged perpetrators) in sexual violence and sexual harassment, and be confident as to how to access this support
- Be aware that children must have an 'appropriate adult' to support and help them in the case of a police investigation or search

The full responsibilities of the DSL are set out in an specific job description, and this includes online safety.

The Headteacher is responsible for the implementation of this policy, including

- Ensuring that staff (including temporary staff) and volunteers:
 - Are informed of our systems which support safeguarding, including this policy, as part of their induction
 - Understand and follow the procedures included in this policy, particularly those concerning referrals of cases of suspected abuse and neglect
- Communicating this policy to parents/carers when their child joins the school and via the school website
- Ensuring that the DSL has appropriate time, funding, training and resources, and that there is always adequate cover if the DSL is absent
- Acting as the 'case manager' in the event of an allegation of abuse made against another member of staff or volunteer, where appropriate
- Making decisions regarding all low-level concerns, though they may wish to collaborate with the DSL on this
- Ensuring the relevant staffing ratios are met, where applicable
- Making sure each child in the Early Years Foundation Stage is assigned a key person
- Overseeing the safe use of technology, mobile phones and cameras in the setting

The School Board will

- Facilitate a whole-school approach to safeguarding, ensuring that safeguarding and child protection are at the forefront of, and underpin, all relevant aspects of process and policy development

The School Board will

- Evaluate and approve this policy at each review, ensuring it complies with the law, and hold the headteacher to account for its implementation
- Be aware of its obligations under the Human Rights Act 1998, the Equality Act 2010 (including the Public Sector Equality Duty), and our school's local multi-agency safeguarding arrangements
- The FHHS School Board lead for Safeguarding is Julie Smith, who will monitor the effectiveness of this policy in conjunction with the full FHHS board. This is always a different person from the DSL
- Ensure all staff undergo safeguarding and child protection training, including online safety, and that such training is regularly updated and is in line with advice from the safeguarding partners
- Ensure that the school has appropriate filtering and monitoring systems in place, and review their effectiveness annually. This includes:
 - Making sure that the leadership team and staff are aware of the provisions in place, and that they understand their expectations, roles and responsibilities around filtering and monitoring as part of safeguarding training
 - Making sure that the leadership team reviews the [DfE's filtering and monitoring standards](#) annually, including if applicable discussions with IT staff and service providers regarding what needs to be done to support the school in meeting these standards
- Make sure:
 - The DSL has the appropriate status and authority to carry out their job, including additional time, funding, training, resources and support
 - Online safety is a running and interrelated theme within the whole-school approach to safeguarding and related policies
 - The DSL has lead authority for safeguarding, including online safety and understanding the filtering and monitoring systems and processes in place
 - The school has procedures to manage any safeguarding concerns (no matter how small) or allegations that do not meet the harm threshold (low-level concerns) about staff members (including supply staff, volunteers and contractors). Appendix 3 of this policy covers this procedure
 - That this policy reflects that children with SEND, or certain medical or physical health conditions, can face additional barriers to any abuse or neglect being recognised
- Where another body is providing services or activities (regardless of whether or not the children who attend these services/activities are children on the school roll):
 - Seek assurance that the other body has appropriate safeguarding and child protection policies/procedures in place, and inspect them if needed
 - Make sure there are arrangements for the body to liaise with the school about safeguarding arrangements, where appropriate
 - Make sure that safeguarding requirements are a condition of using the school premises, and that any agreement to use the premises would be terminated if the other body fails to comply

The chair of governors will act as the 'case manager' in the event that an allegation of abuse is made against the headteacher, where appropriate (see appendix 3).

All governors will read Keeping Children Safe in Education in its entirety.

Confidentiality

- Fountain Head House School recognises that in order to effectively meet a child's needs, safeguard their welfare and protect them from harm the school must contribute to inter-agency working in line with Working Together to Safeguard Children and share information between professionals and agencies where there are concerns.
- All staff must be aware that they have a professional responsibility to share information with other agencies in order to safeguard children and that the Data Protection Act 2018² is not a barrier to sharing information where the failure to do so would place a child at risk of harm.
- All staff must be aware that they cannot promise a child to keep secrets which might compromise the child's safety or wellbeing.
- However, we also recognise that all matters relating to child protection are personal to children and families. Therefore, in this respect they are confidential and the Headteacher or DSLs will only disclose information about a child to other members of staff on a need-to-know basis.
- We will always undertake to share our intention to refer a child to the Local Authority Safeguarding Hub with their parents /carers unless to do so could put the child at greater risk of harm or impede a criminal investigation. If in doubt, we will contact the Local Authority Safeguarding Hub consultation line.
- In line with KCSiE all children's safeguarding files will be kept confidential and stored securely. Safeguarding files will be kept separate from pupils' schools' files.

Recognising and Responding to Safeguarding Concerns

Recognising

Any child, in any family, in any school, could become a victim of abuse. Staff should always maintain an attitude of

“It could happen here”. We also recognise that abuse, neglect, exploitation and safeguarding issues are complex and are rarely standalone events that can be covered by one definition or label. Staff are aware that in most cases multiple issues will overlap one another.

- Abuse, neglect, and exploitation are forms of maltreatment of a child. Somebody may abuse, neglect or exploit a child by inflicting harm or by failing to act to prevent harm. Children may be abused in the family or in an institutional or community setting by those known to them or, more rarely, by others. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. They may be abused by an adult or adults or by another child or children.
- Abuse, neglect and exploitation may also take place outside of the home, contextual safeguarding, and this may include (but not limited to), sexual exploitation criminal exploitation, serious youth violence, radicalisation.
- Staff are aware that behaviours linked to drug taking, alcohol abuse, truanting and sexting put children in danger and that safeguarding issues can manifest themselves via child-on-child abuse.

²The Data Protection Act 2018 is the UK's implementation of the General Data Protection Regulation (GDPR).
[Data Protection in Schools Gov.UK DfE Feb 2023](https://www.gov.uk/government/news/data-protection-in-schools)

Further information about the four categories of abuse; physical, emotional, sexual and neglect, (familial and contextual) and indicators that a child may be being abused can be found in appendices 1 - 17 and in Keeping Children Safe in Education Part 1/Annex A/Annex B. There are also a number of specific safeguarding concerns that we recognise our pupils may experience.

| | |
|--|---|
| <ul style="list-style-type: none"> • Child missing or absent from education • Child missing from home or care • Child Sexual Exploitation (CSE), Child Criminal Exploitation (CCE) • Bullying including cyberbullying • Domestic abuse • Drugs • Fabricated or induced illness • Faith abuse • Female Genital Mutilation (FGM) • Forced Marriage • Gangs and youth violence | <ul style="list-style-type: none"> • Gender-based violence/violence against women and girls (VAWG) • Mental health difficulties • Private fostering • Radicalisation • Youth produced sexual imagery (sexting) • Teenage relationship abuse • Trafficking • Child on Child abuse • Upskirting • Serious violence • Sexual harassment |
|--|---|

- There will be occasions when staff may suspect that a pupil may be at risk but have no 'real' evidence. The pupil's behaviour may have changed, their artwork could be bizarre, and they may write stories or poetry that reveal confusion or distress, or physical or inconclusive signs may have been noticed.
- We recognise that the signs may be due to a variety of factors, for example, a parent has moved out, a pet has died, a grandparent is very ill, or an accident has occurred. However, they may also indicate a child is being abused or is in need of safeguarding.
- In these circumstances staff will try to give the child the opportunity to talk. It is fine for staff to ask the pupil if they are OK or if they can help in any way.

Further information on the different types of safeguarding concerns and schools' response can be found in the Appendices section

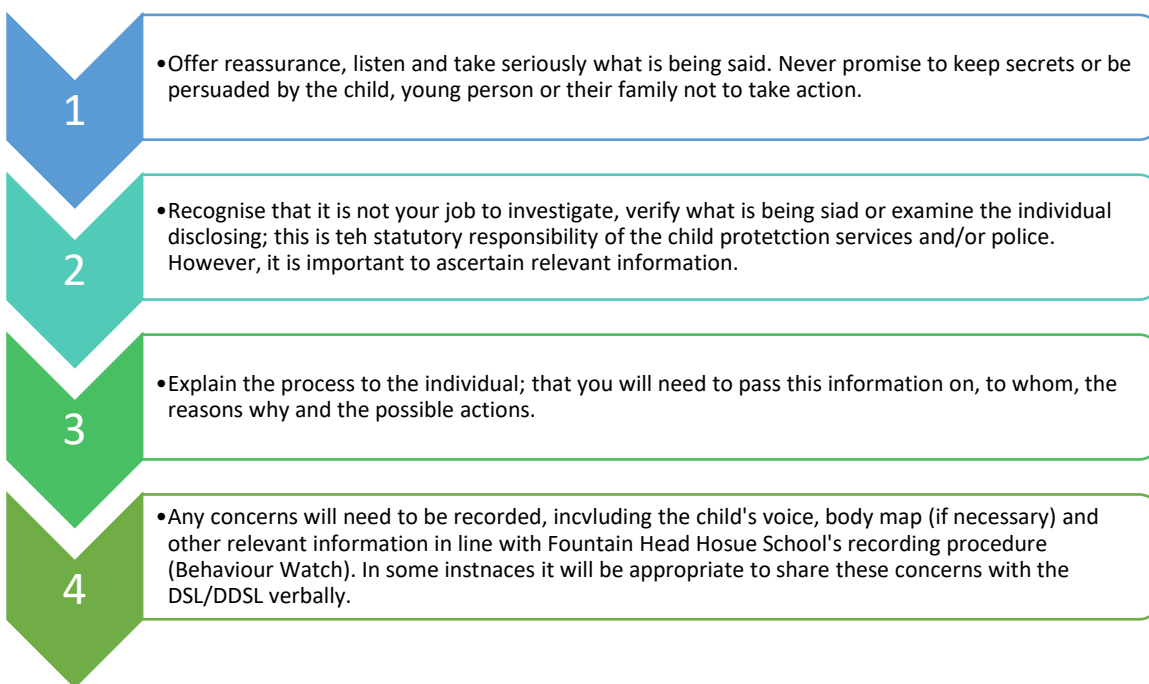
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| App 1. Categories of Abuse |
| App 2. Anti-Bullying / Cyberbullying |
| App 3. Racist Incidents |
| App 4. Radicalisation and Extremism |
| App 5. Domestic Abuse (including Operation Encompass) |
| App 6. Exploitation (including CSE, CCE and County Lines) |
| App 7. Female Genital Mutilation |
| App 8. Forced Marriage |
| App 9. Honour based Abuse |
| App 10. One Chance Rule |
| App 11. Mental Health Difficulties |
| App 12. Private Fostering Arrangements |
| App 13. Looked After Children & Previously Looked After Children |
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| App 18. Additional Resources |

Responding

Following an initial conversation with the pupil, if the member of staff remains concerned, they should discuss their concerns with the DSL and put them in writing, see **Flow Chart A**. Records should include:

- a clear and comprehensive summary of the concern.
- details of how the concern was followed up and resolved.
- a note of any action taken, decisions reached and the outcome.
- If the pupil does begin to reveal that they are being harmed, staff should follow the advice in FLOW CHART A and in the table below 'pupil making a disclosure'.
- All concerns however small must be recorded and shared with the DSL as this information could provide the 'missing' piece of the bigger picture of the lived experience for the child.

Flow Chart A – All Staff



The DSL is – Dan Turner dan.turner@fhhschools.com

The DDSL is Thereza de Lucca Thereza.delucca@fhhschools.com

| If a pupil discloses to a member of staff |
|--|
| <ul style="list-style-type: none"> • We recognise that it takes a lot of courage for a child to disclose that they are being abused. They may feel ashamed, guilty or scared, their abuser may have threatened that something will happen if they tell, they may have lost all trust in adults or believe that what has happened is their fault. Sometimes they may not be aware that what is happening is abuse. • A child who makes a disclosure may have to tell their story on a number of subsequent occasions to the police and/or social workers. Therefore, it is vital that their first experience of talking to a trusted adult is a positive one. |
| During their conversation with the pupil staff will |
| <ul style="list-style-type: none"> • Listen to what the child has to say and allow them to speak freely. |

- Remain calm and not overact, act shocked or disgusted – the pupil may stop talking if they feel they are upsetting the listener.
- Reassure the child that it is not their fault and that they have done the right thing in telling someone.
- Not be afraid of silences – staff must remember how difficult it is for the pupil and allow them time to talk.
- Take what the child is disclosing seriously.
- Ask open questions and avoid asking leading questions.
- Avoid jumping to conclusions, speculation or make accusations.
- Not automatically offer any physical touch as comfort. It may be anything but comforting to a child who is being abused.
- Avoid admonishing the child for not disclosing sooner. Saying things such as 'I do wish you had told me about it when it started' may be the staff member's way of being supportive but may be interpreted by the child to mean they have done something wrong.
- Tell the child what will happen next, that they cannot keep secrets and that information will be shared to ensure the right level of support is given.

Notifying Parents

- The school will normally seek to discuss any concerns about a pupil with their parents/carers. This must be handled sensitively and normally the DSL/DDSL will make contact with the parent in the event of a concern, suspicion or disclosure of abuse of that the child has been harmed in some way.
- However, if the school believes that notifying parents could increase the risk to the child or exacerbate the problem, advice will first be sought from children's Local Authority Safeguarding Hub (MARU/MASH) e.g. familial sexual abuse.
- Where there are concerns about forced marriage or honour-based abuse parents should not be informed a referral is being made as to do so may place the child at a significantly increased risk. In some circumstances it would be appropriate to contact the police.

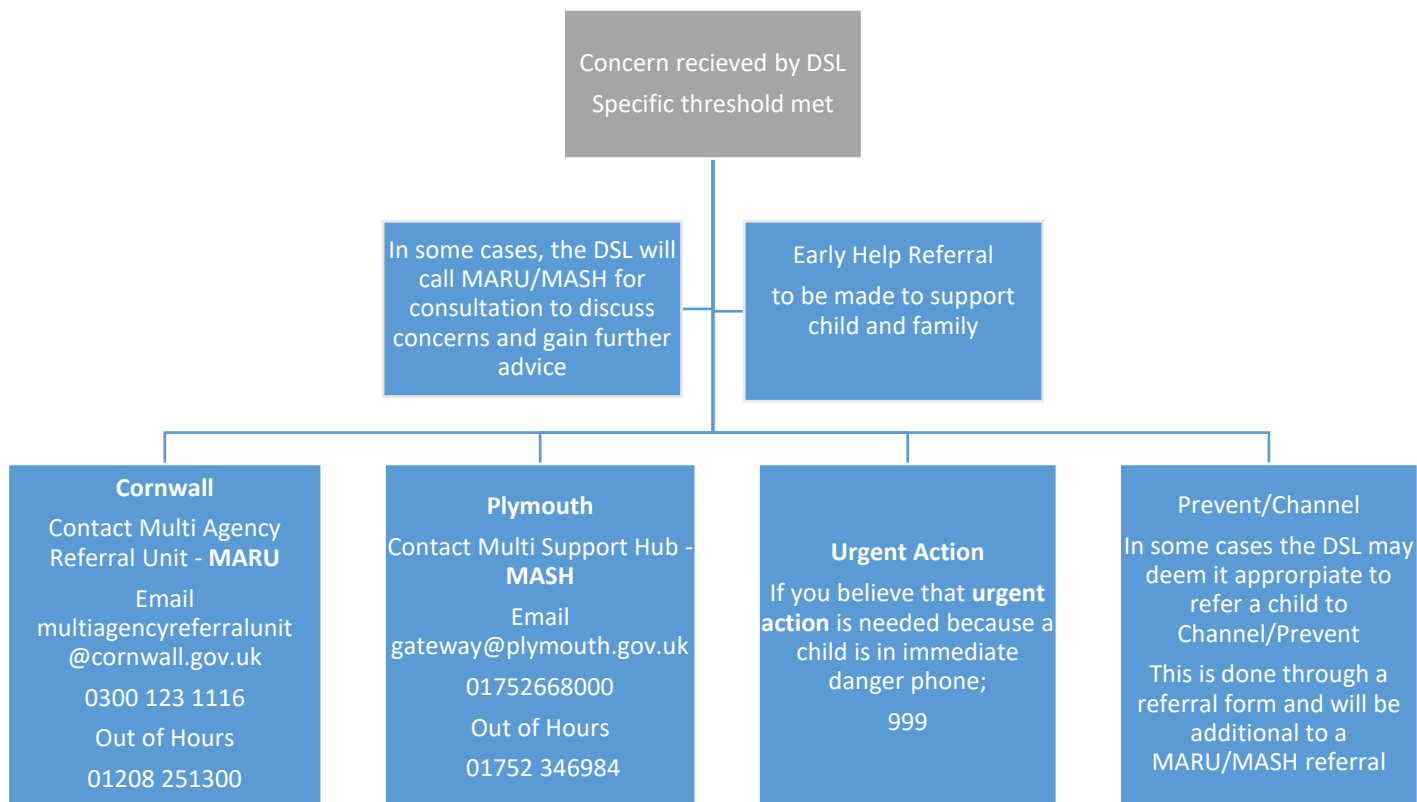
Making a referral

- Concerns about a child or a disclosure should be immediately raised with the DSL who will help decide whether a referral to children's Local Authority Safeguarding Hub (MARU/MASH) or other support (e.g. Early Help) is appropriate in accordance with The Local Authority Threshold Tool.
- If school is uncertain about whether a concern raised should be referred to MARU or MASH, a consultation will be sought with the Local Authority to seek further support and guidance.
- If a referral is needed, the DSL should make this rapidly and have the necessary systems in place to enable this to happen. However, 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.
- The child (subject to their age and understanding) and the parents will be told that a referral is being made, unless to do so would increase the risk to the child.
- If after a referral the child's situation does not appear to be improving the designated safeguarding lead (or the person that made the referral) should press for re-consideration to ensure their concerns have been addressed, and most importantly the child's situation improves.
- If a child is in immediate danger or is at risk of harm a referral should be made to children's Local Authority Safeguarding Hub (MARU/MASH) and/or the police immediately. Anybody can make a referral.
- Where referrals are not made by the DSL, the DSL should be informed as soon as possible.

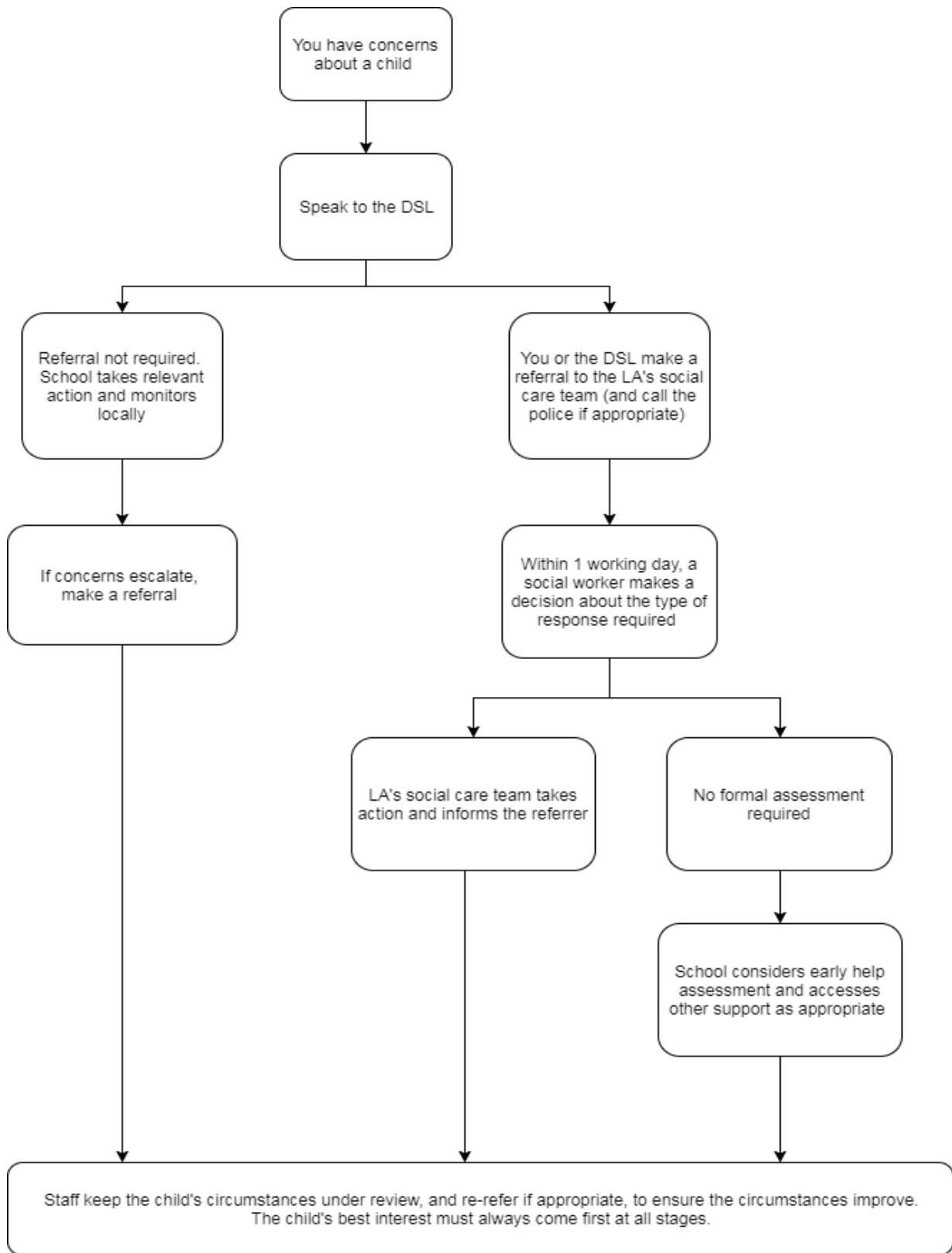
Supporting our Staff

- 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.
- We will support such staff by providing an opportunity to talk through their anxieties with the DSL/Safeguarding Team and to seek further support as appropriate.

Flow Chart B – DSL Reporting



Flow Chart – concerns about welfare (opposed to significant harm or immediate danger)



Children who are particularly vulnerable

Fountain Head House School recognises that some children are more vulnerable to abuse, neglect, exploitation and contextual safeguarding concerns and that additional barriers exist when recognising abuse for some children. We understand that this increase in risk is due more to societal attitudes and assumptions or child protection procedures which fail to acknowledge children's diverse circumstances, rather than the individual child's personality, impairment, or circumstances.

In some cases possible indicators of abuse such as a child's mood, behaviour or injury might be assumed to relate to the child's impairment or disability rather than giving a cause for concern. Or a focus may be on the child's disability, special educational needs or situation without consideration of the full picture. In other cases, such as bullying, the child may be disproportionately impacted by the behaviour without outwardly showing any signs that they are experiencing it.

Some children may also find it harder to disclose abuse due to communication barriers, lack of access to a trusted adult or not being aware that what they are experiencing is abuse.

Any child may benefit from early help, but all school and college staff should be particularly alert to the potential need for early help for a child who:

- Is disabled and has specific additional needs.
- Has special educational needs (whether or not they have a statutory education, health and care plan).
- Is a young carer.
- Is showing signs of being drawn in to anti-social or criminal behaviour, including gang involvement and association with organised crime groups.
- Is frequently missing/goes missing from education, care or from home.
- Is misusing drugs or alcohol themselves.
- Is at risk of modern slavery, trafficking or exploitation.
- Is in a family circumstance presenting challenges for the child, such as substance abuse, adult mental health problems or domestic abuse.
- Has returned home to their family from care.
- Is showing early signs of abuse and/or neglect and/or exploitation.
- Is at risk of being radicalised or exploited.
- Is a privately fostered child.
- Has an imprisoned parent.
- Is experiencing mental health, wellbeing difficulties.
- Is persistently absent from education (including persistently absent for part of the school day).
- Has experienced multiple suspensions, is at risk of being permanently excluded from schools, colleges and in alternative provision or a pupil referral unit.
- Is at risk of 'honour' based abuse such as FGM or forced marriage.

Pupils with SEND or health issues

All pupils at Fountain Head House School have Education, Health and Care Plans (EHCPs). We recognise that pupils with SEND or certain health conditions can face additional safeguarding challenges, and are 3 times more likely to be abused than their peers. Additional barriers can exist when recognising abuse and neglect in this group, including:

- Assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's condition without further exploration
- Pupils being more prone to peer group isolation or bullying (including prejudice-based bullying) than other pupils

- The potential for pupils with SEN, disabilities or certain health conditions being disproportionately impacted by behaviours such as bullying, without outwardly showing any signs
- Communication barriers and difficulties in managing or reporting these challenges
- We offer safeguarding, education welfare and pastoral support for our pupils
- Any abuse involving our pupils will require close liaison with the DSL (or DDSL) and the SENDCO.

Whistleblowing

We recognise that children cannot be expected to raise concerns in an environment where staff fail to do so.

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, poor or unsafe practice and potential failures in the school's safeguarding arrangements. If it becomes necessary to consult outside the school, they should speak in the first instance, to the LADO following the Whistleblowing Policy.

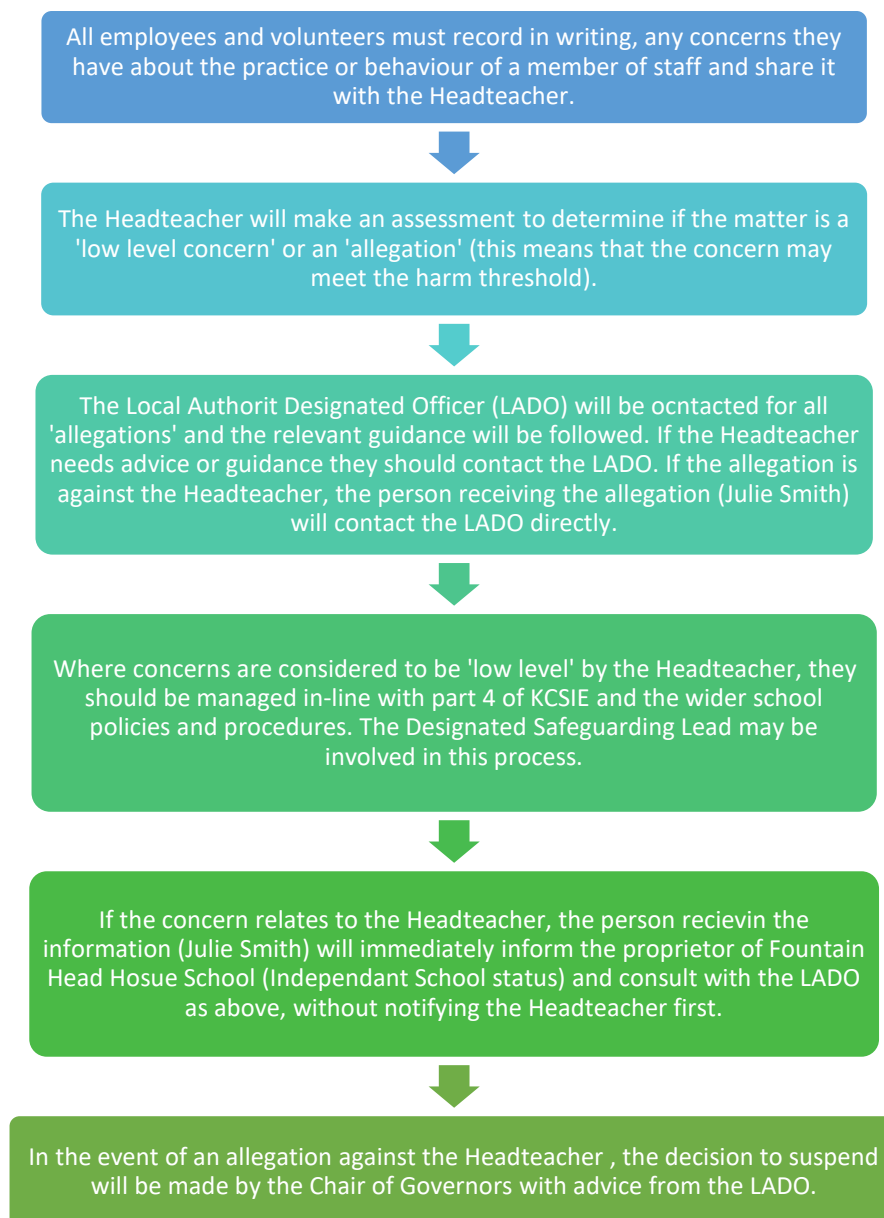
The NSPCC whistleblowing helpline is available for staff who do not feel able to raise concerns regarding child protection failures internally. Staff can call: 0800 028 0285 line is available from 8:00 AM to 8:00 PM, Monday to Friday and email: help@nspcc.org.uk

Whistleblowing regarding the Headteacher should be made to the Chair of the Governing Body – Julie Smith Julie.smith@fhhschools.com

Allegations against staff

All school staff should take care not to place themselves in a vulnerable position with a child. It is always advisable for interviews or work with individual children or parents/carers to be conducted in view of other adults. Guidance about conduct and safe practice, including safe use of mobile phones by staff and volunteers will be given at induction³.

In line with KCSiE part 4 guidelines,



Suspension of the member of staff, against whom an allegation has been made, needs careful consideration, and the Headteacher will seek the advice of the LADO and HR in making this decision.

Staff, parents and governors are reminded that publication of material that may lead to the identification of a teacher who is the subject of an allegation is prohibited by law.

Publication includes verbal conversations or writing including content placed on social media sites.

School will ensure that pupils are aware of how they can raise a concern should they be worried about a member of staffs conduct, this may be for example by talking to a trusted adult.

Physical Intervention

We acknowledge that staff must only ever use physical intervention as a last resort, when a child is endangering him/herself or others, and that at all times it must be the minimal force necessary to prevent injury to another person.

Such events should be recorded and signed by a witness as part of the incident Behaviour Watch log.

Staff who are likely to need to use physical intervention will be appropriately trained in CPI (Crisis Prevention Institute) Safety Intervention Foundation.

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.

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.

Confidentiality, sharing information and GDPR

All staff will understand that child protection issues warrant a high level of confidentiality, not only out of respect for the pupil and staff involved but also to ensure that information being released into the public domain does not compromise evidence.

Staff should be proactive in sharing as early as possible to help identify, assess and respond to risks or concerns about the safety and welfare of children, whether this is when problems are first emerging, or where a child is already known to Local Authority Children's Social Care.

Staff should only discuss concerns with the DSL, Headteacher/Principal or Chair of Governors (depending on who is the subject of the concern). That person will then decide who else needs to have the information and they will disseminate it on a 'need-to-know' basis.

However, following a number of cases where senior leaders in school had failed to act upon concerns raised by staff, Keeping Children Safe in Education emphasises that any member of staff can contact children's social care if they are concerned about a child.

Child protection information will be stored and handled in line with the Data Protection Act 2018 ⁴, the [HM Government Information Sharing and Advice for practitioners providing safeguarding services to children, young people, parents and carers, July 2018](#) and [DfE Data Protection in Schools](#). School will consider where appropriate information sharing prior to the child's formal transfer to their new setting, this could also include key staff from their new setting to be invited to meetings e.g. Child Protection, Core Group or Team Around a Family (with consent of parents and professionals).

At the point a child formally transfers to their new setting, their safeguarding file will be transferred securely in line with GDPR expectations as soon as possible but within 5 working days.

⁴The Data Protection Act 2018 is the UK's implementation of the General Data Protection Regulation (GDPR). [Data Protection in Schools Gov.UK DfE Feb 2023](#)

Information sharing is guided by the following principles:

- Necessary and proportionate
- Relevant
- Adequate
- Accurate
- Timely
- Secure

Fears about sharing information cannot be allowed to stand in the way of the need to promote the welfare and protect the safety of children.

Fountain Head House School will ensure that images of children used within publications, publicity and on the website has written parental consent prior to any images being taken and used. This consent will be obtained in line with school's annual data collection process.

Policy Links

| | |
|--|--|
| <ul style="list-style-type: none">• Positive Behaviour Support incl Physical Intervention Policy• Staff Behaviour/Code of Conduct• Whistleblowing Policy• Anti-bullying Policy• Health and Safety Policy• Low level concerns Policy• Pupil Attendance Policy• Curriculum Policy• PSHE incl Relationships, Se and Health Education Policy | <ul style="list-style-type: none">• Complaints Policy• ICT Acceptable Use Policy• Use of Mobile Devices Policy• Online Safety Policy• Child on Child Abuse Policy• Recruitment and Selection Policy• Equality, Diversity and Inclusion Policy• Intimate Care Policy• Data Protection and GDPR guidance• Supporting Medical Needs Policy |
|--|--|

Appendix 1 – Categories of Abuse

Categories of Abuse

- Physical Abuse
- Emotional Abuse (including Domestic Abuse)
- Sexual Abuse (including child sexual exploitation)
- Neglect

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-needing behaviour
- Suspicious bruises with unsatisfactory explanations
- Lack of self-esteem
- Self-injury
- Depression and/or anxiousness
- Age-inappropriate sexual behaviour
- Child Sexual Exploitation
- Criminality
- Substance abuse
- Mental health problems
- Poor attendance
- Unexplainable and/or persistent absences from education

Risk Indicators

The factors described in this section are frequently found in cases of child abuse. 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 Local Authority 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)/ carers.
- 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 specific needs)

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, handprints or a hairbrush
- 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

Mongolian Blue Spot: Bruising in non-mobile children is rare and may indicate abuse or neglect. Birth marks, especially Mongolian Blue Spots, can mimic bruising. Mongolian Blue Spot can be identified (see below), however if in any doubt as to the cause of the bruise refer to [Southwest Child Protection Procedures](#) Local Authority guidance and consultation.

- Areas of skin hyperpigmentation – flat, not raised, swollen or inflamed
- Not painful to touch
- Usually present at birth/ develop soon afterwards
- Will not change in shape or colour within a few days
- Normally uniform blue/ grey in colour across the mark
- Common in African, Middle Eastern, Mediterranean and Asian children

- While most occur at the lower back and buttocks, they can appear anywhere (e.g. back of shoulder or limb). Scalp/ face rarely affected
- Can be single/ multiple, vary in size, but mostly few centimetres diameter
- Gradually fade over many year

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

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 unresponsive with no apparent medical cause
- Failure of child to grow within normal expected pattern, with accompanying weight loss
- Child thrives away from home environment
- Child frequently absent from school

- Child left with adults who are intoxicated or violent
- Child abandoned or left alone for excessive periods

Appendix 2 – Anti-Bullying/Cyberbullying

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. This includes all forms e.g. cyber, racist, homophobic and gender related bullying. We keep a record of known bullying incidents which is shared with and analysed by the governing body. All staff are aware that children with SEND and / or differences/perceived differences are more susceptible to being bullied / victims of child abuse.

If the bullying is particularly serious, or the anti-bullying procedures are seen to be ineffective, the Headteacher and the DSL will consider implementing child protection procedures.

The subject of bullying is addressed at regular intervals in PHSE education.

Appendix 3 – BPRI

Our school acknowledges that repeated prejudice or racist incidents or a single serious incident may lead to consideration under child protection procedures. We keep a record of bullying, prejudice and racist incidents and report them to the Local Authority.

Appendix 4 – Radicalisation and Extremism

The Prevent Duty for England and Wales (2023)⁵ under section 26 of the Counter-Terrorism and Security Act 2015 places a duty on education and other children's services to have due regard to the need to prevent people from being drawn into terrorism.

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

Some children are at risk of being radicalised; adopting beliefs and engaging in activities which are harmful, criminal or dangerous.

School is clear that exploitation of vulnerable children and radicalisation should be viewed as a safeguarding concern and follows the Department for Education guidance for schools and childcare providers on preventing children and young people from being drawn into terrorism⁶.

School seeks to protect children and young people against the messages of all violent extremism including, but not restricted to, those linked to Islamist ideology, or to Far Right / Neo Nazi / White Supremacist ideology, Irish Nationalist and Loyalist paramilitary groups, and extremist Animal Rights movements.

School staff receive training to help identify early signs of radicalisation and extremism. Indicators of vulnerability to radicalisation are in detailed in the Appendix section.

⁵ [The Prevent duty guidance](#)

⁶ [The Prevent duty: Safeguarding learners vulnerable to radicalisation.](#)

Opportunities are provided in the curriculum to enable pupils to discuss issues of religion, ethnicity and culture and the school follows the DfE advice Promoting Fundamental British Values as part of SMSC (spiritual, moral, social and cultural education) in Schools (2014)⁷.

The school governors, the Headteacher and the Designated Safeguarding Lead (DSL) will assess the level of risk within the school and put actions in place to reduce that risk. Risk assessment may include the use of school premises by external agencies, anti-bullying policy and other issues specific to the school's profile, community and philosophy.

When any member of staff has concerns that a pupil may be at risk of radicalisation or involvement in terrorism, they should speak with the DSL. They should then follow normal safeguarding procedures. If the matter is urgent then the Police must be contacted by dialling 999. In non-urgent cases where police advice is sought then dial 101 or the national police Prevent advice line on 0800 011 3764.

Indicators of Vulnerability to Radicalisation

1. Radicalisation refers to the process by which a person comes to support terrorism and forms of extremism leading to terrorism.
2. Extremism is defined by the Government in the Prevent Strategy as:

Vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs. We also include in our definition of extremism calls for the death of members of our armed forces, whether in this country or overseas.

3. Extremism is defined by the Crown Prosecution Service as:
The demonstration of unacceptable behaviour by using any means or medium to express views which:
 - Encourage, justify or glorify terrorist violence in furtherance of particular beliefs.
 - Seek to provoke others to terrorist acts.
 - Encourage other serious criminal activity or seek to provoke others to serious criminal acts; or
 - Foster hatred which might lead to inter-community violence in the UK.

There is no such thing as a "typical extremist": those who become involved in extremist actions come from a range of backgrounds and experiences, and most individuals, even those who hold radical views, do not become involved in violent extremist activity.

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

Indicators of vulnerability include

- Identity Crisis – the student / pupil is distanced from their cultural / religious heritage and experiences discomfort about their place in society.

⁷ [Promoting Fundamental British Values](#)

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

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

More critical risk factors could include

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

The Prevent duty ensures schools and colleges have 'due regard' to the need to prevent people from being drawn into terrorism.

Channel is the voluntary, confidential support programme which focuses on providing support at an early stage to individuals that have been identified as being vulnerable to radicalisation. Prevent referrals may be passed to the multi-agency Channel panel to determine whether individuals require support.

[The Prevent Duty can be accessed via this link.](#) (School specific para's 57-76)

[The Prevent duty: safeguarding learners vulnerable to radicalisation.](#)

[The Prevent Duty in higher education \(HE\): training and guidance for practitioners.](#)

Guidance on Channel

<https://www.gov.uk/government/publications/channel-guidance>

Further information can be obtained from the Home Office website.

Appendix 5 – Domestic Abuse (Incl. Operation Encompass)

Domestic abuse represents one quarter of all violent crime. It is actual or threatened physical, emotional, psychological or sexual abuse. It involves the use of power and control by one person over another. It occurs regardless of race, ethnicity, gender, class, sexuality, age, and religion, mental or physical ability. Domestic abuse can also involve other types of abuse.

We use the term domestic abuse to reflect that a number of abusive and controlling behaviours are involved beyond violence.

How does it affect children?

Domestic abuse can encompass a wide range of behaviours and may be a single incident or a pattern of incidents. That abuse can be, but is not limited to, psychological, physical, sexual, financial or emotional. Children can be victims of domestic abuse. They may see, hear, or experience the effects of abuse at home and/or suffer domestic abuse in their own intimate relationships (teenage relationship abuse). All of which can have a detrimental and long term impact on their health, well-being, development, and ability to learn. In some cases children may blame themselves for the abuse or may have had to leave the family home as a result. Children who witness domestic abuse are at risk of significant harm.

What are the signs to look out for?

Children affected by domestic abuse reflect their distress in a variety of ways. They may change their usual behaviour and become withdrawn, tired, start to wet the bed and have behavioural difficulties. They may not want to leave their house or may become reluctant to return. Others will excel, using their time in your care as a way to escape from their home life. None of these signs are exclusive to domestic abuse so when you are considering changes in behaviours and concerns about a child, think about whether domestic abuse may be a factor.

What should I do if I suspect a family is affected by domestic abuse?

Cornwall – [Domestic abuse support](#)

Plymouth – [Domestic Abuse and Child Protection Strategy 24-25](#)

[First Light](#) is a charity that offers a range of support in Devon, Cornwall and the Isles of Scilly for anyone suffering from or has suffered from domestic violence or sexual violence.

National Domestic Abuse Helpline Refuge runs the National Domestic Abuse Helpline, available 24hour a day 0808 2000 247 and its website offers guidance and support for potential victims.

Refuge: <https://www.refuge.org.uk/>

Operation Encompass

Operation Encompass helps police and schools work together to provide emotional and practical help for children.

Police will inform the 'key adult' within school if they have been called to an incident of domestic abuse, where there are children in the household before registration the next day.

Fountain Head House School is an Operation Encompass School

Appendix 6 – Exploitation (incl. CSE, CCE and County Lines)

Both CSE and CCE are forms of abuse and both occur where an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a child into sexual or criminal activity. This power imbalance could be due to age, gender, sexual identity, cognitive ability, physical strength, status, and /or access to economic or other resources. The abuse could be linked to an exchange for something the victim perceives that they need or want and/or will be to the financial benefit or other advantage (such as increase status) of the perpetrator or facilitator.

The abuse can be perpetrated by individuals or groups, males or females, and adults or children (who themselves may be experiencing exploitation). The abuse can be a one-off occurrence or a series of incidents over time and range from opportunistic to complex organised abuse. It may involve force and/or enticement-based methods of compliance and may, or may not, be accompanied by violence or threats of violence.

Victims can be exploited even when the activity appears consensual, and it should be noted exploitation as well as being physical can be facilitated and/or take place online. The experience of girls who are criminally exploited can be very different from boys, the indicators may not be the same and both boys and girls that are being criminally exploited may be at higher risk of sexual exploitation.

Any concerns that a child is being or is at risk of being sexually or criminally exploited should be passed without delay to the DSL. We aware there is a clear link between regular school absence/truancy, CSE and CCE. Staff should consider a child to be at potential CSE/CCE risk in the case of regular school absence/truancy and make reasonable enquiries with the child and parents to assess this risk.

The DSL will use the appropriate Local Authority Assessment tool e.g. the Exploitation Toolkit, Tackling Child Exploitation Support Programme and Safer Me Assessment Framework (Plymouth) on all occasions when there is a concern that a child is being or is at risk of being sexually or criminally exploited or where indicators have been observed that are consistent with a child who is being or who is at risk of being sexually or criminally exploited. These assessments will indicate to the DSL whether e.g. a Safer Me Early Help approach or referral to MARU/MASH. If the DSL is in any doubt, they will contact MARU/MASH for consultation.

In all cases if the assessment identified any level of concern the DSL will trigger the local safeguarding procedures, including a referral to the local authority's children's social care team and the police, if appropriate. If a child is deemed to be in imminent danger the police will be called on 999.

School is aware that often a child is not able to recognise the coercive nature of the abuse and does not see themselves as a victim. As a consequence the child may resent what they perceive as interference by staff. However, staff must act on their concerns as they would for any other type of abuse.

School includes the risks of sexual and criminal exploitation in the PHSE and RSE curriculum. Pupils will be informed of the grooming process and how to protect themselves from people who may potentially be intent on causing harm. They will be supported in terms of recognising and assessing risk in relation to CSE/CCE, including online, and knowing how and where to get help.

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 or criminal exploitation.

Signs include

- Going missing from home or school
- Regular school absence/truanting
- 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
- Online safety concerns such as youth produced sexual imagery or being coerced into sharing explicit images.
- 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
- Getting involved in crime
- Police involvement, police records
- Involved in gangs, gang fights, gang membership
- Injuries from physical assault, physical restraint, sexual assault
- Drug or alcohol misuse

Child Criminal Exploitation can include children being forced or manipulated into transporting drugs or money through county lines, working in cannabis factories, shoplifting or pickpocketing. They can also be forced or manipulated into committing vehicle crime or threatening/committing serious violence to others

County lines is a term used to describe gangs and organised criminal networks involved in the exporting of illegal drugs (primarily crack cocaine and heroin) into one or more importing areas (within the UK), using dedicated mobile phone lines or other form of 'deal line.'

Exploitation is an integral part of the county lines offending model with children and vulnerable adults being exploited to move (and store) drugs and money. The same grooming models used to coerce, intimidate and abuse individuals for sexual and criminal exploitation are also used for grooming vulnerable individuals for county lines.

CSE is a form of child sexual abuse. CSE can occur over time or be a one-off occurrence. CSE can affect any child, who has been coerced into engaging in sexual activities. This includes 16 and 17-year-olds who can legally consent to have sex.

Sexual abuse may involve physical contact, including assault by penetration (for example, rape or oral sex) or nonpenetrative acts such as masturbation, kissing, rubbing, and touching outside clothing. It may include noncontact activities, such as involving children in the production of sexual images, forcing children to look at sexual images or watch sexual activities, encouraging children to behave in sexually inappropriate ways or grooming a child in preparation for abuse including via the internet.

For further information on signs of a child's involvement in sexual exploitation: [Child sexual exploitation: guide for practitioners](#)

For further information on County Lines: [Criminal exploitation of children and vulnerable adults: county lines guidance](#)

Appendix 7 – 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. If a member of staff, in the course of their work, discovers that an act of FGM appears to have been carried out, the member of staff must report this to the Police.

Female Genital Mutilation (FGM) is illegal in England and Wales under the FGM Act 2003 ("the 2003 Act"). It is a form of child abuse and violence against women. FGM comprises all procedures involving partial or total removal of the external female genitalia for non-medical reasons.

Section 5B of the 2003 Act¹ introduces a mandatory reporting duty which requires regulated health and social care professionals and teachers in England and Wales to report 'known' cases of FGM in under 18s which they identify in the course of their professional work to the police. The duty came into force on 31 October 2015.

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. Female Genital Mutilation (FGM) is illegal in England and Wales under the FGM Act (2003). It is a form of child abuse and violence against women. A mandatory reporting duty requires teachers to report 'known' cases of FGM in under 18s, which are identified in the course of their professional work, to the police⁸.

The duty applies to all persons in our School who is employed or engaged to carry out 'teaching work' in the school, whether or not they have qualified teacher status. The duty applies to the individual who becomes aware of the case to make a report. It should not be transferred to the Designated Safeguarding Lead; however the DSL should be informed.

If a teacher is informed by a girl under 18 that an act of FGM has been carried out on her, or a teacher observes physical signs which appear to show that an act of FGM has been carried out on a girl under 18, and they have no reason to believe the act was necessary for the girl's physical or mental health or for purposes connected with labour or birth, the teacher should personally make a report to the police force in which the girl resides by calling 101. The report should be made by the close of the next working day.

School staff are trained to be aware of risk indicators of FGM identified in this section of the Appendix. Concerns about FGM outside of the mandatory reporting duty should be reported as per our school's child protection procedures. Staff should be particularly alert to suspicions or concerns expressed by female pupils about going on a long holiday during the summer vacation period. There should also be consideration of potential risk to other girls in the family and practicing community.

Where there is a risk to life or likelihood of serious immediate harm the teacher should report the case immediately to the police, including dialling 999 if appropriate.

There are no circumstances in which a teacher or other member of staff should examine a girl.

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 Leon, 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

⁸ [FGM procedural information](#)

- 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 changes 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 (outlined below) there is the 'One Chance' rule. It is essential that settings /schools/colleges take action **without delay** and make a referral to children's services.

Appendix 8 – Forced Marriage

A forced marriage is a marriage in which one or both people do not (or in cases of people with learning disabilities cannot) consent to the marriage but are coerced into it. Coercion may include physical, psychological, financial, sexual and emotional pressure. It may also involve physical or sexual violence and abuse.

Forced marriage is an appalling and indefensible practice and is recognised in the UK as a form of violence against women and men, domestic/child abuse and a serious abuse of human rights. Since June 2014 forcing someone to marry has become a criminal offence in England and Wales under the Anti-Social Behaviour, Crime and Policing Act 2014.

A forced marriage is not the same as an arranged marriage which is common in several cultures. The families of both spouses take a leading role in arranging the marriage but the choice of whether or not to accept the arrangement remains with the prospective spouses.

School staff should never attempt to intervene directly as a school or through a third party. Contact should be made with either MARU or MASH.

Appendix 9 – Honour Based Abuse

Honour based abuse (HBV) can be described as a collection of practices, which are used to control behaviour within families or other social groups to protect perceived cultural and religious beliefs and/or honour. Such abuse can occur when perpetrators perceive that a relative has shamed the family and/or community by breaking their honour code.

Honour based abuse might be committed against people who.

- become involved with a boyfriend or girlfriend from a different culture or religion.
- want to get out of an arranged marriage.
- want to get out of a forced marriage.
- wear clothes or take part in activities that might not be considered traditional within a particular culture.

It is a violation of human rights and may be a form of domestic and/or sexual abuse. There is no, and cannot be, honour or justification for abusing the human rights of others.

Appendix 10 – One Chance Rule

All staff are aware of the 'One Chance' Rule' in relation to forced marriage, FGM and HBV. Staff recognise they may only have one chance' to speak to a pupil who is a potential victim and have just one chance to save a life.

School is aware that if the victim is not offered support following disclosure that the 'One Chance' opportunity may be lost. Therefore, all staff are aware of their responsibilities and obligations when they become aware of potential forced marriage, FGM and HBV cases.

Appendix 11 – Mental Health

Staff will 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. Whilst school recognise that only appropriately trained professionals can diagnose mental health problems; staff are able to make day to day observations of children and identify such behaviour that may suggest they are experiencing a mental health problem or be at risk of developing one.

How traumatic Adverse Childhood Experiences and experiences of abuse, neglect and exploitation can impact on a child's mental health, behaviour and education through to adolescence and adulthood will be covered in safeguarding awareness training and updates. If staff have a concern about a child's mental health that is also a safeguarding concern, they will share this with the DSL or deputy. School will also refer to the mental health and behaviour in schools' guidance⁹. If you have a mental health concern that is **not** also a safeguarding concern, speak to the DSL and Mental Health Lead to agree a course of action.

When supporting children experiencing mental health difficulties school will explore resources such as

The Department for Education guidance on [mental health and behaviour in schools](#)

Public Health England guidance on promoting children's emotional health and wellbeing at <https://www.gov.uk/government/publications/promoting-children-and-young-peoples-emotional-health-and-wellbeing>

Lesson plans and teaching materials from Rise Above
<https://campaignresources.phe.gov.uk/schools/topics/mental-wellbeing/overview>

Mental Health Foundation
<https://www.mentalhealth.org.uk/>

At Fountain Head House School our Mental Health Lead is

Thereza de Lucca

Appendix 12 – Private Fostering Arrangements

A private fostering arrangement occurs when someone other than a parent or close relative cares for a child for a period of 28 days or more, with the agreement of the child's parents. It applies to children under the age of 16 or 18 if the child is disabled. Children looked after by the local authority or who are placed in residential schools, children's homes or hospitals are not considered to be privately fostered.

⁹ [Mental health and behaviour in schools: guidance](#)

Private fostering occurs in all cultures, including British culture and children may be privately fostered at any age.

School recognise that most privately fostered children remain safe and well but are aware that safeguarding concerns have been raised in some cases. Therefore, all staff are alert to possible safeguarding issues, including the possibility that the child has been trafficked into the country.

By law, a parent, private foster carer or other persons involved in making a private fostering arrangement must notify children's services as soon as possible. However, where a member of staff becomes aware that a pupil may be in a private fostering arrangement, they will raise this with the DSL and the DSL will notify MARU/MASH of the circumstances.

Appendix 13 – Looked After Children and Previously Looked After Children

The most common reason for children becoming looked after is as a result of abuse and neglect. At Fountain Head House School we will ensure that staff have the necessary skills and understanding to keep looked after/previously looked after children safe. Appropriate staff have information about a child's looked after legal status and care arrangements, including the level of authority delegated to the carer by the authority looking after the child and contact arrangements with birth parents or those with parental responsibility.

The designated teacher for looked after children and the DSL have details of the child's social worker and the name and contact details of the Local Authority's virtual school head for children in care.

The designated teacher for looked after children works with the virtual school head to discuss how Pupil Premium Plus funding can be best used to support the progress of looked after children in the school and meet the needs in the child's personal education plan. The designated teacher will follow the statutory guidance 'Promoting the education of Looked After Children'.

Appendix 14 – Children Missing Education and Children Absent from Education

Attendance, absence and exclusions are closely monitored. The school will hold more than one emergency contact number for pupils and students where reasonably possible. A child going missing or who has unexplainable and/or persistent absences from education is a potential indicator of abuse, neglect and exploitation, including sexual abuse and sexual exploitation.

The DSL will monitor unauthorised absences and take appropriate action including notifying the local authority particularly where children go missing on repeat occasions and/or are missing for periods during the school day in conjunction with 'Children Missing Education: Statutory Guidance for Local Authorities'¹⁰.

Staff must be alert to signs of children at risk of travelling to conflict zones, female genital mutilation and forced marriage.

Appendix 15 – Child on Child Abuse (incl. Sexual Violence, Sexual Harassment and HSB)

The DSL, Governing Body/Board and Head Teacher will take due regard to Part 5, KCSIE

In most instances, the conduct of pupils towards each other will be covered by our behaviour policy. However, some allegations may be of such a serious nature that they may raise safeguarding concerns. School recognise that children are capable of abusing their

¹⁰ [CME Statutory Guidance for Local Authorities](#)

peers. It will not be passed off as 'banter' or 'part of growing up'. The forms of child-on-child abuse are outlined below and protocols can be found in our Child on Child abuse policy.

- Domestic abuse – an incident or pattern of actual or threatened acts of physical, sexual, financial and/or emotional abuse, perpetrated by an adolescent against a current or former dating partner regardless of gender or sexuality.
- Bullying (including cyberbullying, prejudice-based and discriminatory bullying).
- Child sexual exploitation – children under the age of 18 may be sexually abused in the context of exploitative relationships, contexts and situations by peers who are also under 18.
- Harmful sexual behaviour – children and young people presenting with sexual behaviours that are outside of developmentally 'normative' parameters and harmful to themselves and others
- Upskirting – which typically involves taking a picture under a person's clothing without them knowing, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm.
- Serious youth violence¹¹ – any offence of most serious violence or weapon enabled crime, where the victim is aged 0-19' i.e. Murder, manslaughter, rape, wounding with intent and causing grievous bodily harm. 'youth violence' is defined in the same way, but also includes assault with injury offences. All staff will receive training so that they are aware of indicators which may signal that children are at risk from or involved with serious violence and crime.
- Initiation/hazing type violence and rituals (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element); and
- Consensual and non-consensual sharing of nudes and semi nudes' images and or videos (also known as sexting or youth produced sexual imagery).

The term child-on-child abuse can refer to all of these definitions and a child may experience one or multiple facets of abuse at any one time. Therefore, our response will cut across these definitions and capture the complex web of their experiences.

There are also different gender issues that can be prevalent when dealing with child-on-child abuse (i.e. girls being sexually touched/assaulted, or boys being subjected to initiation/hazing type violence).

School aims to reduce the likelihood of child-on-child abuse through:

- The established ethos of respect, friendship, courtesy and kindness.
- High expectations of behaviour.
- Clear consequences for unacceptable behaviour.
- Providing a developmentally appropriate PSHE curriculum which develops pupils' understanding of healthy relationships, acceptable behaviour, consent and keeping themselves safe.
- Systems for any pupil to raise concerns with staff, knowing that they will be listened to, valued and believed.
- Robust risk assessments and providing targeted work for pupils identified as being a potential risk to other pupils and those identified as being at risk.

¹¹ [Preventing youth violence and gang involvement](#)

Research indicates that young people rarely disclose child-on-child abuse and that if they do, it is likely to be to their friends. Therefore, School will also educate pupils in how to support their friends if they are concerned about them, that they should talk to a trusted adult in the school and what services they can contact for further advice.

Any concerns, disclosures or allegations of child-on-child abuse in any form should be referred to the DSL using the school's child protection procedures as set out in this policy. Where a concern regarding child-on-child abuse has been disclosed to the DSL(s), advice and guidance will be sought from MASH/MARU and where it is clear a crime has been committed or there is a risk of crime being committed the Police will be contacted.

Working with external agencies the school will respond to the unacceptable behaviour. If a pupil's behaviour negatively impacts on the safety and welfare of other pupils, then safeguards will be put in place to promote the wellbeing of the pupils affected and the victim and perpetrator will be provided with support.

Sexual Harassment, Sexual Violence and Harmful Sexual Behaviour

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. Children's sexual behaviour exists on a wide continuum, ranging from normal and developmentally expected to inappropriate, problematic, abusive and violent. Problematic, abusive and violent sexual behaviour is developmentally inappropriate and may cause developmental damage. 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. Staff should be vigilant to:

- bullying (including cyberbullying)
- physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm
- sexual violence and sexual harassment
- sexting (also known as youth produced sexual imagery)
- initiation/hazing type violence and rituals
- upskirting

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. 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 in the Devon multi-agency protocol "Working with Sexually Active Young People" available at [South West Child Protection Procedures](#).

Appendix 16 – Online Safety

The Designated Safeguarding Lead will take lead responsibility for safeguarding and child protection including online safety and understanding the filtering and monitoring systems and processes in place. The school will carry out an annual review of the approach to online safety, supported by an annual risk assessment that considers and reflects the risks the children face. This will include a review of the effectiveness of procedures periodically to keep up with evolving cyber-crime technologies.

The school has a clear policy on the use of mobile and smart technology, which will also reflect the fact many children have unlimited and unrestricted access to the internet via mobile phone networks (i.e., 3G, 4G and 5G). This access means some children, whilst at school, sexually harass, bully, and control others via their mobile and smart technology, share indecent images consensually and non-consensually (often via large chat groups) and view and share pornography and other harmful content.

We recognise the importance of safeguarding children from potentially harmful and inappropriate online material, and we understand that technology is a significant component in many safeguarding and wellbeing issues.

To address this, our school aims to:

- Have robust processes (including filtering and monitoring systems) in place to ensure the online safety of pupils, staff, volunteers and governors

- Protect and educate the whole school community in its safe and responsible use of technology, including mobile and smart technology (which we refer to as 'mobile phones')
- Set clear guidelines for the use of mobile phones for the whole school community
- Establish clear mechanisms to identify, intervene in and escalate any incidents or concerns, where appropriate

The 4 key categories of risk

Our approach to online safety is based on addressing the following categories of risk:

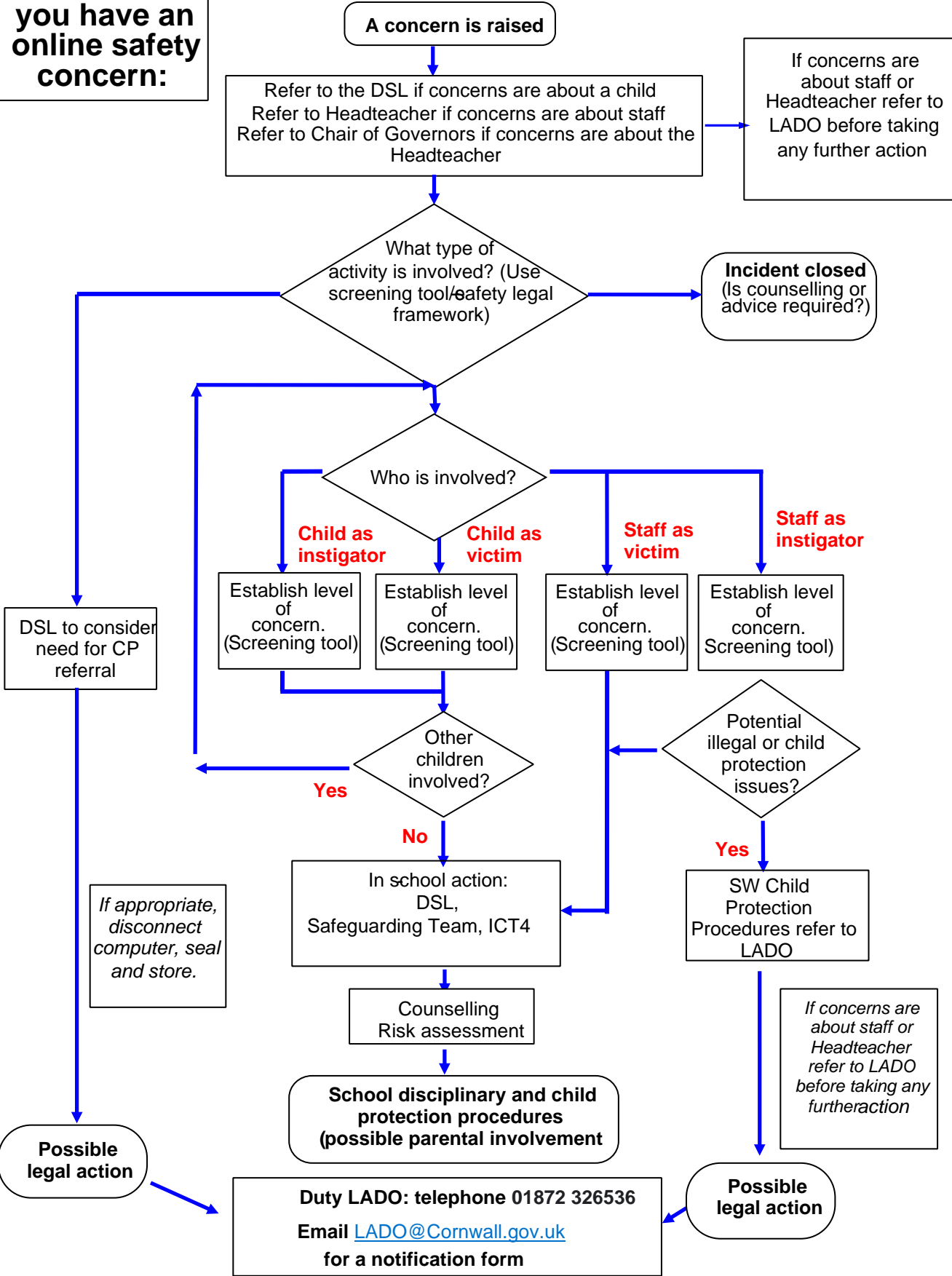
- **Content** – being exposed to illegal, inappropriate or harmful content, such as pornography, fake news, racism, misogyny, self-harm, suicide, antisemitism, radicalisation and extremism
- **Contact** – being subjected to harmful online interaction with other users, such as peer-to-peer pressure, commercial advertising and adults posing as children or 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, such as making, sending and receiving explicit images (e.g. consensual and non-consensual sharing of nudes and semi-nudes and/or pornography), sharing other explicit images and online bullying; and
- **Commerce** – risks such as online gambling, inappropriate advertising, phishing and/or financial scams

To meet our aims and address the risks above we will

- Educate pupils about online safety as part of our PSHE Curriculum. For example:
 - The safe use of social media, the internet and technology
 - Keeping personal information private
 - How to recognise unacceptable behaviour online
 - How to report any incidents of cyber-bullying, ensuring pupils are encouraged to do so, including where they are a witness rather than a victim
- Train staff, as part of their induction, on safe internet use and online safeguarding issues including cyber-bullying and the risks of online radicalisation. All staff members will receive refresher training at least once each academic year
- Share information with parents and carers about online safety via our website, social media, and any other communications sent directly to them. We will also share clear procedures with them so they know how to raise concerns about online safety
- Make sure staff are aware of any restrictions placed on them with regards to the use of their mobile phone and other technological devices such as smart watches and cameras, for example that:
 - Staff are allowed to bring their personal phones to school for their own use, but will limit such use to non-contact time when pupils are not present
 - Staff will not take pictures or recordings of pupils on their personal phones or cameras
- Make all pupils, parents and carers, staff, volunteers and governors aware that they are expected to follow the:
 - FHHS - ICT Acceptable Use Policy
 - FHHS - Use of Mobile Devices Policy
 - FHHS - Online Safety Policy

- Explain the consequences which will be implemented if a pupil is in breach of the policies listed above
- Make sure all staff, pupils, and parents and carers are aware that staff have the power to search pupils' phones, as set out in the [DfE's guidance on searching, screening and confiscation](#)
- Put in place robust filtering and monitoring systems to limit children's exposure to the 4 key categories of risk (described above) from the school's IT systems
- Carry out an annual review of our approach to online safety, supported by an annual risk assessment that considers and reflects the risks faced by our school community
- Provide advice to parents when pupils are being asked to learn online at home and consider how best to safeguard both pupils and staff.

What to do if you have an online safety concern:



Appendix 17 – Youth Produced Sexual Imagery (Sexting)

The practice of children sharing images and videos via text message, email, social media or mobile messaging apps has become commonplace. However, this online technology has also given children the opportunity to produce and distribute sexual imagery in the form of photos and videos. Such imagery involving anyone under the age of 18 is illegal.

Youth produced sexual imagery refers to both images and videos where.

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

All incidents of this nature should be treated as a safeguarding concern and in line with the UKCIS guidance 'Sexting in schools and colleges: responding to incidents and safeguarding young people'¹², and 'Sharing nudes and semi nudes: how to respond to an incident.'¹³

Cases where sexual imagery of people under 18 has been shared by adults and where sexual imagery of a person of any age has been shared by an adult to a child is child sexual abuse and should be responded to accordingly.

If a member of staff becomes aware of an incident involving youth produced sexual imagery, they should follow the child protection procedures and refer to the DSL as soon as possible. The member of staff should confiscate the device involved and set it to flight mode or, if this is not possible, turn it off. Staff should not view, copy or print the youth produced sexual imagery.

The DSL should hold an initial review meeting with appropriate school staff and subsequent interviews with the children involved (if appropriate). Parents should be informed at an early stage and involved in the process unless there is reason to believe that involving parents would put the child at risk of harm. At any point in the process, if there is concern, a young person has been harmed or is at risk of harm a referral should be made to MARU/MASH and/or the Police as appropriate.

Immediate referral at the initial review stage should be made to MARU/MASH/Police if:

- The incident involves an adult.
- There is good 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 education needs).
- What you know about the imagery suggests the content depicts sexual acts which are unusual for the child's development stage or are violent.
- The imagery involves sexual acts.
- The imagery involves anyone aged 12 or under.
- There is reason to believe a child is at immediate risk of harm owing to the sharing of the imagery, for example the child is presenting as suicidal or self-harming.

¹² [Sexting in schools and colleges](#)

¹³ [Sharing nudes and semi-nudes: how to respond to an incident \(UCKIS\)](#)

If none of the above apply then the DSL will use their professional judgement to assess the risk to pupils involved and may decide, with input from the Headteacher, to respond to the incident without escalation to MARU/MASH or the police. Such decisions will be recorded.

In applying judgement the DSL will consider if.

- There is a significant age difference between the sender/receiver.
- There is any coercion or encouragement beyond the sender/receiver.
- The imagery was shared and received with the knowledge of the child in the imagery.
- The child is more vulnerable than usual i.e. At risk.
- There is a significant impact on the children involved.
- The image is of a severe or extreme nature.
- The child involved understands consent.
- The situation is isolated or if the image been more widely distributed.
- There other circumstances relating to either the sender or recipient that may add cause for concern i.e. Difficult home circumstances.
- The children have been involved in incidents relating to youth produced imagery before.

If any of these circumstances are present the situation will be escalated according to our child protection procedures, including reporting to the police or MARU/MASH. Otherwise, the situation will be managed within the school.

The DSL will record all incidents of youth produced sexual imagery, including both the actions taken, actions not taken, reasons for doing so and the resolution in line with safeguarding recording procedure

Appendix 18 – Additional Resources

Further advice on child protection is available from

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

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

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

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

Childnet International –making the internet a great and safe place for children. Includes resources for professionals and parents <http://www.childnet.com/>

Thinkuknow (includes resources for professionals and parents) <https://www.thinkuknow.co.uk/>

Safer Internet Centre <http://www.saferinternet.org.uk/>

Provision for transgender pupils: [Guidance for maintained schools and academies in England on provision for transgender pupils November 2022](#)

Appendix 19 – Local Authority Safeguarding Hub Contact Details

If you are concerned about a child's welfare or worried they are being abused, you can make a referral to:

Cornwall

- Multi-Agency Referral Unit: 0300 123 1116
- Out of Hours Service: 01208 251300

If you have concerns about a professional working with a child you need to contact your Local Authority Designated Officer (LADO) on:

- Cornwall - 01872 326536

The **Cornwall Inter-agency Referral Form** and **Isles of Scilly Children in Need Inter Agency Referral Form** can also be used to share information with your local office.

If you are unsure the **Cornwall and Isles of Scilly Safeguarding Children Partnership Procedures Manual** will be able to help guide you or the **Threshold Guidance** which tells you which types of services a family may need to get support.

Alternatively you can call ChildLine for advice on 0800 1111 or email them by visiting www.childline.org.uk

Plymouth

- MASH: 01752 668000
- Out of Hours: 01752 346984
- MASH@plymouth.gov.uk

Early Help Cornwall

- **01872 322277**
- earlyhelphub@cornwall.gov.uk

Early Help Plymouth

- 01752 668000
- AccessEarlyHelp@plymouth.gov.uk