



GMAT POLICIES

Safeguarding

Greater Manchester Academies Trust

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With you...for you...about you...

Table of Content

Introduction	4
Roles and Responsibilities	5
Our Principal will Ensure that	5
Our Governing Body will Ensure that:	6
The Designated Safeguarding Lead (DSL):	7
All Staff	8
Training and Awareness Raising	8
Safeguarding / Child Protection Policy and Procedure	9
Pupil Voice	9
Attendance	9
Exclusions	10
Vulnerable Groups	10
Case Management, Record Keeping and Multiagency Work	10
Recording and Reporting Concerns	11
Informing Parents / Carers	11
Multi-Agency Working	11
Confidentiality and Information Sharing	12
Child Protection (CP), Child In Need (CiN) and Team Around the Child / Family (TAC/TAF)	
Meetings and Conferences	12
Concerns / Disclosures by Children, Staff and Volunteers	12
Serious Case Reviews	13
The Curriculum	13
E-Safety	13
Safer Recruitment and Selection of Staff	14
Managing Allegations and Concerns against Staff and Volunteers	15
Safety On and Off Site	15
Appendices	16

Introduction

Through this policy we aim to create and maintain a safe learning environment where all children and adults feel safe, secure and valued and know they will be listened to and taken seriously.

This policy has been developed to ensure that all adults in our school are working together to safeguard and promote the welfare of children and to identify and address any safeguarding concerns and to ensure consistent good practice.

Our approach is child-centred.

'Safeguarding and promoting the welfare of children is everyone's responsibility. Everyone who comes into contact with children and their families and carers has a role to play in safeguarding children. In order to fulfil this responsibility effectively, all practitioners should make sure their approach is child-centred. This means that they should consider, at all times, what is in the best interests of the child.' (KCSIE Sept 2019)

See Appendix A, Part 1 of KCSIE Sept 2019, for definitions of Significant Harm, Physical Abuse, Emotional Abuse and Neglect from and further information about Complex Safeguarding Issues including newly identified safeguarding concerns around 'Upskirting' and 'Serious Violence' in the full statutory guidance. This guidance is issued to all new staff during their safeguarding induction.

Safeguarding and promoting the welfare of children goes beyond implementing basic child protection procedures. The aims of this policy are in accordance with our Equal Opportunities Policy and it is an integral part of all of our activities and functions.

'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; and taking action to enable all children to have the best outcomes.' (KCSIE 2nd September 2019)

At Greater Manchester Academies Trust we will deliver excellent provision for our children, their families, the wider community and our staff. We aim to bring equality of educational experience to every child in order to maximise outcomes for all. Our students will:

- Be physically, socially, emotionally safe and healthy
- Be asset rich and resilient to the effects of area and personal disadvantage
- Make good or better academic progress as each key stage of their education
- Be able to secure the employment opportunities of their choice Be able to contribute to the community

Our families and the wider community make an important contribution at GMAT. They access our outstanding facilities and the diverse programme of social and learning

opportunities. Their involvement underpins our community strategy.

Our staff will achieve the highest professional standards, continuously developing their skills and experience through high quality research, training and innovation. We will ensure that their working conditions allow them to be happy and fulfilled at GMAT.

1. Under the Education Act 2002, schools have a duty to safeguard and promote the welfare of their pupils and are committed to the guidance set out in 'Working Together to Safeguard Children 2015' and 'Keeping Children Safe in Education 2nd September 2019.' Our policy ensures that we comply with our Statutory Duties (Appendix A & B)
2. Our policy takes account of non-statutory guidance issued by the DfE and other relevant organisations (Appendix C) Our policy ensures that we work in partnership with other organisations, where appropriate, to identify any concerns about child welfare and take action to address them and that we comply with local policies, procedures and arrangements (Appendices D & F)
3. Our policy complements and supports other relevant school policies (Appendix E).

Roles and Responsibilities

Our Principal will Ensure that

- The policies and procedures adopted by the Governing Body to safeguard and promote the welfare of children, are fully implemented and followed by all staff, including volunteers and that they are regularly updated in response to local practice or national changes in legislation.
- All staff and volunteers understand and comply with our Code of Conduct.
- We evaluate our safeguarding policies & procedures at least annually and return our completed Safeguarding SEF proforma to the LA as requested
- Andrea Grant has been identified by the Principal as the Designated Senior Member of staff, known as the DSL, for child protection and receives appropriate on-going training, support and supervision as well as sufficient time and resources to enable her to discharge her responsibilities.
- Parents/carers are aware of and have an understanding of our responsibilities to promote the safety and welfare of its children by making our statutory obligations clear in our revised prospectus.
- The Safeguarding and Child Protection policy is available on our website and is issued to all new staff/volunteers during their Safeguarding Induction. Copies are also available from our reception staff.
- Child friendly information of how to raise a concern/make a disclosure has been developed with the help from our School Council and Health Ambassadors
- We co-operate fully with MCC and the Safeguarding Partnership multi-agency

safeguarding procedures and arrangements are in place to monitor the quality of referrals and interventions. These are discussed with the DSL/DDSL before submission and during team meetings.

- We create a culture whereby all staff, volunteers and visitors feel confident and have knowledge of how to raise a concern about poor or unsafe practice in regard to the safeguarding and welfare of the children and such concerns are addressed sensitively and effectively. All new staff, volunteers and visitors are provided with a handbook on arrival at the Academy that sets out safeguarding arrangements.
- Any staff commissioned from external agencies/ organisations have been DBS checked and their employing organisations have safeguarding policies in place, including safer recruitment and annual safeguarding training appropriate to roles.
- We have appropriate procedures to ensure that there is no risk to children from visitors and we exercise diligence and prevent any organisation or speaker from using our facilities to disseminate extremist views or radicalise children and staff. We work closely with the local authority and relevant embassies to ensure compliance and our staff monitor sessions during weekend hours and holiday periods.

Our Governing Body will Ensure that:

- All policies, procedures and training in our school are effective and comply with the law at all times.
- Named members are identified as the designated governors for Safeguarding and for Prevent and receive appropriate training.
- The identified Safeguarding Governor will liaise with the designated member of staff half termly, or sooner if the need arises, attend training sessions, contribute to the completion of an annual safeguarding audit and support the DSL when delivering reports to Governors.
- Our safeguarding policy is reviewed at least annually. The policy is revised by the DSL to include new guidance and is agreed by the Governing body.
- We operate safer recruitment and selection practices, including appropriate use of references and checks on new staff and volunteers. There is a robust tracking system in place to ensure compliance and the HR team and DSL work closely together to ensure all checks are completed.
- We have procedures in place for dealing with allegations of abuse against members of staff and volunteers and these are in line with Local Authority procedures.
- All staff and volunteers who have regular contact with children receive appropriate training and information about the safeguarding processes. All new staff receive a Safeguarding Induction and complete Level 1 Safeguarding training which is repeated every 2 years. Further training is offered to identified staff on a range of safeguarding topics and all staff receive safeguarding briefings verbally and via email.
- There is appropriate challenge and QA of the safeguarding policies and procedures.
- All amended/updated policies are ratified by Governors before distribution and the Safeguarding Governor contributes to and oversees the completion of a full

safeguarding audit annually in line with the local authority SEF.

The Designated Safeguarding Lead (DSL):

Has a specific responsibility for championing the importance of safeguarding and promoting the welfare of children. The DSL together with the Safeguarding Team, Heads of Year, identified teaching and pastoral staff will:

- Act as the first point of contact with regards to all safeguarding matters.
- Attend specialist DSL training every two years.
- Keep up to date with changes in local policy and procedures, be aware of any guidance issued by the DfE concerning safeguarding and update school procedures/policies as necessary
- Provide support and training for staff and volunteers via staff briefings, emailed updates and planned training sessions on identified topics that are recorded in the safeguarding staff development record
- Ensure that all referrals made to Children's Services are effective and in line with Safeguarding Partnership procedures. Referrals are reviewed by the DSL/DDSL before submission. There is a robust tracking system in place that ensures referrals are followed up and challenged when necessary. All referrals are recorded on CPOMS.
- Ensure that all staff with specific responsibility for safeguarding children receive the appropriate supervision to undertake this role. Ensure that all staff and volunteers understand and are aware of our reporting and recording procedures and are clear about what to do if they have a concern about a child.
- Always be available during school hours.

The Safeguarding Team provide some cover during the school holidays to ensure advice and guidance is available and to attend statutory meetings. The DSL is available via email or mobile phone.

- **Andrea Grant – Assistant Principal (Safeguarding)** line manages the safeguarding team and is a member of SLT, Staff Governor, DSL and has a child protection/child in need caseload, responsibility for safeguarding audits and the DBS/SCR process.
- **Karen Batchelor – Area Leader (Safeguarding)** is the DDSL and has a child protection and child in need caseload and audits the CME procedure to ensure compliance. Karen also leads the ACES programme.
- **Paula Corrigan – Lead Practitioner (Safeguarding)** is responsible for the administration of all LAC processes and attends PEP and LAC reviews. Paula manages the referral and allocation of support for children who are struggling with their emotional/mental health. Julie Farrington – Lead Professional (Safeguarding) oversees the day to day administration of the safeguarding team and has an Early Help caseload.
- **Kirsty Carvell – SENCO/LAC Designated Teacher** - acknowledges that children

with special educational needs and disabilities (SEND) can face additional safeguarding challenges as they may have an impaired capacity to resist or avoid abuse, and that additional barriers can exist when recognising abuse, neglect and difficulties in this group of children.

- **Serae Easmon – Attendance Lead** - Monitors attendance on a daily basis, offers support and guidance to children and parents and analyses data.
- **Martin Birrell** – Vice Principal (Pastoral) is responsible for the Academy's behaviour management and offers advice and guidance to children, parents and staff. Martin is also a member of SLT.

All Staff

All Staff in the school, including supply staff and volunteers have responsibility for safeguarding, according to their roles and under the guidance of the DSL.

All staff will:

- Follow our agreed Code of Conduct and 'Safer Working Practices' guidance.
- Attend training sessions/briefings as required to ensure that they are aware of the signs of Abuse, Neglect, Complex Safeguarding Concerns and key Safeguarding Partnership approaches including Early Help and Signs of Safety.
- Attend training sessions/briefings as required to ensure that they follow relevant policies/procedures e.g. Behaviour Policy.
- Provide a safe environment where children can learn.
- Be approachable to children and respond appropriately to any disclosures.
- Never promise a child that they will not tell anyone about an allegation, as this may not ultimately be in the best interest of the child.
- Know what to do if they have a concern and follow our agreed procedures for Recording concerns, sharing information and making referrals.
- Attend multi-agency meetings as required, if appropriate to their role.
- Contribute to the teaching of safeguarding in the curriculum as required, if appropriate to their role.
- Provide targeted support for individuals and groups of children as required, if appropriate to their role.

Teaching staff have additional statutory duties, including reporting any cases of known or suspected Female Genital Mutilation

Training and Awareness Raising

All new staff and regular volunteers will receive appropriate safeguarding information during induction. The DSL will advise staff of the safeguarding procedures in place and how to make a referral. Staff/Volunteers will also be given copies of additional

key policies and guidance e.g. Child Safeguarding and Protection policy, E-Safeguarding policy, Working Together.

All staff must ensure that they have read and understood 'KCSIE' Sept 2019 (Annex A and Part One). This guidance is given to all new staff/volunteers during their induction and they are asked to sign and return the Academy's confirmation that they have read and understood the information they have been given. Staff are advised of any amendments to KCSIE (Appendix A and Part One) by the DSL during briefings. Amended guidance is emailed to all staff or discussed during departmental meetings. Where a Safeguarding Induction cannot take place immediately new staff are provided with an induction handbook.

All staff will receive child protection training, which is repeated every 2 years. The training includes basic safeguarding information about our policies and procedures, signs and symptoms of abuse (emotional and physical), indicators of vulnerability to radicalisation, how to manage a disclosure from a child as well as when and how to record a concern about the welfare of a child. All new staff are required to attend Level 1 Safeguarding and Prevent training. Identified staff will attend safeguarding awareness sessions with students to ensure they are able to offer support and guidance around topics such as Female Genital Mutilation (FGM). All training is recorded for tracking and monitoring purposes.

All staff members will receive regular safeguarding and child protection updates in relation to local and national changes, but at least annually, providing them with relevant skills and knowledge to safeguard children effectively. This information is shared either through training sessions or staff briefing papers.

Safeguarding / Child Protection Policy and Procedure

Pupil Voice

Children are encouraged to contribute to the development of policies and share their views through student council or our health ambassadors.

Attendance

We view poor attendance as a safeguarding issue and in accordance with our Attendance Policy, absences are rigorously pursued and recorded. In partnership with the appropriate agencies, we take action to pursue and address all unauthorised absences in order to safeguard the welfare of children in our care.

Our Attendance Policy identifies how individual cases are managed and how we work proactively with parents/carers to ensure that they understand why attendance is important. In certain cases, this may form part of an Early Help Assessment (EHA) or a Parenting Contract.

We implement the statutory requirements in terms of monitoring and reporting children missing education (CME) and off-rolling and understand how important this practice is in safeguarding children and young people. The CME file is audited termly by the DDSL.

Exclusions

The DSL will be involved when a fixed term or permanent exclusion is being discussed and any safeguarding issues will be considered. Where it is felt that a child or young person is likely to be permanently excluded a multi-agency assessment will be instigated to ensure that there is improved understanding of the needs of the young person and their family and that the key agencies are involved.

Vulnerable Groups

We ensure all key staff work together to safeguard vulnerable children through regular meetings of key staff in school and via staff briefings. Relevant information is recorded on SIMS/CPOMS.

- Any child may benefit from early help at times, but all staff will be particularly alert to the potential need for early help for a child who: is disabled and has specific additional needs; has special educational needs (whether or not they have a statutory education, health and care plan); is a young carer; is misusing drugs or alcohol;
- Is in a family circumstance presenting challenges for the child, such as substance abuse, adult mental health problems or domestic abuse is an international new arrival, refugee or asylum seeker is looked after, previously looked after or under a special guardianship order.
- Children with special educational needs (SEN) and disabilities can face additional safeguarding challenges. All staff are aware that additional barriers can exist when recognising abuse and neglect in this group of children. These can include assumptions that indicators of possible abuse such as behaviour, and injury relate to the child's disability without further exploration, being more prone to peer group isolation the potential for being disproportionately impacted by behaviours such as bullying without outwardly showing any signs; and communication barriers and difficulties in overcoming these barriers.

Case Management, Record Keeping and Multiagency Work

At GMAT we record information about our children on SIMS or CPOMS.

- We keep and maintain up to date information on children on the school roll including where and with whom the child is living, attainment, attendance, referrals to and support from other agencies. The record will also include a chronology of any other significant events in a child's life.

- We keep copies of all referrals to Children's Services, the Early Help Hub and any other agencies related to safeguarding children. These are recorded on our Safeguarding tracker to ensure we actively follow up any referrals or multiagency actions.
- We keep secure the safeguarding records.
- We send a pupil's child protection or safeguarding file separately from the main file to a new establishment if a pupil leaves the school and keep a copy of the file in accordance with our Transfer of Records Policy (See Appendix E) and LA Guidance (See Appendix F)

Recording and Reporting Concerns

All staff, volunteers and visitors have a responsibility to report any concerns about the welfare and safety of a child and all such concerns must be taken seriously (Appendix A). If a concern arises all staff, volunteers and visitors must:

- Speak to the DSL or the person who acts in their absence
- Agree with this person what action should be taken, by whom and when it will be reviewed
- Record the concern using our safeguarding recording system

Informing Parents / Carers

Our responsibility is to safeguard and promote the welfare of all the children in our care. We aim to do this in partnership with our parents/carers and would expect them to provide up to date contact details.

In most cases parents/carers will be informed when concerns are raised about the safety and welfare of their child and given the opportunity to address any concerns raised. We will aim to engage with parents/carers through the Early Help processes, including carrying out an Early Help Assessment (EHA).

We will inform, and gain consent, from parents/carers if possible, when a referral is to be made to the Children's Services or any other agency **unless it is believed that doing so would put the child at risk**, eg in cases of suspected physical abuse. We will record the reasons, where consent is not gained.

Multi-Agency Working

We will develop effective links with other relevant agencies and co-operate as required with any enquiries regarding child protection issues.

We will notify Children's Social Care if:

- Child subject to a child protection plan is at risk of permanent exclusion.
- There is an unexplained absence of a child who is subject to a child protection
- It has been agreed as part of any child protection plan or core group plan.

Confidentiality and Information Sharing

- Staff will ensure that confidentiality protocols are followed and under no circumstances will they disclose any information about children outside of their professional role.
- Information about children will only be shared with other members of staff on a need to know basis.
- All staff and volunteers understand that they have a professional responsibility to share information with other agencies, if in the child's best interests, in order to safeguard them.

Child Protection (CP), Child In Need (CiN) and Team Around the Child / Family (TAC/TAF) Meetings and Conferences

Members of staff who are asked to attend a CP conference or other core group meetings about an individual pupil/family will need to have as much relevant updated information about the child as possible.

A CP conference will be held if it is considered that the child is suffering or at risk of significant harm.

Every effort will be made to ensure that we contribute to and attend CP and CiN conferences and reviews. The DSL and DDSL are able to provide wrap around care for our students as they are employed during school holidays. This ensures attendance at statutory meetings and conferences. In the event that their attendance isn't possible a report is pre-prepared and shared with the Conference Chair and a request is sent to the LA representative to enquire if they are able to attend on the school's behalf.

We aim to comply with local arrangements to prepare and submit reports for CP conferences within the required timescales. Attempts will be made to discuss and share reports with the parents/carers. We will use the most up to date proforma.

Concerns / Disclosures by Children, Staff and Volunteers

Any concern, disclosure or expression of disquiet made by a child will be listened to seriously and acted upon as quickly as possible to safeguard his or her welfare.

All staff and volunteers must be clear with children that they cannot promise to keep secrets.

We will make sure that the child or adult who has expressed the concern or made the complaint will be informed, not only about the action to be taken but also where possible about the length of time required to resolve the complaint.

We will endeavour to keep the child or adult informed about the progress of the complaint/expression of concern.

Serious Case Reviews

The Safeguarding Partnership will always undertake a serious case review when a child dies (including death by suicide) and abuse or neglect is known or suspected to be a factor in their death. If required, we will cooperate fully with the review process.

Our DSL will keep up to date with the findings from SCRs in Manchester and share the learning and review our safeguarding procedures if relevant.

The Curriculum

We are committed to promoting emotional health and well-being and to supporting the development of the skills needed to help children keep themselves safe and healthy, develop their self-esteem, develop resilience and understand the responsibilities of adult life, particularly in regard to child care and parenting skills.

All children have access to an appropriate curriculum, differentiated to meet their needs. They are encouraged to express and discuss their ideas, thoughts and feelings through a variety of activities and have access to a range of cultural opportunities which promote the fundamental British values of tolerance, respect and empathy for others.

This enables them to learn to develop the necessary skills to build self-esteem, respect others, defend those in need, resolve conflict without resorting to violence, question and challenge and to make informed choices in later life.

There is access to a range of extra-curricular activities which promotes these values and supports the social, spiritual, moral well-being and physical and mental health of the pupils.

Personal Health and Social Education and Citizenship lessons provide opportunities for children and young people to discuss and debate a range of subjects including lifestyles, knowing and understanding how to keep themselves safe and different family patterns.

We take account of the latest advice and guidance provided to help address specific vulnerabilities, risks and forms of exploitation e.g. CSE, Radicalisation and Extremism, Modern Slavery, County Lines, Female Genital Mutilation, Forced Marriage, Upskirting and Serious Violence. We provide children with opportunities to a wide and varied range of outside speakers and agencies who share important messages and signs to look out for so that our children are better equipped to keep themselves safe.

E-Safety

E-safety is a safeguarding issue not an ICT issue. The purpose of Internet use in our school is to help raise educational standards, promote children's achievement, and support the professional work of staff, as well as enhance our management

information and business administration.

The internet is an essential element in 21st century life for education, business and social interaction and we have a duty to provide children with quality access to it as part of their learning experience.

We will ensure that appropriate filtering methods are in place to ensure that children are safe from all types of inappropriate and unacceptable materials, including terrorist and extremist material.

We have separate acceptable use policies (AUPs) for both staff and children. This covers the use of all technologies used, both on and offsite. GMAT has invested in specific monitoring and reporting systems - NetSafe and Smoothwall. All staff are advised during their Safeguarding Induction that their internet and email usage is monitored on and off site. Children are advised via the curriculum of the monitoring systems in place to ensure they are kept safe online etc.

We follow the Safeguarding Partnerships guidelines 'Safeguarding online guidelines for minimum standards' and the advice on the UK Safer Internet Website. The school will be working towards a 360 Accreditation during 2019-2020.

We work with children and parents to promote good practice in keeping children safe online via tweets and the Academy Newsletter.

Safer Recruitment and Selection of Staff

Our recruitment and selection policies and processes adhere to the DfE guidance 'KCSIE' Sept 2019 and further information can be found in our Recruitment Policy.

The Principal and Governing Body will ensure that all external staff and volunteers using our site have been DBS checked.

Written notification will be requested from any agency or third party organisation used by the Academy to confirm that the organisation has carried out the statutory recruitment checks.

At least one member of each recruitment panel will have attended safer recruitment training.

All relevant staff (involved in early year's settings and/or before or after school care for children under eight) are made aware of the disqualification and disqualification by association legislation and their obligations to disclose relevant information to the academy. The date of the declaration is recorded on our SCR.

Trainee teachers will be checked either by the school or by the training provider, from whom written confirmation will be obtained.

The school maintains a single central record of recruitment checks undertaken.

Managing Allegations and Concerns against Staff and Volunteers

We adhere to DfE guidance 'KCSIE, Section 4', when dealing with allegations made against staff and volunteers. GMAT's guidance is set out in our Allegations of Abuse against Staff policy. Any incidences should be reported to the Principal and/or the DSL immediately.

All allegations made against a member of staff and volunteers, including contractors or security staff working on site, will be dealt with quickly and fairly and in a way that provides effective protection for the child while at the same time providing support for the person against whom the allegation is made. Further information can be found in our Staff Handbook or our Disciplinary and Procedures Policy.

Allegations will be referred to the LA Designated Officer for investigation if they meet the threshold. (See link to guidance in Appendix D)

We ensure that all staff are aware of how to raise a concern, including anonymously as a whistleblower. This information is provided during new staff inductions, in our whistleblowing Policy and the NSPCC, contact details for which are printed on the reverse side of staff identity badges.

Safety On and Off Site

Our site is secure with safeguards in place to prevent any unauthorised access and also to prevent children leaving the site unsupervised.

All visitors, including visiting speakers, are subject to our safeguarding protocols whilst on site and will be supervised at all times, if no checks have been obtained.

These visitors will be requested to wear a red lanyard.

We will ensure that any contractor, or any employee of the contractor, who is to work at the school, has the appropriate DBS check in place. We are responsible for determining the appropriate level of supervision depending on the circumstances. We will always check the identity of visitors/contractors and their staff on arrival at the Academy. **Contractors/visitors with the correct clearance will be requested to wear a blue lanyard.**

We operate a responsible booking protocol and will carry out appropriate checks on all organisations which request the hire of our facilities. This includes an SLA that must be signed by all parties, relevant documentation and checks via Embassies and liaison with the local authority. Please refer to our educational trips and visits policy for more details.

We will only place children in alternative educational provision (AP) which is a registered provider and has been quality assured. Children who require access to AP will have a personalised learning plan designed to meet their needs. Our Behaviour

Manager (Alternative Provision) will liaise with the AP DSL to ensure a consistent approach and that relevant safeguarding information is shared. Their attendance will be monitored by us in accordance with the School Register Regulations.

We have a work experience placement policy and procedures in place. We will ensure that any person supervising a child under the age of 16 on a placement has been subject to the appropriate level of DBS check. If a child 16 years of age or over is on work experience at the Academy and there is the opportunity for contact with children, we will complete a DBS enhanced check.

All school trips are fully risk assessed and no child will be taken offsite without parental permission.

For international exchanges, we will liaise with partner schools abroad, to establish a shared understanding of the arrangements in place both before and during the visit. We will ensure we are satisfied that these are appropriate and sufficient to safeguard effectively every child who will take part in the exchange. We may also feel it necessary to contact the relevant foreign embassy or High Commission of the country in question to discuss what checks may be possible in respect of those providing homestay outside of the UK.

We have a Health & Safety policy which includes guidance on contacting parents, and for reporting to the emergency services, including Police & Hospital.

Appendices

Our policy is based on the following legislation, national & local guidance/procedures and links to other relevant school policies.

Part one: Safeguarding information for all staff

What school and college staff should know and do

A child centred and coordinated approach to safeguarding

1. Schools and colleges and their staff are an important part of the wider safeguarding system for children. This system is described in statutory guidance [Working Together to Safeguard Children](#).
2. Safeguarding and promoting the welfare of children is **everyone's** responsibility. **Everyone** who comes into contact with children and their families has a role to play. In order to fulfil this responsibility effectively, all practitioners should make sure their approach is child-centred. This means that they should consider, at all times, what is in the **best interests** of the child.
3. No single practitioner can have a full picture of a child's needs and circumstances. If children and families are to receive the right help at the right time, **everyone** who comes into contact with them has a role to play in identifying concerns, sharing information and taking prompt action.
4. Safeguarding and promoting the welfare of children is defined for the purposes of this guidance 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; and
 - taking action to enable all children to have the best outcomes.
5. Children includes everyone under the age of 18.

The role of school and college staff

6. School and college staff are particularly important as they are in a position to identify concerns early, provide help for children, and prevent concerns from escalating.
7. **All** staff have a responsibility to provide a safe environment in which children can learn.

8. **All staff** should be prepared to identify children who may benefit from early help.³ Early help means providing support as soon as a problem emerges at any point in a child's life, from the foundation years through to the teenage years.
9. **Any staff member** who has a concern about a child's welfare should follow the referral processes set out in paragraphs 36-47. Staff should expect to support social workers and other agencies following any referral.
10. Every school and college should have a designated safeguarding lead who will provide support to staff to carry out their safeguarding duties and who will liaise closely with other services such as children's social care.
11. The designated safeguarding lead (and any deputies) are most likely to have a complete safeguarding picture and be the most appropriate person to advise on the response to safeguarding concerns.
12. The Teachers' Standards 2012 state that teachers (which includes headteachers) should safeguard children's wellbeing and maintain public trust in the teaching profession as part of their professional duties.⁴

What school and college staff need to know

13. **All staff** should be aware of systems within their school or college which support safeguarding and these should be explained to them as part of staff induction. This should include the:
- child protection policy;
 - behaviour policy;⁵
 - staff behaviour policy (sometimes called a code of conduct);
 - safeguarding response to children who go missing from education; and
 - role of the designated safeguarding lead (including the identity of the designated safeguarding lead and any deputies).

³ Detailed information on early help can be found in Chapter 1 of [Working Together to Safeguard Children](#).

⁴ The [Teachers' Standards](#) apply to: trainees working towards QTS; all teachers completing their statutory induction period (newly qualified teachers [NQTs]); and teachers in maintained schools, including maintained special schools, who are subject to the Education (School Teachers' Appraisal) (England) Regulations 2012.

⁵ All schools are required to have a behaviour policy (full details are [here](#)). If a college chooses to have a behaviour policy, it should be included in the college's safeguarding policy.

Copies of policies and a copy of Part one of this document should be provided to staff at induction.

14. **All** staff should receive appropriate safeguarding and child protection training which is regularly updated. In addition, all staff should receive safeguarding and child protection updates (for example, via email, e-bulletins and staff meetings), as required, and at least annually, to provide them with relevant skills and knowledge to safeguard children effectively.

15. **All** staff should be aware of their local early help⁶ process and understand their role in it.

16. **All** staff should be aware of the process for making referrals to children's social care and for statutory assessments under the Children Act 1989, especially section 17 (children in need) and section 47 (a child suffering, or likely to suffer, significant harm) that may follow a referral, along with the role they might be expected to play in such assessments.⁷

17. **All** staff should know what to do if a child tells them he/she is being abused or neglected. Staff should know how to manage the requirement to maintain an appropriate level of confidentiality. This means only involving those who need to be involved, such as the designated safeguarding lead (or a deputy) and children's social care. Staff should never promise a child that they will not tell anyone about a report of abuse, as this may ultimately not be in the best interests of the child.

What school and college staff should look out for

Early help

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

- is disabled and has specific additional needs;
- has special educational needs (whether or not they have a statutory Education, Health and Care Plan);
- is a young carer;
- is showing signs of being drawn in to anti-social or criminal behaviour, including gang involvement and association with organised crime groups;
- is frequently missing/goes missing from care or from home;
- is at risk of modern slavery, trafficking or exploitation;

⁶ Detailed information on early help can be found in Chapter 1 of [Working Together to Safeguard Children](#).

⁷ More information on statutory assessments is included at paragraph 42. Detailed information on statutory assessments can be found in Chapter 1 of [Working Together to Safeguard Children](#).

- is at risk of being radicalised or exploited;
- is in a family circumstance presenting challenges for the child, such as drug and alcohol misuse, adult mental health issues and domestic abuse;
- is misusing drugs or alcohol themselves;
- has returned home to their family from care; and
- is a privately fostered child.

Abuse and neglect

19. Knowing what to look for is vital to the early identification of abuse and neglect. **All** staff should be aware of indicators of abuse and neglect so that they are able to identify cases of children who may be in need of help or protection. If staff are unsure, they should **always** speak to the designated safeguarding lead (or deputy).

20. **All** school and college staff should be aware that abuse, neglect and safeguarding issues are rarely stand-alone events that can be covered by one definition or label. In most cases, multiple issues will overlap with one another.

Indicators of abuse and neglect

21. **Abuse:** a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Children may be abused by an adult or adults or by another child or children.

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

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

24. **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. The sexual abuse of children by other children is a specific safeguarding issue in education (see paragraph 27).

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

Safeguarding issues

26. **All staff** should have an awareness of safeguarding issues that can put children at risk of harm. Behaviours linked to issues such as drug taking, alcohol abuse, deliberately missing education and sexting (also known as youth produced sexual imagery) put children in danger.

Peer on peer abuse

27. **All staff** should be aware that children can abuse other children (often referred to as peer on peer abuse). This is most likely to include, but may not be limited to:

- bullying (including cyberbullying);
- physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm;
- sexual violence,⁸ such as rape, assault by penetration and sexual assault;

- sexual harassment,⁹ such as sexual comments, remarks, jokes and online sexual harassment, which may be stand-alone or part of a broader pattern of abuse;
- upskirting,¹⁰ which typically involves taking a picture under a person's clothing without them knowing, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm;
- sexting (also known as youth produced sexual imagery); and
- initiation/hazing type violence and rituals.

28. **All** staff should be clear as to the school's or college's policy and procedures with regards to peer on peer abuse.

Serious violence

29. All staff should be aware of indicators, which may signal that children are at risk from, or are involved with serious violent crime. These may include increased absence from school, a change in friendships or relationships with older individuals or groups, a significant decline in performance, signs of self-harm or a significant change in wellbeing, or signs of assault or unexplained injuries. Unexplained gifts or new possessions could also indicate that children have been approached by, or are involved with, individuals associated with criminal networks or gangs.

30. All staff should be aware of the associated risks and understand the measures in place to manage these. Advice for schools and colleges is provided in the Home Office's [Preventing youth violence and gang involvement](#) and its [Criminal exploitation of children and vulnerable adults: county lines](#) guidance¹¹.

Female Genital Mutilation

31. Whilst **all** staff should speak to the designated safeguarding lead (or deputy) with regard to any concerns about female genital mutilation (FGM), there is a specific **legal duty on teachers**.¹² If a teacher, in the course of their work in the profession, discovers that an act of FGM appears to have been carried out on a girl under the age of 18, the teacher **must** report this to the police. See Annex A for further details.

Contextual safeguarding

32. Safeguarding incidents and/or behaviours can be associated with factors outside the school or college and/or can occur between children outside the school or college. **All** staff, but especially the designated safeguarding lead (and deputies) should be considering the context within which such incidents and/or behaviours occur. This is

⁹ For further information about sexual harassment see Annex A.

¹⁰ For further information about 'upskirting' see Annex A.

¹¹ For further information about violent crime see Annex A.

¹² Under Section 5B(1)(a) of the Female Genital Mutilation Act 2003, "teacher" means, in relation to England, a person within section 141A(1) of the Education Act 2002 (persons employed or engaged to carry out teaching work at schools and other institutions in England).

known as contextual safeguarding, which simply means assessments of children should consider whether wider environmental factors are present in a child's life that are a threat to their safety and/or welfare. Children's social care assessments should consider such factors so it is important that schools and colleges provide as much information as possible as part of the referral process. This will allow any assessment to consider all the available evidence and the full context of any abuse. Additional information regarding contextual safeguarding is available here: [Contextual Safeguarding](#).

Additional information and support

33. Departmental advice [What to Do if You Are Worried a Child is Being Abused - Advice for Practitioners](#) provides more information on understanding and identifying abuse and neglect. Examples of potential indicators of abuse and neglect are highlighted throughout the advice and will be particularly helpful for school and college staff. The [NSPCC](#) website also provides useful additional information on abuse and neglect and what to look out for.

34. **Annex A** contains important additional information about specific forms of abuse and safeguarding issues. School and college leaders and those staff who work directly with children should read the annex.

What school and college staff should do if they have concerns about a child

35. Staff working with children are advised to maintain an attitude of '**it could happen here**' where safeguarding is concerned. When concerned about the welfare of a child, staff should always act in the **best** interests of the child.

36. If staff have **any concerns** about a child's welfare, they should act on them immediately. See page 16 for a flow chart setting out the process for staff when they have concerns about a child.

37. If staff have a concern, they should follow their own organisation's child protection policy and speak to the designated safeguarding lead (or deputy).

38. Options will then include:

- managing any support for the child internally via the school's or college's own pastoral support processes;
- an early help assessment;¹³ or

- a referral for statutory services,¹⁴ for example as the child might be in need, is in need or suffering or likely to suffer harm.

39. The designated safeguarding lead or a deputy should always be available to discuss safeguarding concerns. If in exceptional circumstances, the designated safeguarding lead (or deputy) is not available, this should not delay appropriate action being taken. Staff should consider speaking to a member of the senior leadership team and/or take advice from local children's social care. In these circumstances, any action taken should be shared with the designated safeguarding lead (or deputy) as soon as is practically possible.

40. Staff should not assume a colleague or another professional will take action and share information that might be critical in keeping children safe. They should be mindful that early information sharing is vital for effective identification, assessment and allocation of appropriate service provision. [Information Sharing: Advice for Practitioners Providing Safeguarding Services to Children, Young People, Parents and Carers](#) supports staff who have to make decisions about sharing information. This advice includes the seven golden rules for sharing information and considerations with regard to the Data Protection Act 2018 and General Data Protection Regulation (GDPR). If in any doubt about sharing information, staff should speak to the designated safeguarding lead or a deputy. Fears about sharing information **must not** be allowed to stand in the way of the need to promote the welfare, and protect the safety of children.

Early help

41. If early help is appropriate, the designated safeguarding lead (or deputy) will generally lead on liaising with other agencies and setting up an inter-agency assessment as appropriate. Staff may be required to support other agencies and professionals in an early help assessment, in some cases acting as the lead practitioner. Any such cases should be kept under constant review and consideration given to a referral to children's social care for assessment for statutory services, if the child's situation does not appear to be improving or is getting worse.

Statutory assessments

42. **Where a child is suffering, or is likely to suffer from harm, it is important that a referral to children's social care (and if appropriate the police) is made immediately.** Referrals should follow the local referral process.

¹⁴ Chapter 1 of [Working Together to Safeguard Children](#) sets out that the safeguarding partners should publish a threshold document that should include the criteria, including the level of need, for when a case should be referred to local authority children's social care for assessment and for statutory services under section 17 and 47. Local authorities, with their partners, should develop and publish local protocols for assessment. A local protocol should set out clear arrangements for how cases will be managed once a child is referred into local authority children's social care.

Children in need

A child in need is defined under the Children Act 1989 as a child who is unlikely to achieve or maintain a reasonable level of health or development, or whose health and development is likely to be significantly or further impaired, without the provision of services; or a child who is disabled. Local authorities are required to provide services for children in need for the purposes of safeguarding and promoting their welfare. Children in need may be assessed under section 17 of the Children Act 1989.

Children suffering or likely to suffer significant harm

Local authorities, with the help of other organisations as appropriate, have a duty to make enquiries under section 47 of the Children Act 1989 if they have reasonable cause to suspect that a child is suffering, or is likely to suffer, significant harm. Such enquiries enable them to decide whether they should take any action to safeguard and promote the child's welfare and must be initiated where there are concerns about maltreatment, including all forms of abuse and neglect, female genital mutilation or other so-called honour based violence, and extra-familial threats like radicalisation and sexual exploitation.

43. The online tool [Report Child Abuse to Your Local Council](#) directs to the relevant local children's social care contact number.

What will the local authority do?

44. Within one working day of a referral being made, a local authority social worker should acknowledge receipt to the referrer and make a decision about the next steps and the type of response that is required. This will include determining whether:

- the child requires immediate protection and urgent action is required;
- the child is in need, and should be assessed under section 17 of the Children Act 1989;
- there is reasonable cause to suspect the child is suffering or likely to suffer significant harm, and whether enquiries must be made and the child assessed under section 47 of the Children Act 1989;
- any services are required by the child and family and what type of services
- further specialist assessments are required to help the local authority to decide what further action to take;
- to see the child as soon as possible if the decision is taken that the referral requires further assessment.

45. The referrer should follow up if this information is not forthcoming.

46. If social workers decide to carry out a statutory assessment, staff should do everything they can to support that assessment (supported by the designated [Greater Manchester Academies Trust | Safeguarding](#) safeguarding lead (or deputy) as required).

47. If, after a referral, the child's situation does not appear to be improving, the referrer should consider following local escalation procedures to ensure their concerns have been addressed and, most importantly, that the child's situation improves.

Record keeping

48. All concerns, discussions and decisions made, and the reasons for those decisions, should be recorded in writing. If in doubt about recording requirements, staff should discuss with the designated safeguarding lead (or deputy).

Why is all of this important?

49. It is important for children to receive the right help at the right time to address risks and prevent issues escalating. Research and serious case reviews have repeatedly shown the dangers of failing to take effective action.¹⁵ Examples of poor practice include:

- failing to act on and refer the early signs of abuse and neglect;
- poor record keeping;
- failing to listen to the views of the child;
- failing to re-assess concerns when situations do not improve;
- not sharing information;
- sharing information too slowly; and
- a lack of challenge to those who appear not to be taking action.

What school and college staff should do if they have concerns about another staff member who may pose a risk of harm to children

50. If staff have safeguarding concerns, or an allegation is made about another member of staff (including volunteers) posing a risk of harm to children, then:

- this should be referred to the headteacher or principal;
- where there are concerns/allegations about the headteacher or principal, this should be referred to the chair of governors, chair of the management committee or proprietor of an independent school; and
- in the event of concerns/allegations about the headteacher, where the headteacher is also the sole proprietor of an independent school, allegations should be reported directly to the designated officer(s) at the local authority. (Further details can be found in Part four of this guidance).

¹⁵ An analysis of serious case reviews can be found at [Serious case reviews, 2011 to 2014](#).

What school or college staff should do if they have concerns about safeguarding practices within the school or college

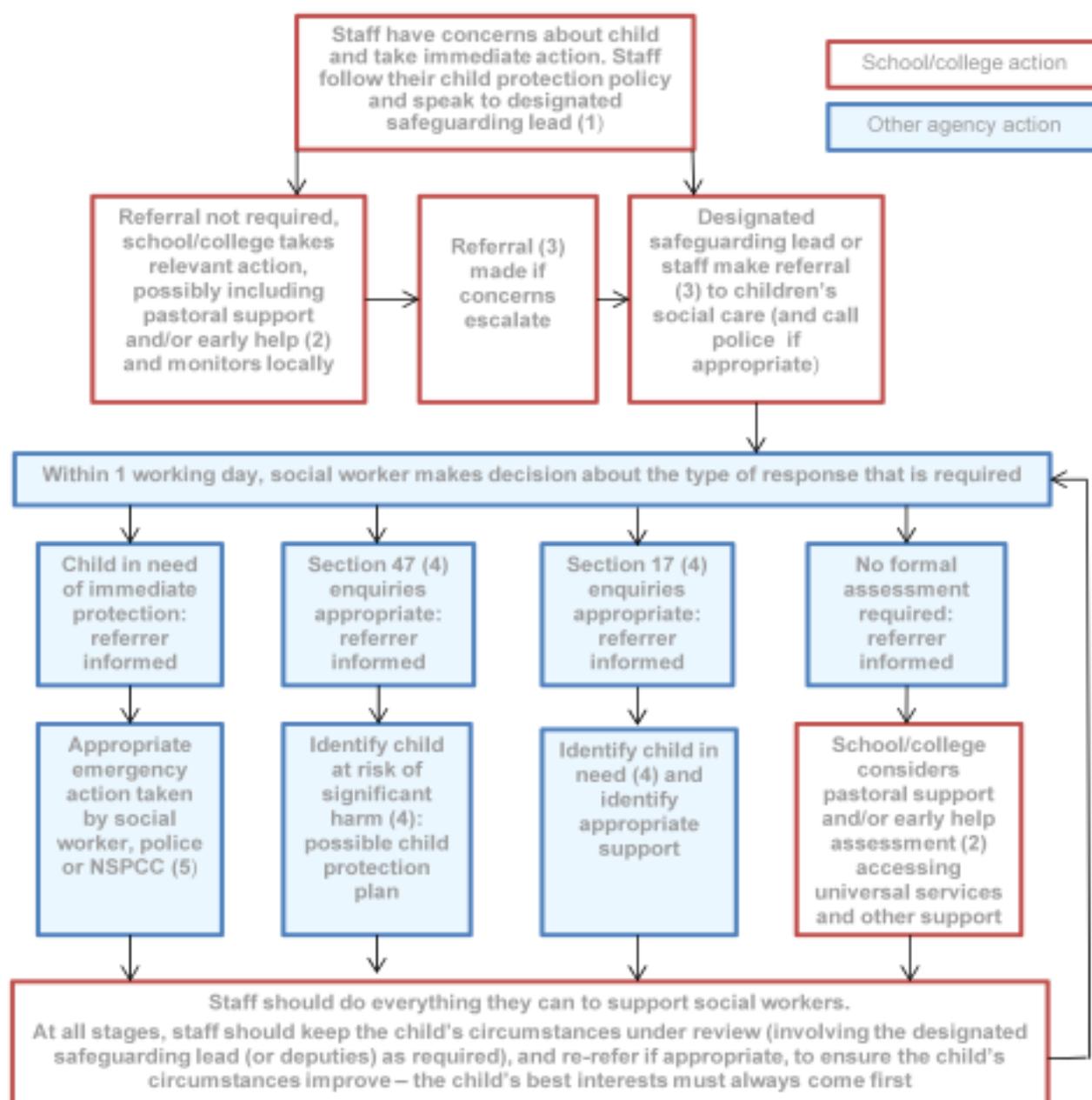
51. All staff and volunteers should feel able to raise concerns about poor or unsafe practice and potential failures in the school's or college's safeguarding regime, and know that such concerns will be taken seriously by the senior leadership team.

52. Appropriate whistleblowing procedures should be put in place for such concerns to be raised with the school's or college's senior leadership team.

53. Where a staff member feels unable to raise an issue with their employer, or feels that their genuine concerns are not being addressed, other whistleblowing channels may be open to them:

- general guidance on whistleblowing can be found via: [Advice on Whistleblowing](#); and
- the [NSPCC's what you can do to report abuse dedicated helpline](#) is available as an alternative route for staff who do not feel able to raise concerns regarding child protection failures internally or have concerns about the way a concern is being handled by their school or college. 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.¹⁶

Actions where there are concerns about a child



(1) In cases which also involve a concern or an allegation of abuse against a staff member, see Part four of this guidance.

(2) Early help means providing support as soon as a problem emerges at any point in a child's life. Where a child would benefit from co-ordinated early help, an early help inter-agency assessment should be arranged. Chapter one of [Working Together to Safeguard Children](#) provides detailed guidance on the early help process.

(3) Referrals should follow the process set out in the local threshold document and local protocol for assessment. Chapter one of [Working Together to Safeguard Children](#).

(4) Under the Children Act 1989, local authorities are required to provide services for children in need for the purposes of safeguarding and promoting their welfare. Children in need may be assessed under section 17 of the Children Act 1989. Under section 47 of the Children Act 1989, where a local authority has reasonable cause to suspect that a child is suffering or likely to suffer significant harm, it has a duty to make enquiries to decide whether to take action to safeguard or promote the child's welfare. Full details are in Chapter one of [Working Together to Safeguard Children](#).

(5) This could include applying for an Emergency Protection Order (EPO).

Annex A: Further information

Annex A contains important additional information about specific forms of abuse and safeguarding issues. School and college leaders and those staff who work directly with children should read this annex.

As per Part one of this guidance, if staff have any concerns about a child's welfare, they should act on them immediately. They should follow their own organisation's child protection policy and speak to the designated safeguarding lead (or deputy).

Where a child is suffering, or is likely to suffer from significant harm, it is important that a referral to children's social care (and if appropriate the police) is made immediately.

Table of Contents

Children and the court system	79
Children missing from education	79
Children with family members in prison	79
Child sexual exploitation	79
Child criminal exploitation: county lines	80
Domestic abuse	81
Homelessness	82
So-called 'honour-based' violence (including Female Genital Mutilation and Forced Marriage)	83
Preventing radicalisation	84
Peer on peer abuse	86
Sexual violence and sexual harassment between children in schools and colleges	87
What is Sexual violence and sexual harassment?	87
Upskirting	89
The response to a report of sexual violence or sexual harassment	89
Additional advice and support	89

Children and the court system

Children are sometimes required to give evidence in criminal courts, either for crimes committed against them or for crimes they have witnessed. There are two age appropriate guides to support children [5-11-year olds](#) and [12-17 year olds](#).

The guides explain each step of the process, support and special measures that are available. There are diagrams illustrating the courtroom structure and the use of video links is explained.

Making child arrangements via the family courts following separation can be stressful and entrench conflict in families. This can be stressful for children. The Ministry of Justice has launched an online [child arrangements information tool](#) with clear and concise information on the dispute resolution service. This may be useful for some parents and carers.

Children missing from education

All staff should be aware that children going missing, particularly repeatedly, can act as a vital warning sign of a range of safeguarding possibilities. This may include abuse and neglect, which may include sexual abuse or exploitation and child criminal exploitation. It may indicate mental health problems, risk of substance abuse, risk of travelling to conflict zones, risk of female genital mutilation or risk of forced marriage. Early intervention is necessary to identify the existence of any underlying safeguarding risk and to help prevent the risks of a child going missing in future. Staff should be aware of their school's or college's unauthorised absence and children missing from education procedures.

Children with family members in prison

Approximately 200,000 children in England and Wales have a parent sent to prison each year. These children are at risk of poor outcomes including poverty, stigma, isolation and poor mental health. [NICCO](#) provides information designed to support professionals working with offenders and their children, to help mitigate negative consequences for those children.

Child sexual exploitation

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. Like all forms of child sex abuse, child sexual exploitation:

- can affect any child or young person (male or female) under the age of 18 years, including 16 and 17 year olds who can legally consent to have sex;
- can still be abuse even if the sexual activity appears consensual;
- can include both contact (penetrative and non-penetrative acts) and non-contact sexual activity;
- can take place in person or via technology, or a combination of both;
- can involve force and/or enticement-based methods of compliance and may, or may not, be accompanied by violence or threats of violence;
- may occur without the child or young person's immediate knowledge (e.g. through others copying videos or images they have created and posted on social media);
- can be perpetrated by individuals or groups, males or females, and children or adults. The abuse can be a one-off occurrence or a series of incidents over time, and range from opportunistic to complex organised abuse; and
- is typified by some form of power imbalance in favour of those perpetrating the abuse. Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including gender, sexual identity, cognitive ability, physical strength, status, and access to economic or other resources.

Some of the following signs may be indicators of child sexual exploitation:

- children who appear with unexplained gifts or new possessions;
- children who associate with other young people involved in exploitation;
- children who have older boyfriends or girlfriends;
- children who suffer from sexually transmitted infections or become pregnant;
- children who suffer from changes in emotional well-being;
- children who misuse drugs and alcohol;
- children who go missing for periods of time or regularly come home late; and
- children who regularly miss school or education or do not take part in education.

Child criminal exploitation: county lines

Criminal exploitation of children is a geographically widespread form of harm that is a typical feature of county lines criminal activity, drug networks or gangs groom and exploit children and young people to carry drugs and money from urban areas to suburban and rural areas, market and seaside towns. Key to identifying potential involvement in county

lines are missing episodes, when the victim may have been trafficked for the purpose of transporting drugs and a referral to the National Referral Mechanism¹⁰² should be considered. Like other forms of abuse and exploitation, county lines exploitation:

- can affect any child or young person (male or female) under the age of 18 years;
- can affect any vulnerable adult over the age of 18 years;
- can still be exploitation even if the activity appears consensual;
- can involve force and/or enticement-based methods of compliance and is often accompanied by violence or threats of violence;
- can be perpetrated by individuals or groups, males or females, and young people or adults; and
- is typified by some form of power imbalance in favour of those perpetrating the exploitation. Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including gender, cognitive ability, physical strength, status, and access to economic or other resources.

Domestic abuse

The cross-government definition of domestic violence and abuse is:

Any incident or pattern of incidents of controlling, coercive, threatening behaviour, violence or abuse between those aged 16 or over who are, or have been, intimate partners or family members regardless of gender or sexuality. The abuse can encompass, but is not limited to:

- psychological;
- physical;
- sexual;
- financial; and
- emotional.

Exposure to domestic abuse and/or violence 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. Domestic abuse affecting young people can also occur within their personal relationships, as well as in the context of their home life.

Advice on identifying children who are affected by domestic abuse and how they can be helped is available at:

- [NSPCC- UK domestic-abuse Signs Symptoms Effects](#)
- [Refuge what is domestic violence/effects of domestic violence on children](#)
- [Safelives: young people and domestic abuse.](#)

Homelessness

Being homeless or being at risk of becoming homeless presents a real risk to a child's welfare. The designated safeguarding lead (and any deputies) should be aware of contact details and referral routes in to the Local Housing Authority so they can raise/progress concerns at the earliest opportunity. Indicators that a family may be at risk of homelessness include household debt, rent arrears, domestic abuse and anti-social behaviour, as well as the family being asked to leave a property. Whilst referrals and/or discussion with the Local Housing Authority should be progressed as appropriate, and in accordance with local procedures, this does not, and should not, replace a referral into children's social care where a child has been harmed or is at risk of harm.

The Homelessness Reduction Act 2017 places a new legal duty on English councils so that everyone who is homeless or at risk of homelessness will have access to meaningful help including an assessment of their needs and circumstances, the development of a personalised housing plan, and work to help them retain their accommodation or find a new place to live. The following factsheets usefully summarise the new duties: [Homeless Reduction Act Factsheets](#). The new duties shift focus to early intervention and encourage those at risk to seek support as soon as possible, before they are facing a homelessness crisis.

In most cases school and college staff will be considering homelessness in the context of children who live with their families, and intervention will be on that basis. However, it should also be recognised in some cases 16 and 17 year olds could be living independently from their parents or guardians, for example through their exclusion from the family home, and will require a different level of intervention and support. Children's services will be the lead agency for these young people and the designated safeguarding lead (or a deputy) should ensure appropriate referrals are made based on the child's circumstances. The department and the Ministry of Housing, Communities and Local Government have published joint statutory guidance on the provision of accommodation for 16 and 17 year olds who may be homeless and/or require accommodation: [here](#).

So-called 'honour-based' violence (including Female Genital Mutilation and Forced Marriage)

So-called 'honour-based' violence (HBV) encompasses incidents or crimes which have been committed to protect or defend the honour of the family and/or the community, including female genital mutilation (FGM), forced marriage, and practices such as breast ironing. Abuse committed in the context of preserving "honour" often involves a wider network of family or community pressure and can include multiple perpetrators. It is important to be aware of this dynamic and additional risk factors when deciding what form of safeguarding action to take. All forms of HBV are abuse (regardless of the motivation) and should be handled and escalated as such. Professionals in all agencies, and individuals and groups in relevant communities, need to be alert to the possibility of a child being at risk of HBV, or already having suffered HBV.

Actions

If staff have a concern regarding a child that might be at risk of HBV or who has suffered from HBV, they should speak to the designated safeguarding lead (or deputy). As appropriate, they will activate local safeguarding procedures, using existing national and local protocols for multi-agency liaison with police and children's social care. Where FGM has taken place, since 31 October 2015 there has been a mandatory reporting duty placed on **teachers**¹⁰³ that requires a different approach (see following section).

FGM

FGM comprises all procedures involving partial or total removal of the external female genitalia or other injury to the female genital organs. It is illegal in the UK and a form of child abuse with long-lasting harmful consequences.

FGM mandatory reporting duty for teachers

Section 5B of the Female Genital Mutilation Act 2003 (as inserted by section 74 of the Serious Crime Act 2015) places a statutory duty upon **teachers** along with regulated health and social care professionals in England and Wales, to report to the police where they discover (either through disclosure by the victim or visual evidence) that FGM appears to have been carried out on a girl under 18. Those failing to report such cases will face disciplinary sanctions. It will be rare for teachers to see visual evidence, and they should **not** be examining pupils or students, but the same definition of what is meant by "to discover that an act of FGM appears to have been carried out" is used for all

¹⁰³ Under Section 5B(11)(a) of the Female Genital Mutilation Act 2003, "teacher" means, in relation to England, a person who is employed or engaged to carry out teaching work at schools and other institutions in England). [Greater Manchester Academies Trust | Safeguarding](#) 34

professionals to whom this mandatory reporting duty applies. Information on when and how to make a report can be found at: [Mandatory reporting of female genital mutilation procedural information](#)

Teachers **must** personally report to the police cases where they discover that an act of FGM appears to have been carried out.¹⁰⁴ Unless the teacher has good reason not to, they should still consider and discuss any such case with the school's or college's designated safeguarding lead (or deputy) and involve children's social care as appropriate. The duty does not apply in relation to at risk or suspected cases (i.e. where the teacher does not discover that an act of FGM appears to have been carried out, either through disclosure by the victim or visual evidence) or in cases where the woman is 18 or over. In these cases, teachers should follow local safeguarding procedures. The following is a useful summary of the FGM mandatory reporting duty: [FGM Fact Sheet](#).

Forced marriage

Forcing a person into a marriage is a crime in England and Wales. A forced marriage is one entered into without the full and free consent of one or both parties and where violence, threats or any other form of coercion is used to cause a person to enter into a marriage. Threats can be physical or emotional and psychological. A lack of full and free consent can be where a person does not consent or where they cannot consent (if they have learning disabilities, for example). Nevertheless, some communities use religion and culture as a way to coerce a person into marriage. Schools and colleges can play an important role in safeguarding children from forced marriage.

The Forced Marriage Unit has published [statutory guidance](#) and [Multi-agency guidelines](#), pages 35-36 of which focus on the role of schools and colleges. School and college staff can contact the Forced Marriage Unit if they need advice or information: Contact: 020 7008 0151 or email fm@fco.gov.uk.

Preventing radicalisation

Children are vulnerable to extremist ideology and radicalisation. Similar to protecting children from other forms of harms and abuse, protecting children from this risk should be a part of a schools' or colleges' safeguarding approach.

[Extremism](#)¹⁰⁵ is the vocal or active opposition to our fundamental values, including democracy, the rule of law, individual liberty and the mutual respect and tolerance of different faiths and beliefs. This also includes calling for the death of members of the armed forces. [Radicalisation](#)¹⁰⁶ refers to the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups.

There is no single way of identifying whether a child is likely to be susceptible to an extremist ideology. Background factors combined with specific influences such as family and friends may contribute to a child's vulnerability. Similarly, radicalisation can occur through many different methods (such as social media) and settings (such as the internet).

However, it is possible to protect vulnerable people from extremist ideology and intervene to prevent those at risk of radicalisation being radicalised. As with other safeguarding risks, staff should be alert to changes in children's behaviour, which could indicate that they may be in need of help or protection. Staff should use their judgement in identifying children who might be at risk of radicalisation and act proportionately which may include the designated safeguarding lead (or deputy) making a referral to the Channel programme.

The Prevent duty

All schools and colleges are subject to a duty under section 26 of the Counter-Terrorism and Security Act 2015 (the CTSA 2015), in the exercise of their functions, to have "due regard"¹⁰⁷ to the need to prevent people from being drawn into terrorism".¹⁰⁸ This duty is known as the Prevent duty.

The Prevent duty should be seen as part of schools' and colleges' wider safeguarding obligations. Designated safeguarding leads and other senior leaders should familiarise themselves with the revised [Prevent duty guidance: for England and Wales](#), especially paragraphs 57-76, which are specifically concerned with schools (and also covers childcare). The guidance is set out in terms of four general themes: risk assessment, working in partnership, staff training, and IT policies.

¹⁰⁵ As defined in the Government's Counter Extremism Strategy.

¹⁰⁶ As defined in the Revised Prevent Duty Guidance for England and Wales.

¹⁰⁷ According to the Prevent duty guidance 'having due regard' means that the authorities should place an appropriate amount of weight on the need to prevent people being drawn into terrorism when they consider all the other factors relevant to how they carry out their usual functions.

¹⁰⁸ "Terrorism" for these purposes has the same meaning as for the Terrorism Act 2000 (section 1(1) to (4) of that Act).

Additional support

The department has published advice for schools on the [Prevent duty](#). The advice is intended to complement the Prevent guidance and signposts other sources of advice and support.

There is additional guidance: [Prevent duty guidance: for further education institutions in England and Wales](#) that applies to colleges.

[Educate Against Hate](#), a website launched by the Her Majesty's Government has been developed to support and equip school and college leaders, teachers, and parents with information, tools and resources (including on the promotion of fundamental British values) to help recognise and address extremism and radicalisation in young people. The platform provides information on and access to training resources for teachers, staff and school and college leaders, some of which are free such as Prevent e-learning, via the Prevent Training catalogue.

Channel

Channel is a programme which focuses on providing support at an early stage to people who are identified as being vulnerable to being drawn into terrorism. It provides a mechanism for schools to make referrals if they are concerned that an individual might be vulnerable to radicalisation. An individual's engagement with the programme is entirely voluntary at all stages. Guidance on Channel is available at: [Channel guidance](#), and a Channel awareness e-learning programme is available for staff at: [Channel General Awareness](#).

The school's or college's designated safeguarding lead (and any deputies) should be aware of local procedures for making a Channel referral. As a Channel partner, the school or college may be asked to attend a Channel panel to discuss the individual referred to determine whether they are vulnerable to being drawn into terrorism and consider the appropriate support required.

Peer on peer abuse

Children can abuse other children. This is generally referred to as peer on peer abuse and can take many forms. This can include (but is not limited to): bullying (including cyberbullying); sexual violence and sexual harassment; physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm; sexting and initiation/hazing type violence and rituals.

Sexual violence and sexual harassment between children in schools and colleges

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. Sexual violence and sexual harassment exist on a continuum and may overlap, they can occur online and offline (both physical and verbal) and are never acceptable. It is important that **all** victims are taken seriously and offered appropriate support. Staff should be aware that some groups are potentially more at risk. Evidence shows girls, children with SEND and LGBT children are at greater risk.

Staff should be aware of the importance of:

- making clear that sexual violence and sexual harassment is not acceptable, will never be tolerated and is not an inevitable part of growing up;
- not tolerating or dismissing sexual violence or sexual harassment as “banter”, “part of growing up”, “just having a laugh” or “boys being boys”; and
- challenging behaviours (potentially criminal in nature), such as grabbing bottoms, breasts and genitalia, flicking bras and lifting up skirts. Dismissing or tolerating such behaviours risks normalising them.

What is sexual violence and sexual harassment?

Sexual violence

It is important that school and college staff are aware of sexual violence and the fact children can, and sometimes do, abuse their peers in this way. When referring to sexual violence we are referring to sexual violence offences under the Sexual Offences Act 2003¹⁰⁹ as described below:

Rape: A person (A) commits an offence of rape if: he intentionally penetrates the vagina, anus or mouth of another person (B) with his penis, B does not consent to the penetration and A does not reasonably believe that B consents.

Assault by Penetration: A person (A) commits an offence if: s/he intentionally penetrates the vagina or anus of another person (B) with a part of her/his body or

¹⁰⁹ legislation.gov.uk

anything else, the penetration is sexual, B does not consent to the penetration and A does not reasonably believe that B consents.

Sexual Assault: A person (A) commits an offence of sexual assault if: s/he intentionally touches another person (B), the touching is sexual, B does not consent to the touching and A does not reasonably believe that B consents.

What is consent?¹¹⁰ Consent is about having the freedom and capacity to choose. Consent to sexual activity may be given to one sort of sexual activity but not another, e.g. to vaginal but not anal sex or penetration with conditions, such as wearing a condom. Consent can be withdrawn at any time during sexual activity and each time activity occurs. Someone consents to vaginal, anal or oral penetration only if s/he agrees by choice to that penetration and has the freedom and capacity to make that choice.¹¹¹

Sexual harassment

When referring to sexual harassment we mean 'unwanted conduct of a sexual nature' that can occur online and offline. When we reference sexual harassment, we do so in the context of child on child sexual harassment. Sexual harassment is likely to: violate a child's dignity, and/or make them feel intimidated, degraded or humiliated and/or create a hostile, offensive or sexualised environment.

Whilst not intended to be an exhaustive list, sexual harassment can include:

- sexual comments, such as: telling sexual stories, making lewd comments, making sexual remarks about clothes and appearance and calling someone sexualised names;
- sexual "jokes" or taunting;
- physical behaviour, such as: deliberately brushing against someone, interfering with someone's clothes (schools and colleges should be considering when any of this crosses a line into sexual violence - it is important to talk to and consider the experience of the victim) and displaying pictures, photos or drawings of a sexual nature; and
- online sexual harassment. This may be standalone, or part of a wider pattern of sexual harassment and/or sexual violence.¹¹² It may include:
 - non-consensual sharing of sexual images and videos;
 - sexualised online bullying;
 - unwanted sexual comments and messages, including, on social media;

¹¹⁰ It is important school and college staff (and especially designated safeguarding leads and their deputies) understand consent. This will be especially important if a child is reporting they have been raped. More information: [here](#).

¹¹¹ [PSHE Learning about Consent](#) from the PSHE association provides advice and lesson plans to teach consent at Key stage 3 and 4.

¹¹² [Project deSHAME](#) from Childnet provides useful research, advice and resources regarding online sexual harassment.

- sexual exploitation; coercion and threats; and
- upskirting.

Upskirting¹¹³

'Upskirting' typically involves taking a picture under a person's clothing without them knowing, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm. It is now a criminal offence.

The response to a report of sexual violence or sexual harassment

The initial response to a report from a child is important. It is essential that all victims are reassured that they are being taken seriously and that they will be supported and kept safe. A victim should never be given the impression that they are creating a problem by reporting sexual violence or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report.

If staff have a concern about a child or a child makes a report to them, they should follow the referral process as set out from paragraph 35 in Part one of this guidance. As is always the case, if staff are in any doubt as to what to do they should speak to the designated safeguarding lead (or a deputy).

Additional advice and support

Abuse or Safeguarding issue	Link to Guidance/Advice	Source
Abuse	What to do if you're worried a child is being abused	DfE advice
	Domestic abuse: Various Information/Guidance	Home Office
	Faith based abuse: National Action Plan	DfE advice
	Relationship abuse: disrespect nobody	Home Office website
Bullying	Preventing bullying including cyberbullying	DfE advice
	Advice for 5-11-year olds witnesses in criminal courts	MoJ advice

Abuse or Safeguarding issue	Link to Guidance/Advice	Source
Children and the courts	Advice for 12-17 year old witnesses in criminal courts	MoJ advice
Children missing from education, home or care	Children missing education	DfE statutory guidance
	Child missing from home or care	DfE statutory guidance
	Children and adults missing strategy	Home Office strategy
Children with family members in prison	National Information Centre on Children of Offenders	Barnardo's in partnership with Her Majesty's Prison and Probation Service (HMPPS) advice
Child Exploitation	County Lines: criminal exploitation of children and vulnerable adults	Home Office guidance
	Child sexual exploitation: guide for practitioners	DfE
	Trafficking: safeguarding children	DfE and HO guidance
Drugs	Drugs: advice for schools	DfE and ACPO advice
	Drug strategy 2017	Home Office strategy
	Information and advice on drugs	Talk to Frank website
	ADEPIS platform sharing information and resources for schools: covering drug (& alcohol) prevention	Website developed by Mentor UK
"Honour Based Violence" (so called)	Female genital mutilation: information and resources	Home Office
	Female genital mutilation: multi agency statutory guidance	DfE, DH, and HO statutory guidance
	Forced marriage: statutory guidance and government advice	Foreign Commonwealth Office and Home Office
Health and Well-being	Fabricated or induced illness: safeguarding children	DfE, Department for Health and Home Office
	Rise Above: Free PSHE resources on health, wellbeing and resilience	Public Health England resources
	Medical-conditions: supporting pupils at school	DfE statutory guidance
	Mental health and behaviour	DfE advice
Homelessness	Homelessness: How local authorities should exercise their functions	MHCLG

Abuse or Safeguarding issue	Link to Guidance/Advice	Source
Online	Sexting: responding to incidents and safeguarding children	UK Council for Child Internet Safety
Private fostering	Private fostering: local authorities	DfE - statutory guidance
Radicalisation	Prevent duty guidance	Home Office guidance
	Prevent duty advice for schools	DfE advice
	Educate Against Hate Website	DfE and Home Office
Violence	Gangs and youth violence: for schools and colleges	Home Office advice
	Ending violence against women and girls 2016-2020 strategy	Home Office strategy
	Violence against women and girls: national statement of expectations for victims	Home Office guidance
	Sexual violence and sexual harassment between children in schools and colleges	DfE advice
	Serious violence strategy	Home Office Strategy

Annex B: Role of the designated safeguarding lead

Governing bodies, proprietors and management committees should ensure an appropriate **senior member** of staff, from the school or college **leadership team**, is appointed to the role of designated safeguarding lead.¹¹⁴ The designated safeguarding lead should take **lead responsibility** for safeguarding and child protection (including online safety). This should be explicit in the role holder's job description. This person should have the appropriate status and authority within the school to carry out the duties of the post. They should be given the time, funding, training, resources and support to provide advice and support to other staff on child welfare and child protection matters, to take part in strategy discussions and inter-agency meetings, and/or to support other staff to do so, and to contribute to the assessment of children.

Deputy designated safeguarding leads

It is a matter for individual schools and colleges as to whether they choose to have one or more deputy designated safeguarding leads. Any deputies should be trained to the same standard as the designated safeguarding lead and the role should be explicit in their job description. Whilst the activities of the designated safeguarding lead can be delegated to appropriately trained deputies, the ultimate **lead responsibility** for child protection, as set out above, remains with the designated safeguarding lead, this **lead responsibility** should not be delegated.

Manage referrals

The designated safeguarding lead is expected to:

- refer cases of suspected abuse to the local authority children's social care as required;
- support staff who make referrals to local authority children's social care;
- refer cases to the Channel programme where there is a radicalisation concern as required;
- support staff who make referrals to the Channel programme;

¹¹⁴ When a school has a sole proprietor rather than a governing body, appropriate steps should be taken to ensure that the member of the senior leadership team who is appointed as designated safeguarding lead (DSL) is able to discharge that role with sufficient independence, particularly in relation to any allegations involving the proprietor or members of the proprietor's family. This may involve including in the appointment as DSL, written confirmation that part of the duties of the post involve contacting the Local Authority Designated Officer on any matter that the DSL considers cannot be properly dealt with internally. Consideration could also be given to providing the DSL with access to external advice from an appropriate company or legal service.

- refer cases where a person is dismissed or left due to risk/harm to a child to the Disclosure and Barring Service as required; and
- refer cases where a crime may have been committed to the Police as required.

Work with others

The designated safeguarding lead is expected to:

- act as a point of contact with the three safeguarding partners;
- liaise with the headteacher or principal to inform him or her of issues- especially ongoing enquiries under section 47 of the Children Act 1989 and police investigations;
- as required, liaise with the "case manager" (as per Part four) and the designated officer(s) at the local authority for child protection concerns in cases which concern a staff member;
- liaise with staff (especially pastoral support staff, school nurses, IT Technicians, and SENCOs or the named person with oversight for SEN in a college) on matters of safety and safeguarding (including online and digital safety) and when deciding whether to make a referral by liaising with relevant agencies; and
- act as a source of support, advice and expertise for all staff.

Training

The designated safeguarding lead (and any deputies) should undergo training to provide them with the knowledge and skills required to carry out the role. This training should be updated at least every two years. The designated safeguarding lead should undertake Prevent awareness training.

In addition to the formal training set out above, their knowledge and skills should be refreshed (this might be via e-bulletins, meeting other designated safeguarding leads, or simply taking time to read and digest safeguarding developments) at regular intervals, as required, and at least annually, to allow them to understand and keep up with any developments relevant to their role so they:

- understand the assessment process for providing early help and statutory intervention, including local criteria for action and local authority children's social care referral arrangements.¹¹⁵

¹¹⁵ Full details in Chapter one of [Working Together to Safeguard Children](#).

- have a working knowledge of how local authorities conduct a child protection case conference and a child protection review conference and be able to attend and contribute to these effectively when required to do so;
- ensure each member of staff has access to, and understands, the school's or college's child protection policy and procedures, especially new and part time staff;
- are alert to the specific needs of children in need, those with special educational needs and young carers;¹¹⁶
- understand relevant data protection legislation and regulations, especially the Data Protection Act 2018 and the General Data Protection Regulation.
- understand the importance of information sharing, both within the school and college, and with the three safeguarding partners, other agencies, organisations and practitioners.
- are able to keep detailed, accurate, secure written records of concerns and referrals;
- understand and support the school or college with regards to the requirements of the Prevent duty and are able to provide advice and support to staff on protecting children from the risk of radicalisation;
- are able to understand the unique risks associated with online safety and be confident that they have the relevant knowledge and up to date capability required to keep children safe whilst they are online at school or college;
- can recognise the additional risks that children with SEN and disabilities (SEND) face online, for example, from online bullying, grooming and radicalisation and are confident they have the capability to support SEND children to stay safe online;
- obtain access to resources and attend any relevant or refresher training courses; and
- encourage a culture of listening to children and taking account of their wishes and feelings, among all staff, in any measures the school or college may put in place to protect them.

Raise Awareness

The designated safeguarding lead should:

- ensure the school's or college's child protection policies are known, understood and used appropriately;
- ensure the school's or college's child protection policy is reviewed annually (as a minimum) and the procedures and implementation are updated and reviewed regularly, and work with governing bodies or proprietors regarding this;
- ensure the child protection policy is available publicly and parents are aware of the fact that referrals about suspected abuse or neglect may be made and the role of the school or college in this; and
- link with the safeguarding partner arrangements to make sure staff are aware of any training opportunities and the latest local policies on local safeguarding arrangements.

Child protection file

Where children leave the school or college the designated safeguarding lead should ensure their child protection file is transferred to the new school or college as soon as possible. This should be transferred separately from the main pupil file, ensuring secure transit, and confirmation of receipt should be obtained. Receiving schools and colleges should ensure key staff such as designated safeguarding leads and SENCOs or the named person with oversight for SEN in colleges, are aware as required.

In addition to the child protection file, the designated safeguarding lead should also consider if it would be appropriate to share any information with the new school or college in advance of a child leaving. For example, information that would allow the new school or college to continue supporting victims of abuse and have that support in place for when the child arrives.

Availability

During term time the designated safeguarding lead (or a deputy) should always be available (during school or college hours) for staff in the school or college to discuss any safeguarding concerns. Whilst generally speaking the designated safeguarding lead (or deputy) would be expected to be available in person, it is a matter for individual schools and colleges, working with the designated safeguarding lead, to define what "available" means and whether in exceptional circumstances availability via phone and or Skype or other such media is acceptable.

It is a matter for individual schools and colleges and the designated safeguarding lead to arrange adequate and appropriate cover arrangements for any out of hours/out of term activities.

Annex C: Online safety

The use of technology has become a significant component of many safeguarding issues. Child sexual exploitation; radicalisation; sexual predation: technology often provides the platform that facilitates harm. An effective approach to online safety empowers a school or college to protect and educate the whole school or college community in their use of technology and establishes mechanisms to identify, intervene in, and escalate any incident where appropriate.

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

- **content:** being exposed to illegal, inappropriate or harmful material; for example pornography, fake news, racist or radical and extremist views;
- **contact:** being subjected to harmful online interaction with other users; for example commercial advertising as well as adults posing as children or young adults; and
- **conduct:** personal online behaviour that increases the likelihood of, or causes, harm; for example making, sending and receiving explicit images, or online bullying.

Education

Opportunities to teach safeguarding, including online safety, are discussed at paragraph 88-90. Resources that could support schools and colleges include:

- [Teaching online safety in school](#) - DfE guidance outlining how schools can ensure their pupils understand how to stay safe and behave online as part of existing curriculum requirements.
- UKCIS has recently published its [Education for a connected world framework](#). Online safety is a whole school and college issue. The framework aims to support the development of the curriculum and is of particular relevance to PSHE education and Computing. It is designed, however, to be usable across the curriculum and beyond and to be central to a whole school or college approach to safeguarding and online safety. It covers early years through to age 18.
- The PSHE Association provides guidance to schools on developing their PSHE curriculum – www.pshe-association.org.uk
- Parent Zone and Google have developed [Be Internet Legends](#) a free internet safety curriculum with PSHE accredited lesson plans and teaching resources for Key Stage 2 pupils.

Filters and monitoring

Governing bodies and proprietors should be doing all that they reasonably can to limit children's exposure to the above risks from the school's or college's IT system. As part of this process, governing bodies and proprietors should ensure their school or college has appropriate filters and monitoring systems in place.

Whilst considering their responsibility to safeguard and promote the welfare of children, and provide them with a safe environment in which to learn, governing bodies and proprietors should consider the age range of their pupils, the number of pupils, how often they access the IT system and the proportionality of costs vs risks.

The appropriateness of any filters and monitoring systems are a matter for individual schools and colleges and will be informed in part, by the risk assessment required by the Prevent Duty.¹¹⁷ The UK Safer Internet Centre has published guidance as to what "appropriate" filtering and monitoring might look like: [UK Safer Internet Centre: appropriate filtering and monitoring](#).

Guidance on e-security is available from the [National Education Network](#). Support for schools is available via the: [schools' buying strategy](#) with specific advice on procurement here: [buying for schools](#).

Whilst filtering and monitoring is an important part of the online safety picture for schools and colleges to consider, it is only one part. Governors and proprietors should consider a whole school or college approach to online safety. This will include a clear policy on the use of mobile technology in the school or college. Many children have unlimited and unrestricted access to the internet via 3G, 4G and 5G in particular and the school and college should carefully consider how this is managed on their premises.

Whilst it is essential that governing bodies and proprietors ensure that appropriate filters and monitoring systems are in place, they should be careful that "over blocking" does not lead to unreasonable restrictions as to what children can be taught with regard to online teaching and safeguarding.

Reviewing online safety

Technology in this area evolves and changes rapidly. A free online safety self-review tool for schools can be found via the [360 safe website](#). UKCIS has published [Online safety in schools and colleges: Questions for the governing board](#)

Staff training

Governors and proprietors should ensure that, as part of the requirement for staff to undergo regularly updated safeguarding training (paragraph 84) and the requirement to ensure children are taught about safeguarding, including online safety (paragraph 87), that online safety training for staff is integrated, aligned and considered as part of the overarching safeguarding approach.

Information and support

There is a wealth of information available to support schools, colleges and parents to keep children safe online. The following list is not exhaustive but should provide a useful starting point:

Organisation/Resource	What it does/provides
thinkuknow	NCA CEOPs advice on online safety
disrespectnobody	Home Office advice on healthy relationships, including sexting and pornography
UK safer internet centre	Contains a specialist helpline for UK schools and colleges
swgfl	Includes a template for setting out online safety policies
internet matters	Help for parents on how to keep their children safe online
parentzone	Help for parents on how to keep their children safe online
childnet cyberbullying	Guidance for schools on cyberbullying
pshe association	Guidance and useful teaching resources covering online safety issues including pornography and the sharing of sexual images
educateagainsthate	Practical advice for parents, teachers and governors on protecting children from extremism and radicalisation.
the use of social media for online radicalisation	A briefing note for schools on how social media is used to encourage travel to Syria and Iraq
UKCIS	The UK Council for Internet Safety's website provides: <ul style="list-style-type: none">• Sexting advice• Online safety: Questions for Governing Bodies• Education for a connected world framework

Organisation/Resource	What it does/provides
NSPCC	NSPCC advice for schools and colleges
net-aware	NSPCC advice for parents
commonsensemedia	Independent reviews, age ratings, & other information about all types of media for children and their parents
searching screening and confiscation	Guidance to schools on searching children in schools and confiscating items such as mobile phones
lgfl	Advice and resources from the London Grid for Learning

Annex D: Boarding schools, residential special schools, residential colleges and children's homes

There are additional requirements for boarding schools, residential special schools, residential colleges and children's homes to consider with regards to safeguarding. These are set out in National Minimum Standards and regulations for the relevant setting. All schools and colleges that provide such residential accommodation and/or are registered as children's homes must comply with the relevant National Minimum Standards and/or regulations for their sector. Such schools and colleges should be particularly alert to the signs of abuse in such settings and work closely with the host local authority and, where relevant, any local authorities that have placed their children there. The relevant guidance for each sector is on GOV.UK and the relevant links are listed below:

- [The National Minimum Standards for Boarding Schools](#)
- [The National Minimum Standards for Residential Special Schools](#)
- [The National Minimum Standards for FE colleges which Accommodate under 18s](#)
- [Guide to the Children's Homes Regulations.](#)

In addition, the Visits to Children in Long-Term Residential Care Regulations 2011¹¹⁸ apply to children and young people living away from home in residential settings for periods of 3 months or more (including those placed in residential schools and colleges). An appropriate representative from the accommodating Local Authority must visit these settings to ensure the welfare of these children.

¹¹⁸ www.legislation.gov.uk.

Annex E: Host families - homestay during exchange visits

Schools and colleges often make arrangements for children to take part in exchange visits, either to other parts of the UK or abroad. Exchanges can benefit learning across a range of subjects. In particular, foreign visits can enrich the languages curriculum and provide exciting opportunities for pupils to develop their confidence and expertise in the use of other languages.

Schools and colleges have a duty to safeguard and promote children's welfare, as defined at paragraph 4. This extends to considering their safety and how best to minimise risk of harm to those children during any exchange visit the school or college arranges, and when organising for the care and accommodation of a child with a host family (known as homestays) as part of the exchange.

School/college arranged homestay – suitability of adults in UK host families

When arranging a homestay, schools should consider the suitability of the adults in the respective families who will be responsible for the visiting child during the stay.

In circumstances where a school or college arrange for a visiting child to be provided with care and accommodation in the UK (including where they engage a company to make those arrangements) in the home of a family to which the child is not related¹¹⁹ the responsible adults will be engaging in regulated activity for the period of the stay.¹²⁰ In such cases and where the school or college has the power to terminate such a homestay the school or college would be the regulated activity provider.¹²¹

A regulated activity provider commits a criminal offence if it knows, or has reason to believe that, an individual is barred by the Disclosure and Barring Service (DBS) from engaging in regulated activity but allows that individual to carry out any form of regulated activity.¹²²

¹¹⁹ This includes where a person has parental responsibility for the visiting child.

¹²⁰ Paragraph 1(5) of Schedule 4 and Section 53 of the Safeguarding Vulnerable Groups Act 2006. Where an adult is providing homestay in circumstances other than as described in this section, the school or college should seek advice from the DBS about whether the individual will be in regulated activity.

Greater Manchester Academies Trust | Safeguarding 2006.

¹²² Section 9 of the Safeguarding Vulnerable Groups Act 2006.

Where the child's parent(s) or a student themselves arranges their own homestay, this would be a private arrangement¹²³ therefore the school or college would not be the regulated activity provider.

When a school or college arrange a homestay, it should consider what intelligence/information will best inform its assessment of the suitability of the adults in those families who will be responsible for the visiting child during the stay. It will be for the school or college to use their professional judgement to decide what it considers what will be relevant. However, to help inform that assessment, schools and colleges should¹²⁴ obtain a DBS enhanced certificate with barred list information. This check will not only establish whether the adults are barred from engaging in regulated activity relating to children, but where criminal record information is disclosed it will also allow the school or college to consider, alongside all other intelligence that it has obtained, whether the adults would be a suitable host for a child.

DBS enhanced certificates with barred list information for volunteer roles¹²⁵ can be obtained free of charge.¹²⁶ In respect of an adult who provides UK homestay and receives no remuneration in respect of the stay or where schools reimburse families only for expenses incurred, to enable a DBS application to be considered as a volunteer role the 'Position Applied For' field will need to make clear that the position is unpaid.

In addition to those engaging in regulated activity, schools and colleges are free to decide whether they consider it necessary to obtain a DBS enhanced certificate in respect of anyone aged 16 or over in the household where the child will be staying.

Homestay – suitability of adults in host families abroad

It is not possible for schools and colleges to obtain criminality information from the DBS about adults who provide homestays abroad. Schools and colleges should liaise with partner schools abroad, to establish a shared understanding of, and agreement to the arrangements in place for the visit. They should use their professional judgement to satisfy themselves that the arrangements are appropriate and sufficient to safeguard effectively every child who will take part in the exchange. Parents should be aware of agreed arrangement. Schools and colleges are also free to decide whether they consider

¹²³ Where it is a private arrangement, the school or college are not entitled to obtain a standard or enhanced DBS check.

¹²⁴ See page 3 for interpretation of 'should' used throughout the document.

¹²⁵ Volunteer is defined as "Any person engaged in an activity which involves spending time, unpaid (except for travel and other approved out-of-pocket expenses), doing something which aims to benefit some third party and not a close relative."

¹²⁶ Some checking bodies will charge an admin fee to process a DBS certificate/barred list request. As these fees will vary, schools should assess what services are being offered and consider what is known about the performance and reputation of the organisation.

it necessary to contact the relevant foreign embassy or High Commission of the country in question to discuss what checks may be possible in respect of those providing homestay outside of the UK.

During the visit

Pupils should understand who to contact during a homestay should an emergency occur or a situation arise which makes them feel uncomfortable.

Additional action for extended homestays

Where a period of UK homestay lasts 28 days or more, for a child aged under 16 years of age (under 18 years of age if the child has disabilities), this may amount to private fostering under the Children Act 1989.¹²⁷ In these cases the school or college should notify the local authority of the arrangements. Private fostering legislation places a duty on local authorities to satisfy themselves that the welfare of a child who is being, or proposed to be, privately fostered in their area is being or will be satisfactorily safeguarded and promoted. By notifying the local authority, the school and college will be assisting the local authority in discharging its duty. See paragraphs 192-194 for additional information about private fostering and local authority notifications.

¹²⁷ Private fostering occurs when a child under the age of 16 (under 18, if disabled) is provided with care and accommodation by a person who is not a parent, person with parental responsibility for them or a relative in their own home. A child is not privately fostered if the person caring for and accommodating them has done so for less than 28 days and does not intend to do so for longer.

Annex F: Statutory guidance - Regulated activity (children) - Supervision of activity with children which is regulated activity when unsupervised

This statutory guidance on the supervision of activity with children, which is regulated activity when unsupervised, is also published separately on [GOV.UK](https://www.gov.uk).

1. This document fulfils the duty in legislation⁽¹⁾ that the Secretary of State must publish statutory guidance on supervision of activity by workers with children, which when unsupervised is regulated activity. This guidance applies in England, Wales and Northern Ireland. It covers settings including but not limited to schools, childcare establishments, colleges, youth groups and sports clubs.
2. For too long child protection policy has been developed in haste and in response to individual tragedies, with the well intentioned though misguided belief that every risk could be mitigated and every loophole closed. The pressure has been to prescribe and legislate more. This has led to public confusion, a fearful workforce and a dysfunctional culture of mistrust between children and adults. This Government is taking a different approach.
3. We start with a presumption of trust and confidence in those who work with children, and the good sense and judgment of their managers. This guidance applies when an organisation decides to supervise with the aim that the supervised work will not be regulated activity (when it would be, if not so supervised). In such a case, the law makes three main points:
 - there must be supervision by a person who is in regulated activity⁽²⁾
 - the supervision must be regular and day to day; and
 - the supervision must be “reasonable in all the circumstances to ensure the protection of children”.

The organisation must have regard to this guidance. This gives local managers the flexibility to determine what is reasonable for their circumstances. While the precise nature and level of supervision will vary from case to case, guidance on the main legal points above is as follow.

4. Supervision by a person in regulated activity/regular and day to day: supervisors must be in regulated activity themselves⁽³⁾. The duty that supervision must take place “on a regular basis” means that supervision must not, for example, be concentrated during the first few weeks of an activity and then tail off thereafter, becoming the exception not the rule. It must take place on an ongoing basis, whether the worker has just started or has been doing the activity for some time.
5. Reasonable in the circumstances: within the statutory duty, the level of supervision

may differ, depending on all the circumstances of a case. Organisations should consider the following factors in deciding the specific level of supervision a person will require:

- ages of the children, including whether their ages differ widely;
 - number of children that the individual is working with;
 - whether or not other workers are helping to look after the children;
 - the nature of the individual's work (or, in a specified place such as a school, the individual's opportunity for contact with children);
 - how vulnerable the children are (the more they are, the more an organisation might opt for workers to be in regulated activity);
 - how many workers would be supervised by each supervising worker.
6. An organisation is not entitled to request a barred list check on a worker who, because they are supervised, is not in regulated activity.

Examples

Volunteer, in a specified place

Mr Jones, a new volunteer, helps children with reading at a local school for two mornings a week. Mr Jones is generally based in the classroom, in sight of the teacher. Sometimes Mr Jones takes some of the children to a separate room to listen to them reading, where Mr Jones is supervised by a paid classroom assistant, who is in that room most of the time. The teacher and classroom assistant are in regulated activity. The headteacher decides supervision is such that Mr Jones is not in regulated activity.

Volunteer, not in a specified place

Mr Wood, a new entrant volunteer, assists with the coaching of children at his local cricket club. The children are divided into small groups, with assistant coaches such as Mr Wood assigned to each group. The head coach oversees the coaching, spends time with each of the groups, and has sight of all the groups (and the assistant coaches) for most of the time. The head coach is in regulated activity. The club's managers decide whether the coach's supervision is such that Mr Wood is not in regulated activity.

Employee, not in a specified place

Mrs Shah starts as a paid activity assistant at a youth club. She helps to instruct a group of children, and is supervised by the youth club leader who is in regulated activity. The youth club's managers decide whether the leader's supervision is such that Mrs Shah is not in regulated activity.

In each example, the organisation uses the following steps when deciding whether a new worker will be supervised to such a level that the new worker is not in regulated activity:

- Consider whether the worker is doing work that, if unsupervised, would be regulated activity. (Note: If the worker is not engaging in regulated activity, the remaining steps are unnecessary. If the worker is engaging in regulated activity the remaining steps should be followed);
- consider whether the worker will be supervised by a person in regulated activity, and whether the supervision will be regular and day to day, bearing in mind paragraph 4 of this guidance;
- consider whether the supervision will be reasonable in all the circumstances to ensure the protection of children, bearing in mind the factors set out in paragraph 4 of this guidance above; and if it is a specified place such as a school; and
- consider whether the supervised worker is a volunteer.

i Safeguarding Vulnerable Groups Act 2006, amended by Protection of Freedoms Act 2012: Schedule 4, paragraph 5A: guidance must be "for the purpose of assisting" organisations "in deciding whether supervision is of such a kind that" the supervisee is not in regulated activity.

ii Safeguarding Vulnerable Groups (Northern Ireland) Order 2007, Schedule 2, paragraph 5A, is as above on guidance on "supervision" for Northern Ireland.

iii If the work is in a specified place such as a school, paid workers remain in regulated activity even if supervised.

iv The Protection of Freedoms Act 2012 includes provisions for a statutory duty on an organisation arranging regulated activity (under the 2006 Act or 2007 Order, both as amended) to check that a person entering regulated activity is not barred from regulated activity and a stand-alone barring check. These are as yet not commenced.

v A volunteer is: in England and Wales, a person who performs an activity which involves spending time, unpaid (except for travel and other approved out-of-pocket expenses), doing something which aims to benefit someone (individuals or groups) other than or in addition to close relatives. In Northern Ireland, a volunteer is: a person engaged, or to be engaged, in an activity for a non-profit organisation or person which involves spending time unpaid (except for travel and other approved out-of-pocket expenses) doing something which amounts to a benefit to some third party other than, or in addition to, a close relative.

Annex G: Disclosure and Barring Service checks

These are the types of checks available to those working with children:

Type of check	What the check involves	Positions eligible for this level of check
Standard check	Check of the Police National Computer records of convictions, cautions, reprimands and warnings.	The position being applied for must be covered by an exempted question in the Rehabilitation of Offenders Act 1974 (Exceptions) Order 1975.
Enhanced check	Check of the Police National Computer records plus additional information held by police such as interviews and allegations. Additional information will only be disclosed where a chief police officer reasonably believes it to be relevant and considers that it ought to be disclosed.	The position being applied for must be covered by an exempted question in the Rehabilitation of Offenders Act 1974 (Exceptions) Order 1975 and by provisions in the Police Act 1997 (Criminal Records) Regulations 2002.*
Enhanced criminal record check with children's and/or adult's barred list information	Check of the Police National Computer records plus additional information held by police plus check of the DBS Children's Barred List plus check of the DBS Adults' Barred List.	The position must be eligible for an enhanced level criminal record check as above and be for a purpose listed in the Police Act 1997 (Criminal Records) (No2) Regulations 2009 as qualifying for a barred list(s) check.

*This legislation does not provide a list of job roles that are eligible for this check – such a list does not exist. Instead, the Rehabilitation of Offenders Act 1974 (Exceptions) Order 1975 sets out the 'exempted questions' for which a standard check can be obtained. Similarly, the Police Act 1997 (Criminal Records) Regulations 2002 set out the purposes for which an enhanced check can be obtained, and the Police Act 1997 (Criminal Records) (No 2) Regulations 2009 list the circumstances in which an enhanced check will automatically include a barred list check. It is important to note that the Regulations can also remove roles, duties or activities through the removal of an exempted question or of a particular purpose. The Rehabilitation of Offenders Act 1974 (Exceptions) Order 1975, the Police Act 1997 (Criminal Records) Regulations 2002 and the Police Act 1997 (Criminal Records) (No 2) Regulations 2009 can all be found on the [legislation website](#).

An individual (including an applicant for a job which does not involve working with children) can be asked to apply for a basic criminal record check. This will show only unspent convictions and cautions. This service is currently provided via the Disclosure and Barring Service. Further details can be found on [gov.uk](#).

Annex H: Table of substantive changes from September 2018

Where	What
Summary	
Page 4	Removed reference to multi-agency "transitional" arrangements from the summary on page 4 (as the new three safeguarding partner arrangements must be in place by September 2019)
Part one	
Abuse and neglect	A number of paragraphs have been moved in Part 1 to improve the flow of this section. Content has not been changed but the information that was included at the end of Part 1 covering abuse, neglect and safeguarding issues has been moved to the "What school and college staff should look out for section"
Paragraph 27	Reference to upskirting included (which is now a criminal offence)
Paragraph 29-30	New paragraphs on serious violence
Paragraph 53	Updated the link to the NSPCC helpline
Part two	
Paragraphs 68-75	Multi-agency working updated to reflect new safeguarding partner arrangements
Paragraph 79	Updated to make it clear that the DPA/GDPR does not prevent schools from withholding education data where doing so would be in the interests of a child in a refuge
Paragraph 89	Updated to reflect the new requirements for Relationships Education, Relationships and Sex Education and Health Education
Paragraph 91	Updated to reflect new Ofsted framework
Paragraph 91	Removed the reference to the School Inspection Service as they no longer inspect independent schools
Part three	
Paragraph 122	Removed reference to section 167A of the Education Act

Paragraph 157	Wording changed for overseas trained teachers and directs to GOV.uk for further information. Removed direct link to guidance as it is currently being revised and GOV.uk will be updated in due course
Paragraph 173	Provided clarity regarding Section 128 checks for school governors
Paragraph 174	New paragraph about associate members appointed by the governing body to serve on governing body committees
Part four	No changes
Part five	No changes
Annex A	
Children with family members in prison	Added clarity that the number of children covers England and Wales
So called 'honour-based' violence	Added Female Genital Mutilation and Forced Marriage into the section header to be clear what it includes
Upskirting	New paragraph added to reflect the fact that this is now a criminal offence
Annex B	No changes
Annex C	Added link to new departmental guidance: Teaching online safety in school. This guidance outlines how schools can ensure their pupils understand how to stay safe and behave online as part of existing curriculum requirements
Annex D	No changes
Annex E	No changes
Annex F	No changes
Annex G	No changes



Department
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