



Safeguarding and Child Protection Policy

January 2022

Reviewed and Discussed by Management /Proprietor:

Disseminated to staff: **26th January 2022**

WRITTEN

(and to be read) IN CONJUNCTION WITH:

- Keeping Children Safe in Education
(September 2021)
- Working Together to Safeguard Children
(July 2018)
- What to do if you're worried a child is
being abused
(March 2015)
- Teaching Online Safety in School
(June 2019)

INTRODUCTION

This policy applies to, and is specific to all adults, including volunteers, working in or on behalf of Bright Futures School. This Policy is based on the Keeping Children Safe In Education (KCSIE) statutory guidance that came into force on 1st September 2021.

Everyone working in or for Bright Futures School shares an objective to help keep children and young people safe by contributing to:

- providing a safe environment for children and young people to learn and develop in our school setting, and
- identifying children and young people who are suffering or likely to suffer significant harm, and taking appropriate action with the aim of making sure they are kept safe both at home and in our school setting

This policy is available on the school website and all staff are required to read it and conform to it.

SCHOOL COMMITMENT

Bright Futures School is committed to safeguarding and promoting the welfare of all of its pupils. Each pupil's welfare is of paramount importance. We recognise that some children and particularly those with SEN and disabilities *may* be especially vulnerable to abuse. We recognise that children who are abused or neglected may find it difficult to develop a sense of self-worth and to view the world in a positive way. We will always take a considered and sensitive approach in order that we can support all of our pupils. All staff are expected to share this commitment. Staff take all welfare concerns seriously and encourage children to speak out about anything that worries them, always acting in the best interests of the child.

Bright Futures School aims 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. We recognise that all staff, including volunteers, have a full and active part to play in providing early help protecting pupils from harm. We believe that our school provides a caring, positive, safe and stimulating environment, which promotes all pupils' social, physical, emotional and moral development. Ultimately, effective safeguarding of children can only be achieved by putting children at the centre, and by every individual and agency playing their full part.

Under the Education Act 2002 schools have a duty to safeguard and promote the welfare of their pupils and, in accordance with statutory guidance set out in Working Together to Safeguard Children 2018 and Keeping Children Safe in Education 2021, Bright Futures School will work in partnership with other organisations where appropriate to identify any concerns about child welfare and take action to address them. All staff at Bright Futures School are required to read Part 1 of the KCSIE 2021 guidance. Our Policy follows the same structure as the latest KCSIE (September 2021), please note the following.

Where the guidance states "must" please consider this to be legal and you will need to do it. Where something is recommended as best practice we will use the word "should".

Annual Safeguarding training will be provided for all Bright Futures School staff with regular updates provided as appropriate.

All staff must understand that Safeguarding and Child Protection are two different things:

- Safeguarding is what we do for all our pupils and staff;
- Child protection consists of the procedures we use for children and young people who have been significantly harmed or are at risk of such harm.

The aims of our Policy are to:

- Confirm that the pupils' development is supported in ways that will foster security, confidence and independence.
- Raise the awareness of all staff and volunteers of the need to safeguard children and of their responsibilities in identifying and reporting possible cases of abuse, including Female Genital Mutilation (FGM), Child Sexual Exploitation (CSE) and Honour Based Violence (HBV), Sexual Violence and Sexual Harassment (SVSH). (Guidance on Child on Child SVSH is a new section in Keeping Children Safe in Education, 2021.)
- Confirm the structured procedures to be followed by all members of our school community in cases of suspected harm or abuse.
- Emphasise the need for good levels of communication between all members of staff and those with designated responsibility for child safeguarding, health and safety and other safeguarding responsibilities.
- Confirm the working relationship with Local Authority agencies such as Children and Families Direct, the LA Safeguarding Boards, and other agencies with similar services in neighbouring authorities. Working Together to Safeguard Children (July 2018) outlines how the agencies should work together.

The school will always act in line with Oldham Safeguarding Children Partnership policies and procedures and practice guidance

Responsibilities

The Head of Learning (Alison Hughes) or, in her absence, the Head of Development (Zoe Thompson) or School Manager (Lisa Rigg) has the ultimate responsibility for safeguarding and promoting the welfare of our children and young people.

KCSIE 2021 states that all schools should have a child centred and coordinated approach to safeguarding and this is mirrored by the work that we do as a school. Paragraph 4 (KSCIE 2021, pg5) states that "Safeguarding and promoting the welfare of children" is defined as: -

- protecting children from maltreatment;
- preventing impairment of children's mental 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.

Our Safeguarding Policy must apply to all staff, volunteers and visitors to the school.

The school recognises that Safeguarding incidents and/or behaviours can be associated with factors outside the school and/or can occur between children outside the school. All staff, but especially our designated safeguarding lead (and deputies) will consider the context within which such incidents and/or behaviours occur. This is 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. The school will provide as much information as possible as part of the referral process to Children's Social Care.

THE CURRICULUM

All children have access to an appropriate curriculum which is broad and balanced and differentiated to meet their needs. 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.

Children and young people 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, understanding and empathy for others.

Personal Social Health and Citizenship Education, and humanities sessions will provide opportunities for children and young people to discuss and debate a range of subjects including lifestyles, forced marriage, family patterns, religious beliefs and practices and human rights issues.

Bright Futures School will be aware of and take account of the latest advice and guidance provided to help address specific vulnerabilities and forms of exploitation as described in Part 1 KCSIE 2021 e.g. Female Genital Mutilation (FGM), Child Sexual Exploitation (CSE), Grooming, Radicalisation and Extremism, Forced Marriage, Honour Based Violence (HBV), Sexual Violence and Sexual Harassment (SVSH).

All pupils will know that there are adults in the school who they can approach in confidence if they are in difficulty or feeling worried and that their concerns will be taken seriously and treated with respect. All staff will be prepared to identify children who may benefit from “Early Help” which means providing support as soon as a problem emerges at any point in a child’s life.

ATTENDANCE

Bright Futures School views attendance as a safeguarding issue and in accordance with the school’s Attendance Policy, absences are rigorously pursued and recorded. The school, in partnership with the appropriate agencies, takes action to pursue and address all unauthorised absences in order to safeguard the welfare of children and young people in its care.

The school 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.

We will 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.

Keeping Records

Bright Futures School will 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 school record will also include a chronology of any other significant event in a child’s life.

All instances of a safeguarding nature will be recorded by staff on the school CPOMS logging system, which alerts the management team, who will decide on any follow up action required.

TAKING ACTION TO ENSURE THAT CHILDREN ARE SAFE AT SCHOOL AND AT HOME

All staff follow the Oldham Safeguarding Partners Child Protection Procedures which are consistent

with Working Together to Safeguard Children 2018 and 'What to do if you are worried a child is being abused'

It is *not* the responsibility of the school staff to investigate welfare concerns or determine the truth of any disclosure or allegation. All staff, however, have a duty to recognise concerns and maintain an open mind. Accordingly, all concerns regarding the welfare of pupils will be recorded and discussed with the designated senior person (or deputy) with responsibility for child protection prior to any discussion with parents.

All concerns re child safety will be recorded on the school **CPOMS** logging system which alerts management who can then take appropriate action.

1. Staff must immediately report:

- any suspicion that a child is injured, marked, or bruised in a way which is not readily attributable to the normal knocks or scrapes received in play
- any explanation given which appears inconsistent or suspicious
- any behaviours which give rise to suspicions that a child may have suffered harm (e.g. significant changes in behaviour, worrying drawings or play)
- any concerns that a child may be suffering from inadequate care, ill treatment, or emotional maltreatment
- any concerns that a child is presenting signs or symptoms of abuse or neglect
- any significant changes in a child's presentation, including non-attendance
- any hint or disclosure of abuse or neglect received from the child, or from any other person, including disclosures of abuse or neglect perpetrated by adults outside of the family or by other children or young people
- any concerns regarding person(s) who may pose a risk to children (e.g. staff in school or person living in a household with children present) including inappropriate behaviour e.g. inappropriate sexual comments; excessive one-to-one attention beyond the requirements of their usual role and responsibilities; or inappropriate sharing of images
- any concerns relating to peer abuse
- any concerns relating to youth produced sexual imagery (sexting, nude images)
- any concerns relating to a child's engagement with extremist groups or ideologies
- any concerns regarding upskirting

2. Responding to Disclosure

Disclosures or information may be received from pupils, parents or other members of the public. School recognises that those who disclose such information may do so with difficulty, having chosen carefully to whom they will speak. Accordingly all staff will handle disclosures with sensitivity. Staff have roles, training and support to ensure pupils with autism are able to discuss issues and concerns with staff in safety and with confidence.

Such information cannot remain confidential and staff will immediately communicate what they have been told to the designated person and make a detailed record.

Staff will not investigate but will, wherever possible, elicit enough information to pass on to the designated person in order that s/he can make an informed decision of what to do next.

Staff will:

- listen to and take seriously any disclosure or information that a child may be at risk of harm
- try to ensure that the person disclosing does not have to speak to another member of school staff

- clarify the information
- try to keep questions to a minimum and of an 'open' nature e.g. 'Can you tell me what happened?' rather than 'Did x hit you?'
- try not to show signs of shock, horror or surprise
- not express feelings or judgements regarding any person alleged to have harmed the child
- explain sensitively to the person that they have a responsibility to refer the information to the senior designated person
- reassure and support the person as far as possible
- explain that only those who 'need to know' will be told
- explain what will happen next and that the person will be involved as appropriate
- record the incident on the school CPOMS logging system
- Complete a BFS safeguarding concern form

If at any point, there is a risk of immediate serious harm to a child, a referral should be made to Children's Social Care or the police immediately. Under Keeping Children Safe in Education guidance, it is made clear that all staff should know how to make a referral.

The National Police Chief Council (NPCC) have produced [guidance](#) of when to call the police, it also gives guidance of what you can expect to happen when you do make a report.

Note: Any member of staff may make a referral to or obtain advice from Social Care in the absence of Alison, Zoe or Lisa.

3. **Action by the Designated Safeguarding Lead (DSL)** - Alison Hughes (or deputies Zoe Thompson / Lisa Rigg in her absence.) Following any information raising concern, the designated person will consider:

- any urgent medical needs of the child
- *making an enquiry to the MASH team to find out if the child is subject to a Child Protection Plan by ringing - 0161 770 7777*
- discussing the matter with other agencies involved with the family
- consulting with appropriate persons e.g. ESW service, Social Care
- the child's wishes

*Where there is a safeguarding concern, governing bodies, proprietors and school or college leaders should ensure the child's wishes and feelings are taken into account when determining what action to take and what services to provide. Systems should be in place for children to express their views and give feedback. Ultimately, all systems and processes should operate with the **best interests of the child at their heart**" (KCSIE, 2021 paragraph 83)*

Then, decide

- wherever possible, to talk to parents, unless to do so may place a child at risk of significant harm, impede any police investigation and/or place the member of staff or others at risk
 - whether to make a child protection referral to the Children Assessment Team (0161 770 7770) or for children over 16 (0161 770 6599) because a child is suffering or is likely to suffer significant harm and if this needs to be undertaken immediately. Referrals can now be made by email (child.mash@oldham.gov.uk)
- OR*
- not to make a referral at this stage
 - if further monitoring is necessary
 - if it would be appropriate to undertake an assessment (e.g. CAF) and/or make a referral for other services

All information and actions taken, including the reasons for any decisions made, will be fully documented. All referrals to social care will be accompanied by a standard referral/disclosure form.

4. Action following a child protection referral

It is the responsibility of all staff to safeguard children. It is the role of the DSL (or appropriately trained Deputy DSL) to attend multi-agency meetings and provide reports for these. Other staff in school, however, may be asked to contribute.

The designated lead or other appropriate member of staff will:

- *make regular contact with the Social worker involved to stay informed*
- provide a report for, attend and contribute to any subsequent Child Protection Conference
- if the child or children are placed on the Child Protection Register, contribute to the Child Protection Plan and attend Core Group Meetings and Review Child Protection Conferences
- where possible, share all reports with parents prior to meetings
- where in disagreement with a decision made e.g. not to apply Child Protection Procedures or not to convene a Child Protection Conference, discuss this with the Safeguarding Officer for Learning or the Manager of the Child Protection and Review Unit
- where a child on the child protection register moves from the school or goes missing, immediately inform the key worker in Social Care

5. Recording and monitoring

Accurate records will be made as soon as practicable using the Bright Futures Disclosure Concern form and will clearly distinguish between observation, fact, opinion and hypothesis. All records will be signed and dated, any information given will be recorded verbatim where possible and a note made of the location and description of any injuries seen.

All C.P. documents will be retained in a 'Child Protection' file, separate from the child's main file. This will be locked away and only accessible to the Head of Learning/ Development. These records will be copied and transferred to any school or setting the child moves to, clearly marked 'Child Protection, Confidential, for attention of Designated Person Child Protection.' If the child goes missing from education or is removed from roll to be educated at home, then any Child Protection file should be copied and the copy sent to the Education Social Work Service. Original copies will be retained until the child's 25th birthday.

ROLES and RESPONSIBILITIES

The Head of Learning, through consultation with the Proprietor will ensure that:

- The policies and procedures adopted by the Management team to safeguard and promote the welfare of pupils are fully implemented and followed by all staff including volunteers.
- Safe recruitment and selection of staff and volunteers is practised.
- Designated Senior Members of staff for child protection are identified and receive appropriate on-going regular training.
- Sufficient time and resources are made available to enable the designated member of staff to discharge their responsibilities, including attending inter-agency meetings, contributing to the assessment of children and young people, supporting colleagues and delivering training as appropriate.
- All staff and volunteers receive appropriate training which is regularly updated.
- All temporary staff and volunteers are made aware of the school's safeguarding policy and arrangements including Part 1 KCSIE 2021.
- All staff and volunteers feel safe about raising concerns about poor or unsafe practice in regard to the safeguarding and welfare of the children and young people and such concerns will be addressed sensitively and effectively.
- Parents/carers are aware of and have an understanding of the school's responsibilities to promote the safety and welfare of its pupils by making its obligations clear in the school prospectus.
- The Safeguarding and Child Protection policy is available on the school's web-site.
- The school is pro-active and co-operates with appropriate agencies and risk based approaches to ensure young people are safeguarded against any potential grooming activities which may attempt to draw them into harmful activities eg CSE and radicalization and extremism.

The Designated Person will:

- Act as the first point of contact with regards to all safeguarding matters.
- Attend up-dated training every two years.
- Provide relevant information to the LA on how the school carries out its safeguarding duties.
- Provide support and training for staff and volunteers.

- Ensure that the schools actions are in line with the OSCP Inter-Agency Procedures.
- Support staff to make effective referrals to the Children and Families Services and any other agencies where there are concerns about the welfare of a child.
- Keep copies of all referrals to Children and Families Services and any other agencies related to safeguarding children.
- Ensure that all staff and volunteers receive information on safeguarding policies and procedures from the point of induction.
- Ensure that any staff with specific responsibility for safeguarding children receive the appropriate training to undertake this role.
- Manage and keep secure the school's safeguarding records.
- Ensure that all staff and volunteers understand and are aware of the school's reporting and recording procedures and are clear about what to do if they have a concern about a child or an adult; including that they pass all concerns on to the DSPs central record, for consideration of patterns and themes
- Liaise with the Proprietors about any safeguarding issues.
- Ensure that the Safeguarding Policy is regularly reviewed and up-dated.
- Keep up to date with changes in local policy and procedures and are aware of any guidance issued by the DfE concerning Safeguarding.
- Send a pupil's child protection or safeguarding file separately from the main file to a new establishment if a pupil leaves the school. Keep a copy of the file.

SAFER RECRUITMENT and SELECTION of STAFF

The school's recruitment and selection policies and processes adhere to the DfE guidance "Keeping Children Safe in Education" 2021.

CONFIDENTIALITY AND INFORMATION SHARING

When sharing confidential information about a member of staff or pupil, the school has regard to the data protection principles, which allow them to share personal information, as provided for in the Data Protection Act 2018, and the GDPR provided that there is a lawful basis to process any personal information required and where relevant, the Education (Pupil Information) (England) Regulations 2005 and the Freedom of Information Act 2000.

The school notes that Keeping Children Safe in Education (2021), para 78: 'The Data Protection Act 2018 and GDPR do not prevent, or limit, the sharing of information for the purposes of keeping children safe. 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' 'This includes allowing practitioners to share information without consent' para 80.

Staff ensure that confidentiality protocols are followed and information is shared appropriately. The Designated Member of Staff will disclose any information about a pupil to other members of staff on a need to know basis only.

All staff and volunteers must understand that they have a professional responsibility to share information with other agencies in order to safeguard children. All staff and volunteers must be clear with children that they cannot promise to keep secrets. *'Fears about sharing information must not be allowed to stand in the way of the need to safeguard and promote the welfare and protect the safety of children.'*

TRAINING FOR STAFF AND VOLUNTEERS

All staff will be made aware of the school's safeguarding systems as part of their induction and in accordance with "Keeping children safe in education – September 2021" all staff will receive training at induction.

All staff should receive appropriate child protection training which includes the following:

- basic safeguarding information about the school's policies and procedures
- signs and symptoms of abuse (emotional and physical)
- indicators of vulnerability to radicalisation
- training in E Safety

The Designated Person for Safeguarding (Alison Hughes) will receive refresher training every two years as well as annual updates. All staff will receive appropriate child protection training which is regularly updated.

All staff will be supported to recognise warning signs and symptoms in relation to specific safeguarding issues and will receive training or briefings on for example, Forced Marriage, Female Genital Mutilation, Domestic Abuse and Coercive Control, Child Sexual Exploitation, Peer-on-Peer (Child on child) Abuse including Sexual violence and sexual harassment, Trafficking and Preventing Violent Extremism, Honour violence, Fabricated or Induced Illness, as listed in Annex A KCSIE 2021.

INFORMING PARENTS/CARERS

Our approach to working with parents/carers is one of transparency and honesty and 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. In most cases parents and carers will be informed when concerns are raised about the safety and welfare of their child. Parents and carers should be given the opportunity to address any concerns raised.

Parents and carers will usually be informed if a referral is to be made to the Children's Social Care Service or any other agency. Parents/carers will not be informed if it is believed that by doing so would put the child at risk. In such cases the Designated Persons will seek advice from Children's Social Care.

Child Protection's Policies and Procedures will be used to protect children and young people exposed to, and at risk from, domestic abuse. Any child or young person thought to be at immediate risk will be reported without delay to the police service as a 999 emergency and the OSCP will be contacted as soon as possible.

Definitions of the four kinds of Abuse and Neglect

As in the Children Acts 1989 and 2004, a child is anyone who has not yet reached his / her 18th birthday.

The following definitions are from Working Together to Safeguard Children (2018)

Significant Harm means ill-treatment or impairment of health and development, including, for example, impairment suffered from seeing or hearing the ill-treatment of another; Development means physical, intellectual, emotional, social or behavioural development; Health includes physical and mental health; Ill-treatment includes sexual abuse and other forms of ill-treatment which are not physical.

Local authorities have a duty to make enquiries to decide whether they should take action to safeguard or promote the welfare of a child who is suffering or likely to suffer significant harm.

Abuse, including neglect, and safeguarding issues are rarely standalone events that can be covered by one definition or label. In most cases, multiple issues will overlap.


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

Emotional abuse is the persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.

Emotional abuse 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.
- Not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate.
- Age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability, as well as overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction.
- Seeing or hearing the ill-treatment of another.
- Serious bullying (including cyberbullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children.

(See Appendix 4 for signs and symptoms of emotional abuse).

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.

- Non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (including via the internet).
- Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.

Neglect is the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy as a result of maternal substance abuse.

Once a child is born, neglect may involve a parent or carer failing to:

- Provide adequate food, clothing and shelter (including exclusion from home or abandonment).
- Protect a child from physical and emotional harm or danger.
- Ensure adequate supervision (including the use of inadequate care-givers).
- Ensure access to appropriate medical care or treatment.

It may also include neglect of, or unresponsiveness to, a child's basic emotional needs. It can be difficult to know when to take action to protect a child from neglect, ensure that staff know who they can approach to voice their concerns and discuss next steps.

One off signs may not mean that a child is being neglected. Knowing when a child or family need help requires someone to recognise that there are ongoing or persistent patterns of neglect.

Particularly Vulnerable Groups

Some children and young people may be particularly vulnerable to abuse and harm, which is documented in Section 35 of the Safeguarding Vulnerable Groups Act 2006. This includes for example privately fostered children, children with a disability, children with communication needs. Certain forms of behaviour can also increase the vulnerability of a young person such as drug or alcohol misuse. The DSLs should be aware of the range of guidance that is available and vigilant to concerns being raised by staff and children which need to be reported in accordance with national (Government) and local (NCSCB) procedures without delay. The lead should also ensure staff working with children are alert to signs which may indicate possible abuse or harm.

Child Sexual Exploitation (CSE) and Child Criminal Exploitation (CCE)

Both CSE and CCE are forms of abuse and both occur where an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a child into sexual or criminal activity. CSE and CCE can affect children, both male and female and can include children who have been moved (commonly referred to as trafficking) for the purpose of exploitation.

Child Sexual Exploitation

The sexual exploitation of children and young people (CSE) under 18 is defined as that which:

'involves exploitative situations, contexts and relationships where young people (or a third person or persons) receive 'something' (e.g. food, accommodation, drugs, alcohol, cigarettes, affection, gifts, money) as a result of them performing, and/or another or others performing on them, sexual activities.'

Child sexual exploitation can occur through the use of technology without the child's immediate recognition; for example being persuaded to post sexual images on the Internet/mobile phones without immediate payment or gain. In all cases, those exploiting the child/young person have power over them by virtue of their age, gender, intellect, physical strength and/or economic or other resources. Violence, coercion and intimidation are common, involvement in exploitative relationships being characterised in the main by the child or young person's limited availability of choice resulting from their social/economic and/or emotional vulnerability' (Department for Education, 2012).

Child sexual exploitation is a form of abuse which involves children (male and female, of different ethnic origins and of different ages) receiving something in exchange for sexual activity. Schools are well placed to prevent, identify and respond to children at risk of sexual exploitation.

Who is at risk?

Child sexual exploitation can happen to any young person from any background. Although the research suggests that the females are more vulnerable to CSE, boys and young men are also victims of this type of abuse.

The characteristics common to all victims of CSE are not those of age, ethnicity or gender, rather their powerlessness and vulnerability. Victims often do not recognise that **they** are being exploited because they will have been groomed by their abuser(s). As a result, victims do not make informed choices to enter into, or remain involved in, sexually exploitative situations but do so from coercion, enticement, manipulation or fear. Sexual exploitation can happen face to face and it can happen online. It can also occur between young people.

In all its forms, CSE is child abuse and should be treated as a child safeguarding issue. Full details can be found on **page 125 of KCSIE 2021 which** gives further guidance.

Child Criminal Exploitation

CCE is where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child into any criminal activity for:

- a) in exchange for something the victim needs or wants, and/ or
- b) for the financial or other advantage of the perpetrator or facilitator and/or
- c) through violence or the threat of violence.

Data shows children as young as 8 can become victims of CCE, however staff should be vigilant for all children and families regardless of age.

Children can become trapped by this type of exploitation as perpetrators can threaten victims (and their families) with violence, or entrap and coerce them into debt. As children involved in criminal exploitation often commit crimes themselves, their vulnerability as victims is not always recognised by adults and professionals. They may still have been criminally exploited even if the activity appears to be something they have agreed to or consented to.

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

County Lines

Page 125 of KCSIE, 2021 documents how children can be at risk of exploitation in a geographically widespread form of abuse relating to drug and gang cultures. Children are moved around the area and in some cases across the country to carry drugs, money and other illegal activities. Further information is available in the document produced by the Home Office - **Criminal Exploitation of children and vulnerable adults: County Lines guidance.**

Preventing Radicalisation

Preventing violent extremism by countering the ideology of extremism and by identifying those who are being drawn into radicalism has for some time formed part of our approach to safeguarding. The Counter-terrorism and

Security Act 2015 now imposes a duty on a wide range of bodies including all schools to respond when they become concerned that a child is being, or is at risk of, becoming radicalised. Compliance will be monitored through various inspection regimes such as Ofsted that will be looking to see that organisations have assessed the level of risk and that staff are appropriately trained to look out for signs of radicalisation. Also schools will be monitored to ensure they are aware of the process for making referrals to Channel, the panel that reviews and refers individuals to programmes to challenge extremist ideology.

Statutory guidance has been published and is available here:

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

Anyone who has a concern about individuals who may be being drawn into support for extremist ideology should contact their regional police Prevent Team who will then make contact to discuss whether a referral should be made. Although a police team, their role is to support early intervention so that vulnerable children or adults do not end up facing criminal sanctions.

Radicalisation refers to the process by which a person comes to support terrorism and forms of extremism. Extremism is vocal or active opposition to fundamental British values, such as democracy, the rule of law, individual liberty, and mutual respect and tolerance of different faiths and beliefs.

Schools have a duty to prevent children from being drawn into terrorism. The DSL will undertake Prevent awareness training and make sure that staff have access to appropriate training to equip them to identify children at risk.

Staff will assess the risk of children in our school being drawn into terrorism. This assessment will be based on an understanding of the potential risk in our local area, in collaboration with our local safeguarding children board and local police force.

Staff will ensure that suitable internet filtering is in place, and equip pupils to stay safe online at school and at home.

There is no single way of identifying an individual who is likely to be susceptible to an extremist ideology. Radicalisation can occur quickly or over a long period.

Staff will be alert to changes in pupils' behaviour.

The government website [Educate Against Hate](#) and charity [NSPCC](#) say that signs that a pupil is being radicalised can include:

- Refusal to engage with, or becoming abusive to, peers who are different from themselves.
- Becoming susceptible to conspiracy theories and feelings of persecution.
- Changes in friendship groups and appearance.
- Rejecting activities they used to enjoy.
- Converting to a new religion.
- Isolating themselves from family and friends.
- Talking as if from a scripted speech.
- An unwillingness or inability to discuss their views.
- A sudden disrespectful attitude towards others.
- Increased levels of anger.
- Increased secretiveness, especially around internet use.
- Expressions of sympathy for extremist ideologies and groups, or justification of their actions.
- Accessing extremist material online, including on Facebook or Twitter.

- Possessing extremist literature.
- Being in contact with extremist recruiters and joining, or seeking to join, extremist organisations.

Children who are at risk of radicalisation may have low self-esteem, or be victims of bullying or discrimination. It is important to note that these signs can also be part of normal teenage behaviour – staff should have confidence in their instincts and seek advice if something feels wrong.

Staff should **always** take action if they are worried. All staff are responsible as individuals to report any concerns.

Honour-Based Violence (HBV)

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

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

Female Genital Mutilation

Female genital mutilation (FGM) refers to procedures that intentionally alter or cause injury to the female genital organs for non-medical reasons. The practice is illegal in the UK.

FGM typically takes place between birth and around 15 years old; however, it is believed that the majority of cases happen between the ages of 5 and 8.

Risk factors for FGM include:

- Low level of integration into UK society.
- Mother or a sister who has undergone FGM.
- Girls who are withdrawn from PSHE.
- Visiting female elder from the country of origin.
- Being taken on a long holiday to the country of origin.
- Talk about a ‘special’ procedure to become a woman.

Symptoms of FGM

FGM may be likely if there is a visiting female elder, there is talk of a special procedure or celebration to become a woman, or parents wish to take their daughter out-of-school to visit an ‘at-risk’ country (especially before the summer holidays), or parents who wish to withdraw their children from learning about FGM.

Potential indications that FGM may have already taken place may include:

- Difficulty walking, sitting or standing and may even look uncomfortable.
- Spending longer than normal in the bathroom or toilet due to difficulties urinating.
- Spending long periods of time away from a classroom during the day with bladder or menstrual problems.
- Frequent urinary, menstrual or stomach problems.
- Prolonged or repeated absences from school or college, especially with noticeable behaviour changes (e.g. withdrawal or depression) on the girl’s return.
- Reluctance to undergo normal medical examinations.
- Confiding in a professional without being explicit about the problem due to embarrassment or fear.

- Talking about pain or discomfort between her legs.

The Serious Crime Act 2015 sets out a duty on professionals (including teachers) to notify police when they discover that FGM appears to have been carried out on a girl under 18. In schools, this will usually come from a disclosure.

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**. 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. (**KCSIE 2021 paragraph 40**).

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 perpetrators use perceived cultural practices 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 (FMU) has created: Multi-agency practice guidelines: handling cases of forced marriage (pages 32-36 of which focus on the role of schools and colleges) and, Multi-agency statutory guidance for dealing with forced marriage, which can both be found at <https://www.gov.uk/guidance/forced-marriage>. School and college staff can contact the Forced Marriage Unit if they need advice or information: Contact: 020 7008 0151 or email fmu@fcd.gov.uk.

Children Missing from Education (Cme)

A child going missing from education is a potential indicator of abuse or neglect, and such children are at risk of being victims of harm, exploitation or radicalisation.

There are many circumstances where a child may become missing from education, but some children are particularly at risk. These include children who:

- Are at risk of harm or neglect.
- Come from Gypsy, Roma, or Traveller families.
- Come from the families of service personnel.
- Go missing or run away from home or care. 🏠 Are supervised by the youth justice system.
- Cease to attend a school.
- Come from new migrant families.

We will follow our procedures for unauthorised absence and for dealing with children who go missing from education to help identify the risk of abuse and neglect, including sexual exploitation, and to help prevent the risks of going missing in future. This includes informing the local authority if a child leaves the school without a new school being named and adhering to requirements with respect to sharing information with the local authority, when applicable, when removing a child's name from the admission register at non-standard transition points.

Staff will be trained in signs to look out for and the individual triggers to be aware of when considering the risks of potential safeguarding concerns which may be related to being missing, such as travelling to conflict zones, FGM and forced marriage.

If a staff member suspects that a child is suffering from harm or neglect, we will follow local child protection procedures, including with respect to making reasonable enquiries. We will make an immediate referral to the local authority children's social care team, and the police, if the child is in immediate danger or at risk of harm.

Private Fostering

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

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

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

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

School staff should notify the Designated Safeguarding Lead if they become aware of private fostering arrangements. The Designated Safeguarding Lead will speak to the family of the child involved to check that they are aware of their duty to inform the local authority.

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

Child on Child Sexual Violence/Sexual Harassment (SVSH)

KCSIE 2021 (Part 5) documents how schools should manage reports of child on child sexual violence and sexual harassment. The schools safeguarding policy should document how staff should manage allegations and how they should put measures in place to safeguard the alleged victim and alleged perpetrator.

All staff must be trained to deal with these allegations and how to make a referral to the relevant authorities such as the police. There is additional guidance available for allegations about online abuse at the UKCCIS sexting advice document.

KCSIE is very clear that any allegation regarding sexual violence and / or sexual harassment is not acceptable and will not be tolerated. Allegations should not be passed off by any party as "Banter" "Part of growing up" or "having a laugh".

Peer on Peer Abuse including Sexting and Upskirting

Staff should be aware that safeguarding issues can manifest themselves via peer on peer abuse. It can happen both inside and outside of school and online. It is important that all staff recognise the indicators and signs of peer on peer abuse. Even if there are no reports it does not mean it is not happening, it may be the case that it is just not being reported. Any concerns regarding peer on peer abuse should be reported to the DSLs.

Abuse is abuse and should never be tolerated or passed off as “banter”, “just having a laugh”, “boys being boys” or “part of growing up” as this can lead to a culture of unacceptable behaviours, an unsafe environment for children and in worst case scenarios a culture that normalises abuse. Peer on peer abuse is most likely to include (but not limited to):

- Bullying (including cyberbullying, prejudice-based and discriminatory bullying);
- Abuse in intimate relationships between peers;
- Physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (this may include an online element which facilitates, threatens, and/or encourages physical abuse);
- Sexual violence, sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment, which may be standalone or part of a broader pattern of abuse;
- Causing someone to engage in sexual activity without consent such as forcing someone to engage in sexual activity;
- Consensual and non-consensual sharing of nudes and semi nudes images and/or videos (also known as sexting);
- Upskirting, which typically involves taking a picture under of a person’s clothing without their permission, with the intention of viewing their genitals or buttocks to cause the victim humiliation, distress or alarm; and
- Initiation/hazing-type violence and rituals (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element).

Different gender issues can be prevalent when dealing with peer on peer abuse. All staff should be clear in their role and the important part they have in preventing it by responding where they believe a child may be at risk from peer on peer abuse.

At Bright Futures School, we believe that all children have a right to attend school and learn in a safe environment. Children should be free from harm by adults in the school and other pupils.

We recognise that some pupils will sometimes negatively affect the learning and wellbeing of others and their behaviour will be dealt with under the school’s Behaviour Policy.

Occasionally, allegations may be made against pupils by others in the school, which are of a safeguarding nature. Safeguarding issues raised in this way may include physical abuse, emotional abuse, sexual abuse and sexual exploitation. It is likely that to be considered a safeguarding allegation against a pupil, some of the following features will be found.

The allegation:

- is made against an older pupil and refers to their behaviour towards a younger pupil or a more vulnerable pupil;
- is of a serious nature, possibly including a criminal offence;
- raises risk factors for other pupils in the school;
- indicates that other pupils may have been affected by this pupil;
- indicates that young people outside the school may be affected by these pupils.

At Bright Futures School we will support the victims of peer on peer abuse.

Sexting

In cases of 'sexting' we follow guidance given to schools and colleges by the UK Council for Child Internet Safety (UKCCIS) published in August 2016: 'Sexting in schools and colleges, responding to incidents, and safeguarding young people'.

Upskirting

The Voyeurism (Offences) Act, often referred to as Upskirting Act was introduced on 19th April 2019. Upskirting is defined by KCSIE, 2019 is "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." Upskirting is illegal, and the perpetrator can face up to 2 years in prison.

The victim can be any gender. KCSIE 2021 has been updated to clarify that although referred to as "Upskirting" the victim can be any gender.

Mobile Devices

Appropriate use of mobile devices is essential. The use of mobile devices must not detract from the quality of supervision and care of children. All parents have the school phone number that is used by the school and are encouraged phone on that number. Staff are able to use their personal mobile phones during their break times. During working hours they must be kept out of the reach of children and parents, in a secure area accessible only to staff. All staff are made aware of their duty to follow this procedure which is set out in the Code of Conduct.

Visitors to schools are requested not to use their mobile phones (or other personal devices) on the premises.

We believe that photographs validate children's experiences and achievements and are a valuable way of recording milestones in a child's life. Parental permission for the different ways in which we use photographs is gained as part of the initial registration. We may take a mixture of photos that reflect the school environment; sometimes this will be when children are engrossed in an activity either on their own or with their peers. In order to safeguard children and adults, and to maintain privacy, cameras are not to be taken into the toilets by adults or children. All staff and volunteers at Bright Futures School understand the difference between appropriate and inappropriate sharing of images. All images are kept securely in compliance with the Data Protection Act.

Children who Self-harm

Staff should always be mindful of the underlying factors which may lead a child or young person of any age to self-harm. This is particularly the case for children of primary school age as self-harm in this age group is uncommon. Where information comes to the attention of practitioners which suggests that a primary age child has self-harmed serious consideration must be given to whether there are other underlying factors, including abuse. All such cases should be discussed with children's social care.

Even in those unusual cases where a primary age child is thought to have self-harmed it is important to recognise that this behaviour is an indicator of emotional distress and the child will need support to address this.

Online Safety

Every opportunity should be taken to promote online safety with our children. The online world means that we all have access to material and people that we may not come across in every day life. Paragraph 123- 126 of KCSIE 2021 includes details for online safety and outlines the 4 main risks; -

- **Content:** being exposed to illegal, inappropriate or harmful content, for example: pornography, fake news, racism, misogyny, self-harm, suicide, anti-Semitism, radicalisation and extremism.
- **Contact:** being subjected to harmful online interaction with other users; for example: peer to peer pressure, commercial advertising and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes.
- **Conduct:** personal online behaviour that increases the likelihood of, or causes, harm; for example, making, sending and receiving explicit images (e.g consensual and non-consensual sharing of nudes and semi nudes and /or pornography, sharing other explicit images and online bullying; and
- **Commerce** - risks such as online gambling, inappropriate advertising, phishing and or financial scams. If you feel your pupils, students or staff are at risk, please report it to the Anti-Phishing Working Group(<https://apwg.org/>).

The Children's Code came into effect on 2 September 2021. This is a data protection code of practice for online services such as apps, online games, web and social media sites likely to be accessed by children. Schools and DSLs must ensure that any online services commissioned are compliant with the 15 standards in which to protect children's data online. More information and teaching resources are available: childrenscore@ico.org.uk.

Children with Special Educational Needs and Disabilities (SEND)

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

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

Bright Futures School managers ensure that all staff have extensive knowledge of each pupil and their autism presentations, as well as excellent relationships with pupils. This helps staff to be able to recognise signs of abuse or neglect in BFS pupils. Our whole school pupil risk assessment is regularly updated with details of pupil behaviours and all staff have access to it on Google drive.

Allegations regarding person(s) working in or on behalf of school (including volunteers)

Where an allegation is made against any person working in or on behalf of the school, that he or she has:

- a. Behaved in a way that has harmed a child or may have harmed a child
- b. Possibly committed a criminal offence against or related to a child or
- c. Has behaved towards a child or children in a way that indicates s/he is unsuitable to work with children.

We will apply the same principles as in the rest of this document and we will always follow the OSCP procedures that can be accessed at www.oldham.gov.uk

Detailed records will be made to include decisions, actions taken, and reasons for these. All records will be retained securely in staff files.

Whilst we acknowledge such allegations, (as all others), may be false, malicious or misplaced, we also acknowledge they may be founded. It is, therefore, essential that all allegations are investigated

properly and in line with agreed procedures.

Initial Action

- The person who has received an allegation or witnessed an event will immediately inform the Head of Learning / Development and make a record.
- In the event that an allegation is made against the Head Of Learning the matter will be reported to the proprietors who will proceed as the Head Of Learning.
- In the event that an allegation is made against both the Head of Learning and The Head of Development, the matter will be reported to the Local Authority Designated Officer.
- The Head Of Learning/ Development will take steps, where necessary, to secure the immediate safety of children and any urgent medical needs
- The member of staff will not be approached at this stage unless it is necessary to address the immediate safety of children
- The Head Of Learning/ Development may need to clarify any information regarding the allegation, however no person will be interviewed at this stage
- The Head Of Learning/ Development will consult with the Local Authority Designated Officer (See Contacts Appendix) in order to determine if it is appropriate for the allegation to be dealt with by school or if there needs to be a referral to social care and/or the police for investigation
- Consideration will be given throughout to the support and information needs of pupils, parents and staff
- The Head of Learning will inform the proprietor of any allegation.

CONTACTS

Oldham Multi Agency Safeguarding Hub - (MASH): 0161 770 7777

Oldham Safeguarding Partner (Manager):0161 770 8096 (Sue Harrison)

Local Authority Designated Officer : 0161 770 8870 - Colette Morris (LADO)

Children Missing Education: 0161 770 4201 (Pupil Tracking Team)

Children With Disabilities: 0161 770 3770

Emergency Duty Team (Out of Hours): 0161 770 6936

The NSPCC whistle-blowing helpline number: 0800 800 5000

Uk Anti- terrorist hotline - 0800 789 321

A J Hughes
January 2022