



## Safeguarding Children Policy

Designated Safeguarding Lead (DSL): Sue Hornby

Deputy Safeguarding Lead (DDSL) at Hanley: Jackie Penfold

Deputy Safeguarding Lead (DDSL) at Bridge Business Centre: Neil Hornby and Vicky Gundersen

Nominated Governor with Safeguarding Lead: Helen Attree

This policy will be made available to parents on request and is available on the school website. In addition, the following documents can be obtained at the web addresses provided:

- Working Together to Safeguard Children 2018  
[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/779401/Working\\_Together\\_to\\_Safeguard-Children.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/779401/Working_Together_to_Safeguard-Children.pdf)
- Keeping Children Safe in Education, Department for Education September 2019 (note it is a statutory requirement for Part 1 of this document to have been read and understood by all staff and Governors).  
[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/835733/Keeping\\_children\\_safe\\_in\\_education\\_2019.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/835733/Keeping_children_safe_in_education_2019.pdf)
- Disqualification under the Childcare Act June 2006  
<https://www.gov.uk/government/publications/disqualification-under-the-childcare-act-2006/disqualification-under-the-childcare-act-2006>
- Guidance for Safer Working Practice for Adults who work with Children and Young People in Education Settings – May 2019  
<https://www.saferrecruitmentconsortium.org/GSWP%20Sept%202019.pdf>
- Worcestershire Safeguarding Partnership  
<https://www.safeguardingworcestershire.org.uk/wscb/>

### Worcestershire Safeguarding Children Partnership (WSCP)

In Worcestershire the three Safeguarding Partners are:

1. Chief Executive of Worcestershire County Council
2. Chief Constable of West Mercia Police
3. Accountable Officer for NHS South Worcestershire, NHS Wyre Forest and NHS Redditch and Bromsgrove Clinical Commissioning Groups (CCGs)

WSCP replaces the Worcestershire Safeguarding Children Board (WSCB), however guidance produced by WSCB remains valid and should be followed by professionals.

## Introduction

The Bridge fully recognises its responsibilities for safeguarding children. The school's duty is to ensure that safeguarding permeates all activity and functions. It adheres to the statutory guidance issued by the Department of Education 2019. It is accepted that when undertaking development or planning of any kind the school will consider safeguarding matters as part of this process. This policy has been developed in accordance with the principles established by the Children Acts 1989 and 2004; the Education Act 2002; and in line with government publications the Teachers' Standards 2012, 'Working Together to Safeguard Children' 2015 and 'Keeping Children Safe in Education' 2019. Please note that the School's Radicalisation and Extremism Self Risk Assessment is available in the Staff Handbook or can be requested from the DSL. Our policy applies to all staff, part time and full time, permanent or temporary, governors and volunteers working at the Bridge, hereafter referred to as the school. There are five main elements to our policy:

- Ensuring we practice safe recruitment in checking the suitability of staff and volunteers to work with children;
- Raising awareness of child protection issues and equipping children with the skills needed to keep them safe;
- Developing and then implementing procedures for identifying and reporting cases, or suspected cases, of abuse;
- Supporting pupils who have been identified as in need of early help or at risk of harm in accordance with his/her agreed Child Protection, Child in Need or Early Help plan;
- Establishing a safe environment in which children can learn and develop.

The nature of the school's intake is that many students will experience a range of SEN, including autism and attachment disorders, high anxiety and low levels of emotional resilience. Some may be in the looked after system, including adopted, and are likely to experience a level of PTSD as a result. It is therefore incumbent on all staff to recognise the additional safeguarding challenges that these children represent. In particular, staff need to be aware that:

- There is higher risk of peer group isolation
- They will be more vulnerable to bullying
- Bullying will have a disproportionate impact on them
- Children may struggle to communicate with staff about their situations and/or concern for others
- Behaviour, mood and injury may relate to possible abuse, and not just be due to their SEN or disability

It is for these reasons that the school has a dedicated pastoral manager; high staff/student ratios; and high levels of supervision during unstructured times such as at lunch time.

We recognise that because of the day-to-day contact with children, school staff are well placed to identify concerns early and to observe the outward signs of abuse. The school will therefore:

- Establish and maintain an environment where children feel safe, secure, valued and respected and encouraged to talk, believing they will be listened to;
- Ensure children know that there are adults in the school whom they can approach if they are worried;

- Include opportunities in the curriculum, specifically through PSHCE for children to develop the skills they need to recognise and stay safe from abuse and to know who they should turn to for help.

## **Procedures**

We will follow the procedures set out by the Worcestershire Safeguarding Children Partnership (WSCP) and take account of guidance issued by the Department for Education (DfE). The WSCP website address is: <http://www.worcestershire.gov.uk/cms/safeguarding-children.aspx> The school will:

- Ensure it has a Senior Leader nominated as a Designated Safeguarding Lead (DSL) who will undertake regular, appropriate training and support for this role – currently Sue Hornby (Headteacher) and Jackie Penfold (Pastoral Co-ordinator) at Hanley and Neil Hornby and Vicky Gundersen at the Bridge Business Centre.
- Ensure it has a nominated governor responsible for safeguarding children (currently Helen Attree).
- Ensure every member of staff (including temporary staff and volunteers (supply staff are not used)) and the governing body knows the name of the DSL and understands their role.
- Ensure all staff and volunteers understand their responsibilities in being alert to the signs of abuse and neglect, including the specific issues of Female Genital Mutilation (FGM), child sexual exploitation (CSE), children missing education (CME) and radicalisation and extremism (RE), and maintain an attitude of “it could happen here”. All staff must always act in the best interest of the child.
- Ensure all staff and volunteers understand their responsibility for referring any concerns to the DSL in a timely manner and are aware that they may raise concerns directly with Children's Social Care Services if they believe their concerns have not been listened to or acted upon.
- Risk assess volunteers to decide whether to obtain an enhanced DBS for volunteers who are not engaging in a regulated activity. Such risk assessments will be recorded.
- All staff in leadership roles, including Governors, will be subject to the S128 check.
- The School will report immediately to Children's Social Care Services any children who have suffered or are likely to suffer significant harm. The School will work with external agencies in line with procedures set out by the Worcestershire Safeguarding Children Partnership (WSCP) and take account of guidance issued by the Department of Education (DfE) to support children who are in need of additional support. The School will act to promote the welfare of a child in need of additional support, even if they are not suffering harm or are not at immediate risk.
- Ensure that parents have an understanding of the responsibility placed on the school and staff for child protection by publishing this document on the school's website.
- Notify Worcestershire Children's Services Front Door if there is an unexplained absence of more than two days of a pupil who is subject to a child protection plan.

- Develop effective links with relevant agencies and co-operate as required with their enquiries regarding safeguarding matters including attendance at strategy meetings, initial case conference, core groups and child in need review meetings.
- Ensure that the duty of care towards its pupils and staff is promoted by raising awareness of illegal, unsafe and unwise behaviour and assist staff to monitor their own standards and practice.
- Keep written records of concerns about children, even where there is no need to refer the matter immediately.
- Ensure all child protection records are kept securely, separate from the main pupil file, and in locked locations.
- Ensure that all child protection files are transferred in a safe and timely manner when a child moves schools.
- Be aware of and follow procedures set out by Children's Services and the WSCB where an allegation is made against a member of staff or volunteer, including making a referral to the DBS and/or National College for Teaching and Leadership if a person in regulated activity has been dismissed or removed due to safeguarding concerns, or would have been had they not resigned. Such referrals will always be given priority and will be done promptly and made within at least one month of the person leaving our employment.
- Operate safer recruitment practice.
- Ensure that the Governing Body undertake an annual review of the school's safeguarding policies and procedures and of the efficiency with which the related duties have been discharged in accordance with current legislation.
- Our procedures will be reviewed and updated regularly and at least annually.

## **Training**

When staff and volunteers join the Bridge they will be informed of the safeguarding children arrangements in place. This policy will be referred to and they will be told who the DSL is and who acts in their absence. Staff are required to read this policy, including its appendices, the current Keeping Children Safe in Education 2019, specifically Part 1 and Annex A. All staff (and volunteers working directly with pupils) will be given safeguarding induction which will include basic safeguarding information relating to signs and symptoms of abuse, how to manage a disclosure from a child and when and how to record a concern about the welfare of a child, advice on safe working practice, the school's Safeguarding Children's Policy, the Staff Code of Conduct Policy, the school's response to children missing education, the identity of the DSL and a copy of Part 1 of Keeping Children Safe in Education. All regular visitors to the school, and volunteers not working directly with children, will be told where the policy is kept and given the name of the DSL and informed of the school's procedures in reporting concerns. All staff will receive training in child protection and safe working practice, updated every three years, in line with WSCB guidance. Staff with specific responsibility for safeguarding children will undertake both single and inter-agency training at a level suitable to their role and responsibility, updated every two years. Staff with leadership responsibilities will undertake further relevant training in safeguarding related issues such as CSE, Radicalisation (WRAP Training), Management of Allegations of Abuse and cascade the learning from this training to the rest of the staff.

## Staff Code of Conduct

All staff and this includes full time, part time, temporary and permanent members of staff, including volunteers, must adhere to the School's Code of Conduct Policy and a copy of this Policy is available in the Staff Handbook. Staff should be mindful of the need to consider safeguarding arrangements where children are engaged in close one to one teaching, particularly in performing arts and sports activities. Specific guidance can be provided on a case-by-case basis by consulting with the DSL or Head as required.

## Off site provision

The school will obtain written confirmation that external providers have completed all relevant safeguarding checks on their staff.

## Peer on peer abuse

Peer on peer abuse may take many forms including:

- Bullying, including cyber bullying
- Physical abuse
- Sexual violence and sexual harassment
- Sexting
- 'Up skirting' \*
- 'initiation ceremonies'

*\* Since April 12, 2019, upskirting has been a criminal offence in England and Wales. Upskirting 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. Under the Voyeurism Act, upskirting offenders can now be arrested, face up to two years in prison and having their name placed on the sex offenders' register. This includes instances where culprits say the images were taken "just for a laugh".*

All peer on peer abuse will be taken seriously. Attempts are made to minimise peer on peer abuse using the following strategies:

- Students are made aware of the school's expectations of behaviour and attitude during their induction to the school. It is explained that the school's behaviour expectations extend to their behaviour and social interaction with each other, on and off line, outside of school.
- Students are introduced to the DSL and DDSL at their induction, and their roles are explained, to encourage reporting of all forms of abuse or welfare concerns regarding themselves or others.
- Relationship and social skills education and training forms part of the curriculum and children are encouraged to disclose all forms of Peer on peer abuse.
- The school implements the government's Relationship and Sexual Education and Health Education statutory guidance, June 2019.
- All students are supervised at break and lunch times, including at the start and end of day.
- Banter is not tolerated, since young people with SEN and other complex needs find 'banter' and sarcasm difficult to interpret.
- Peer on peer abuse when directed towards girls or children from different ethnic backgrounds will be viewed as sexist or racist abuse and addressed accordingly.

- All allegations of peer on peer abuse are recorded using incident and cause for concern procedures for all other incidents.
- Victims and perpetrators will be supported through a process of Restorative Justice and behaviour plans as necessary.

### **Contextual Safeguarding**

- Assessments of student's safety will include the wider picture, ie the social context in which the young person operates outside of school. Consideration will be given to a child's wider social context when considering concern around changes in behaviour, attitude and overall wellbeing of children.

### **Responsibilities**

The DSL will ensure that:

- Safeguarding policies and procedures are in place, available to parents on the school website or by other means and reviewed annually;
- An annual report on the effectiveness of the school's safeguarding procedures is presented to the governing body. Any weaknesses brought to its attention relating to safeguarding are remedied without delay.
- It complies with all legislative duties, including the duty to report suspected or known cases of FGM and the duty to prevent young children from being drawn into terrorism.
- The Safeguarding policies and procedures are fully implemented and followed by all staff.

The DSL and DDSL will

- Organise safeguarding induction training for all newly appointed staff and Governors and whole staff training, refreshed at least every 3 years.
- Undertake an annual audit of safeguarding procedures, using the County safeguarding checklist or similar.
- Refer a child to the Early Help Hub or Children's Social Care promptly, when there are concerns about possible abuse and neglect. The DSL will contact the Police in the case of serious harm.
- Refer a child to the Channel Panel promptly when there are concerns about possible radicalisation or involvement in extremist groups.
- Keep written records of concerns about children, including the use of body maps, even where there is no need to refer the matter immediately. Note staff must only view parts of a child's body which are normally visible.
- Ensure all child protection records are kept securely, separate from the main pupil file, and in locked locations.
- Ensure that all child protection files are transferred in a safe and timely manner when a child moves settings, both between and across phases, within and out of county.
- Notify the key worker if there is an unexplained absence of more than two days of a pupil who is subject to a child protection plan.

- Monitor unauthorised absence, particularly where children go missing on repeated occasions, reporting concerns in line with the procedure for a child going missing in the Missing Children's Policy.
- Develop effective links with relevant agencies and other professionals and co-operate as required with their enquiries regarding safeguarding matters including co-operation with serious case reviews, attendance at strategy meetings, initial and review child protection conferences, core group and child in need review meetings.
- Contribute to assessments and providing a report to initial and review conferences which has been shared with parents first.
- Co-ordinate a programme of safety, health and well-being through the curriculum, including issues of protective behaviours, healthy relationships, staying safe on-line, and the active promotion of the fundamentals of British Values.

### **Managing a Disclosure**

Teachers and other staff in schools are in a unique position to observe children's behaviour over time and often develop close and trusting relationships with pupils. If a child discloses directly to a member of staff, the following advice to staff will be followed:

- Listen carefully to what is said.
- Do not promise confidentiality.
- Ask only open questions such as:
  - 'Could you tell me what happened?'
  - 'Please explain what you mean when you say...?'
  - 'Can you describe the person? or Can you describe the place?'
- Do not ask questions which may be considered to suggest what might have happened, or who has perpetrated the abuse, e.g. 'Did your Dad hit you?'
- Do not force the child to repeat what he/she said in front of another person.
- Do not begin an investigation – for example by asking the child to record what happened in writing or taking a photograph of any injuries.
- Report immediately to the DSL and complete a hand-written record as soon after the disclosure as possible and in any case within 24 hours, using the child's words as far as possible. Use body maps to record any observed injuries. Note staff must only view parts of a child's body which are normally visible.

Where a child discloses safeguarding allegations against another pupil in the same setting, the DSL should refer to the local procedures on the WSCB website (section 2.11) and seek advice from the Children's Services Front Door before commencing its own investigation or contacting parents.

Staff Obligations – staff should refer to the Staff Code of Conduct, which provides details about their obligations for keeping the School informed of reasons why they should not work with children.

## Definitions of Abuse and Neglect

**Abuse:** a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm, or by failing to act to prevent harm. They may be abused by an adult or adults or another child or children.

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

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

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

**Neglect:** the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to: provide adequate food, clothing and shelter (including exclusion from home or abandonment); protect a child from physical and emotional harm or danger; ensure adequate supervision (including the use of inadequate care-givers); or ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

**Child sexual exploitation (CSE):** involves exploitative situations, contexts and relationships where young people receive something (for example food, accommodation, drugs, alcohol, gifts, money or in some cases simply affection) as a result of engaging in sexual activities. Sexual exploitation can take many forms ranging from the seemingly 'consensual' relationship where sex is exchanged for affection or gifts, to serious organised crime by gangs and groups. What

marks out exploitation is an imbalance of power in the relationship. The perpetrator always holds some kind of power over the victim, which increases as the exploitative relationship develops. Sexual exploitation involves varying degrees of coercion, intimidation or enticement, including unwanted pressure from peers to have sex, sexual bullying including cyber bullying and grooming. However, it is also important to recognise that some young people who are being sexually exploited do not exhibit any external signs of this abuse.

Staff are aware that expert and professional organisations are best placed to provide up-to-date guidance and practical support on specific safeguarding issues. For example NSPCC offers information for schools and colleges on the TES website and also on its own website [www.nspcc.org.uk](http://www.nspcc.org.uk). Staff, volunteers and Governors can also access broad government guidance on the issues listed below via the GOV.UK website:

- child sexual exploitation (CSE) – see also below
- bullying, including cyber bullying
- domestic violence
- drugs
- fabricated or induced illness
- faith abuse
- female genital mutilation (FGM) – see also below
- forced marriage
- gangs and youth violence
- gender-based violence/violence against women and girls (VAWG)
- mental health
- private fostering
- radicalisation
- sexting
- teenage relationship abuse
- trafficking

**County Lines and Criminal Exploitation:** Criminals deliberately target vulnerable children and groom them into trafficking drugs or engaging in other criminal activities, with promises of money, friendship and status. The school recognises that many of its pupils present with vulnerabilities that make them especially at risk of being targeted by criminals. For example, children in the looked after system; with learning difficulties; or trapped in poverty. Any reports or suspicion that pupils are being abused in this way will be acted on immediately.

### **Serious violence**

The Serious Violence Strategy, introduced by the government in 2018, identifies offences such as homicides and knife and gun crime as key factors which account for around one per cent of all recorded crime and the impact these crimes have on communities.

As in all areas of safeguarding children, the school will work with the WSCP to help reduce the incidents of serious violence.

All staff should be aware of indicators which may signal that children are at risk from, or are involved with, serious violent crime. These may include:

- increased absence from school
- a change in friendships or relationships with older individuals or groups
- a significant decline in performance
- signs of self-harm or a significant change in wellbeing
- signs of assault or unexplained injuries
- Unexplained gifts or new possessions

Early intervention is about recognising and responding to the indicators of potential vulnerability, providing early support that is effective. When a young person begins to show the signs of exploitation or vulnerability to exploitation, and therefore are at increased risk from serious violence, we should be able to intervene as early as possible to help reduce the risk factors and increase the protective factors.

## **Recognising signs of child abuse**

### **Categories of Abuse**

- Physical Abuse
- Emotional Abuse (including Domestic Abuse)
- Sexual Abuse
- 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-seeking behaviour
- Suspicious bruises with unsatisfactory explanations
- Lack of self-esteem
- Self-injury
- Depression
- Age inappropriate sexual behaviour

N.B. Please refer to further detail on signs on abuse given below.

### **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 the DSL or Deputy DSL (or in the absence of all those individuals, an experienced colleague)
- May require consultation with and/or referral to Children's Services

The absence of such indicators does not mean that abuse or neglect has not occurred. In an abusive relationship the child may:

- Appear frightened of the parent/s

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

The parent or carer may:

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

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

### **Recognising Physical Abuse**

The following are often regarded as indicators of concern:

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

### **Bruising**

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

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

### **Bite Marks**

Bite marks can leave clear impressions of the teeth. Human bite marks are oval or crescent shaped. Those over 3 cm in diameter are more likely to have been caused by an adult or older child. A medical opinion should be sought where there is any doubt over the origin of the bite.

### **Burns and Scalds**

It can be difficult to distinguish between accidental and non-accidental burns and scalds, and will always require experienced medical opinion.

Any burn with a clear outline may be suspicious e.g.

- Circular burns from cigarettes (but may be friction burns if along the bony protuberance of the spine)
- Linear burns from hot metal rods or electrical fire elements
- Burns of uniform depth over a large area
- Scalds that have a line indicating immersion or poured liquid (a child getting into hot water on 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 no attachment
- Aggressive behaviour towards others
- Scape-goated 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 Sexual Abuse**

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

There may be no physical signs and indications are likely to be emotional/behavioural. Some behavioural indicators associated with this form of abuse are:

- Inappropriate sexualised conduct
- Sexually explicit behaviour, play or conversation, inappropriate to the child’s age
- Continual and inappropriate or excessive masturbation
- Self-harm (including eating disorder), self-mutilation and suicide attempts
- Involvement in prostitution or indiscriminate choice of sexual partners
- An anxious unwillingness to remove clothes e.g. for sports events (but this may be related to cultural norms or physical difficulties)

Some physical indicators associated with this form of abuse are:

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

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

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

Developmental Sexual Activity encompasses those actions that are to be expected from children and young people as they move from infancy through to an adult understanding of their physical, emotional and behavioural relationships with each other. Such sexual activity is essentially information gathering and experience testing. It is characterised by mutuality and of the seeking of consent. Inappropriate Sexual Behaviour can be inappropriate socially, inappropriate to development, or both. In considering whether behaviour fits into this category, it is important to

consider what negative effects it has on any of the parties involved and what concerns it raises about a child or young person. It should be recognised that some actions may be motivated by information seeking, but still cause significant upset, confusion, worry, physical damage, etc. It may also be that the behaviour is “acting out” which may derive from other sexual situations to which the child or young person has been exposed.

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

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

With any situation involving potential abuse by a young person the DSL will always seek guidance on the matter from the Senior Adviser for Safeguarding Children in Education or the Worcestershire Children’s Social Care Services Front Door. The DSL will also follow the guidance in the Inter Agency section of the WSCB website, in particular section 6.15 ‘sexually active young people’ and section 4.3 ‘Children who abuse others’.

### **Assessment**

In order to more fully determine the nature of the incident the following factors should be given consideration.

The presence of exploitation in terms of:

- Equality – consider differentials of physical, cognitive and emotional development, power and control and authority, passive and assertive tendencies
- Consent – agreement including all the following:
  - o Understanding that is proposed based on age, maturity, development level, functioning and experience
  - o Knowledge of society’s standards for what is being proposed
  - o Awareness of potential consequences and alternatives
  - o Assumption that agreements or disagreements will be respected equally
  - o 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.

Assessments of student’s safety will include the wider picture, ie the social context in which the young person operates outside of school.

## 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 irresponsive with no apparent medical cause
- Failure of child to grow within normal expected pattern, with accompanying weight loss
- Child thrives away from home environment
- Child frequently absent from school
- Child left with adults who are intoxicated or violent
- Child abandoned or left alone for excessive periods

## Child Sexual Exploitation

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

- underage sexual activity
- inappropriate sexual or sexualised behaviour
- sexually risky behaviour, 'swapping' sex
- repeat sexually transmitted infections
- in girls, repeat pregnancy, abortions, miscarriage
- receiving unexplained gifts or gifts from unknown sources
- having multiple mobile phones/sim cards and worrying about losing contact via mobile
- having unaffordable new things (clothes, mobile) or expensive habits (alcohol, drugs)
- changes in the way they dress
- going to hotels or other unusual locations to meet friends
- seen at known places of concern
- moving around the country, appearing in new towns/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 / anti-social groups / with other vulnerable peers
- associating with other young people involved in sexual exploitation
- recruiting other young people to exploitative situations
- truancy, exclusion, disengagement with school, opting out of education altogether
- unexplained changes in behaviour or personality (chaotic, aggressive, sexual)
- mood swings, volatile behaviour, emotional distress
- self-harming, suicidal thoughts, suicide attempts, overdosing, eating disorders
- drug or alcohol misuse
- getting involved in crime
- police involvement, police records
- involved in gangs, gang fights, gang membership
- injuries from physical assault, physical restraint, sexual assault.

The DSL is responsible for implementing local guidance in respect of child sexual exploitation as given on the Worcestershire Safeguarding Children Partnership (WSCP) website: [www.safeguardingworcestershire.org.uk](http://www.safeguardingworcestershire.org.uk)

The DSL must ensure that all staff are aware of signs and symptoms of CSE and know that these must be reported and recorded as child protection concerns. In particular, be aware of local sites which attract young people in the evenings/night time, and that will subsequently attract predators, eg Victoria (Vicky) Park, Priory Park and Duke's Meadow in Malvern, The Hive and Cripplegate in Worcester. The DSL must follow the Worcestershire Pathway for dealing with issues of CSE, including completion of the screening tool.

### **Effects of domestic abuse on children and young people**

The impact of domestic abuse on the quality of a child's or young person's life is very significant. Children and young people who live with domestic abuse are at increased risk of behavioural problems, emotional trauma, and mental health difficulties in adult life. The impact of domestic abuse on children and young people can be wide-ranging and may include effects in any or all of the following areas:

**Physical:** Children and young people can be hurt either by trying to intervene and stopping the violence or by being injured themselves by the abuser. They may develop self-harming behaviour, or eating disorders. Their health could be affected, as they may not be being cared for appropriately. They may have suicidal thoughts or try to escape or blank out the abuse by using drugs, alcohol or by running away.

**Sexual:** There is a high risk that children and young people will be abused themselves where there is domestic abuse. In homes where living in fear is the norm, and situations are not discussed, an atmosphere of secrecy develops and this creates a climate in which sexual abuse could occur. In addition to this, children and young people may sometimes be forced to watch the sexual abuse of their mother/carer. This can have long-lasting effects on the sexual and emotional development of the child/young person.

**Economic:** The parent or carer of the child or young person may have limited control over the family finances. Therefore, there might be little or no money available for extracurricular activities, clothing or even food, impacting on their health and development.

**Emotional:** Children and young people will often be very confused about their feelings – for example, loving both parents/carers but not wanting the abuse to continue. They may be given negative messages about their own worth, which may lead to them developing low self-esteem. Many children and young people feel guilty, believing that the abuse is their fault. They are often pessimistic about their basic needs being met and can develop suicidal thoughts. Some children and young people may internalise feelings and appear passive and withdrawn or externalise their feelings in a disruptive manner.

**Isolation:** Children and young people may become withdrawn and isolated; they may not be allowed out to play; and if there is abuse in the home they are less likely to invite their friends round. Schooling may be disrupted in many ways, and this may contribute to their growing isolation. They may frequently be absent from school as they may be too scared to leave a

parent/carer alone. They may have to move away from existing friends and family – e.g. into a refuge or other safe or temporary accommodation.

**Threats:** Children and young people are likely to have heard threats to harm their mother/father/carer. They may have been directly threatened with harm or heard threats to harm their pet. They also live under the constant and unpredictable threat of violence, resulting in feelings of intimidation, fear and vulnerability, which can lead to high anxiety, tension, confusion and stress. This clearly highlights that living with domestic abuse has a significant impact on a child's ability to achieve the five outcomes as outlined in the Every Child Matters agenda:

- be healthy;
- stay safe;
- enjoy and achieve;
- make a positive contribution;
- achieve economic well being.

What you might see in school:

- Unexplained absences or lateness – either from staying at home to protect their parent/carer or hide their injuries, or because they are prevented from attending school;
- Children and young people attending school when ill rather than staying at home;
- Children and young people not completing their homework, or making constant excuses, because of what is happening at home;
- Children and young people who are constantly tired, on edge and unable to concentrate through disturbed sleep or worrying about what is happening at home;
- Children and young people displaying difficulties in their cognitive and school performance;
- Children and young people whose behaviour and personality changes dramatically;
- Children and young people who become quiet and withdrawn and have difficulty in developing positive peer relations;
- Children and young people displaying disruptive behaviour or acting out violent thoughts with little empathy for victims;
- Children and young people who are no trouble at all.

This list is not exhaustive – this is intended to give you an idea of some of the types of behaviour that could be presented.

### **What the School can do**

The school can create an environment which both promotes their belief and commitment that domestic abuse is not acceptable, and that they are willing to discuss and challenge it. For many victims, the school might be the one place that they visit without their abuser. It would help if schools displayed posters or had cards/pens available with information about domestic abuse and contact details for useful agencies, for example:

NSPCC Helpline 0808 800 5000

Police 101 (or 999 in an emergency)

Worcestershire Safeguarding Children Partnership (WSCP)

[www.safeguardingworcestershire.org.uk](http://www.safeguardingworcestershire.org.uk)

Worcestershire County Council Advice page

[http://www.worcestershire.gov.uk/info/20379/domestic\\_abuse\\_and\\_sexual\\_violence](http://www.worcestershire.gov.uk/info/20379/domestic_abuse_and_sexual_violence)

West Mercia Women's Aid <http://www.westmerciawomensaid.org/>

Research shows that the repeated use of physical, sexual, psychological and financial abuse is one of the ways in which male power is used to control women. The underlying attitudes which legitimate and perpetuate violence against women should be challenged by the School as part of the whole school ethos. The School can support individual children and young people by:

- having a whole-school philosophy that domestic abuse is unacceptable;
- Responding to disclosures and potential child protection concerns; recognising that domestic abuse and forced marriage may be a child protection concern;
- Giving emotional support – the child or young person might need referral to a more specialist service or need additional support to complete coursework, exams etc;
- Facilitating a peer support network – children and young people can become isolated but often welcome talking to friends about their problems;
- Offering practical support – if children or young people are new to the school they may be unfamiliar with the syllabus, the area, etc;
- Providing somewhere safe and quiet to do their homework or just to sit and think;

Improving the self esteem and confidence of children and young people by:

- offering them opportunities to take on new roles and responsibilities;
- offering tasks which are achievable and giving praise and encouragement;
- monitoring their behaviour and setting clear limits;
- criticising the action, not the person;
- helping them to feel a sense of control in their school lives;
- involving them in decision making;
- helping them to be more assertive;
- respecting them as individuals;
- encouraging involvement in extra-curricular activities.

## **Advice the School will follow on receiving notification of a Domestic Abuse incident**

### **Background**

Following a call to a domestic abuse incident where children are involved, Police notify Social Care and Health. The Children's Services Front Door will sort the notifications into low, medium and high risk, depending on the perceived level of risk to the children. For those cases that are classified medium or high, the school DSL will receive an e-mail via their secure e-mail link on Edulink from the Children's Services Front Door informing them that an incident has taken place and giving them a copy of the Police log. For high risk cases, they will also be contacted by telephone and asked whether they have any concerns about the children at school. Social Care will also write to parents informing them that the school's DSL has been notified of the incident and reassuring them that the information will be treated confidentially.

## School action

On receiving this information, the DSL should:

- Log the information and keep the record alongside other information/concerns that the school has on this child/family, with all other confidential safeguarding records in a secure place. This will allow the school to recognise any pattern and/or frequency of notifications and take appropriate action. Please note that school may receive further communication about this same incident, once further assessment of the situation has been undertaken by Police – be careful not to log this as a separate incident.
- Inform any staff of notification on a ‘need to know’ only basis – e.g. coach, pastoral support.
- Alert all staff who teach pupil/student with minimum of information – e.g. ‘This pupil/student may need extra support / may need extra time to complete homework’.
- Monitor pupil/student behaviour in school (including attendance) and should concerns arise which may be attributed to the impact of the incident, consult with Social Care through the Children’s Services Front Door as the concerns may be significant and lead to new safeguarding action, or to seek advice on how to proceed.
- Provide appropriate support for child, if required – do not question pupil/student about the incident. Respect the child's decision on whether or not they wish to discuss the situation.
- Provide appropriate support for adult, if asked – e.g.

Refuge helpline number (**0808 2000 247**)

Worcestershire County Council Advice page

[http://www.worcestershire.gov.uk/info/20379/domestic\\_abuse\\_and\\_sexual\\_violence](http://www.worcestershire.gov.uk/info/20379/domestic_abuse_and_sexual_violence)

Worcestershire Safeguarding Children Partnership (WSCP)

[www.safeguardingworcestershire.org.uk](http://www.safeguardingworcestershire.org.uk)

West Mercia Women’s Aid <http://www.westmerciawomensaid.org/>

## Bear in mind

- Victim of incident may be anxious that the information will be shared inappropriately.
- Notification may not give details as to which parent is the perpetrator/victim – any disclosure to the ‘wrong’ parent could heighten risk.
- Need to be aware who is ‘connected’ to the child – e.g. a member of staff may be the child’s relative / friend of the family.

Inappropriate sharing of information could heighten the risk for the victim and/or the child. If in doubt, consult with either the Children’s Services Front Door (01905 768054) or Sally Mills, Senior Adviser for Safeguarding Children in Education (01905 728902).

## So-called ‘honour-based’ violence (HBV)

Whilst the schools predominately white British pupil population makes culturally related abuses such as HBV, forced marriage, FGM and breast ironing low risk, it is essential that staff are fully aware of, and vigilant, with regards to these crimes; not only for the small number of cultural minority pupils that attend but also in the context of pupil’s potential wider friendships outside of school.

So-called HBV encompasses incidents or crimes which have been committed to protect or defend the honour of the family and/or the community, including female genital mutilation (FGM), forced marriage, and practices such as breast ironing. Abuse committed in the context of preserving “honour” often involves a wider network of family or community pressure and can include multiple perpetrators. All forms of HBV are abuse.

Concerns have been raised that breast ironing is to be found amongst African communities in the UK, with as many as 1000 girls at risk. Keeping Children Safe in Education (2019) mentions breast ironing on page 80 in the section on so-called ‘Honour Violence’.

Appendix 1 of this policy provides information and guidance on recognising and dealing with concerns about Forced Marriage, which is a form of Domestic Abuse.

Appendix 2 of this policy provides information and guidance on recognising and dealing with concerns about Female Genital Mutilation (FGM), which is a form of Human Rights Abuse.

### **Record Keeping**

Any member of staff receiving a disclosure of abuse from a child or noticing signs or symptoms of possible abuse, should make notes as soon as possible (within the hour, if possible) writing down exactly what was said, using the child’s own words as far as possible. All notes should be timed, dated and signed, with name printed alongside the signature. Causes for concerns **MUST** be entered on to Hal on the day received. Where necessary, longer written statements may be made on a Cause for Concern form.

All records of a child protection nature should be passed to the relevant DSL including case conference minutes and written records of any concerns.

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

The DSL will maintain and regularly audit the school's child protection records and ensure that each stand-alone file includes a chronology of significant events.

### **Information Sharing & Confidentiality**

We recognise that all matters relating to Child Protection are confidential.

The DSL will disclose any information about a pupil to other members of staff on a need to know basis only.

All staff must be aware that they have a professional responsibility to share information with other agencies in order to safeguard children.

All staff must be aware that they cannot promise a child to keep secrets that might compromise a child’s safety or well-being.

### **Communication with Parents**

We recognise that good communication with parents is crucial in order to safeguard and promote the welfare of children effectively.

We will always undertake appropriate discussion with parents prior to involvement of another agency unless to do so might place the child or an adult at further risk of harm or would impede a criminal investigation.

We will ensure that parents have an understanding of the responsibilities placed on the school and staff to safeguard children and their duty to co-operate with other agencies in this respect.

### **Supporting Children**

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

The school will endeavour to support all children by:

- Encouraging self-esteem and self-assertiveness through the curriculum specifically through PSHCE, as well as promoting respectful relationships, challenging bullying and humiliating behaviour;
- The school ethos which promotes a positive, supportive and secure environment giving pupils a sense of being valued;
- A consistently applied Behaviour Policy that is aimed at supporting vulnerable pupils in the school.
- The school will ensure that the pupil knows that some behaviour is unacceptable but they are valued and not to be blamed for any abuse which has occurred;
- Liaison with other agencies that support the pupil such as Children's Services, Child and Adult Mental Health Services, education welfare service and educational psychology service and those agencies involved in the safeguarding of children;
- The use of Early Help Services, through the Early Help Hub, when appropriate; Notifying Children's Social Care Services immediately there is a significant concern.
- Providing continuing support to a pupil about whom there have been concerns who leaves the school by ensuring that appropriate information is forwarded under confidential cover to the pupil's new setting.

### **Supporting Staff and Supervision of 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 relevant DSL and to seek further support such as counselling, as appropriate. We will enable supervision for the DSL through governor meetings.

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

### **Safer Recruitment and Selection of Staff**

The school has a written recruitment policy statement and procedures linking explicitly to this policy. The statement is included in all job advertisements, publicity material, recruitment websites, and candidate information packs.

When considering the employment of overseas trained teachers, the school will follow the guidance at the gov.uk website.

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

All staff in regulated activity within our school have been checked as to their suitability, including verification of their identity, qualifications, a satisfactory barred list check, a prohibition check and enhanced DBS check and a right to work in the UK. Our Governors are subject to an Enhanced DBS check without barred list check, in line with Worcestershire recommendation.

The school maintains a single central record of recruitment checks for audit purposes. Any member of staff working in regulated activity prior to verification by the Bridge of their satisfactory DBS Certificate will not be left unsupervised and will be subject to a risk assessment.

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

Enhanced DBS checks are not mandatory for Associate members.

The school has a single central record, which is checked and updated regularly and records all the recruitment checks undertaken by the school.

### **Allegations against staff**

We acknowledge that a pupil may make an allegation against members of staff or volunteers. If such an allegation is made, which meets the criteria as identified in Part 4 of Keeping Children Safe in Education, the member of staff receiving the allegation will immediately inform the DSL. If the DSL is not immediately available the matter should be referred to the Deputy DSL. If an allegation is made against a DSL, the Governors should be informed immediately; All unnecessary delays to the process should be eradicated and the Local Authority Designated Officer (LADO) will be contacted within one working day of all allegations that come to the school's attention or that are made directly to the police.

In all cases of an allegation being made, and prior to undertaking any investigation, the school will immediately contact the LADO to discuss the allegation, consider the nature, content and context of the allegation and agree a course of action including any involvement of the Police. Discussions will be recorded in writing, and communication with both the individual and the parents of the child/children agreed. Due weight to the views of the LADO and the Policy will be taken when making a decision about suspension.

In borderline cases informal discussions with the LADO may take place without naming the individual.

Where any member of staff or volunteer is considered unsuitable to work with children, the school will cease to use that person's services.

Ceasing to use a person's services includes: dismissal, non-renewal of a fixed term contract, no longer engaging/refusing to engage a supply teacher provided by an employment agency, terminating the placement of a student teacher or other trainee, no longer using staff employed by contractors, no longer using volunteers, resignation and voluntary withdrawal from supply teaching, contract working, a course of initial teacher training, or volunteering. Reports will include as much evidence about the circumstances of the case as possible. Compromise Agreements or Settlement Agreements cannot apply in this connection, or where the individual refuses to co-operate with an investigation.

The following organisations will be informed when the school ceases to use a person's services due to concerns over the safety of children and vulnerable adults.

- The Disclosure and Barring Service
- The Charity Commission
- The National College for Teaching and Leadership (NCTL)

We will make every effort to maintain confidentiality and guard against unwanted publicity. In the event of an allegation made against a member of staff, the school is aware of its legal obligations to do its utmost to protect the anonymity of the member of staff during the investigative stage. This legislation is to protect staff in the event that an allegation is found to be unfounded or malicious.

### **Whistleblowing**

The school has a Confidential Reporting (Whistleblowing) Policy that staff should refer to. We recognise that children cannot be expected to raise concerns in an environment where staff fail to do so. Thus, all staff should be aware of their duty to raise concerns about the attitude or actions of others. Any member of staff may make a referral to external agencies. Staff should report concerns about poor or unsafe practice and potential failures in the School's safeguarding regime. Such concerns can be raised directly with the DSL/Deputy DSL/Headteacher.

Whistleblowing concerns about the DSL/Deputy DSL or the Headteacher, should be immediately reported to the Chair of Governors.

### **Abuse by Pupils**

Where there is reasonable cause to suspect a child is suffering, or likely to suffer significant harm by the actions of one or more pupils the matter will be investigated according to the procedure laid out in this Policy, including referral to local agencies.

### **Complaints or Concerns expressed by Pupils, Parents, Staff or Volunteers**

We recognise that listening to children is an important and essential part of safeguarding them against abuse and neglect. To this end any expression of dissatisfaction or disquiet in relation to an individual child will be listened to and acted upon in order to safeguard his/her welfare.

We will also seek to ensure that the child or adult who makes a complaint is informed not only about the action the school will take but also be given an indication of the length of time that will be required to resolve the complaint. The school will also endeavour to keep the child or adult

regularly informed as to the progress of his/her complaint. The school's Complaints Policy is readily available.

### **Prevention**

We recognise that the school plays a significant part in the prevention of harm to our pupils by providing them with good lines of communication with trusted adults, supportive friends and an ethos of protection. The school will therefore:

- Establish and maintain an environment where children feel secure, are encouraged to talk, and are always listened to;
- Ensure children know that there are adults in the school whom they can approach if they are worried or in difficulty;
- Include in the curriculum opportunities that equip children with the skills they need to recognise and stay safe from abuse.

### **Positive Physical Intervention**

In light of the SEN and complex needs of the children attending the school, physical force is avoided at all costs; the school does not operate Team Teach. See the school's De-escalation Procedure. The school acknowledges that staff must only ever use physical intervention as a last resort, and that at all times it must be the minimal reasonable force necessary to prevent injury or damage to property (please refer to the 'Use Of Reasonable Force Advice for Headteachers, Staff & Governing Bodies, July 2013, <https://www.gov.uk/government/publications/use-of-reasonable-force-in-schools>). The term 'reasonable force' at the school means no more force than is necessary. Student individual learning plans consider behavioural triggers and strategies to avoid escalation, thus reducing the potential need for physical intervention from staff.

The school understands that physical intervention of a nature that causes injury or distress to a child may be considered under safeguarding children or disciplinary procedures. A record of all incidents of physical intervention that occur in the School will be maintained by the DSL. The school recognises that touch is appropriate in the context of working with children (see the Safe Touch Policy) to ensure that staff are clear about their professional boundaries.

### **Abuse of Trust**

We recognise that as adults working in the school we are in a relationship of trust with the pupils in our care and acknowledge that it could be considered a criminal offence to abuse that trust.

We acknowledge that the principle of equality embedded in the legislation of the Sexual Offenders Act 2003 applies irrespective of sexual orientation.

We recognise that the legislation is intended to protect young people in education who are over the age of consent but under 18 years of age.

### **Children Missing Education (CME)**

We recognise that a child going missing from education is a potential indicator of abuse or neglect. Our procedures for dealing with children that go missing from education are based on the LA and LSCB procedures.

We will ensure that we follow these procedures for dealing with children that go missing from education, particularly on repeat occasions, to help identify the risk of abuse and neglect, including sexual exploitation, and to help prevent the risks of their going missing in future.

We will ensure that we report children missing education to the LA CME officer, in line with statutory requirements.

### **Radicalisation and Extremism**

We encourage pupils to respect the fundamental British values of democracy, the rule of law, individual liberty and mutual respect, and tolerance of those with different faiths and beliefs. We ensure that partisan political views are not promoted in the teaching of any subject in the school and where political issues are brought to the attention of the pupils, reasonably practicable steps have been taken to offer a balanced presentation of opposing views to pupils.

We value freedom of speech and the expression of beliefs/ideology as fundamental rights underpinning our society's values. Both pupils and teachers have the right to speak freely and voice their opinions. However, freedom comes with responsibility and free speech that is designed to manipulate the vulnerable or that leads to violence and harm of others goes against the moral principles in which freedom of speech is valued. Free speech is not an unqualified privilege; it is subject to laws and policies governing equality, human rights, community safety and community cohesion. We seek to ensure our pupils are aware of the dangers of radicalisation and we work to build their resilience to such dangers through Equality and Diversity programme, assemblies and our PSHCE programme.

We seek 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. The Staff Code of Conduct Policy provides for monitoring the appropriateness of visiting speakers and states that visiting speakers must not have unsupervised contact with any pupils.

Appendix 3 of this Policy provides information and guidance on recognising indicators of vulnerability of radicalisation. If a member of staff has concerns about a pupil being at risk of radicalisation or concerns that that are being or have been subjected to radicalisation ideology they should immediately raise the matter with the DSL who will decide whether or not a referral should be made, will act on the concern and share information with appropriate external agencies as required. However, the School recognises that anybody can make a referral. Please note that information and emergency advice can be obtained from the Department of Education helpline telephone 0202 73407264 or via the Police by telephoning 101. Alternatively, the authorities can be contacted via [counter.extremism@education.gsi.gov.uk](mailto:counter.extremism@education.gsi.gov.uk)

### **Racist Incidents**

Repeated racist incidents or a single serious incident may lead to consideration under child protection procedures. We maintain a log of racist incidents in school.

### **Bullying and Peer on Peer Abuse**

To allow or condone bullying may lead to consideration under child protection procedures. All incidences of bullying, including racist, homophobic and gender related bullying, cyber bullying

via social media eg, sexting and up skirting, will be dealt with in accordance with the school's Anti-Bullying policy. We recognise that children with special needs and/or disabilities are more susceptible to being bullied. We maintain a log of bullying incidents as Cause for Concerns on Hal.

### **E-safety**

The School recognises that Internet safety is a whole school responsibility, involving staff, pupils and parents. Children and young people may expose themselves to danger, whether knowingly or unknowingly, when using the Internet and other technologies. Additionally, some young people may find themselves involved in activities which are inappropriate or possibly illegal. The school therefore recognises its responsibility to educate its pupils, teaching them the appropriate behaviours and critical thinking skills to enable them to remain both safe and legal when using the Internet and related technologies. These issues are addressed within the curriculum, in the PSHCE programme and in assemblies. Parents will also be invited to attend talks on e-safety. We will ensure that filters are in place to prevent access to unsuitable sites and we will monitor the use of the school network and internet to ensure that any pupil or staff member attempting to access inappropriate, abusive or harmful material is appropriately advised and/or supported.

Also Refer to the BT D E-Safety Policy for keeping children safe on line whilst attending school.

### **Health and Safety**

The School's Health and Safety Policy reflects the consideration we give to the safeguarding of our children both within the school environment and when away from school, for example when undertaking school trips and visits. Risk Assessments are undertaken and reviewed regularly, in respect of site security and risk to and from children displaying harmful behaviour.

Appendix 4 of this Policy provides information and guidance on Home School Safeguarding Guidance for Work Related Experience.

### **Photography and use of images**

The welfare and protection of children is paramount and consideration should always be given to whether the use of photography will place children at risk. Images may be used to harm children, for example as a preliminary to 'grooming' or by displaying them inappropriately on the Internet, particularly social networking sites.

### **Safe Environment**

The school undertakes appropriate risk assessments and checks in respect of all equipment and of the building and grounds. The school has adequate security arrangements in place in respect of the use of its grounds and buildings by visitors both in and out of school hours. Visitors to the school, for example visiting speakers or curriculum specialists, will be appropriately checked and vetted, to ensure they are not linked to extremist groups or promoting extremist or other harmful material.

### **Referrals**

Although it is expected that the majority of referrals will be made by the DSL or Deputy DSL, any member of staff may make a referral to an external agency. As stated in the section on Thresholds, if, at any time, a child is thought to have suffered serious harm or is thought to be at risk from suffering serious harm then this should be reported to Children's Social Care immediately.

## **Challenge and Escalation**

We recognise that professional disagreements may arise between any agencies and resolving problems is an integral part of co-operation and joint working to safeguard children. As part of

our responsibility for safeguarding children, we acknowledge that we must be prepared to challenge each other if we feel that responses to concerns, assessments or the way in which plans are implemented are not safeguarding the child and promoting their welfare.

We are aware of the Worcestershire Safeguarding Children Partnership (WSCP) escalation procedures for raising concerns in respect of poor practice and our responsibility to utilise these as and when necessary, in the interests of safeguarding and promoting the welfare of children.

## **Monitoring and Evaluation**

Our Safeguarding Children policy and procedures will be monitored and evaluated by:

- There are DSL and Deputy DSL at both Bridge sites (Hanley and Barnard's Green).
- The DSL and Deputy DSL meeting on a regular basis to discuss and review any safeguarding concerns.
- Scrutiny of data and risk assessments;
- Scrutiny of the school's single central record of recruitment checks. The school's single central record of recruitment checks is available to senior managers at both sites.
- Monitoring of logs of bullying/racist/behaviour incident records;
- Providing the nominated Governor with responsibility for Safeguarding with regular updates as required and termly reports to the Governors.

## **Review**

This Policy will be reviewed annually. If there has been a substantiated allegation against a member of staff, the school will work with the LADO to review the policy and procedures or practice.

## **INTERNAL CONTACTS**

Helen Attree, Vice Chair of Governors and nominated Governor responsible for safeguarding  
Sue Hornby, Headteacher and DSL

Jackie Penfold, Pastoral Coordinator and Deputy DSL (Hanley)

Neil Hornby, Chief Executive Officer and Deputy (Bridge Business Centre)

Vicky Gundersen, Assistant Head of Centre and Deputy DSL (Bridge Business Centre)

## **EXTERNAL CONTACTS**

### **Worcestershire Children First**

Professional number – 01905 768054

Public number – 0845 846000 (option 2)

By e-mail – [childrensteam@worcschildrenfirst.org.uk](mailto:childrensteam@worcschildrenfirst.org.uk)

Out of Hours Emergency Duty Team – 01905 768020

## **Adult Safeguarding Contacts**

Worcestershire Adult Safeguarding Team

Advice – 01905 843189

Referral – 01905768053

## **Channel/Prevent contacts**

Local Authority	James Wheeliker ( <a href="mailto:jwheeliker@worcestershire.gov.uk">jwheeliker@worcestershire.gov.uk</a> )
West Mercia Police	DS Phil Colley 01386 591835 / 07736 084701
DC Gary Shephard	01386 591816 / 07772 904013
T/DC Jemma Greenhow	01386 591825 / 07890 746662

[prevent@warwickshireandwestmercia.pnn.police.uk](mailto:prevent@warwickshireandwestmercia.pnn.police.uk)

## **Police**

Police Public Protection Unit - 24hrs non-emergency 101

Emergency 999

## **For concerns regarding radicalisation**

Department of Education helpline 0202 73407264

Police 101

E-Mail [counter.extremism@education.gsi.gov.uk](mailto:counter.extremism@education.gsi.gov.uk)

## **Advice**

Sally Mills – Senior Adviser, Safeguarding Children in Education 07809 665 973

John Hancock – LADO 01905 752800

NSPCC Helpline 0808 800 5000

Worcestershire Safeguarding Children Partnership (WSCP)

[www.safeguardingworcestershire.org.uk](http://www.safeguardingworcestershire.org.uk)



## **Forced Marriage – A Form of Honour Based Violence and Domestic Abuse**

Forced Marriage should be recognised as a human rights abuse – and should always invoke child protection procedures within the school.

A forced marriage is a marriage conducted without the full consent of both parties, and one where duress is a factor. A forced marriage is not the same as an arranged marriage – in an arranged marriage the families take a leading role in choosing the marriage partner. The marriage is entered into freely by both people.

### **Warning signs**

Warning signs can include a sudden drop in performance, truancy from lessons and conflicts with parents over continuation of the student's education.

There may be excessive parental restrictions and control, a history of domestic abuse within the family, or extended absence through sickness or overseas commitments. Students may also show signs of depression or self-harming, and there may be a history of older siblings leaving education early to get married.

### **The justifications**

Most cases of forced marriage in the UK involve South Asian families. This is partially a reflection of the fact that there is a large established South Asian population in the UK. It is clear, however, that forced marriage is not a solely South Asian phenomenon — there have been cases involving families from East Asia, the Middle East, Europe and Africa.

Some forced marriages take place in the UK with no overseas element, while others involve a partner coming from overseas, or a British citizen being sent abroad. Parents who force their children to marry often justify it as protecting them, building stronger families and preserving cultural or religious traditions. They may not see it as wrong.

Forced marriage can never be justified on religious grounds: every major faith condemns it and freely given consent is a pre-requisite of Christian, Jewish, Hindu, Muslim and Sikh marriage.

### **Culture**

Often parents believe that they are upholding the cultural traditions of their home countries, when in fact practices and values there have changed. Some parents come under significant pressure from their extended families to get their children married.

## The law

Although there is no specific criminal offence of 'forcing someone to marry' within England and Wales, forced marriage may involve criminal offences. Perpetrators — usually parents or family members — could be prosecuted for offences including: threatening behaviour, assault, kidnap, abduction, imprisonment and in the worse cases murder.

Sexual intercourse without consent is rape, regardless of whether this occurs within the confines of a marriage. A girl who is forced into marriage is likely to be raped and may be raped until she becomes pregnant.

In addition, the Forced Marriage (Civil Protection) Act (2007) makes provision for protecting children, young people and adults from being forced into marriage without their full and free consent through Forced Marriage Protection Orders. Breaching a Forced Marriage Protection Order is a criminal offence.

The Anti-Social Behaviour, Crime and Policing Act 2014 makes it a criminal offence, with effect from 16 June 2014, to force someone to marry. This includes:

- Taking someone overseas to force them to marry (whether or not the marriage takes place);
- Marrying someone who lacks the mental capacity to consent to the marriage (whether they're pressured into it or not).

### What to do if a student seeks help

- The student should be seen immediately in a private place, where the conversation cannot be overheard.
- The student should be seen on her own, even if she attends with others.
- Develop a safety plan in case the student is seen i.e. prepare another reason why you are meeting.
- Guidance from the Forced Marriage Unit details that Forced Marriage issues must be treated automatically as a safeguarding procedure.
- Explain all options to the student and recognise and respect her wishes. If the student does not want to be referred to Children's Services, you will need to consider whether to respect the student's wishes — or whether the student's safety requires further action to be taken. If you take action against the student's wishes you must inform the student.
- Establish whether there is a family history of forced marriage — i.e. siblings forced to marry. Advise the student not to travel overseas and discuss the difficulties she may face.
- Seek advice from the Forced Marriage Unit.
- Liaise with Police and Children's Services to establish if any incidents concerning the family have been reported.
- Refer to the local Police Child Protection Unit if there is any suspicion that there has been a crime or that one may be committed.
- Refer the student with her consent to the appropriate local and national support groups, and counselling services.

### What to do if the student is going abroad imminently

The Forced Marriage Unit advises education professionals to gather the following information if at all possible — it will help the unit to locate the student and to repatriate her:

- a photocopy of the student's passport for retention — encourage her to keep details of her passport number and the place and date of issue
- as much information as possible about the family (this may need to be gathered discretely)
- full name and date of birth of student under threat
- student's father's name
- any addresses where the student may be staying overseas
- potential spouse's name
- date of the proposed wedding
- the name of the potential spouse's father if known
- addresses of the extended family in the UK and overseas

### **Specific information**

It is also useful to take information that only the student would know, as this may be helpful during any interview at an embassy or British High Commission — in case another person of the same age is produced pretending to be the student. Professionals should also take details of any travel plans and people likely to accompany the student. Note also the names and addresses of any close relatives remaining in the UK and a safe means to contact the student — a secret mobile telephone, for example, that will function abroad.

Forced marriage: what educators should NOT do

- treat such allegations merely as domestic issues and send the student back to the family home
- ignore what the student has told you or dismiss the need for immediate protection
- approach the student's family or those with influence within the community, without the express consent of the student, as this will alert them to your concern and may place the student in danger
- contact the family in advance of any enquires by the Police, Children's Services or the Forced Marriage Unit, either by telephone or letter
- share information outside child protection information sharing protocols without the express consent of the student
- breach confidentiality except where necessary in order to ensure the student's safety
- attempt to be a mediator

Further guidance is available from:

The Forced Marriage Unit: Tel: (+44) (0)20 7008 0151 between 9.00 a.m. and 5.00 p.m. Monday to Friday

Emergency Duty Officer (out of hours): (+44) (0)20 7008 1500 E-mail: [fmufco.gov.uk](mailto:fmufco.gov.uk) Website: [www.fco.gov.uk/forcedmarriage](http://www.fco.gov.uk/forcedmarriage)

FMU publication: 'Multi-Agency Practice Guidelines: Handling Cases of Forced Marriage' June 09

See also:

'The Right to Choose – Multi-Agency Guidance in relation to Forced Marriage' Government Office  
- November 2008

Interagency Guidance on Forced Marriage on the WSCB website. Ref: WSCB local procedures  
'Forced Marriage'

Worcestershire's Forced Marriage, Honour-Based Violence and Female Genital Mutilation  
Protocol – April 2014.



## Female Genital Mutilation (FGM) – a form of Honour Based Violence and a Human Rights Abuse

### What is FGM?

FGM includes procedures that intentionally alter or injure the female genital organs for non-medical reasons. There are four known types of FGM, all of which have been found in the UK:

**Type 1 – clitoridectomy:** partial or total removal of the clitoris and, in very rare cases, only the prepuce (the fold of skin surrounding the clitoris)

**Type 2 – excision:** partial or total removal of the clitoris and the labia minora, with or without excision of the labia majora (the labia are the ‘lips’ that surround the vagina)

**Type 3 – infibulation:** narrowing of the vaginal opening through the creation of a covering seal. The seal is formed by cutting and repositioning the inner, or outer, labia, with or without removal of the clitoris

**Type 4 – other:** all other harmful procedures to the female genitalia for non-medical purposes, e.g., pricking, piercing, incising, scraping and cauterising the genital area.

FGM is sometimes known as ‘female genital cutting’ or female circumcision. Communities tend to use local names for this practice, including ‘sunna’.

### Why is FGM carried out?

It is believed that:

- It brings status and respect to the girl and that it gives a girl social acceptance, especially for marriage.
- It preserves a girl’s virginity/chastity.
- It is part of being a woman as a rite of passage.
- It upholds the family honour.
- It cleanses and purifies the girl.
- It gives the girl and her family a sense of belonging to the community.
- It fulfils a religious requirement believed to exist.
- It perpetuates a custom/tradition.
- It helps girls and women to be clean and hygienic.
- It is cosmetically desirable.
- It is mistakenly believed to make childbirth safer for the infant.

Religion is sometimes given as a justification for FGM. For example, some people from Muslim communities argue that the Sunna (traditions or practices undertaken or approved by the prophet Mohammed) recommends that women undergo FGM, and some women have been told that having FGM will make them ‘a better Muslim’. However, senior Muslim clerics at an international conference on FGM in Egypt in 2006 pronounced that FGM is not Islamic, and the

London Central Mosque has spoken out against FGM on the grounds that it constitutes doing harm to oneself or to others, which is forbidden by Islam.

### **Within which communities is FGM known to be practised?**

According to the Home Office it is estimated that up to 24,000 girls under the age of 15 are at risk of FGM. UK communities that are most at risk of FGM include Kenyan, Somali, Sudanese, Sierra Leone, Egyptian, Nigerian and Eritrean, as well as non-African communities including Yemeni, Afghani, Kurdish, Indonesian and Pakistani. Obviously, this not to say that all families from the communities listed above practise FGM, and many parents will refuse to have their daughters subjected to this procedure. However, in some communities a great deal of pressure can be put on parents to follow what is seen as a cultural or religious practice.

### **Is FGM harmful?**

FGM is extremely harmful and is often described as brutal because of the way it is carried out, and its short and long term effects on physical and psychological health.

FGM is carried out on children between the ages of 0 and 15, depending on the community in which they live. It is often carried out without any form of sedation and without sterile conditions. The girl or young woman is held down while the procedure of cutting takes place and survivors describe extreme pain, fear and feelings of abandonment.

Where the vagina is cut and then sewn up, only a very small opening may be left. This is often seen as a way to ensure that when the girl enters marriage, she is a virgin. In some communities the mother of the future husband and the girl's own mother will take the girl to be cut open before the wedding night.

Repeat urinary tract infections are a common problem for women who have undergone FGM, and for some, infections come from menstruation being restricted. Many women have problems during pregnancy and childbirth. The removal of the clitoris denies women physical pleasure during sexual activity and some groups will practise complete removal to ensure chastity.

### **Is it illegal?**

FGM is internationally recognised as a violation of the human rights of girls and women, and is illegal in most countries – including the UK. The Female Genital Mutilation Act 2003 came into force in 2004: The act makes it illegal to:

- practise FGM in the UK
- take girls who are British nationals or permanent residents of the UK abroad for FGM, whether or not it is lawful in that country
- aid and abet, counsel or procure the carrying out of FGM abroad. The offence carries a penalty of up to 14 years in prison, and/or a fine.

### **Signs, symptoms and indicators**

The following list of possible signs and indicators are not diagnostic, but are offered as a guide as to what kind of things should alert professionals to the possibility of FGM.

#### Things that may point to FGM happening:

- a child talking about getting ready for a special ceremony
- a family arranging a long break abroad
- a child's family being from one of the 'at-risk' communities for FGM (see above)

- knowledge that an older sibling has undergone FGM
- a young person talks of going abroad to be 'cut', or get ready for marriage.

Things that may indicate a child has undergone FGM:

- prolonged absence from school or other activities
- behaviour change on return from a holiday abroad, such as the child being withdrawn and appearing subdued
- bladder or menstrual problems
- finding it difficult to sit still, and looking uncomfortable
- complaining about pain between their 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.

**What should schools do?**

Where schools have a concern about a child, they should contact Children's Social Care Services. If the concerns are based on more concrete indicators – i.e., the young person says this is going to happen to them, or disclosure that it has happened to them or to an older sister – schools should make a child protection referral.

Schools should NOT:

- contact the parents before seeking advice from children's social care;
- make any attempt to mediate between the child/young person and parents.

It is important to keep in mind that the parents may not see FGM as a form of abuse; however, they may be under a great deal of pressure from their community and or family to subject their daughters to it. Some parents from identified communities may seek advice and support as to how to resist and prevent FGM for their daughters, and education about the harmful effects of FGM may help to make parents feel stronger in resisting the pressure of others in the community. Remember that religious teaching does not support FGM.

**The 'one chance' rule**

In the same way that we talk about the 'one chance rule' in respect of young people coming forward with fears that they may be forced into marriage, young people disclosing fears that they are going to be sent abroad for FGM are taking the 'one chance', of seeking help.

It is essential that we take such concerns seriously and act without delay. Never underestimate the determination of parents who have decided that it is right for their daughter to undergo FGM. Attempts to mediate may place the child/young person at greater risk, and the family may feel so threatened at the news of their child's disclosure that they bring forward their plans or take action to silence her.

**Mandatory Reporting Duty**

Section 5B of the Female Genital Mutilation Act 2003 (as inserted by section 74 of the Serious Crime Act 2015) will place a statutory duty upon teachers, along with social workers and healthcare professionals, to report to the police where they discover (either through disclosure by the victim or visual evidence) that FGM appears to have been carried out on a girl under 18.

Those failing to report such cases will face disciplinary sanctions. It will be rare for teachers to see visual evidence, and they should not be examining pupils, but the same definition of what is meant by “to discover that an act of FGM appears to have been carried out” is used for all professionals to whom this mandatory reporting duty applies.

The Mandatory reporting duty will commence in October 2015. Once introduced, teachers must report to the police cases where they discover that an act of FGM appears to have been carried out (this can be done by telephoning 101). Unless the teacher has a good reason not to, they should still consider and discuss any such case with the school’s designated safeguarding lead and involve children’s social care as appropriate.



## 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.
4. 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.
5. 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.
6. Indicators of vulnerability include:

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

**Personal Crisis** – the 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 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 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** – pupils may experience difficulties with social interaction, empathy with others, understanding the consequences of their actions and awareness of the motivations of others.

7. 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.

8. More critical risk factors could include:

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



## Home School Safeguarding Guidance for Work Related Experience

### 1. What are your responsibilities?

All providers have a duty of care for young people under their supervision, but the home school retains the primary and overarching responsibility for its learners in any educational setting. This remains the case with any provision set up for a young person by an off-site learning provider, e.g. a work placement as part of collaborative provision. It is therefore vital that programmes and providers are chosen with care and in line with the county Provider Quality Standard Agreement, that learners and their parent/carer are properly and effectively advised, and that all those involved in providing for the learner have all the information they need to take proper and effective care.

### 2. What should the home school do?

a) Ensure that the school has a safeguarding policy in place which reflects the requirements of the national guidance for 'Working Together to Safeguard Children' (2015), Keeping Children Safe in Education (September 2019) the local authority produced 'Model Safeguarding Children Policy', and taking into account the additional needs of 14-19 off-site learners.

b) Ensure the relevant Service Level Agreement (SLA) is agreed and signed by both the Learning Provider and the Home School

c) Provide Information, Advice and Guidance.

During the referral/recruitment process, it is the home school's responsibility to ensure that both learner and parent/carer understands safeguarding issues surrounding the off-site provision, i.e. transport arrangements, undertaking learning in a different environment, learning alongside young people from other schools, different levels of supervision, working with teachers unknown to the young person. The home school is responsible for making the judgement that a young person is able to cope with this kind of provision.

d) Satisfy itself that the provision is safe and appropriate for the learner, and that it complies with the local authority's Provider Quality Standard Agreement. This will remain the case if a learning provider proposes arranging a third party placement for a young person.

e) Provide relevant information to the learning provider according to agreed consortium processes. In order for the home school to exercise its responsibility for its learners, it is vital that all relevant information pertaining to the learner is forwarded to the learning provider before the start of the provision, and in a way that is easily understood, e.g. jargon and acronym free. Information to be shared would include:

- All relevant personal information, e.g. contact details, date of birth etc
- All relevant learning information, e.g. target grades, SEN Codes of Practice, SEN assessments, barriers to learning etc
- All relevant medical information
- Flagging of the existence of relevant safeguarding/child protection issues. It will then be the responsibility of the home school's Designated Safeguarding Lead (DSL) to contact the learning provider's designated Child Protection Officer. Information will only be shared where it is deemed relevant and pertinent to the off-site provision.
- All relevant behavioural issues (via a Behavioural Risk Assessment, if agreed within the consortium)
- All relevant contact information, including at least two emergency contact numbers
- Ensure all relevant permissions are obtained from parent/carer, and copies shared with the learning provider
- Ensure learner contract is signed, outlining the young person's responsibilities

f) Update to the learning provider any of the above information if a learner's situation changes. The home school's DSL will again be responsible for making a judgement as to whether it is appropriate/relevant to share changes to safeguarding/child protection information with the learning provider.

g) Ensure there is a named person in the home school, who is appropriately trained and competent to deal with learners' problems arising from off-site provision, and that all learners have contact details for that person.

h) Ensure that the young person understands the detail of the transport plan

i) Risk assesses the Learner Transport Plan against the individual learner's need and the off-site provision arrangements, and takes steps to provide support as appropriate.

### **3. What should you do if a learner makes a disclosure to the learning provider at the learning provider's premises (this could also include a third party, e.g. an employer during a work placement)?**

Ensure that learning providers have contact details for your Designated Safeguarding Lead (DSL), and those of the member of staff who will act in his/her absence. If you are able, please provide an out of hours contact number.

Act on information according to the local authority's Safeguarding Children Guidance. It is vital that, once a concern has been referred to the home school, all parties are clear as to who is taking responsibility for progression of the issue. In the majority of cases, the home school will be responsible for following the national 'Keeping Children Safe in Education' guidance (September 2019), with regard to the Worcestershire Children's Services HR leaflet for Managing Allegations and dealing with disclosures.

If the disclosure has been referred by the learning provider directly to the Children's Social Care Services Front Door, for example, if the disclosure was made out of normal school hours, the

home school will follow the bulleted guidance above, once contact with the Children's Services Front Door has been made.

#### **4. What do you do if your learner makes an allegation against a member of your staff to the learning provider at the learning provider's premises?**

Ensure the learning provider has the relevant home school contact details for dealing with allegations. This will usually be the Headteacher, although the Chair of Governors will be contacted if the allegation relates specifically to the Headteacher. The Front Door number will also be provided in case the Headteacher or the designated deputy within the home school, is not available.

Using the information above, and following the 'Keeping Children Safe in Education' national guidance for managing allegations, the learning provider will refer the issue to the home school's Headteacher who will follow the agreed national process.

#### **5. What do you do if your learner makes an allegation to you against the learning provider?**

You should not attempt to investigate the allegation yourself

Inform the home school Headteacher or, in his/her absence, another senior member of staff

The home school Headteacher or senior member of staff must inform the learning provider's most senior member of staff, or if the allegation relates to them, the learning provider's Chair of Governors/Board of Directors.

The learning provider will follow the 'Keeping Children Safe in Education' nationally published procedures. NB: If you are unsure about what to do in any situation relating to a safeguarding issue, immediately contact the Children's Services Front Door for advice on 01905 768054 Please refer to the national guidance for 'Working Together to Safeguard Children', and the links to safer working practices that can be accessed via the Worcestershire Safeguarding Children Partnership (WSCP) website at [www.safeguardingworcestershire.org.uk](http://www.safeguardingworcestershire.org.uk). It is expected that all partners will comply with these guidelines, and will have signed up to the local authority's Provider Quality Standard Agreement.



## Safeguarding and Protecting Vulnerable Adults

This document supplements the Bridge Training and Development's Safeguarding Policy.

### Definition of a vulnerable adult

A person, 18 years or over, who is or may be in need of community care services by reason of mental or other disability, age or illness and who is or may be unable to take care of him or herself, or unable to protect him or herself against significant harm or exploitation.

### Definition of mental capacity

A person's ability to make their own choices and decisions. Under UK law, someone's **capacity** is judged according to the specific decision to be made, so a person may have sufficient **capacity** to make simple decisions but not more complicated ones. In England and Wales the Mental Capacity Act says that a person lacks capacity to make a decision if they have an 'impairment of or disturbance in the function of their mind or brain' (either temporary or permanent), and as a result they cannot do **one or more** of the following:

- Understand the information relating to this particular decision (including its benefits and risks)
- Retain the information for long enough to make this decision
- Weigh up the information involved in making this decision
- Communicate their decision in any way.

### The Mental Capacity Act 2005 is underpinned by five key principles

1. A presumption of capacity – every adult has the right to make their own decisions and must be assumed to have capacity unless it is proved otherwise.
2. Individuals have the right to make their own decisions – adults must be given all appropriate help before anyone can conclude that they cannot make their own decisions.
3. Individuals have the right to make eccentric or unwise decisions – this does not mean they lack capacity.
4. Best interests – anything done for or on behalf of people lacking capacity must be done in their best interest
5. Least restrictive intervention – anything done for or on behalf of people without capacity should be the least restrictive of their basic human rights and freedom.

You need to assess if the impairment or disturbance means that the person is unable to make a specific decision when they need to and this can only apply if all practical and appropriate support to help the person make the decision has failed. A person is only deemed unable to make a decision if they cannot :

- understand information about the decision to be made;
- retain that information in their mind;

use or weigh that information as part of the decision making process; or communicate their decision (by talking, using sign language or any other means.)

The requirement for a mental capacity assessment should be agreed as part of a strategy meeting and undertaken by health or social care staff.

### **The difference between adult and child abuse**

The primary difference in addressing adult and child abuse relates to the adult's right to self-determination. Adults may choose not to act at all to protect themselves and only in extreme circumstances will the law intervene. This is not the case for children because they are minors under the Children Act 1980 and this legislation can be used quickly and effectively to ensure protection from abuse once it has been recognised. In cases of suspected adult abuse it is important to recognise that assertive persuasion to encourage the individual to report or take action against an abuser or abusive situation may have negative outcomes for the vulnerable adult and could be detrimental to their wellbeing by causing them further harm. Therefore, the protection of vulnerable adults from abuse is a more complex process than child protection and requires policy and procedures that reflect this. Policy users need to develop an understanding that protecting vulnerable adults necessitates a more supportive and advisory approach in response to reporting abuse, than in child protection situations where the legal framework is clear and definitive and requires stipulated responses. In serious situations the child can be removed from the abusive environment, for vulnerable adults it is not always possible or appropriate to achieve this level of safety. Each vulnerable adult is a unique individual with varying degrees of need and ability. Some people will have a combination of physical and learning disability, others may have one or the other; some may have mental health needs and a combination of other complex disabilities such as Epilepsy, Diabetes, Down Syndrome, visual or hearing impairment.

Additional forms of abuse which vulnerable adults may be subject to include:

### **Financial Abuse**

Financial Abuse is defined as "the unauthorised and improper use of funds, property or any resources belonging to an individual".

Those who financially abuse may be people who hold a position of trust, power, and authority or has the confidence of the Adult at Risk.

### **Examples of Financial Abuse**

- Misuse and/or misappropriation of monies, benefits and/or property;
- Forcing changes to a will or testament;
- Preventing access to money, property, possessions or inheritance.

### **Signs and Symptoms of Financial Abuse:**

- Unexplained sudden inability to pay bills or maintain lifestyle;
- Unusual or inappropriate bank account activity;
- Lasting Power of Attorney or Enduring Power of Attorney obtained when Adult at Risk is unable to comprehend and give consent;
- Withholding of money;
- Recent change of deeds or title of property;
- Unusual interest shown by family or others in the Adult at Risk's assets;
- Person managing financial affairs is evasive or uncooperative.

## **Discriminatory Abuse**

Discriminatory Abuse links into all other forms of abuse.

Discriminatory Abuse exists when values, beliefs or culture result in a misuse of power that denies mainstream opportunities to some groups or individuals.

It is the exploitation of a person's vulnerability, resulting in repeated or pervasive treatment of an individual, which excludes them from opportunities in society, for example, education, health, justice, civic status and protection. It includes where a person or group is treated less favourably than any other person or group based on their colour, sex, age, disability, sexual orientation, religion, status, etc

### **Examples of Discriminatory Abuse**

- Unequal treatment;
- Verbal abuse;
- Inappropriate use of language;
- Slurs;
- Harassment;
- Deliberate exclusion.

### **Signs and Symptoms of Discriminatory Abuse:**

- Lack of respect shown to an individual;
- Signs of a sub-standard service offered to an individual;
- Repeated exclusion from rights afforded to citizens such as health, education, employment, criminal justice and civic status;
- Failure to follow the agreed care plans can result in the Adult at Risk being placed at risk.

## **Organisational Abuse**

Repeated instances of poor care may be an indication of more serious problems.

Organisational abuse is abuse that arises from an unsatisfactory regime. It occurs when the routines, systems and norms of an institution override the needs of those it is there to support. Such regimes compel individuals to sacrifice their own preferred life style and cultural diversity in favour of the interests of those there to support them, and others. This can be the product of both ineffectual and punitive management styles, creating a climate within which abuse of Adults at Risk, intentional or otherwise, is perpetrated by individual staff and others. There is a lack of good leadership within the institution and members of staff are not equipped to carry out the care required.

Managers and staff of such services have a responsibility to ensure that the operation of the service is focused on the needs of service users, not on those of the organisation. Managers will ensure they have mechanisms in place that both maintain and review the appropriateness, quality and impact of the service for which they are responsible. These mechanisms will always take into account the views of service users, their carers and relatives.

**Examples of behaviour:** Inflexible routines set around the needs of staff rather than individual service users, e.g. requiring everyone to eat together at specified times, bathing limited to times to suit staff, no doors on toilets. These can arise through lax, uninformed or punitive management regimes.

### **Signs and Symptoms of Organisational Abuse:**

- Inappropriate or poor care;
- Misuse of medication;

- Inappropriate restraint Sensory deprivation, e.g. denial of use of spectacles or hearing aid;
- Lack of respect shown to the Adult at Risk;
- Denial of visitors or phone calls;
- Restricted access to toilet or bathing facilities;
- Restricted access to appropriate medical or social care;
- Failure to ensure appropriate privacy or personal dignity;
- Lack of flexibility and choice, e.g. mealtimes and bedtimes, choice of food;
- Lack of personal clothing or possessions;
- Lack of adequate procedures, e.g. for medication, financial management;
- Controlling relationships between staff and service users;
- Poor professional practice;
- Lack of staff training.

### **Indicators of Organisational Abuse**

People who have contact with Adults at Risk should be aware of some signs, which **may** indicate abuse:

- Seeking shelter or protection;
- Unexplained reactions towards particular individuals;
- Unexplained reactions toward particular settings;
- Frequent or regular visits to the GP, or hospital casualty department or hospital admissions;
- Frequent or irrational refusal to accept investigations or treatments for routine difficulties;
- Unexplained change in material circumstances;
- Inconsistency of explanation or no explanation.

Where the following 'trigger' behaviours are apparent in a service user/patient, these **may** be additional indicators that abuse is occurring:

- Destruction of physical environment;
- Turning night into day/sleep disturbance;
- Chronic incontinence;
- Extreme physical and/or emotional dependence;
- Verbal abuse and aggression towards the carer;
- Changes in personality;
- Non-compliance with carer's wishes;
- Obsessive behaviour;
- Wandering/absconding;
- Self-harm.

Organisational factors that may contribute to abuse:

- Weak or oppressive management;
- Inadequate leadership;
- High staff turnover;
- Incidents seen in isolation;
- Inadequate staffing (numbers, competence);
- Inadequate staff supervision or support;
- Insufficient training;
- Rigid routines;
- Closed communication channels.

### **Neglect and acts of omission**

The failure of any person, who has responsibility for the charge, care or custody of an adult at risk, to provide the amount and type of care that a reasonable person would be expected to provide. Neglect can be intentional or unintentional.

Examples of neglect and acts of omission:

- Failure to provide for medical, social or educational needs
- Withholding necessities such as food, drink and warmth,
- A lack of protection from hazards.

### **Self Neglect**

Self-neglect covers a wide range of behaviour including neglect of one's personal hygiene, health or surroundings and includes behaviour such as hoarding.

Impact and typical characteristics of self-neglect may be:

- Poor standards of personal care
- Evidence of urine or faeces from adult or animal in the home
- Evidence of significant hoarding
- Home filthy, verminous, not habitable
- Lacks mental capacity
- Evidence of physical, mental or learning disability or illness
- Refuses important health care
- Non co-operative with services
- Substance misuse- heavy use of drugs or alcohol or both
- No support from family or others- very isolated
- Victim of crime, anti-social behaviour or abuse
- Perpetrator of crime, anti-social behaviour
- Risk of fatality or serious harm
- Fire Risk
- Self- neglect has a serious impact on the safety of others

Many of these situations may be resolved by safeguarding enquiries. However Adult Protection procedures will have to be considered for cases where there is imminent/ high risk of fatality or harm or harm to others.

### **Modern slavery**

The Modern Slavery Act 2015 applies to England and Wales, and includes two substantive offences – human trafficking, and slavery, servitude and forced or compulsory labour. Servitude, forced or compulsory labour and human trafficking are all forms of modern slavery. The following definitions have been sourced from the Modern Slavery Act 2015, Crown Prosecution Service (CPS) and the UK Human Trafficking Centre (UKHTC)

### **Slavery**

Slavery is described as the status or condition of a person over whom any, or all, of the powers attaching the right of ownership are exercised. In essence, characteristics of ownership and indoctrination need to be present for a state of slavery to exist.

**Servitude**

Servitude is linked to slavery, but is much broader than slavery. Servitude is a 'particularly serious form of denial of freedom'. It includes, in addition to the obligation to provide certain services to another, the obligation on the 'serf' to live on the other's property and the perceived impossibility of changing his or her status.

**Forced or compulsory labour**

Forced or compulsory labour is defined as being 'all work or service which is exacted from any person under the menace of any penalty and for which the said person has not offered himself voluntarily'. It may include recruitment by deception, coercion and/or abuse, exploitation at work, and coercion at destination.

**Human trafficking**

The arrangement of facilitation of the travel of another person, to exploit them. It is irrelevant whether the exploited person, adult or child, consents to the travel.

A person may arrange or facilitate the exploitation of another by recruiting them, transporting or transferring them, harbouring or receiving them, or transferring or exchanging control over them.

'Travel' means arriving in, or entering, any country; departing from any country; and travelling within any country.