

**St. Joseph's Specialist Trust**  
**Amlets Lane, Cranleigh**  
**Surrey, GU6 7DH**

Website: [www.st-josephscranleigh.surrey.sch.uk](http://www.st-josephscranleigh.surrey.sch.uk)

# **Safeguarding Policy**



*Christ in our Lives*  
*'No limits ... just possibilities'*

***Reviewed: September 2024***  
*Cycle: Annual*

**STATUTORY &  
WEBSITE POLICY**

# Safeguarding Young people

St Joseph's Specialist Trust is committed to safeguarding and promoting the welfare of children and young people and expects all staff and volunteers to share this commitment.

We have comprehensive Child Protection and Safeguarding Policies and Procedures in place which we refer to in our prospectus. All Trustees, members of the Education Governing Committee and Staff (including supply staff and volunteers) must ensure that they are aware of these procedures. Families and young people are welcome to read the Policy which can be found on our website.

Sometimes we may need to share information and work in partnership with other agencies when there are concerns about a child's welfare. We will ensure that our concerns about our young people are discussed (age appropriately with him/her) and his/her family first unless we have reason to believe that such a move would be contrary to his/her welfare or under the direction of the Local Safeguarding Children's Partnership.

Our Safeguarding Officers are:



**Alan Day**  
Director of Care Services and  
Designated Safeguarding  
Leader



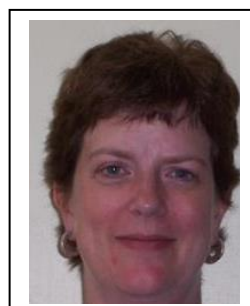
**Annie Sutton**  
Executive Principal  
Deputy Safeguarding  
Officer



**Nick Durling**  
Head of Safeguarding &  
Inclusion  
Deputy Safeguarding Officer



**Simon Jaggard**  
Head Teacher  
& Director of Education  
Deputy Safeguarding  
Officer



**Karen May**  
Director of Therapies  
Deputy Safeguarding  
Officer

If you are concerned about a young person's welfare please email [safeguarding@st-josephscranleigh.surrey.sch.uk](mailto:safeguarding@st-josephscranleigh.surrey.sch.uk). Do NOT conduct your own investigation. You can also refer them yourself to the Surrey contact centre on [sscp@surreycc.gov.uk](mailto:sscp@surreycc.gov.uk)

If your concerns relate to the actions or behaviour of a member of staff (which could suggest that s/he is a danger to children or young people) then you should report this to Executive Principal; if the concern relates to the Executive Principal this should be reported to the Chair of Trustees or the Lead Trustee for Safeguarding, in confidence, who will consider what action to take.

**Annie Sutton, Executive Principal**

<b>Content</b>	<b>Page</b>	<b>Content</b>	<b>Page</b>
Safeguarding Statement & Key Personnel	<b>4</b>	Harmful Sexual Behaviour	<b>31</b>
Introduction & Guidance Documents	<b>5</b>	Anti-Bullying & Cyber Bullying	<b>33</b>
Policy Principles & Values	<b>6</b>	Online Safety	<b>33</b>
Policy Aims	<b>6</b>	Racist Incidents	<b>34</b>
Supporting Children	<b>7</b>	Radicalisation and Extremism	<b>34</b>
Prevention/Protection	<b>8</b>	Domestic Abuse	<b>35</b>
Roles and Responsibilities - All staff	<b>9</b>	Child Exploitation and Criminal Exploitation	<b>36</b>
Roles and Responsibilities - Executive Principal	<b>10</b>	Youth Produced Sexual Imagery (Sexting)	<b>38</b>
Roles and Responsibilities – DSL & Deputy DSL	<b>11</b>	Female Genital Mutilation (FGM)	<b>39</b>
Roles and Responsibilities – Trustee Board	<b>13</b>	Forced Marriage	<b>40</b>
Confidentiality & Sharing Information	<b>14</b>	Honour based abuse	<b>41</b>
Child Protection Procedures	<b>14</b>	One Chance Rule	<b>41</b>
Child Protection Procedures Flowchart	<b>17</b>	Private Fostering Arrangements	<b>41</b>
Dealing with Disclosure	<b>18</b>	Children Looked After	<b>42</b>
Allegations Against Adults Working with Children and Low-Level concerns	<b>19</b>	Children Missing Education (CME)	<b>42</b>
What is Child Abuse	<b>21</b>	Young people Missing Out on Education (PMOOE)	<b>43</b>
Indicators of Abuse - Neglect	<b>23</b>	Attendance and Behaviour	<b>44</b>
Indicators of Abuse - Emotional Abuse	<b>24</b>	Physical Intervention	<b>44</b>
Indicators of Abuse - Physical Abuse	<b>25</b>	Whistle-blowing	<b>45</b>
Indicators of Abuse - Sexual Abuse	<b>26</b>	Linked Policies	<b>46</b>
Sexual Violence & Sexual Harassment between children in school: Peer on Peer / child on child Abuse Policy	<b>27</b>	Additional Resources	<b>47</b>

<b>Committee Responsible:</b>	Care Committee
<b>Lead Trustee for Safeguarding:</b>	Richard Boyle
<b>Nominated Lead Members of Staff:</b>	Alan Day (DSL) and Nick Durling (Deputy DSL)
<b>Status &amp; Review Cycle:</b>	Statutory Annual
<b>Next Review Date:</b>	Sept 2024

## Safeguarding Statement

St Joseph's Specialist Trust recognise our moral and statutory responsibility to safeguard and promote the welfare of all young people. We make every effort to provide an environment in which children and adults feel safe, secure, valued and respected, and feel confident to talk if they are worried, believing they will be effectively listened to.

We are alert to the signs of abuse and neglect and follow our procedures to ensure that children receive effective support, protection and justice. Child protection forms part of the trust's safeguarding responsibilities.

The purpose of this policy is to provide staff, volunteers and board members the framework they need in order to keep young people safe and secure in our setting. The policy also informs parents and carers how we will safeguard their children whilst they are in our care.

### Key Personnel

**The Designated Safeguarding Lead is Alan Day**

**The Head of Safeguarding and Inclusion is:** Nick Durling

Contact details: email: [safeguarding@st-josephscranleigh.surrey.sch.uk](mailto:safeguarding@st-josephscranleigh.surrey.sch.uk) Telephone: 01483 272449

**The deputy DSL(s) are:** Nick Durling, Annie Sutton, Karen May, Simon Jaggard email: [safeguarding@st-josephscranleigh.surrey.sch.uk](mailto:safeguarding@st-josephscranleigh.surrey.sch.uk)

**The nominated lead Trustee for Safeguarding is:** Richard Boyle, contactable via Clerk to the Trustees: [clerk@st-josephscranleigh.surrey.sch.uk](mailto:clerk@st-josephscranleigh.surrey.sch.uk)

**The Executive Principal and Responsible Individual is:** Annie Sutton

Contact details: email: [asutton@st-josephscranleigh.surrey.sch.uk](mailto:asutton@st-josephscranleigh.surrey.sch.uk) Telephone: 01483 272449

**The Chair of the Care Governing Committee is:** Simon Charleton

Contactable via Clerk to the Trustees: [clerk@st-josephscranleigh.surrey.sch.uk](mailto:clerk@st-josephscranleigh.surrey.sch.uk)

**The Chair of Education Governing Committee is:** Richard Boyle

Contactable via Clerk to the Trustees: [clerk@st-josephscranleigh.surrey.sch.uk](mailto:clerk@st-josephscranleigh.surrey.sch.uk)

**The Chair of Trustees is:** .Dominic Gorton, Contactable via the Clerk to Trustees

Contactable via Clerk to the Trustees: [clerk@st-josephscranleigh.surrey.sch.uk](mailto:clerk@st-josephscranleigh.surrey.sch.uk)

## **Terminology**

**Safeguarding** and promoting the welfare of children is defined as:

- protecting children from maltreatment
- preventing impairment of children's health or development
- ensuring that children grow up in circumstances consistent with the provision of safe and effective care
- taking action to enable all children to have the best outcomes
- preventing impairment of children's mental or physical health or development.

**Child Protection** is a part of safeguarding and promoting welfare. It refers to the activity that is undertaken to protect specific children who are suffering, or are likely to suffer, significant harm.

**Early Help** refers to the provision of support as soon as any needs emerge or are identified at any point in a child's life.

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

**Child** includes everyone under the age of 18.

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

**Social Care** refers to the local authority's social services in which either the child is resident, or who have placed the child.

**C-SPA** refers to the Children's Single Point of Access and the Child Protection Consultation Line in Surrey. These services will differ within other Local Authorities.

**MAP** refers to the Surrey Multi-Agency Partnership

## **Introduction**

This policy has been developed in accordance with the principles established by the Children Acts 1989 and 2004; the Education Act 2002, the non-maintained special schools (England) regulations 2015, and in line with government publications: 'Working Together to Safeguard Children' 2018, Revised Safeguarding Statutory Guidance 2 'Framework for the Assessment of Children in Need and their Families' 2000, 'What to do if You Are Worried a Child is Being Abused' 2015 and the Charity Commission safeguarding guidance 2017 (as updated 2021). The policy also reflects both 'Keeping Children Safe in Education' 2023, and Surrey Safeguarding Children Partnership SSCP Child Protection Procedures<sup>1</sup>

The Trustee Board and its delegated Education Governing Committee takes seriously its responsibility under section 157/175 of the Education Act 2002 the Education (Independent School Standards) Regulations 2014 and Children's Homes (England) Regulations 2015 to safeguard and promote the welfare of children; and to work together with other agencies to ensure adequate arrangements within our trust to identify, assess, and support those children who are suffering harm or at risk of suffering harm.

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<sup>1</sup> The SSCP Child protection Procedures are only available online at <http://surreyscb.procedures.org.uk/>

This policy applies to all members of Staff, Trustees and members of the Education Governing Committee in the organisation.

### **Equalities statement**

With regards to safeguarding, we will consider our duties under the Equality Act 2010 and our general and specific duties under the Public Sector Equality Duty. We will work to;

- Advance equality of opportunity between people who share a protected characteristic and those who do not share it
- Foster good relationships across all protected characteristics between people who share a protected characteristic and those who do not share it.

### **Policy Principles and Values**

The welfare of the child is paramount.

Maintain an attitude of “It could happen here”.

Maintain a “zero-tolerance approach to sexual violence and sexual harassment.

All children regardless of age, gender, culture, language, race, ability, sexual identity or religion have equal rights to protection, safeguarding and opportunities. They cannot learn effectively unless they feel safe and secure.

We recognise that all adults, including temporary staff, volunteers and Trustees have a full and active part to play in protecting our young people from harm and have an equal responsibility to act on any suspicion or disclosure that may suggest a child is at risk of harm; either in the organisation or community settings, taking into account contextual safeguarding, in accordance with statutory guidance.

We acknowledge that working in partnership with other agencies protects children and reduces risk, therefore we will continue to engage in partnership working to protect and safeguard young people.

Young people and staff involved in child protection issues will receive appropriate support.

Whilst the trust will work openly with parents as far as possible, it reserves the right to contact Social Care or the police, without notifying parents, if this is believed to be in the child’s best interests.

We will always act in the best interests of the young person and ensure that our decisions around safeguarding take a child-centred and coordinated approach.

### **Policy Aims**

To demonstrate the organisation’s commitment, regarding safeguarding and child protection, to young people, parents and other partners, recognising that all people have the potential to abuse children. It occurs in all races, religions and social classes and may be perpetrated by those known to the young person.

To support the child’s development in ways that will foster security, confidence and independence.

To provide an environment in which children and young people feel safe, secure, valued and respected, and feel confident to, and know how to approach adults if they are in difficulties, believing they will be effectively listened to.

To ensure consistent good practice across the organisation and ensure that safeguarding follows a whole setting approach.

To develop and promote effective working relationships with other agencies, especially the Police and Social Care and contribute to Early Help, assessments of need and support for children.

To ensure that all staff working within our trust, who have substantial access to children, have been checked as to their suitability, including verification of their identity, qualifications, and a satisfactory DBS check (according to guidance)<sup>2</sup>, and that a single central record is kept for audit.

We comply with the Disqualification under the Childcare Act 2006 guidance issued in August 2018 and for staff in our children's homes, the Disqualification from Caring for Children Regulations 2002.

## **Supporting Children**

We recognise that a child who is abused or witnesses' violence may feel helpless and humiliated, may blame themselves, and find it difficult to develop and maintain a sense of self-worth.

We recognise that the school may provide the only stability in the lives of children who have been abused or who are at risk of harm.

We accept that research shows that the behaviour of a child in these circumstances may range from that which is perceived to be normal to aggressive or withdrawn.

St Joseph's Specialist Trust will support all children by:

Encouraging self-esteem and self-assertiveness, through the curriculum as well as our relationships, whilst not condoning aggression or bullying.

Promoting a caring, safe and positive environment within the trust.

Responding sympathetically to any requests for time out to deal with distress and anxiety.

Offering details of helplines, counselling or other avenues of external support.

Liaising and working together with all other support services and those agencies involved in the safeguarding of children.

Notifying Social Care as soon as there is a significant concern.

Providing continuing support to a child about whom there have been concerns, when they leave the trust, by ensuring that information is shared under confidential cover to the child's new setting and ensuring the trust medical records for the child are forwarded as a matter of priority and within statutory timescales.

Ensuring children are taught to understand and manage risk through our personal, social, health and economic (PSHE) education and Relationship and Sex Education (RSE) and through all aspects of trust life. This includes online safety.

## Prevention / Protection

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

The school and children's home community will therefore:

- Work to establish and maintain an ethos where children feel secure, are encouraged to talk and are always listened to.
- Include regular consultation with children e.g., through safety questionnaires, participation in anti-bullying week, asking children to report whether they have had happy/sad lunchtimes/playtimes
- Ensure that all children know there is an adult, in the school or home, who they can approach if they are worried or in difficulty.
- Include safeguarding across the curriculum, including PSHE opportunities which equip children with the skills they need to stay safe from harm and to know to whom they should turn for help. In particular this will include anti-bullying work, online-safety, road safety, pedestrian and cycle training.
- Ensure all staff are aware of trust guidance for their use of mobile technology and have discussed safeguarding issues around the use of mobile technologies and their associated risks.

We will ensure that:

- The trust operates a safer recruitment procedure that includes statutory checks on staff suitability to work children and young people.
- All staff receive information about the trust's safeguarding arrangements, staff code of conduct, safeguarding policy, details regarding the trust's safeguarding team and Keeping Children Safe in Education Part 1 or where appropriate, Annex A.
- All staff receive safeguarding training as part of their induction, which is regularly updated and receive safeguarding updates (for example, via email, staff meetings, etc) at least annually.
- All staff are trained in and receive regular updates regarding online safety.
- All members of staff maintain a zero-tolerance approach to sexual violence and sexual harassment.

The child protection policy is made available via the trust website and that parents are made aware of this, including the roles and responsibilities of staff at the trust in relation to the policy.

All staff will be given a copy of part 1 of Keeping Children Safe in Education 2023 and will sign to confirm that they have read and understood it. This applies to the Trustees and members of its delegated Education Governing Committee in relation to part 2 of the same guidance.

Staff, Trustees and members of the Education Governing Committee will receive regular safeguarding awareness training, updated by the DSL as appropriate.

The Safeguarding Policy is made available via the trust website.

All parents/carers are made aware of the responsibilities of staff members with regards to safeguarding procedures through the publication of the Safeguarding Policy.

We provide a coordinated offer of Early Help where the need is identified through partnership working and contribute to early help arrangements.

The names of the safeguarding team are clearly advertised around site, with a statement explaining the organisation's role in referring cases of suspected harm and abuse.



## Roles and Responsibilities

### All staff

All staff have a vital part to play in identifying concerns, providing support for children and ensuring their safety and wellbeing. To achieve this, they will:

- Provide a safe environment in which children can learn.
- Know who the safeguarding team are and how to contact them.
- Establish and maintain an environment where children feel secure, are encouraged to talk and are listened to.
- Ensure that children feel safe and know that there are adults in the trust that they can approach if they are worried or have any concerns.
- Maintain a zero-tolerance approach to sexual violence and sexual harassment.
- Read and understand Part 1 and Annex B of KCSIE 2023.
- Be aware that mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation.
- Understand that only appropriately trained professionals will attempt to make a diagnosis of a mental health problem.
- Be well placed to observe children day-to-day and identify those whose behaviours suggests that they may be experiencing a mental health problem or be at risk of developing one.
- Understand that where children have suffered abuse and neglect, or other potentially traumatic adverse childhood experiences, this can have a lasting impact on a young person's life. Staff will be aware of how these experiences can impact on a child's mental health, behaviour and education. Immediately take action, where they have a safeguarding concern that is also a mental health concern, by following our child protection policy and procedure and speaking to the safeguarding team.
- Plan opportunities for children to develop skills and learn to manage risks to keep themselves safe.
- Attend training to ensure they are aware of and alert to the signs, indicators and impact of abuse.
- Maintain an attitude of "it could happen here" with regards to safeguarding.
- Know how to respond to a child if they make a disclosure of abuse or harm.
- Record their concerns if they are worried that a child is being abused and report their concerns to the safeguarding team immediately that day. If the DSL is not contactable immediately, a Deputy DSL should be informed.
- Be prepared to refer directly to the appropriate social care team and/or the police, as appropriate, if there is a risk of significant or immediate harm and the safeguarding team are not available.
- Understand that the organisation has a pivotal role to play in multi-agency safeguarding arrangements.
- Follow the allegations procedure within this policy if the allegation is against a member of staff, agency staff, volunteer or contractor.
- Report low-level concerns (as defined in KCSIE 2023) about any member of staff, supply staff or contractor to the DSL (or deputy) and where the concern relates to the DSL, it will be shared with the Executive Principal. If the concern relates to the Executive Principal, the concern will be shared with the Chair of Trustees.
- Provide support to children that is in keeping with identified plans.
- Treat information with confidentiality and sensitivity but never promising to keep a secret. Notify the safeguarding team of any child who has an unexplained absence or is subject of a child protection plan.
- Teacher standards state that teachers should safeguard children's wellbeing and maintain public trust in the teaching profession as part of their professional duties.
- Assist the Trustee Board/ Education Governing Committee and Executive Principal in fulfilling their safeguarding responsibilities set out in legislation and statutory guidance.

- Have an understanding of Early Help, liaising with the DSL in identifying those who may benefit from Early Help. In some circumstances, it may be appropriate for a member of staff to act as the lead professional in Early Help cases.
- Liaise with other agencies that support the Early Help process.
- Have an awareness of who the Safeguarding Team are, their role and how to contact them.
- Have an awareness of the trust's safeguarding policy, behaviour management policy and staff code of conduct.

### **The Executive Principal**

In addition to the role and responsibilities of all staff, the Executive Principal will ensure that:

- St Joseph's Specialist Trust recognises that, in order to effectively meet a child's needs, safeguard their welfare and protect them from harm, the trust must contribute to inter-agency working in line with Working Together to Safeguard Children 2018 and share information between professionals and agencies where there are concerns.
- The Safeguarding Policy and Procedures are implemented and followed by all staff and make clear that sexual harassment, online abuse and sexual violence are unacceptable.
- All staff are aware of the role and identities of the safeguarding team.
- Staff have appropriate knowledge of KCSIE 2023 Part 5.
- Sufficient time, training, support, funding and resources (including cover arrangements where needed) is allocated to the DSL to carry out their role effectively, including the provision of advice, support and training for staff, to take part in relevant professional meetings and contribute to the assessment of children.
- All Deputy DSLs are trained to the same standard as the DSL and the role is explicit within their job description.
- With the DSL, ensure that there are appropriate arrangements in place for appropriate cover for out of hours/ out of term times.
- Where there is a safeguarding concern, that the child's wishes and feelings are taken into account when determining what action is to be taken.
- That there are appropriate, child centred systems and processes in place to support the expression of children's views and feelings.
- All staff feel able to raise concerns about poor or unsafe practices and that such concerns are handled sensitively and in accordance with our whistleblowing procedures.
- That young people are provided with opportunities throughout the curriculum to learn about safeguarding, including keeping themselves safe online.
- Opportunities are provided for a coordinated offer of Early Help.
- Ensure that all allegations or concerns against staff are dealt with in accordance with guidance from Department for Education (DfE), Surrey Safeguarding Children Partnership(SSCP), Surrey County Council (SCC) and other placing authorities.
- Ensure that statutory requirements are met to make a referral to the DBS and additionally in the case of teaching staff, the Teacher Regulation Agency where they think an individual has engaged in conduct that harmed (or is likely to harm) a child; or if the person otherwise poses a risk of harm to a child.

### **The Designated Safeguarding Lead**

In addition to the role and responsibilities of all staff, the DSL:

- Will maintain an "It could happen here" approach to safeguarding.
- Hold the lead responsibility for safeguarding and child protection in the trust, which cannot be delegated.
- Will act as a source of support and expertise in carrying out safeguarding duties for the whole safeguarding community.

- Will liaise with the relevant local authority and work in partnership with safeguarding partners and other agencies in line with Working Together to Safeguard Children 2018.
- Will manage and submit a referral for a child if there are concerns of suspected harm or abuse to the relevant local authority and act as a point of contact and support for staff.
- NPCC - “When to call the police”, should help designated safeguarding leads understand when they should consider calling the police and what to expect when they do.
- Will refer cases where there is a radicalisation concern via the relevant local authority or police force and act as a point of contact and support for staff to discuss concerns. Advice can be sought in Surrey by calling 101 or 01483 632982 and asking to speak to the Prevent supervisor for Surrey. The DfE has established a dedicated helpline to raise concerns around Prevent (020 7340 7264)
- Will refer cases where a crime may have been committed to the Police as required.
- Will liaise with the case manager and Local Authority Designated Officer (LADO) for child protection concerns in cases which concern a member of staff or a volunteer; and refer relevant cases to the DBS and Teacher Regulation Agency as required.
- Will record and share low-level concerns in cases which concern a member of staff, supply staff or contractor. The records should include details of the concern, the context of the concern and actions taken.
- Will follow DfE and KCSIE guidance “Child on Child Abuse” when a concern is raised that there is an allegation of a child abusing another child within the Trust
- Be available for staff to discuss any safeguarding concerns, with appropriate arrangement in place to cover periods where the DSL is absent.
- Will encourage and promote a culture of listening to the child’s wishes and feelings.
- Will regularly access training and support to ensure that they have the knowledge required to carry out the role. DSL training should be updated at least every 2 years.
- Will have a good working knowledge of local safeguarding procedures and understand the assessment process for providing early help and statutory intervention, including their level of need criteria and referral arrangements.
- Will understand and support the trust delivery with regards to the requirements of the Prevent Duty and provide advice and guidance to staff on protecting children from radicalisation.
- Will understand the risks associated with online activity and be confident that they have the up to date knowledge and capability to keep children safe whilst they are online at St Joseph’s, in particular being aware of the additional risks young people with SEND face when online.
- Will have a clear understanding of access and referral to the local Early Help offer and be able to advise and support staff where intervention is appropriate.
- Will keep detailed, accurate records that include all concerns about a child, even if there is no need to make an immediate referral and the rationale for decisions made and action taken.
- Will ensure an indication of the existence of the additional safeguarding file is marked on the child’s school file.
- Will ensure that when a child transfers school (including in-year), their safeguarding file is passed to the new school as soon as possible and within 5 days (separately from the child’s main file) and that confirmation of receipt is received.
- Will ensure that where a child transfers and is on a child protection plan, that their information is passed onto the new school immediately and that the child’s social worker is informed. A copy of the plan may be retained until confirmation of receipt has been received.
- Will ensure that all appropriate staff members have a working knowledge and understanding of their role in multi-agency working and meetings, to ensure that they are able to contribute effectively when required to do so.
- Will report to the Executive Principal any significant issues such as enquiries under section 47 of the Children Act 1989 and any use of local authority escalation procedures.

- Will ensure that the allocated social worker is informed of any child on a child protection plan who is absent without reason.
- Will ensure that all staff sign to say that they have read and understood the trust's safeguarding policy, code of conduct policy and Part 1 of KCSIE and all policies are used effectively.
- Will organise safeguarding induction training for all staff, ensuring that they receive regular updates at least annually (including online safety), keeping a record of attendance.
- Ensure that, in collaboration with the trust's leadership team and Trustee Board that the safeguarding policy is reviewed at least annually and the procedures and implementation are updated and reviewed regularly.
- Ensure that the Safeguarding Policy is available publicly.
- Establish links with the safeguarding partners to make sure that staff are aware of training opportunities and local safeguarding arrangements.
- With the Executive Principal, Trustee Board and members of its Education Governing Committee contribute to the "Audit of statutory duties and associated responsibilities" to be submitted annually to the SCC Education Safeguarding Team.
- Will ensure that details of the trust's safeguarding team are displayed and advertised prominently within the trust, with a statement explaining the trust's role in referring and monitoring cases of suspected abuse.
- Meet all other responsibilities as set out for DSL's in KCSIE 2023.
- Liaise with relevant trust staff on matters of safety and safeguarding and consult threshold documents to inform decision making and liaison with relevant agencies.
- When there has been a report of sexual violence, harassment or online abuse, make a risk and needs assessment, as required.
- Understand the lasting impact that adversity and trauma can have and what is needed in responding to this in promoting educational outcomes.
- Work with the executive principal and relevant strategic leads to promote educational outcomes by knowing the safeguarding issues that children are experiencing and the impact these might have.
- Report to the Executive Principal and significant issues such as police investigations. This should also include being aware of the require for children to have an appropriate adult. Further details can be found in statutory guidance – PACE Code C 2019.

See also KCSIE 2023 annex C.

### **The Deputy Designated Safeguarding Leads**

In addition to the role and responsibilities of all staff, the deputy DSL's will:

- Be trained to the same level as the DSL and the role is explicit within their job description.
- Provide support and capacity to the DSL in carrying out delegated activities of the DSL; however, the lead responsibility cannot be delegated.
- In the absence of the DSL, carry out these activities necessary to ensure the ongoing safety and protection of children. In the event of the long-term absence of the DSL, the deputies will assume all of the function above.

### **All members of the Trustee Board and its Education Governing Committee understand and fulfil their responsibilities to ensure that:**

- The organisation has effective safeguarding policies and procedures including a code of conduct policy and a response to children who go missing from education. We ensure policies are consistent with SSCP and statutory requirements, are reviewed regularly and that the policy is available on the trust's website.
- The SSCP are informed in line with local requirements about the discharge of duties via the annual safeguarding audit.

- The trust operates a safer recruitment procedure that includes statutory checks on staff suitability to work with children and by ensuring that there is at least one person on every recruitment panel who has completed safer recruitment training. If there is not a panel conducting the interview, then the interviewer will have completed the safer recruitment training.
  - Trustees and Governors should receive appropriate training at induction, which is updated regularly. This should provide them with the knowledge to provide strategic challenge to test and assure themselves that policies and procedures are effective and support a whole trust approach.
  - That at least one member of the Trustee Board and its Education Governing Committee has completed safer recruitment training, to be repeated every two years.
  - Staff have been appropriately trained and this is updated in line with guidance and all staff have read KCSIE 2023 Part 1 and Annex B; and that mechanisms are in place to assist staff in understanding and discharging their roles and responsibilities as set out in this guidance.
  - That all staff including temporary staff and volunteers are provided with the Trust's Safeguarding Policy and Code of Conduct.
  - That the trust has procedures for dealing with allegations of abuse against staff, volunteers and against other children and that a referral is made to the DBS and/ or Teaching Regulation Agency and if appropriate, the police, if a person in regulated activity has been removed or dismissed due to safeguarding concerns, or would have, if they had not resigned.
  - Ensure that Charity law and Charity Commission safeguarding guidance is adhered to and that serious incident notifications are made where appropriate
  - Processes are in place for dealing with concerns which do not meet threshold (low-level concerns), as defined in KCSIE 2023.
  - That a nominated Trustee for safeguarding is identified.
  - They have appointed a DSL who will take lead responsibility for safeguarding and that the role is explicit in the job holder's job description.
  - That on appointment, the DSL and deputies undertake interagency training and update this at least every two years.
  - That children are taught about safeguarding (including online safety) as part of a broad and balanced curriculum, covering relevant issues through PSHE and relationships and sex education (RSE). The Trustees will ensure that the trust has appropriate systems in place for monitoring and application filtering, to safeguard children online.
  - That the trust will comply with DfE and SCC Children 'Missing Education' requirements.
  - The trust complies with regular data returns requested by the local authority.
  - That appropriate online filtering systems are in place.
  - Enhanced DBS checks are in place for all Trustees (without barred list checks, unless the Trustee/Education Governing Body member is also a volunteer at the trust).
  - That any weaknesses in Safeguarding are remedied quickly.
  - There is an awareness that mental health problems can be, in some cases, an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation. Trustees will ensure clear systems and processes and processes are in place for identifying possible mental health problems, including clear referral and escalation processes.
- Ensure that safeguarding files are maintained as set out in KCSIE 2023 Annex C.

### **Confidentiality and Sharing Information**

All matters relating to safeguarding will be treated as confidential and only shared as per the ['Information Sharing Advice for Practitioners' \(DfE 2018\) guidance](#).

St Joseph's Specialist Trust will refer to the guidance in the data protection: toolkit for schools - <https://www.gov.uk/government/publications/data-protection-toolkit-for-schools>

Information will be shared with staff in the trust who 'need to know'. Relevant staff have due regard to Data Protection principles which allow them to share (and withhold) information.

All staff must be aware that they have a professional responsibility to share information with other agencies in order to safeguard children and that the Data Protection Act 2018 and General Data Protection Regulations (GDPR) are not a barrier to information sharing where a failure to do so would put a child at risk of harm. There is a lawful basis for safeguarding concerns to be shared with agencies who have a statutory duty for safeguarding.

All staff must be aware that they cannot promise a child to keep secrets which might compromise the child's safety or wellbeing. However, staff are aware that matters relating to safeguarding are sensitive and personal to children and families and in this respect are confidential. The DSL's will only disclose information to staff on a need to know basis.

All staff will always undertake to gain consent and/or share our intention to refer a child to social care with their parents/ carers, unless to do so could put the child at greater risk of harm or impede a criminal investigation.

Upon admission of any child, St Joseph's Specialist Trust will make contact with their previous school and/ or residential placement to request the transfer of relevant files in relation to safeguarding. These must be transferred securely.

### **Safeguarding Procedure**

The following procedure applies to all staff working in the organisation and will be covered by training to enable staff to understand their role and responsibility.

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

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

All staff are aware that our young people may be more likely to communicate concerns through behaviours rather than words. Additionally, staff will question the cause of knocks or injuries to our young people.

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

- Make a record of the information related to the concern, including:
  - Dates and times of their observations
  - Dates and times of any discussions in which they were involved
  - Any injuries observed
  - Explanations given by the child or adult (in their own words)
  - Rationale for decision making and action taken
  - Any actual words or phrases used by the child or staff involved
  - The records must be signed and dated by the author or equivalent on electronic based records
  - In the absence of the DSL or their deputies, staff must be prepared to refer directly to C-SPA, social care (and the police if appropriate) if there is the potential for immediate significant harm.
- Report it to the safeguarding team immediately by email, phone or face to face.
- The safeguarding team will consider if there is a requirement for immediate medical intervention, however urgent medical intervention should not be delayed if the safeguarding team are not immediately available.
- On a case by case basis, report relevant information to social workers as per a standing arrangement.

## **Taking Photographs/Videos of Medical Conditions on Young People**

If there is a medical concern where a medical professional has requested a photograph/video of a young person's condition a safeguarding referral should be sent so the safeguarding team can assess if this is appropriate or not. No photographs/video of medical concerns on young people can be taken without agreement and guidance from a member of the safeguarding team.

No photograph can be taken without the consent of either the young person or their responsible adult.

2 people must be present

### **Safeguarding Team to Consider**

- Consent from Parents and young person if young adult where appropriate - See above. Must be written consent. If no consent – no photo
- Request evidence of request made from Health Professional and reason why a photograph rather than in person visit
- What part(s) of the body is photograph/video needed of? Example there might be a request made to video a seizure.
- Can the child be identified
- Safeguards around the child. (Child Protection Order, Regulation 40 and Section 17 Child in Need)
- GDPR – what happens to the photo after it is taken
- Only controlled group must have access to the data

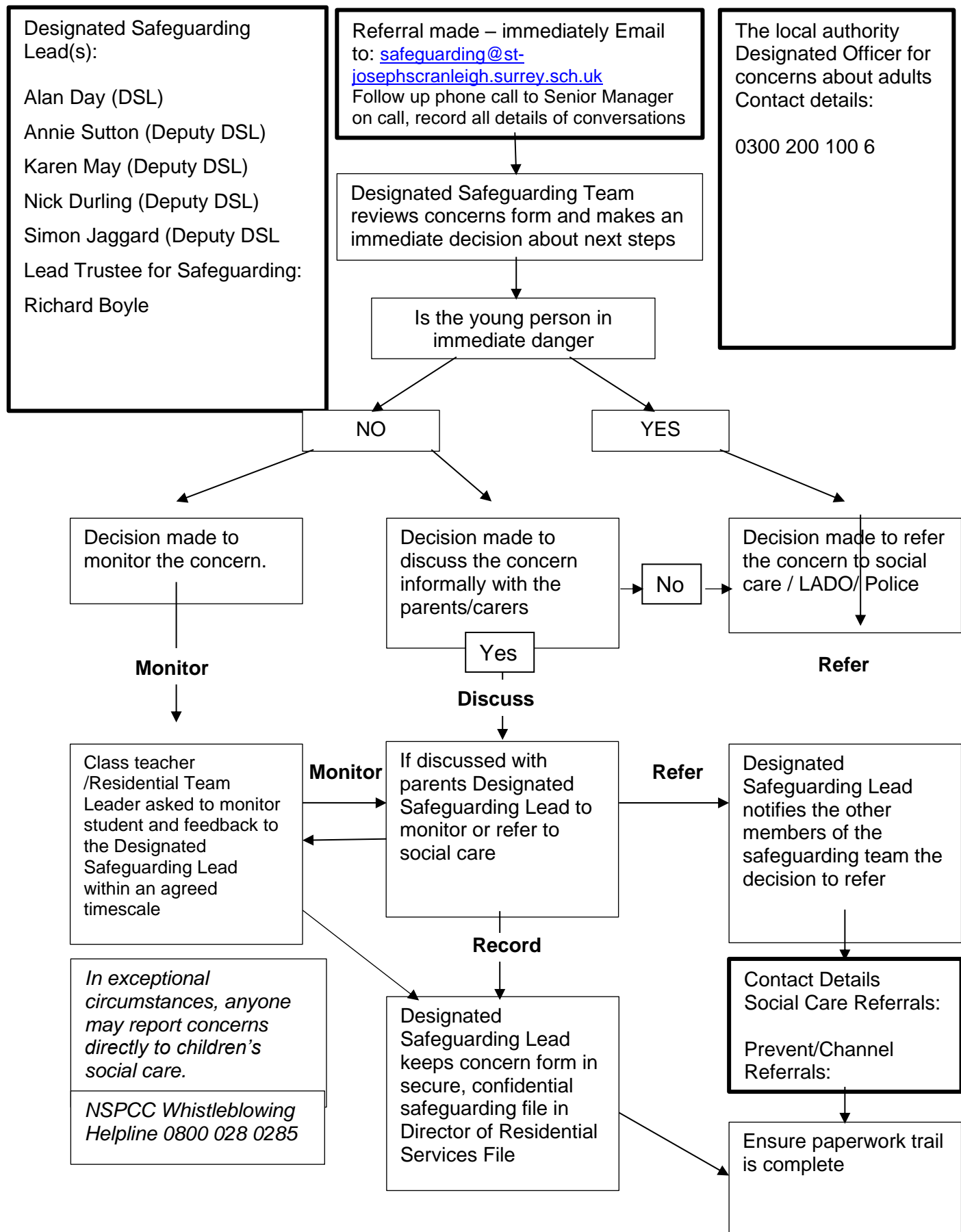
Following a report of concerns, the Safeguarding team must:

- Using the responsible authority's threshold document, decide whether or not there are sufficient grounds for suspecting significant harm, in which case a referral must be made to the relevant local authority and the police if appropriate.
- Normally the DSL should try to discuss any concerns about a child's welfare with the family and where possible, seek their agreement, before making a referral to the social care team. However, this should only be done where it will not place the child at further risk or could impact on any agency's investigation. The child's views should also be taken into account.
- If there are grounds to suspect a child is suffering, or is likely to suffer, significant harm or abuse then the safeguarding team must make a referral to social care. If a child is in immediate danger and urgent protective action is required, the police must be called. The safeguarding team must also notify social care of the occurrence and any action that has been taken.
- If the DSLs are unsure about whether a referral is appropriate, they may call social care for a consultation.
- If there is not a risk of significant harm, the safeguarding team will either actively monitor the situation or consider Early Help.
- Where there are doubts or reservations about involving the child's family, the safeguarding team should clarify with social care or the police whether the parents should be told about the referral and, if so, when and by whom. This is important in cases where there may be a criminal investigation.
- When a pupil is in need of urgent medical attention and there is suspicion of abuse, the safeguarding team should take the child to the nearest accident and emergency unit, having first notified social care. The DSL should seek advice about what action will be taken about informing parents, remembering that parents should normally be informed if a child requires urgent medical attention.

- The exception to this will be in cases of known FGM where there is a mandatory requirement for teachers to report directly to the police. The safeguarding team must also be made aware.



## Flow Chart for Raising Safeguarding Concerns about a Student



## **Dealing with disclosures**

A member of staff who is approached by a child should listen positively and try to reassure them. They cannot promise complete confidentiality and should explain that they may need to share the information with other professionals to help keep them or other children safe. The degree of confidentiality should always be governed by the need to protect the child.

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

All staff should know who the DSL's are and who to approach if the DSL is not available. All staff have the right to make a referral to social care or police directly and should do this if, for whatever reason, there are difficulties in following the agreed protocol, for example if there are no other staff on site and the staff member has a concern about sending the child home.

## **Guiding principles, the seven R's**

### **Receive**

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

### **Reassure**

- Reassure the student, but only so far as is honest and reliable
- Don't make promises you may not be able to keep, such as "I won't tell anyone"
- Do reassure, for example, you could say "I believe you"

### **Respond**

- Respond to the pupil as far as necessary for you to establish whether or not you need to refer this matter
- Do not ask leading questions. Such questioning may invalidate your evidence (and the child's) in any further proceedings. Use open questions such as "Can you tell me more"
- Do not ask the child why something happened
- Do not criticise the alleged perpetrator; the student may care about him/ her and reconciliation may be possible
- Do not ask the student to repeat it all to another member of staff. Explain what you have to do next and whom you have to talk to. Reassure the student that it will be a senior member of staff.

### **Report**

- Share your concerns with the safeguarding team immediately
- If you are not able to contact the safeguarding team and the child is at risk of immediate harm, contact social care or the police directly, as appropriate.
- If you are dissatisfied with the level of response that you receive following your concerns, you should press for re-consideration.

### **Record**

- If possible, make some very brief notes at the time and email them to the Safeguarding Team as soon as possible. If this cannot be done at the time, a record should be made as soon as possible after the disclosure.
- Keep your original notes
- Record the date, time, place, persons present and the words used by the child, rather than translating them into 'proper' words
- If appropriate, complete a body map to indicate the position of any noticeable injury
- Record the facts and observable things, rather than your interpretations or assumptions

- This should be sent directly via email to the safeguarding team

### **Remember**

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

### **Review (by DSL)**

- Has the action taken provided good outcomes for the child?
- Did the procedure work?
- Were any deficiencies or weaknesses identified in the procedure? Have these been remedied?
- Is further training required?
- Has any appropriate documentation been updated to reflect recent events, such as risk assessments?

### **What happens next?**

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

If they have concerns that the disclosure has not been acted upon appropriately, they might inform the Executive Principal or Safeguarding Trustee of the trust and/or may contact social care.

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

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

### **Safeguarding concerns and allegations against adults who work with children**

#### **Procedure**

This procedure should be used in all cases in which it is alleged a member of staff or volunteer in the organisation, or another adult who works with children has:

- Behaved in a way that has harmed a child or may have harmed a child.
- Possibly committed a criminal offence against or related to a child.
- Behaved towards a child or children in a way that indicates he or she would pose a risk of harm to children; or
- Behaved or been involved in an incident outside of a setting which did not involve children but could impact on their suitability to work with children.

In dealing with allegations or concerns against an adult, staff must:

- Report any concerns about the conduct of any member of staff or volunteer to the Executive Principal immediately, via the safeguarding email address.
- If an allegation is made against the Executive Principal or, if relates to staff in the Children's Home, the concerns need to be raised to the Lead Trustee for Safeguarding

Rebecca Vickers or Chair of Trustees, Bernard Smith, as soon as possible. If neither are available, then the LADO should be contacted directly.

- There may be situations when the Executive Principal or above Trustees will want to involve the police immediately if the person is deemed to be an immediate risk to children or there is evidence of a possible criminal offence.
- Once an allegation has been received by the Executive Principal or Trustees, they will contact the LADO team on 0300 123 1650 or by email on [LADO@surreycc.gov.uk](mailto:LADO@surreycc.gov.uk) immediately and before taking any action or investigation.
- Following consultation with the LADO, inform the parents of the allegation unless there is a good reason not to.

In liaison with the LADO, the trust will determine how to proceed and, if necessary, the LADO will refer the matter to social care and/ or the police.

If the matter is investigated internally, the LADO will advise the trust to seek guidance from local authority colleagues as set out in Part 4 of KCSIE 2023 and local procedures.

Guidance about conduct and safe practice, including use of mobile phones by staff and volunteers will be given at induction.

Suspension of a member of staff against whom an allegation has been made needs careful consideration and the Executive Principal or Lead Trustee for Safeguarding of Chair of Trustees, will seek advice of the LADO, Head of HR or a HR consultant in making this decision.

### **Low level concerns**

The term “low-level concern” does not mean that it is insignificant. A low-level concern is any concern – no matter how small, and even if no more than causing a sense of unease or a “nagging doubt” – that an adult working in or on behalf of the trust may have acted in a way that:

- Is inconsistent with the staff code of conduct, including inappropriate conduct outside of work and
- Does not meet the harm threshold or is otherwise not serious enough to consider a referral to the LADO.

The purpose of reporting low-level concerns is to create and embed a culture of openness, trust and transparency in which the trust’s values and expected behaviour set out in our staff code of conduct are lived, monitored and reinforced constantly by all staff.

The setting creates an environment where staff are encouraged and feel confident to self-refer where they have found themselves in a situation.

Reports should be made to the safeguarding team in a timely manner. If they have any doubt as to whether the information shared about the individual as a low-level concern in fact meets the harm threshold, they will consult with the LADO.

### **What is child abuse?**

The following definitions are taken from Working Together to Safeguard Children 2018. In addition to these definitions, it should be understood that children can also be abused by being sexually exploited, through honour based abuse, forced marriage or female genital mutilation. To support the local context, all staff have access to the Surrey Safeguarding Children’s Partnership level of need document.

### **What is abuse and neglect?**

Abuse and neglect are forms of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm, or by failing to act to prevent harm. Children may be abused in a family or in an institutional or community setting, by those known to them or, more rarely, by a stranger. They may be abused wholly online, or technology may be used to facilitate offline abuse. They may be abused by an adult or adults, or another child or children.

### **Physical abuse**

Physical abuse may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating, or otherwise causing physical harm to a child. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child. It may also include concerns such as force feeding and unjustified use of physical interventions. Additionally, it may include concerns over the use of medication for the purpose of tranquilisation and sedation.

### **Emotional abuse**

The persistent emotional maltreatment of a child such as to cause severe and persistent adverse effects on the child's emotional development.

It may involve conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children.

These may include interactions that are beyond a child's developmental capability, as well as overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. In this setting, it may include intentionally restricting access to family or friends.

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 in isolation.

### **Sexual abuse**

Involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening.

The activities may involve physical contact, including assault by penetration (for example, rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse. Sexual abuse can take place online, and technology can be used to facilitate offline abuse.

Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.

### **Neglect**

Neglect is the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development.

Neglect may occur during pregnancy as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to:

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

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

[The SSCB Neglect Strategy](#) and the [Neglect Risk Assessment Tool](#) are available to provide more detailed information regarding neglect.

### **Indicators of abuse**

#### **Neglect**

##### **The nature of neglect**

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

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

Neglect can include parents or carers failing to:

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

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

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

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

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

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

### **Indicators of neglect**

The following is a summary of some of the indicators that may suggest a child is being abused or is at risk of harm.

It is important to recognise that indicators alone cannot confirm whether a child is being abused. Each child should be seen in the context of their family and wider community and a proper assessment carried out by appropriate persons. What is important to keep in mind is that if you feel unsure or concerned, do something about it. Don't keep it to yourself. The [Neglect Risk Assessment Tool](#) provides staff with a resource to identify and act on concerns regarding neglect.

#### **Physical indicators of neglect**

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

#### **Behavioural indicators of neglect**

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

### **Emotional abuse**

#### **The nature of emotional abuse**

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

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

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

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

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

It is sometimes possible to identify emotionally abusive behavior from parents and carers to their children, by the way that the adults are speaking to, or behaving towards children. An

appropriate challenge or intervention could affect positive change and prevent more intensive work being carried out later on.

## **Indicators of emotional abuse**

### **Developmental issues**

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

### **Behaviour**

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

### **Social issues**

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

### **Emotional responses**

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

## **Physical abuse**

### **The nature of physical abuse**

Most children collect cuts and bruises quite routinely as part of the rough and tumble of daily life. Clearly, it is not necessary to be concerned about most of these minor injuries. But accidental injuries normally occur on the *bony prominences* – e.g. knees, shins.

Injuries on the *soft* areas of the body are more likely to be inflicted intentionally and should therefore make us more alert to other concerning factors that may be present.



A body map can assist in the clear recording and reporting of physical abuse. The body map should only be used to record observed injuries and no child should be asked to remove clothing by a member of staff. Body maps should be sent to the safeguarding team.

### **Indicators of physical abuse / factors that should increase concern**

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

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

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

You should be concerned if a child:

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

### **Sexual abuse**

#### **The nature of sexual abuse**

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

Sexual exploitation is seen as a separate category of sexual abuse. The [SSCB Screening Tool and guidance](#) provides trust staff with information regarding indicators of CSE (further information about CSE is available on pages [45-46](#)).

Characteristics of child sexual abuse:

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

Most people who sexually abuse children are men, but some women sexually abuse too.

### **Indicators of sexual abuse**

Physical observations:

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

Behavioural observations:

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

### **Sexual violence and sexual harassment between children in schools**

#### **Child to child Abuse – Policy Framework**

##### **Context**

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

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

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

## **Policy**

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

We recognise that children are capable of abusing other children and this will be dealt with under our child protection policy and in line with KCSIE (2023) and following recommendations from the Sexual Violence and Sexual Harassment between Children in Schools and Colleges guidance (DfE 2021).

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

Child on Child abuse is most likely to include, but may not be limited to:

- Bullying abuse in intimate personal relationships between children (sometimes known as 'teenage relationship abuse')
- Physical abuse or otherwise causing physical harm
- Sexual violence such as rape, assault by penetration and sexual assault. This may include an online element which facilitates, threatens or encourages sexual violence.
- Sexual harassment such as sexual comments, remarks, jokes and online harassment, which may be standalone or part of a broader pattern of abuse.
- Causing someone to engage in sexual activity without consent, such as forcing them to strip, touch themselves sexually or to engage in sexual activity with a third party.

We will minimise the risk of peer on peer/ child on child abuse by:

## **Prevention**

Taking a whole trust approach to safeguarding & child protection

Providing training to all staff.

Providing a clear set of values and standards, underpinned by the organisation's behaviour policy and pastoral support; and by a planned programme of evidence-based content delivered through the curriculum. We believe that failing to do so can lead to a culture of unacceptable behaviour, an unsafe environment and in worst case scenarios a culture that normalises abuse.

Engaging with specialist support and interventions.

Teaching young people about safe behaviours and relationships through RSE as part of our curriculum.

Recognising acknowledging and understanding the scale of harassment and that even if there are no reports, it does not mean that it is not happening.

Challenging physical behaviours such as grabbing bottoms, breasts and genitalia, as we believe that dismissing or tolerating them, risks normalising these behaviours.

### **Responding to reports of sexual violence and sexual harassment**

Children making a report of sexual violence or sexual harassment will be taken seriously, kept safe and be well supported.

The Voyeurism (Offences) Act, which is commonly known as the Upskirting Act, came into force on 12 April 2019. 'Upskirting' is where someone takes a picture under a person's clothing (not necessarily a skirt) without their permission and/or knowledge, with the intention of viewing their genitals or buttocks (with or without underwear) to obtain sexual gratification, or cause the victim humiliation, distress or alarm. It is a criminal offence. Anyone of any gender, can be a victim.

If the report includes an online element staff will be mindful of the Searching, Screening and Confiscation: advice for schools (DfE 2018) guidance. The key consideration is for staff not to view or forward illegal images of a child. The guidance provides more details on what to do if viewing an image is unavoidable.

Staff taking the report will inform the safeguarding team immediately by email.

Staff taking a report will never promise confidentiality.

Parents or carers should usually be informed (unless this would put the child at greater risk).

If a child is at risk of harm, is in immediate danger, or has been harmed, a referral will be made to social care.

### **Risk Assessment:**

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

The risk assessment will consider:

- The victim, especially their protection and support.

- The alleged perpetrator, their support needs and any discipline action.

- All other children at the trust.

- The victim and the alleged perpetrator sharing classes and space at St Joseph's.

The risk assessment will be recorded and kept under review.

Where there has been other professional intervention and/or other specialist risk assessments, these professional assessments will be used to inform the organisation's approach to supporting and protecting young people.

**Action: The DSL will consider:**

The wishes of the victim.

The nature of the incident including whether a crime has been committed and the harm caused.

Ages of the children involved.

Developmental stages of the children.

Any power imbalance between the children.

Any previous incidents.

That sexual violence and sexual harassment can take place within intimate personal relationships between children.

The importance of understanding the intra familial harms and any necessary support for siblings following incidents.

Ongoing risks.

Other related issues or wider context.

**Confidentiality**

The victim might ask not to share information with anyone about the sexual violence or sexual harassment. If the victim does not give consent to share information, staff may still lawfully share it if there is another legal basis under UK GDPR that applies. The DSL will consider;

- Parents or carers should normally be informed unless to do so would put the victim at greater risk.
- The basic safeguarding principal is if a child is at risk of harm, is in immediate danger or has been harmed, a referral should be made to children's social care, and
- Rape, assault by penetration and sexual assaults are crimes. Where a report of rape, assault by penetration or sexual assault is made, this should be referred to the police. Whilst the age of criminal responsibility is 10, if the alleged perpetrator is under 10, the starting principal is the same.

**Options: The DSL will make a decision regarding the issue, with the following possible options:**

Manage internally.

Early Help intervention.

Refer to social care.

Report to the police (generally in parallel with a referral to social care).

**Ongoing Response:**

The DSL will manage each case individually and will ensure the risk assessment is reviewed regularly with relevant partner agencies, for example the police and Children's Social Care.

Where an allegation of sexual violence or sexual harassment is progressing through the criminal justice system, settings should be aware of anonymity, witness support and the criminal process in general, so they can offer support and act appropriately.

Where there is a criminal investigation into a rape, assault by penetration or sexual assault, the alleged perpetrator should be removed from any classes they share with the victim.

The DSL will consider how best to keep the victim and perpetrator a reasonable distance apart on trust premises and on transport where appropriate.

Where a criminal investigation into a rape or assault by penetration leads to a conviction or caution, the trust will take suitable action. In all but the most exceptional of circumstances, the rape or assault is likely to constitute a serious breach of discipline and may lead to the view that allowing the perpetrator to remain in the same school or college would seriously harm the education or welfare of the victim (and potentially themselves and other young people).

Where a criminal investigation into sexual assault leads to a conviction or caution, the Trust will, if it has not already, consider any suitable sanctions in light of their behaviour policy, which may include consideration of permanent exclusion. Where the perpetrator is going to remain at the school or college, the Executive Principal should continue keeping the victim and perpetrator in separate classes and continue to consider the most appropriate way to manage potential contact on school and college premises and transport. The nature of the conviction or caution and wishes of the victim will be especially important in determining how to proceed in such cases.

The victim, alleged perpetrator and any other affected children or adults will receive appropriate support and safeguards on a case-by-case basis.

The trust will take any disciplinary action against the alleged perpetrator in accordance with the trust behaviour policy.

The trust recognises that taking disciplinary action and providing appropriate support are not mutually exclusive actions and will occur at the same time if necessary.

The trust will consider the potential impact of social media in facilitating the spreading of rumours and exposing victims' identities.

We recognise that those who have experienced sexual violence may display a wide range of responses or no overt signs at all.

### **Physical Abuse**

While a clear focus of peer on peer/ child on child abuse is around sexual abuse and harassment, physical assaults and initiation violence and rituals from young people to young people can also be abusive.

These are equally not tolerated and if it is believed that a crime has been committed, will be reported to the police.

The principles from the anti-bullying policy will be applied in these cases, with recognition that any police investigation will need to take priority.

#### *References:*

*DfE Keeping Children Safe in Education 2023*

**Harmful Sexual Behaviour** There are a number of resources available to assist schools to categorise the sexual behaviours of young people and is designed to help professionals:

- Make decisions about safeguarding children and young people
- Assess and respond appropriately to sexual behaviour in children and young people
- Understand healthy sexual development and distinguish it from harmful behaviour
- By categorising sexual behaviours, St Joseph's can work with other agencies to the same standardised criteria when making decisions and can protect children and young people with a multi-agency approach.

The trust recognise that it is vital that professionals agree on how behaviours should be categorised regardless of culture, faith, beliefs, and their own experiences or values.

Children's sexual behaviour exists on a continuum, ranging from normal and developmentally expected to inappropriate, problematic, abusive and violent. Problematic, abusive and violent sexual behaviour is developmentally inappropriate and may cause developmental damage. It can occur face-to-face and/or online.

In the context of St Joseph's Specialist Trust, the different diagnoses of our young people may mean that children present with behaviours typical of those younger to them. Any concerns or queries must be referred to the safeguarding team.

## **Anti-Bullying/ Cyberbullying**

The Trust's policy on anti-bullying is set out in a separate document and acknowledges that to allow or condone bullying may lead to consideration under child protection procedures.

We keep a record of known bullying incidents which is shared with and analysed by the Trustee Board by its delegated committee for Care, All staff are aware that children with SEND and/or differences/

perceived differences are more susceptible to being bullied/victims of child abuse.

When there is 'reasonable cause to suspect that a child is suffering, or is likely to suffer, significant harm' a bullying incident should be addressed as a child protection concern. If the anti-bullying procedures are seen to be ineffective, the Executive Principal and the safeguarding team will also consider child protection procedures.

The fact that a young person may be LGBT is not in itself an inherent risk factor of harm. However, young people who are LGBT can be targeted by other young people. In some cases, a young person who is believed to be LGBT can be just as vulnerable as someone who identifies as LGBT.

Risks can be compounded where young people who are LGBT lack a trusted adult with whom they can be open. It is therefore vital that staff endeavour to reduce the additional barriers faced and provide a safe space for them to speak out or share concerns with staff.

LGBT inclusion is part of the RSE curriculum and there is a range of support available for settings to counter bullying and abuse.

PHSE education regularly provides opportunities for children to understand bullying is wrong, its impact and how to deal with it.

### **Online Safety**

The trust has an online safety policy which explains how we try to keep young people safe in school and how we respond to online safety incidents.

Children increasingly use electronic equipment on a daily basis to access the internet, share and view content and images via social media sites such as Facebook, twitter, Instagram, snapchat and TikTok, and for online gaming.

Some adults and other children use these technologies to harm children. The harm might range from sending hurtful or abusive texts or emails, to grooming and enticing children to engage in extremist or sexual behaviour such as webcam photography or face-to-face meetings.

Young people may also be distressed or harmed by accessing inappropriate material such as pornographic websites or those which promote extremist behaviour, criminal activity, suicide or eating disorders

Young people are taught about online safety throughout the curriculum and all staff receive online safety training which is regularly updated.

Children with particular skills and interest in computing and technology may inadvertently or deliberately stray into cyber-dependent crime. If there are concerns about a child of this nature, the DSL will consider a referral into the cyber choices programme.

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

- Content – being exposed to illegal, inappropriate or harmful content such as pornography, fake news extremism or self-harm.



- Contact – being subjected to harmful online interaction with other users, for example peer to peer pressure and adults posing as children to groom, exploit, etc.
- Conduct – personal online behaviours that increase the likelihood of, or causes harm.
- Commerce – risks such as online gambling, phishing or financial scams.

## **Racist Incidents**

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

## **Radicalisation, Terrorism and Extremism**

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

Extremism is defined as '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.

Terrorism is an action that endangers or causes serious violence to a person/ people; causes serious damage to property; or seriously interferes with an electronic system. The use of threat must be designed to influence the government or to intimidate the public and is made for the purpose of advancing a political, religious or ideological cause.

Some children are at risk of being radicalised; adopting beliefs and engaging in activities which are harmful, criminal or dangerous. This can happen both online and offline.

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

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

Trust staff receive training to help identify early signs of radicalisation and extremism.

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

The Trustee Board, members of its Education Governing Committee, the Executive Principal and the Safeguarding Team will assess the level of risk within the trust and put actions in place to reduce that risk. Risk assessment may include, [the use of school premises by external agencies](#), anti-bullying policy and other issues specific to the trust's profile, community and philosophy.

When any member of staff has concerns that a pupil may be at risk of radicalisation or involvement in terrorism, they should speak with the DSL's. They should then follow the safeguarding procedures and refer cases to the [preventreferrals@surrey.pnn.police.uk](mailto:preventreferrals@surrey.pnn.police.uk) following the prevent referral process using the [Prevent referral form](#) . If the matter is urgent then police must be contacted by dialling 999. In non-urgent cases where police advice is

sought then dial 101 or 01483 632982 and ask to speak to the Surrey Police Prevent Coordinator.

The Department of Education has also set up a dedicated telephone helpline for staff and Trustees and members of the Education Governing Committee to raise concerns around Prevent (020 7340 7264).

Any significant event or allegation relating to terrorism or extremism will be notified to the Charity Commission via a serious incident notification.

Radicalisation refers to the process by which a person comes to support terrorism and forms of extremism leading to terrorism.

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.

The Department of Education guidance [The Prevent Duty](#) can be accessed via this link.

## **Domestic Abuse**

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

The Domestic Abuse Act received Royal Assent in April 2021. The act introduces the first ever statutory definition of domestic abuse and recognises the impact of domestic abuse on children. The statutory definition ensures that different types of relationships are captured and different abusive behaviours such as economic abuse and coercive and controlling behaviours. Both the person carrying out the behaviour and the person whom the behaviours are directed towards must be aged 16 or over and must be “personally connected”.

All children can witness and be adversely affected by domestic abuse in the context of their home life where domestic abuse occurs between family members. Experiencing domestic abuse can have a serious, long lasting emotional and psychological impact on children. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result.

We use the term domestic abuse to reflect that a number of abusive and controlling behaviours are involved beyond violence. Slapping, punching, kicking, bruising, rape, ridicule, constant criticism, threats, manipulation, sleep deprivation, social isolation, and other controlling behaviours all count as abuse.

Living in a home where domestic abuse takes place is harmful to children and can have a serious impact on their behaviour, wellbeing and understanding of healthy, positive relationships. Children who witness domestic abuse are at risk of significant harm and staff are alert to the signs and symptoms of a child suffering or witnessing domestic abuse.

The trust is enrolled onto the Operation Encompass scheme, a joint project between Surrey Police, Surrey County Council, Surrey Domestic Abuse Service and Surrey Schools; where every school day morning our DSL is notified of all domestic abuse incidents that have occurred and been reported to Police in the previous 24 hours which involved a child at this school (72 hours on a Monday morning). This provides an opportunity for us to ensure the right support is in place at the right time for children who are experiencing domestic abuse.

## **Homelessness**

Being homeless or being at risk of homelessness presents a real risk to a child's welfare. The safeguarding team is aware of contact details and referral routes into the LA housing authority so that they can raise/ progress concerns at the earliest opportunity.

## **Child Sexual Exploitation (CSE)**

Child sexual exploitation is a form of child sexual abuse.

It occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or young person under the age of 18 into sexual activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial advantage or increased status of the perpetrator or facilitator.

The victim may have been sexually exploited even if the sexual activity appears consensual. Child sexual exploitation does not always involve physical contact; it can also occur through the use of technology. All staff are aware of the link between online safety and vulnerability to CSE.

Any concerns that a child is being or is at risk of being sexually exploited should be passed immediately to the DSL by email.

The Trust is aware there is a clear link between regular non-attendance at school and CSE. Staff will consider a child to be at potential CSE risk in the case of regular non-attendance at school and make reasonable enquiries with the child and parents to assess this risk.

All staff are aware that safeguarding incidents and/ or behaviours can be associated with factors outside the Trust and/ or can occur between young people outside of these environments. All staff, but especially the safeguarding team, will consider whether children are at risk of abuse or exploitation outside their families. Extra-familial harms take a variety of different forms and children can be vulnerable to multiple harms including sexual exploitation, criminal exploitation and serious youth violence.

The staff who know the child well will complete a CSE risk assessment for every child to assess whether a child is being, or is at risk of being, sexually exploited or where indicators have been observed that are consistent with a child who is being or who is at risk of being sexually exploited.

In all cases, if the risk assessment identifies that a child is at high risk of CSE, a referral should be made to social care by the safeguarding team and discussed with parents. If a child is in immediate danger the police should be called on 999.

The trust is aware that a child often is not able to recognise the coercive nature of the abuse and does not see themselves as a victim. As a consequence, the child may resent what they perceive as interference by staff. However, staff must act on their concerns as they would for any other type of abuse. Children also rarely self-report CSE so staff must be particularly vigilant to potential indicators of risk.

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

## **Child Criminal Exploitation & Gangs**

CCE is a form of abuse and both occur where an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a child into criminal activity.

There are a number of areas in which young people are put at risk by gang activity, both through participation in, and as victims of, gang violence which can be in relation to their peers or to a gang-involved adult in their household.

A child who is affected by gang activity or serious youth violence may have suffered, or may be likely to suffer, significant harm through physical, sexual and emotional abuse or neglect.

The risk or potential risk of harm to the child may be as a victim, a gang member or both - in relation to their peers or to a gang-involved adult in their household. Teenagers can be particularly vulnerable to recruitment into gangs and involvement in gang violence. This vulnerability may be exacerbated by risk factors in an individual's background, including violence in the family, involvement of siblings in gangs, poor educational attainment, cognitive impairment, poverty or mental health problems.

Criminal exploitation of children is a typical feature of county lines criminal activity. Key identifying features of involvement in county lines are when children are missing, or when the victim may have been trafficked for transporting drugs. A referral to the National Referral Mechanism should be considered with Social Care and police colleagues. County Lines is a term used to describe gangs and organised crime networks involved in exporting illegal drugs (primarily crack cocaine and heroin) into one or more importing areas [within the UK], using dedicated mobile phone lines or other forms of 'deal lines'.

Any concerns that a child is being or is at risk of being criminally exploited will be passed without delay to the safeguarding team. The trust is aware there is a clear link between regular non-attendance at school and exploitation. Staff will consider a child to be at potential risk in the case of regular non-attendance at school and make reasonable enquiries with the child and parents to assess this risk.

A referral to social care will be made when any concern of harm to a child as a consequence of gang activity including child criminal exploitation becomes known. Any member of staff who has concerns that a child may be at risk of harm should immediately inform the safeguarding team. The safeguarding team will contact social care. If there is concern about a child's immediate safety, the police will be contacted on 999.

## **Serious Violence**

There are a number of indicators which may signal children are at risk from, or are involved in, serious violent crime. These may include:

- Increased absence
- A change in friendships or relationships with older individuals or groups
- A significant decline in performance
- Signs of self-harm or a significant change in wellbeing
- Unexplained gifts or new possessions.

Staff are aware that violence can often peak just before and after the children attend the school.

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

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

Sharing nudes/ semi nudes refers to both images and videos where:

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

All incidents of this nature should be treated as a safeguarding concern and in line with the UKCCIS guidance [sharing nudes/ semi nudes: advice for education settings working with children and young people.](#)

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

If a member of staff becomes aware of an incident involving youth produced sexual imagery, they should follow the child protection procedures and refer to the safeguarding team immediately.

The member of staff should, if possible, remove the device involved and set it to flight mode or, if this is not possible, turn it off. Staff must not view, copy or print the youth produced sexual imagery.

The safeguarding team should discuss the concerns with social care or, if there is a perceived risk of immediate danger, the police.

Parents should be informed at an early stage and involved in the process unless there is reason to believe that involving parents would put the child at risk of harm.

Immediate referral should be made to Children's Social Care/police if:

- The incident involves an adult.
- There is good reason to believe that a young person has been coerced, blackmailed or groomed or if there are concerns about their capacity to consent (for example, owing to special education needs).
- What you know about the imagery suggests the content depicts sexual acts which are unusual for the child's development stage or are violent.
- The imagery involves sexual acts.
- The imagery involves anyone aged 12 or under.
- There is reason to believe a child is at immediate risk of harm owing to the sharing of the imagery, for example the child is presenting as suicidal or self-harming.

If none of the above apply then the DSL will use their professional judgement to assess the risk to young people involved and may decide, with input from the Executive Principal, to respond to the incident without referral to social care or the police.

During the decision making the DSL will consider if:

- There is a significant age difference between the sender/receiver.

- There is any coercion or encouragement beyond the sender/receiver.
- The imagery was shared and received with the knowledge of the child in the imagery.
- The child is vulnerable, for example subject to Child in Need, Child Protection or Early Help plans, Looked After, level of need/ diagnoses.
- There is a significant impact on the children involved.
- The image is of a severe or extreme nature.
- The child involved understands consent.
- The situation is isolated or if the image been more widely distributed.
- There other circumstances relating to either the sender or recipient that may add cause for concern.
- The children have been involved in incidents relating to youth produced imagery before.

If any of these circumstances are present the situation will be referred according to our child protection procedures, including referral to social care or the police.

The DSL will record all incidents of youth produced sexual imagery, including the actions taken, rationale for actions and the outcome.

## **Modern Slavery**

Modern slavery encompasses human trafficking and slavery, servitude and forced or compulsory labour. Exploitation can take many forms, including sexual exploitation, forced labour, forced criminality and the removal of organs.

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

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

- Are informed by a girl under 18 that an act of FGM has been carried out on her; or
- Observe physical signs which appear to show that an act of FGM has been carried out on a girl under 18 and they have no reason to believe that the act was necessary for the girls health or for the purposes connected with labour or birth.

The duty applies to all persons in St Joseph's who is employed or engaged to carry out 'teaching work' in the school, whether or not they have qualified teacher status.

The duty applies to the individual who becomes aware of the case to make a report. It should not be transferred to the Safeguarding Team, however they should be informed.

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

Trust staff are trained to be aware of risk indicators of FGM.

Concerns about FGM outside of the mandatory reporting duty should be reported using the trust's child protection procedures. Staff should be particularly alert to suspicions or concerns expressed by female young people about going on a long holiday during the summer holiday.

There should also be consideration of potential risk to other girls in the family and practicing community. Where there is a risk to life or likelihood of serious immediate harm the teacher should report the case immediately to the police, including dialling 999 if appropriate.

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

### **Forced Marriage**

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

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

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

Trust staff should never attempt to intervene directly as a school or through a third party. Contact should be made with social care, police and/or the Forced Marriage Unit 200 7008 0151.

### **Honour-based abuse**

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

Honour based abuse might be committed against people who:

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

It is considered a violation of human rights and may be a form of domestic and/or sexual abuse.

### **One Chance Rule**

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

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

### **Contextual Safeguarding**

Contextual safeguarding looks to understand and respond to the experiences and relationships that young people have beyond their family home that may contain elements of

abuse and/ or violence. In most cases, families have very little influence over these experiences or relationships, therefore it is vital to engage with those who do have influence to understand, manage and support the young person and any factors contributing to potential harm.

St Joseph's Specialist Trust acts as part of this larger network, who may have information regarding relationships with peers, online activity, etc and will seek to actively engage with agencies regarding any concerns noted in relation to a young person's safety or wellbeing.

### **Private Fostering Arrangements**

A private fostering arrangement occurs when someone other than a parent or close relative cares for a child for a period of 28 days or more, with the agreement of the child's parents. It applies to children under the age of 16 years old or 18 years old if the child is disabled.

Children looked after by the local authority or who are placed in residential schools, children's homes or hospitals are not considered to be privately fostered.

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

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

By law, a parent, private foster carer or other persons involved in making a private fostering arrangement must notify Children's Social Care immediately. However, where a member of staff becomes aware that a pupil may be in a private fostering arrangement, they will raise this with the safeguarding team and the safeguarding team will notify social care immediately.

### **Children Looked After**

One of the most common reasons for children becoming looked after is as a result of abuse and neglect. However, amongst the children at St Joseph's Specialist Trust, the most common reason is a voluntary arrangement because of their residential status.

The trust ensures that staff have the necessary skills and understanding to keep looked after children safe. Appropriate staff have information about a child's looked after legal status and care arrangements, including the level of authority delegated to the carer by the authority looking after the child and contact arrangements with birth parents or those with parental responsibility.

The designated teacher and governor for children looked after will have the appropriate level of training to equip them with the knowledge and skills to undertake their role.

The designated teacher for children looked after and the DSL have details of the child's social worker and the name and contact details of the local authority's Head of Virtual School.

The designated teacher for children looked after and children previously looked after will work in partnership with the Virtual School Assistant and Executive Principal to discuss how Pupil Premium Plus funding can be best used to support the progress of children looked after in the school and meet the needs of the child within their personal education plan.

### **Children Missing Education**



All children, regardless of their circumstances, are entitled to an efficient, full time education which is suitable to their age, ability, aptitude and any special educational needs they may have.

The organisation recognises that children missing education are at significant risk of underachieving, being victims of abuse and harm, exploitation or radicalisation, and becoming NEET (not in education, employment or training) later in life.

Where possible the trust will hold more than one emergency contact number for each pupil.

The organisation will ensure that there is a record of joiners and leavers as defined in The Education (Pupil Registration) (England) 2006 (amended 2016).

When removing a child's name, the trust will notify the Local Authority of: (a) the full name of the child, (b) the full name and address of any parent with whom the child normally resides, (c) at least one telephone number of the parent, (d) the child's future address and destination school, if applicable, and (e) the ground in regulation 8 under which the child's name is to be removed from the school register.

The organisation will make reasonable enquiries to establish the whereabouts of a child jointly with the Local Authority, before deleting the child's name from the school register if the deletion is under regulation 8(1), sub-paragraphs (f) (iii) and (h) (iii) of The Education (Pupil Registration) (England) 2006 (amended 2016).

The organisation will:

- Enter children on the admissions register on the first day on which the trust has agreed, or has been notified, that the pupil will attend the school.
- Notify the Local Authority within five days of adding a child's name to the admission register. The notification must include all the details contained in the admission register for the new pupil.
- Monitor each child's attendance through their daily register and follow the SCC procedure in cases of unauthorised absence.
- Remove a child's name from the admissions register on the date that the child leaves the school.
- The trust will notify the Local Authority when they are about to remove a child's name from the school register, under any of the fifteen grounds listed in the regulations, no later than the date that the child's name is due to be removed.
- Where parents notify the trust, in writing, of their intention to electively home educate, the trust will forward a copy of the letter to the Elective Home Education Team / Education Welfare. Where parents orally indicate that they intend to withdraw their child to be home educated and no letter has been received, the trust will not remove the child from roll and will notify Education Welfare at the earliest opportunity.

### **Children Missing Out on Education**

The vast majority of children engage positively with trust and attend regularly. However, in order to flourish, some children require an alternative education offer or may require a modified timetable to support a return to full time education provision. It is recognised that children accessing alternative provision, or a reduced or modified timetable may have additional vulnerabilities. Ofsted refer to these as Young People Missing Out On Education (PMOOE), because they are not accessing their education in school in the 'usual way'.

The organisation will gain consent (if required in statute) from parents to put in place alternative provision and/or a reduced or modified timetable

The organisation will ensure that and parents (and the local authority where the pupil has an EHCP) are given clear information about alternative provision placements and reduced or modified timetables: why, when, where, and how they will be reviewed;

The organisation will keep the placement and timetable under review and involve parents in the review. Reviews will be frequent enough to provide assurance that the off-site education and/or modified timetable is achieving its objectives and that the pupil is benefitting from it.

The organisation will monitor and track children attending alternative provision to ensure that the provision meets the needs of the child. The trust continues to be responsible for the safeguarding of that young person. The trust will obtain written confirmation from the alternative provider that appropriate safeguarding checks have been carried out on individuals working at the establishment.

The organisation will comply with regular data returns requested by the Local Authority, regarding all young people, of statutory school age, attending alternative provision and/or on a reduced or modified timetable.

The Trust's leadership will report to Trustees of any formal direction of a pupil to alternative provision to improve behaviour.

The Trust's leadership will report to Trustees, information regarding the use and effectiveness of the use of alternative provision and modified timetables.

### **School Attendance and Behaviour**

Additional policies and procedures are in place regarding school attendance and behaviour.

The trust recognises that absence from school and exclusion from school may be indicators of abuse and neglect, including the exploitation of children. The DSL will regularly liaise with members of school staff with responsibility for behaviour and attendance to ensure risk is identified and appropriate intervention is in place to protect children from harm.

The trust will work in partnership with Surrey Police and other partners for reporting children that go missing from the site during the school day. Staff will be alert to signs of children at risk of travelling to conflict zones, female genital mutilation and forced marriage.

### **Pupils Missing Out on Education (PMOOE)**

Most children engage positively with school/ college and attend regularly. However, to flourish, some young people require an alternative provision or may require a modified timetable in order to support a return to full time education provision. It is recognised that young people accessing these may have additional vulnerabilities. Ofsted refer to these as Pupils Missing Out on Education (PMOOE) because they are not accessing education in school/ college in the 'usual way'.

The Trust will gain consent from parents to put in place alternative provision and/ or a reduced or modified timetable.

The Trust will ensure that parents are given clear information about alternative provision placements and reduced/ modified timetables.

The Trust will monitor and trace young person accessing alternative provision to ensure it meets the needs of the young person.

The trust will comply with regular data returns requested by the local authorities regarding young people accessing alternative provision or a reduced/ modified timetable.

### **Restrictive Physical Intervention**

We acknowledge that staff must only ever use physical intervention as a last resort, when a child is or is at immediate risk of harming themselves or others and that at all times it must be

the minimal force necessary to prevent injury to another person. Such events should be fully recorded on Sleuth, detailing witnesses.

All staff will be trained appropriately in Team Teach, including as part of their induction.

Staff understand that physical intervention of a nature which causes injury to a child may be considered under child protection and/ or disciplinary procedures.

We recognise that touch is appropriate in the context of working with children, and that all staff have been given 'safe practice' guidance to ensure that they are clear about professional boundaries.

The Trust has a separate Inclusion Support (Behaviour Management) Policy, which all staff must be aware of and is reflected in the training that all staff receive.

### **Whistle-blowing**

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

All staff should be aware of their duty to raise concerns, where they exist, about the management of child protection, which may include the attitude or actions of colleagues, poor or unsafe practice and potential failures in the trust's safeguarding arrangements. If it becomes necessary to consult outside the trust, they should speak in the first instance, to the Area Schools Officer or LADO in accordance with the Whistleblowing Policy.

The NSPCC whistleblowing helpline is available for staff who do not feel able to raise concerns regarding child protection failures internally or have concerns about a way a concern is being handled by their school. Staff can call: 0800 028 0285 – line is available from 8:00 AM to 8:00 PM, Monday to Friday and Email: [help@nspcc.org.uk](mailto:help@nspcc.org.uk).

Whistle-blowing regarding the Executive Principal should be made to the Chair of the Trustees whose contact details are available to staff.

Any member of staff or volunteer can also whistle blow to the Charity Commission via email on [whistleblowing@charitycommission.gov.uk](mailto:whistleblowing@charitycommission.gov.uk)

This policy also links to our policies on:

Administration of medicines  
Allegations against staff  
Anti-bullying  
Code of conduct  
Curriculum  
Disciplinary  
ICT  
Inclusion Support (Behaviour Management)  
Intimate care  
Missing child policy  
Physical contact  
PSHE  
Recruitment  
Social media  
Whistleblowing

**For further advice and information, visit;**

[Surrey County Council Education Safeguarding Team](#)

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

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

CEOP Thinkuknow: <https://www.thinkuknow.co.uk/>

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

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

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

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

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

Contextual Safeguarding Network <https://www.contextualsafeguarding.org.uk/>

[Charity Commission safeguarding guidance 2017](#)

[Charity Commission serious incident notifications](#)

[Charity Commission whistleblowing number](#)

# Appendix A – Covid-19

## Context

In March 2020, the government stated that vulnerable children and children of keyworkers (as detailed in their published guidance) should attend school and that other children should remain at home. These measures were instigated in response to the Covid-19 pandemic. This update aims to provide clarity of the safeguarding provision during this period. In the context of the government's briefings, all of the young people on register are deemed to be vulnerable and St Joseph's will continue to work with families and local authorities to support and protect them.

## Safeguarding Team/ DSL

St Joseph's Specialist Trust has a Designated Safeguarding Lead (DSL) and a number of Deputy DSL's. We aim to have a member of our Safeguarding Team on-site at all times during the school day and available by telephone for consultation outside of those hours. If there should be a period where no member of the Safeguarding Team is on-site then staff, or a nominated senior leader will make telephone contact with the DSL.

The Safeguarding Team will continue to respond to and action all concerns reported in relation to safeguarding concerns and will work closely with local authorities, social workers and families to coordinate their response.

Whatever the scenario, it is essential that all staff and children have access to a DSL at all times.

## Reporting concerns

Where staff have a concern about a child, they should continue to follow the process as outlined in the trust's Safeguarding Policy.

In the unlikely event that staff cannot access their emails to make such a referral, they must call a member of the safeguarding team to discuss their concerns. In the event that their concern is in relation to the Executive Principal, concerns should be discussed with the Chair of Trustees, whose details can be obtained from the Clerk to Trustees.

***All staff are reminded that they must report all concerns without delay.***

## Safeguarding Training and Induction

All existing staff have received full safeguarding training as part of our standard induction/ refresher training programmes and will be familiar with Keeping Children Safe in Education 2021 Part 1.

During this period, the DSL and Safeguarding Team will communicate to staff, any changes in legislation, policy or practice relevant to the organisation or their roles.

Any new staff recruited will continue to be given safeguarding training as part of their induction.

Any visitors or agency staff coming onto the site will continue to be provided with appropriate safeguarding information to allow them to make a referral if the need arises.

## Safer Recruitment

It remains essential that individuals who are not suitable to work with children are prevented from accessing St Joseph's Specialist Trust. To this end, the organisation continues to follow extensive safer recruitment processes, including relevant areas of KCSIE 2023 Part 3, under the support of the Safeguarding Team.

In response to COVID-19, the Disclosure and Barring Service (DBS) has made changes to its guidance on standard and enhanced DBS ID checking to minimise the need for face-to-face contact – see <https://www.gov.uk/government/news/covid-19-changes-to-dbs-id-checking-guidelines>

Where St Joseph's Specialist Trust are utilising volunteers, we will continue to follow the checking and risk assessment process as set out in KCSIE. Under no circumstances will a volunteer who has not been checked be left unsupervised or allowed to work in regulated activity.

St Joseph's Specialist Trust will continue to comply with the legal duty to refer to the DBS anyone who has harmed or poses a risk of harm to a child or vulnerable adult. Full details can be found at paragraph 329 of KCSIE.

St Joseph's Specialist Trust will continue to consider and make referrals to the Teaching Regulation Agency (TRA) as per paragraph 333 of KCSIE and the TRA's 'Teacher misconduct: advice for making a referral'.

### **Supporting Children at Home**

St Joseph's Specialist Trust continues its commitment to ensuring the safety and wellbeing of all of its students.

To this end, the trust will continue to maintain close contact with families and social workers to ensure that any concerns are addressed effectively.

St Joseph's Specialist Trust recognises that school is a protective factor for children and young people, and the current circumstances have a significant potential to affect the mental health of pupils and their parents.

### **Supporting children in school**

St Joseph's Specialist Trust is committed to ensuring the safety and wellbeing of all of its students.

St Joseph's Specialist Trust will continue to be a safe space for all children to attend and flourish. The Headteacher will ensure that appropriate staff are on site and staff to pupil ratio numbers are appropriate, maximising safety.

St Joseph's Specialist Trust will refer to the Government guidance for education and childcare settings on how to implement social distancing and continue to follow the advice from Public Health England on handwashing and other measures to limit the risk of spread of coronavirus.

St Joseph's understands that the Covid-19 situation is likely to cause significant anxiety to our young people. In view of this, our therapies team continues to develop relevant materials to support in their understanding, through social stories and scripts for staff.

### **Consultations and professional's meetings**

During this period, we will continue to work closely with our safeguarding partners and other agencies. To facilitate these meetings and discussions, we will continue to utilise technology and media. We will endeavour to comply with all statutory requests for information sharing.

## Review Schedule

Date	Changes	Reviewed by	Version	Trustee Ratification Due By	Trustee Ratification Received
October 2007	Policy Developed		V1	-	-
December 2008	v1.2	December 2008	v1.2	-	-
April 2010	v1.3	April 2010	v1.3	-	-
June 2011	Various	Alan Day	v1.4	-	-
June 2012	Changed references of Principal to Principal Inserted new Skin Map form (page 18)	Alan Day	v1.5	-	-
November 2013	Significant changes including addition of information regarding i) Female Genital Mutilation ii) Working Together to Safeguard Children March 2013 iii) and new Skin Map Appendix iv) Child Exploitation concerns and guidance.	Alan Day	v1.6	-	-
March 2014	Updated Appendix 4 – removed Simon Charleton from CPLO list	Liz Wright	v1.7	-	-
January 2015	Updated All Sections	Alan Day	v1.8	-	-
June 2015	Updated Extremism and Radicalisation Information	Alan Day	v1.9	-	-
September 2015	Updated	Alan Day	v2	-	-
November 2015	Minor amendments	Jay Shekleton	v2.1	-	-
May 2016	Updated DCPOs	Alan Day	v2.2	-	-
February 2017	Updated DCPOs and changed learner to student (no need for new version) Minor amends to Appendix 1 (no need for new version)	Alan Day Nicola Marklew		-	-
September 2017	Amended job titles Minor amends	Alan Day	V2.4	-	-
November 2017	Full update review	Alan Day	V2.5	-	-
May 2018	Amended named safeguarding lead	Jay Shekleton	V2.6	-	-
November 2018	Full update to reflect legislative changes	Jay Shekleton	V3	-	-
January 2019	Minor change to Trust	Alan Day	V3.1	-	-
November 2019	Full update review	Jay Shekleton	V3.2	-	-
August 2020	Full update/ review	Jay Shekleton	V3.3	-	-



August 2021	Updated following KCSIE 2021 release	Jay Shekleton	V3.4	-	-
March 2022	Updated following review	Jay Shekleton	V3.5	01/04/2022	
August 2022	Updated following KCSIE 2022 release	Jay Shekleton	V4	06/09/2022 by JS	
February 2023	Additions to Safeguarding Officers and change DSL to Nick Durling as Acting Safeguarding Lead	Annie Sutton	V4.1		
March 2023	Change Head of Safeguarding to Nick Durling	Annie Sutton	V4.2		
September 2023	Changes to KCSIE 2023	Alan Day	V4.3		
September 2024	No changes	Nick Durling	V4.4		
April 2025	Changes to Safeguarding Procedure	Nick Durling	V4.5		