

Trust Shared Service Safeguarding Policy 2020-2021

July 2020

This Safeguarding Policy applies to Greenshaw Learning Trust (GLT) Shared Service, and members, trustees and staff of the Trust Shared Service and visitors to the Trust Shared Service must abide by this policy which has been adopted in accordance with and pursuant to the Safeguarding Policy of the GLT.

It is the responsibility of the GLT CEO to ensure that this policy is adhered to.

This policy is subject to the GLT Safeguarding Policy. If there is any ambiguity or conflict then the GLT Safeguarding Policy takes precedence. If there is any question or doubt about the interpretation of this, the GLT CEO should be consulted.

Approval and review:

This policy is the responsibility of: The GLT CEO.

This policy was approved by the Board of Trustees on **17 July 2020**.

This policy is due for review by: July 2021.

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A. RESPONSIBLE PERSONS

The following are the responsible persons with regard to the Trust Shared Service as referred to in this policy.

The GLT Designated Safeguarding Lead (DSL):

The Chief Executive Officer (CEO) of GLT:

William Smith. Email: wsmith@greenshawlearningtrust.co.uk, telephone: 07841 696922

The Deputy Designated Safeguarding Lead (DSL):

Deputy Designated Safeguarding Lead for Greenshaw Learning Trust (GLT Deputy DSL):

Sarah Vardy. Email: svardy@greenshawlearningtrust.co.uk, telephone 020 8715 1078.

Safeguarding & Child Protection lead governor:

Nominated Safeguarding (& Child Protection) Trustee:

Roger Mills. Email: rmills@greenshawlearningtrust.co.uk, telephone:

Chair of the Board of Trustees

Roger Mills. Email: rmills@greenshawlearningtrust.co.uk, telephone:

Safer Recruitment

Head of HR for Greenshaw Learning Trust :

Jenny Cain Email: jcain@greenshawlearningtrust.co.uk, telephone: 020 8715 1078.

Attendance Manager:

Julie Carrick. Email: jcarrick@greenshawlearningtrust.co.uk, telephone: 07969 157445.

B. APPLICABILITY

Anyone who has a safeguarding concern relating to a child at any GLT school or on the school roll, a member of staff, paid or unpaid, a volunteer or contractor at any GLT school, or anyone visiting or using any GLT school premises; or relating to an incident that took place at any GLT school, should report the matter to the School DSL and it will be dealt with in accordance with the School Safeguarding Policy.

Where the subject of a safeguarding concern is a member of staff or volunteer of a GLT school the School DSL must report the matter to the school Headteacher, and it will be dealt with under the Trust Staff Disciplinary Policy. The school Headteacher must inform and take advice from the GLT Head of HR.

Where the subject of a safeguarding concern is a member of staff or volunteer of the Trust Shared Service the GLT DSL must report the matter to the Executive GLT CEO, and it will be dealt with under the Trust Staff Disciplinary Policy. The GLT CEO must inform and take advice from the GLT Head of HR.

Where the subject of a safeguarding concern is a supply teacher at a GLT school the Designated Safeguarding lead must report the matter to the Headteacher and to the Designated Officer (LADO) of the school's local authority..

Where the subject of a safeguarding concern is a member of a GLT governing body or non-Trustee-member of a Board Committee the matter must be reported to the GLT CEO who will inform the

Chair of the Board of Trustees.

Where the subject of a safeguarding concern is the GLT CEO, the matter must be reported to the Chair of the Board of Trustees, who will inform the appropriate Local Authority Designated Officer.

Where the subject of a safeguarding concern is a Trustee, the matter must be reported to the Chair of the Board of Trustees, who will inform the GLT CEO.

Where the subject of a safeguarding concern is the Chair of the Board of Trustees, the matter must be reported to the appropriate Local Authority Designated Officer.

C. RELATED POLICIES AND PROCEDURES

The following [Trust policies](#) are directly related to and complement this Trust Safeguarding Policy and Procedures:

- Greenshaw Learning Trust Anti Radicalisation Policy.
- Greenshaw Learning Trust Staff Code of Conduct.
- Greenshaw Learning Trust Whistle-blowing Policy.
- Greenshaw Learning Trust HR, Recruitment & Selection and disciplinary policies and procedures.

INTRODUCTION

“THE WELFARE OF THE CHILD IS PARAMOUNT”

At the Greenshaw Learning Trust, the safety and welfare of our pupils is of the highest importance. We have worked hard to ensure that there is a culture of vigilance within Greenshaw Learning Trust and that all adults working at Greenshaw Learning Trust know that they must protect students from harm and abuse and be aware that any pupil may be at risk of harm or abuse. Safeguarding is everyone’s responsibility; we all have a duty to safeguard and promote the welfare of our students (*those under 18 years of age*) under the Education Act 2002 and Children Act 1989 through identifying any child welfare concerns and taking action to address them in partnership with families and other agencies where appropriate.

In addition to our safeguarding policy, we have policies to cover the roles of staff, students and parents in respect of health and safety, anti-bullying, and equality. We also ensure that issues of child protection are raised with students through the Personal, Social and Health Education (PSHE) curriculum, and Relationship Education (for all primary pupils) or Relationships and Sex Education (for all secondary pupils).

There are a number of elements to our policy:

- Ensuring Safer Recruitment practice in checking the suitability of all our staff and volunteers to work with children;
- Raising awareness of safeguarding issues amongst all staff and volunteers and of what to do if they have concerns;
- Ensuring that a system is in place to protect our students from mistreatment;
- Developing and implementing procedures for identifying and reporting cases, or suspected cases, of abuse;
- Developing effective links with relevant agencies and co-operating as required with their enquiries regarding safeguarding matters including attendance at case conferences and core group meetings;
- Establishing and maintaining a safe environment in which students feel secure, are able to learn and are encouraged to talk freely about anything that concerns them;
- Establishing a culture of listening to and respecting our students;
- Ensuring students know there are adults in the school who they can approach if they are worried about anything;
- Including opportunities in the PSHE curriculum to develop and equip students with the skills needed to recognise risks and stay safe from abuse;
- Supporting students who have been abused or may be at risk of harm in accordance with any agreed child protection plan;
- Ensuring we respond appropriately to any concern or allegation about a member of staff or volunteer; and
- Ensuring staff follow accepted “safe practice” principles when working with students.

If there are safeguarding concerns, the procedures of the appropriate local authority must be followed (available from the designated teacher). This policy and procedure also accords with:

- DfES guidance – “Keeping Children Safe in Education” (*Sept 2020*) and
- “Working Together to Safeguard Children” (*HM Government, July 2018*).

1.1 SAFE PRACTICE

All Trust Shared Service Staff:

- Have a duty to follow the Greenshaw Learning Trust Safeguarding policy and the Safeguarding policy of the school they are visiting
- Have a duty to report any concerns they have about the well-being of children to the Designated Officer at the school they are visiting
- Are responsible for their own actions and behaviour and should avoid any conduct which would lead to any reasonable person to question their motives or intentions;
- Should work in an open and transparent way;
- Are required to discuss or take advice from school DSL on any incident which may give rise for concern.

1.2 PARTNERSHIP WITH OTHERS

GLT Shared Service recognises that it is essential to establish positive and effective working relationships with other agencies. There is a joint responsibility on all agencies to share information to ensure the safeguarding of all students.

1.3 RECRUITMENT, SELECTION, TRAINING AND SUPERVISION OF STAFF AND VOLUNTEERS

In our recruitment and selection of staff and volunteers we will at all times adhere to Greenshaw Learning Trust Recruitment and Selection policies and procedures, and to the appropriate guidance which followed the Bichard Enquiry Report (*Keeping Children Safe in Education, Sept 2020*).

In particular, we will ensure that our interview panellists are appropriately trained in Safer Recruitment practices, that we always follow up gaps in previous employment, that we always require specific references from employers for the last five years and that for all posts, paid and voluntary, the appropriate Disclosure and Barring Service checks are conducted.

We keep a central record of all staff with the date and outcome of their DBS status so that at all times staff, students and parents can be assured this has been done.

1.4 SCHOOL TRAINING & STAFF INDUCTION

The Trust Shared Service's Designated Safeguarding Lead and deputy will undertake the necessary training to keep fully informed of current legislation and requirements with regard to child protection.

All other Trust Shared Service staff will undertake appropriate induction training in their first term after they are employed and then will have further training as and when necessary, but at least annually.

All staff are provided with the GLT Safeguarding Policy and informed of the Trust's Safeguarding arrangements, including information about identifying abuse and who to refer it to.

All staff are required to abide by the Greenshaw Learning Trust Staff Code of Conduct.

1.5 GENERAL GUIDANCE

As a member of staff in GLT (paid or unpaid) we should follow the DfE guidance on appropriate behaviour.

- Set clear standards of appropriate safe behaviour;
- Adopt safer recruitment procedures;
- Protect students from discrimination and avoidable harm;
- Treat students with respect and dignity;
- Protect students from sexual, physical and emotional harm.

If any member of staff has any concerns regarding the treatment of any student in or outside school, they have a duty of care to report it to the appropriate school DSL. It may be possible at some time that they may have a concern regarding a colleague in the Trust Shared Service; again they have a duty of care to report this to the GLT CEO.

For further details see the [GLT Whistleblowing Policy](#)

ESAFETY AND COMPUTER USE

2.1. INTERNET USE

At Trust Shared Service, we believe that the use of the internet is integral to education, business and social interaction.

Trust Shared Service will maintain a current record of all staff who are granted access to the Trust's electronic communications.

When staff leave the Trust Shared Service, their account and rights to specific GLT areas will be disabled.

2.2. SECURITY OF INFORMATION SYSTEMS

Virus protection will be updated regularly. The security of the school information systems and users will be reviewed regularly as well as system capacity. Data will be backed up daily and regular archives taken and stored off-site.

Personal data will be recorded, processed, transferred and made available according to the Data Protection Act 1998, and from the 25th May 2018 according to the General Data Protection Regulation (GDPR).

2.3. FILTERING AND MONITORING SYSTEMS

The Trust Shared Service will work with Sutton LA to ensure that systems to protect students continue to be reviewed and improved where necessary. If staff discover unsuitable sites, the URL must be reported to The Network Manager.

Any material that the school believes is illegal must be reported to appropriate agencies such as the Internet Watch Foundation or the Child Exploitation and Online Protection Centre. GLT Shared Service's broadband access will include appropriate filtering.

At Trust Shared Service, we have software in place to minimise access and highlight any person accessing inappropriate sites or information – We use Impero software which filters and controls internet access, as well as being part of the London Grid for Learning, which also filters the internet. There is a system whereby key words trigger an email alert which is sent to the Safeguarding Designate, along with a screen shot of what the person was working on at the time the alert was sent. The key word list is updated regularly in response to new technologies and new world threats, in line with the PREVENT strategy. This system covers all computers in GLT Shared Service.

The Trust will take all reasonable precautions to ensure that users access only appropriate material. However, it is not possible to guarantee that access to unsuitable material will never occur via a school computer. Neither the Trust or its schools can accept liability for the material accessed, or any consequences resulting from Internet use.

As we increasingly work online, it is essential that children are safeguarded from potentially harmful and inappropriate online material. As such, we will ensure appropriate filters and appropriate monitoring systems are in place.

2.4. EMAIL

E-mails sent by staff to external organisations should be checked carefully before sending, in the same way as a letter written on school headed paper. Staff should only use Trust Shared Service email accounts.

Use of inappropriate language in an email will be flagged up through our monitoring system and will result in the account being disabled and the information sent to the GLT CEO and the Network Manager who will evaluate an appropriate response.

2.5. SOCIAL NETWORKING, SOCIAL MEDIA AND PERSONAL PUBLISHING

The Trust will block/filter access to social networking sites unless required for educational purposes.

Staff should not use social networks to discuss other members of staff or students. It would be considered an act of gross professional misconduct should a member of staff use a social networking site to bring GLT or any of its schools into disrepute.

Staff should not accept friend invites or communications from students on social networking sites. It will be considered a disciplinary matter if staff befriend students or are not proactive in ensuring that the security of their online social networking sites is at the highest level.

Staff are forbidden from including students in friendships groups on social networking sites as this can potentially lead to a professionally compromising situation (*see GLT Staff Code of Conduct*).

Twitter do's and don'ts – guidance on Twitter Accounts for staff

Do's	Don'ts
Have the school "swoosh" as your Twitter icon (saved in A:pool > Twitter icon). If you would like a variation of this created please contact George Bligh	Tweets must not contain students full names (please use forename only)
Keep the language professional	Photos of students should not be tweeted. You could put on photos of trophies, places you're visiting certificates, examples of students work,

	etc.
Use it to promote extra-curricular activities and to congratulate students	Don't forget this is in the public domain and anyone can see it.
Use it as a reminder of events within your department	Do not 'follow' students back on their Twitter accounts.
Follow similar and relevant Twitter accounts	
Embed your Twitter feed onto your FROG website (contact George Bligh)	

2.6. PUBLISHED CONTENT, ONLINE PLATFORM, PHOTOGRAPHS AND VIDEOS

The contact details on the website should be the school address, email and telephone number. Staff or students' personal information must not be published.

The GLT CEO will take overall editorial responsibility for publications and ensure that content is accurate and appropriate.

Images that include students will be selected carefully and will not include images of students if their parents or carers have not given their permission to do so.

Students' full names will not be used anywhere on the website, particularly in association with photographs and videos.

All videoconferencing equipment must be switched off when not in use and not set to auto answer.

CCTV is installed on-site for security purposes and is used to assist with crime prevention and detection and disciplinary matters.

Access to CCTV is restricted to site staff. Footage in relation to a crime will be distributed when requested by police. All other footage will remain on site.

2.7. CYBER BULLYING

Cyber bullying, as with any form of bullying, will not be tolerated in the Trust.

There are clear procedures in place to:

- support anyone affected by Cyber bullying;
- investigate incidents or allegations of Cyber bullying. Students, staff and parents/carers will be advised to keep a record of the bullying as evidence.

2.8. INTRODUCING THE POLICY TO STUDENTS, STAFF AND PARENTS

All users will be informed that network and Internet use will be monitored. Safe and responsible use of the internet and technology will be reinforced across the curriculum. Particular attention will be given where students are considered to be vulnerable.

The Safeguarding policy will be formally provided to and discussed with all members of staff. Staff should be aware that Internet traffic can be monitored and traced to the individual user. Discretion and professional conduct is essential. Staff training in safe and responsible Internet use, both professionally and personally, will be provided through Safeguarding training.

SAFEGUARDING AND CHILD PROTECTION

Safeguarding and promoting the welfare of children is defined as:

- Protecting children from maltreatment;
- Preventing impairment of children's **mental and physical** health or development;
- Ensuring children are growing up in circumstances consistent with the provision of safe and effective care.
- Taking action to enable all children to have the best outcomes.

Child protection is a part of safeguarding and promoting welfare. It refers to the activity that is undertaken to protect specific children who are suffering, or are likely to suffer, significant harm. Effective child protection is essential as part of wider work to safeguard and promote the welfare of children. However, all agencies and individuals should aim to proactively safeguard and promote the welfare of children so that the need for action to protect children from harm is reduced.

Definition of abuse

An abused child is a boy or girl under 18 years of age who has suffered from, or is believed to be at significant risk of, physical injury, neglect, emotional abuse or sexual abuse.

'Child abuse and neglect' is a generic term encompassing all ill treatment of children, including serious physical and sexual assaults as well as cases where the standard of care does not adequately support the child's health or development.

Children may be abused or neglected through the infliction of harm, or through the failure to act to prevent harm.

Abuse can occur in a family or an institutional or community setting. The perpetrator may or may not be known to the child.

Working Together to Safeguard Children (*July 2018*) set out definitions and examples of the four broad categories of abuse which are used for the purposes of registration:

- Physical abuse;
- Emotional abuse;
- Sexual Abuse;
- Neglect.

These categories overlap and an abused child does frequently suffer more than one form of abuse. (*see Appendix A for further information about abuse types*)

The definition above may be said to assume the guilt of the accused. At the point of allegation, however, guilt has not been established and it is important therefore to be careful to be supportive of all parties involved. Having said this, it is made clear in the documentation that our first priority is the following: **'The protection of the child must take precedence over the rights of the parents and the welfare of the child must be the paramount concern'**.

3.1 WHAT TO DO IF YOU ARE WORRIED A CHILD IS BEING ABUSED

Everyone working with students needs to be familiar with local procedures and protocols for safeguarding their welfare. Adults have a duty to report any child protection or welfare concerns to a the schools designated safeguarding lead.

See Appendix A for information about the key staff and signs of the different types of abuse.

3.2 EMERGING ISSUES – FGM, HONOUR BASED ABUSE, PEER ON PEER ABUSE, CONTEXTUAL SAFEGUARDING, CCE, CSE, COUNTY LINES, SEXTING, DOMESTIC ABUSE, UPSKIRTING AND MENTAL HEALTH

Staff will be kept updated through staff meeting/briefings on any emerging issues, for example: Female Genital Mutilation, Child Sexual Exploitation, Honour related violence and Forced Marriage.

Radicalisation

The GLT Anti-Radicalisation Policy gives further information on this area, however, where concerns that an individual child or young person may be at risk of radicalisation toward violent extremism and terrorism they should refer the matter to the appropriate person in accordance with this policy and procedures. 'Radicalisation' is defined as the act or process by which an individual is persuaded to make fundamental changes to their beliefs so that they come to favour violent extremism or terrorism to achieve fundamental changes in political, economic or social conditions, institutions or habits of the mind.

The following observable indicators are manifestations of possible radicalisation toward violent extremism and terrorism. Each indicator is just that—it indicates that a person may be radicalising toward violent extremism; it does not automatically deem them radical and/or a threat.

Key indicators are:

- Change in physical appearance and/or attire
- Disconnecting from previous friendship groups
- Active promotion of an extremist ideology
- Seeking to impose radical or extreme views on others
- Association with known extremist groups

Secondary indicators include:

- Increased incidents of verbal abuse / prejudicial language
- Conflict with peers
- Self-identified feelings of isolation
- Accessing inappropriate material in the internet

In schools these will often be manifested in:

- Attitude to authority
- Demotivation about learning
- Changes in friendship groups
- Seeking support / mental health issues
- Damage to property
- Breakdown in parent-student relationship

Female Genital Mutilation

Female genital mutilation 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.

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.

Trust Shared Service staff follow the Mandatory Reporting of Female Genital Mutilation:

Where a professional, who is subject to the mandatory reporting duty, has either been told by a girl that she has had FGM performed on her or has observed a physical sign appearing to show that a girl has had FGM, s/he should personally report the matter to the police by calling 101.

Trust Shared Service staff will also report to the Designated Safeguarding Lead at the school they are visiting.

Honour based abuse (including Female Genital Mutilation and Forced Marriage).

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 (regardless of the motivation) and should be handled and escalated as such.

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.

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.

Breast Ironing

Keeping Children Safe in Education (2020) mentions Breast Ironing, under so-called 'Honour-based Violence'. Breast Ironing is practiced in some African countries, notably Cameroon. Girls aged between 9 and 15 have hot pestles, stones or other implements rubbed on their developing breast to stop them growing further.

Peer on peer abuse

All staff should recognise that children are capable of abusing their peers and that safeguarding issues can manifest themselves via peer on peer abuse. This is most likely to include, but not limited to: bullying (including cyber bullying), gender based violence/sexual assaults and sexting.

Abuse is abuse and should never be tolerated or passed off as “banter” or “part of growing up”. Different gender issues can be prevalent when dealing with peer on peer abuse. This could, for example, include girls being sexually touched/assaulted or boys being subject to initiation-type violence.

Other forms of peer on peer abuse are:

- sexual violence and sexual harassment
- physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm;
- ‘Upskirting’ typically involves taking a picture under a person’s clothing (not necessarily a skirt) without them knowing, with the intention of viewing their genitals or buttocks (with or without underwear) to obtain sexual gratification, or cause the victim humiliation, distress or alarm. Anyone of any gender can be a victim.
- sexting (also known as youth produced sexual imagery):
- initiation/hazing type violence and rituals.

At the Greenshaw Learning Trust, 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 students.

We recognise that some students 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 students 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 (*see Appendix C for what constitutes a criminal offence*);
- raises risk factors for other pupils in the school;
- indicates that other pupils may have been affected by this student;
- indicates that young people outside the school may be affected by this student.

Upskirting

- ‘Upskirting’ typically involves taking a picture under a person’s clothing (not necessarily a skirt) without them knowing, with the intention of viewing their genitals or buttocks (with or without underwear) to obtain sexual gratification, or cause the victim humiliation, distress or alarm. Anyone of any gender can be a victim. It is now a criminal offence (Voyeurism Act 2019).

Child Criminal Exploitation (CCE), Child Sexual Exploitation (CSE) and County lines

All staff should be aware that safeguarding incidents and/or behaviours can be associated with factors outside the school or college and/or can occur between children outside of these environments

All staff, but especially the designated safeguarding lead (and deputies) should consider whether children are at risk of abuse or exploitation in situations **outside their families**. Extra-familial harms take a variety of different forms and children can be vulnerable to multiple harms including (but not limited to) sexual exploitation, criminal exploitation, and serious youth violence.

Child Criminal Exploitation (CCE)

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 (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. The victim may have been criminally exploited even if the activity appears consensual. CCE does not always involve physical contact; it can also occur through the use of technology. CCE can include children being forced to work in cannabis factories, being coerced into moving drugs or money across the country (county lines, see page 85 for more information), forced to shoplift or pickpocket, or to threaten other young people.

Some of the following can be indicators of CCE:

- children who appear with unexplained gifts or new possessions;
- children who associate with other young people involved in exploitation;
- 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 Sexual Exploitation (CSE)

Child sexual exploitation is a form of child sexual abuse. Sexual abuse 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 clothing. CSE does not always involve physical contact; it can also occur through the use of technology. It may include non-contact activities, such as involving children in the production of sexual images, forcing children to look at sexual images or watch sexual activities, encouraging children to behave in sexually inappropriate ways or grooming a child in preparation for abuse (including via the internet).

The definition of child sexual exploitation is as follows:

Child sexual exploitation is a form of child sexual abuse. It occurs where an individual or group (can be male or female, children or adults) takes advantage of an imbalance of power (power can be due to age, gender, cognitive ability, physical strength, status, economic resources or sexual identity) 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. It 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. Child sexual exploitation can be a one-off occurrence or a series of incidents over time and range from opportunistic to complex organised abuse.

Staff should be aware of the key indicators of children being sexually exploited which can include:

- going missing for periods of time or regularly coming home late;
- regularly missing school or education or not taking part in education;
- appearing with unexplained gifts or new possessions;
- associating with other young people involved in exploitation;
- having older boyfriends or girlfriends;
- suffering from sexually transmitted infections;
- mood swings or changes in emotional wellbeing;
- drug and alcohol misuse;
- displaying inappropriate sexualised behaviour.

Staff should also be aware that many children and young people who are victims of sexual exploitation do not recognise themselves as such.

There are three main types of child sexual exploitation:

Inappropriate relationships:

Usually involves just one abuser who has inappropriate power – physical, emotional or financial – or control over a young person. The young person may believe they have a genuine friendship or loving relationship with their abuser.

Boyfriend/Girlfriend:

Abuser grooms victim by striking up a normal relationship with them, giving them gifts and meeting in cafés or shopping centres. A seemingly consensual sexual relationship develops but later turns abusive. Victims may be required to attend parties and sleep with multiple men/women and threatened with violence if they try to seek help.

Organised exploitation and trafficking:

Victims are trafficked through criminal networks – often between towns and cities – and forced or coerced into sex with multiple men. They may also be used to recruit new victims. This serious organised activity can involve the buying and selling of young people.

Sexting

Sexting is the act of sending an indecent image, often of oneself, to someone else through electronic means. It is a criminal offence to share indecent images of children. We recognise the increase in both the capability of young people to send indecent images through the use of mobile devices and also of the prevalence of such cases and often, the school is the first agency to have their awareness raised of such an incident having occurred.

At GLT, we take sexting very seriously and support our schools who respond by:

- Ensuring that the topic is covered during PSHE and also in assemblies to try to prevent or reduce occurrences;

- Confiscating any mobile devices which we suspect may contain indecent images of young people – we try not to view images, as far as reasonable practical, and ensure their deletion once the police have concluded their enquiries;
- Liaising closely with our linked police officer and the parents or carers whenever an offence takes place, although we work to ensure that the young person is not criminalised, wherever possible;
- Working quickly to try and identify whether the image has spread further to try to prevent the image being made available on the internet;
- Ensuring we liaise swiftly with other schools in the event that the image has gone further, or if the sexting is between students from different schools.

Child Criminal Exploitation (CCE): County Lines

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

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. 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.

Homelessness

Being homeless or being at risk of becoming homeless presents a real risk to a child’s welfare. 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.

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 and the court system

Children are sometime required to give evidence in criminal courts, either for crimes committed against them or for crimes they have witnessed. Making child arrangements via the family courts following separation can be stressful and entrench conflict in families. This can be stressful for children.

Children with family members in prison

Approximately 200,000 children have a parent sent to prison each year. These children are at risk of poor outcomes including poverty, stigma, isolation and poor mental health.

Serious Violence

All staff should be aware of indicators, which may signal that children are at risk from, or are involved with serious violent crime. These may include increased absence from school, a change in friendships or relationships with older individuals or groups, a significant decline in performance, signs of self-harm or a significant change in well-being, 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.

Domestic abuse

The 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.

All children can witness and be adversely affected by domestic abuse in the context of their home life where domestic abuse occurs between family members. 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.

Mental Health

All staff should also be aware that mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation. Staff need to be aware that there may be a link between mental health problems and safeguarding issues.

Only appropriately trained professionals should attempt to make a diagnosis of a mental health problem. Staff however, are well placed to observe children day-to-day and identify those whose behaviour suggests that they may be experiencing a mental health problem or be at risk of developing one.

Where children have suffered abuse and neglect, or other potentially traumatic adverse childhood experiences (ACEs), this can have a lasting impact throughout childhood, adolescence and into adulthood. It is key that staff are aware of how these children's experiences, can impact on their mental health, behaviour and education.

If staff have a mental health concern about a child that is also a safeguarding concern, they should report this to the Designated Safeguarding Lead immediately.

3.3 DESIGNATED STAFF RESPONSIBLE FOR SAFEGUARDING

The Designated Safeguarding Lead is responsible for child protection and safeguarding issues. Any member of staff concerned about a student should tell the Designated Safeguarding Lead

immediately. If the Designated Safeguarding Lead is unavailable, you should speak to the deputy Designated Safeguarding Lead.

The Designated Safeguarding Lead has a responsibility to:

- liaise with the nominated trustee, appropriate school DSL and other agencies
- act as the contact person within the Trust Shared Service, providing advice and support and ensuring that all staff (including temporary, supply staff and volunteers and members of the board of trustees) are aware of their role;
- ensure Trust Shared Service staff are familiar with this Policy and Procedure, and DfE (*previously DfES*) guidance and receive appropriate training

The Role of Individual Staff

Everyone in Trust Shared Service must be alert to the possibility that any student, regardless of race, religion, culture, class or family background, could be the victim of abuse or neglect and must be familiar with these procedures. Concern about a student must be discussed with the Designated Safeguarding Lead of the school immediately so that if necessary, a referral can be made without delay. In urgent situations, referral must not be delayed.

Members of staff should not investigate child protection concerns. This is done by Children's Social Services or the Police. However, if a student says something, it is vital to listen carefully, so you can record and report it accurately. Records will also assist other members of staff who may have concerns.

3.4 CONFIDENTIALITY OF RECORDS

Students and their parents have the right to expect that all staff will deal sensitively and sympathetically with their situation. It is important that information is only available to those who need to know it. Parents and where appropriate students should be told their right to confidentiality may be breached if information comes to light suggesting possible harm to a young person. Child protection issues relating to individual cases must not be subject to open discussion in the staff room or elsewhere in the school.

Members of staff should also remember not to promise to students to keep "secrets" (*see procedure in Appendix B*).

3.5 WORKING WITH CHILDREN

GLT Shared Service recognises that young people who are abused, neglected or who witness either of these things, may find it difficult to develop a sense of self-worth. They may feel helplessness, humiliation and some sense of blame. The school may be the only stable, secure and predictable element in the lives of children at risk. When at school their behaviour may be challenging and defiant or they may be withdrawn.

3.6 REQUESTS FOR ASSISTANCE BY OTHER AGENCIES

- Trust Shared Service staff have a legal duty to assist Children's Social Services or the Police when they are making enquiries about the welfare of students;
- information about a student must therefore be shared on a "need to know" basis with other agencies;

- when telephone requests for information are received, **always** maintain security by checking the telephone number listing for the caller and calling back to a switchboard number **before** giving information or confirming the student is on the school roll;
- always advise the designated teacher of the school about such requests for information;
- requests for attendance at meetings about individual students (e.g. child protection conferences) should be notified to the designated teacher, who will arrange preparation of a report and attendance at the meeting;
- reports should contain information about the child's:
 - academic progress
 - attendance
 - behaviour
 - relationships with children and adults
 - family
 - any other relevant matter;
- reports should be objective, distinguishing between fact, observation, allegation and opinion;
- unless you specify otherwise, reports will normally be made available to the student's family.
- ensuring that, where a student with a child protection plan leaves the school, their information and child protection file is transferred to any new school immediately and that the social worker is informed and that there is a clear process for doing this.

3.7 CHILDREN WHO ARE LOOKED AFTER AND PREVIOUSLY LOOKED AFTER CHILDREN

- If required, Trust Shared Service staff are made aware of the children who are looked after or previously looked after and maintain a responsibility, as they do with any child, to monitor their progress and well-being, reporting anything they deem to be a concern to the Designated Safeguarding Lead within the school;
- Appropriately placed staff with responsibilities, such as the Safeguarding Team and the Heads of Year, are fully aware of contact arrangements for the individuals in relation to birth parents.

3.8 ATTENDANCE, ADMISSIONS AND CHILDREN MISSING EDUCATION

The Trust Shared Service recognises that attendance is often an indicator of other issues which may well constitute safeguarding concerns, therefore there are strong links between the Designated Safeguarding Lead and the Attendance Officer within the school.

3.9 CHILDREN WITH SEND AND EARLY HELP

Children and young people with special educational needs and disabilities (SEND) 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 SEN and disabilities can be disproportionately impacted by things like bullying without outwardly showing any signs; and difficulties may arise in overcoming communication barriers.
- they may be more prone to peer group isolation than other children

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 EHC plan);

- is a young carer;
- is frequently missing/goes missing from care or home;
- 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; and/or
- has returned home to their family from care.

Individual schools identify pupils who might need early help, more support to be kept safe or to keep themselves safe.

1.10 CONTACT BETWEEN STAFF AND STUDENTS AND USE OF 'REASONABLE FORCE

As a general principle, all staff should maintain high professional standards and there should only be personal contact between students and staff through the school text system and school email, no other medium. The exception to this is the members of pastoral staff who, for safeguarding purposes, may have direct contact with students outside school hours.

The protocols for contact between pastoral staff and students are:

- Staff will be assigned a school phone to use for direct contact with students. Staff should not give students their own personal phone numbers and should not use their own phones for contact purposes.
- As a general rule, staff should only have their assigned school phone switched on in school hours and during term time.
- In exceptional circumstances, staff may use their assigned school phone to contact students in holiday time or at weekends; this is only justified if there is a safeguarding concern for the student.
- In regards to all pupils but especially those with special educational needs staff must understand the needs of the child to avoid situations where force is required
- Use of reasonable force means 'using no more force than is needed'. It covers the broad range of actions used by staff that involve a degree of physical contact to control or restrain children. This can range from guiding a child to safety by the arm, to more extreme circumstances such as breaking up a fight or where a young person needs to be restrained to prevent violence or injury.
- There are circumstances when it is appropriate for staff to use reasonable force to safeguard children and young people. The use of force may involve either passive physical contact, such as standing between pupils or blocking a pupil's path, or active physical contact such as leading a pupil by the arm out of the classroom.

3.11 GENERAL ISSUES

All staff must observe the above policy and procedure at all times. They will be reviewed annually and as required in line with changes in local three Safeguarding partners or national guidance.

APPENDIX A

The Designated Safeguarding Lead at GLT Shared Service is:

Executive GLT CEO / CEO of GLT (DSL):

William Smith. Email: wsmith@greenshawlearningtrust.co.uk, telephone: 07841 696922

In their absence please contact

Deputy Designated Safeguarding Lead for Greenshaw Learning Trust (GLT Deputy DSL):

Sarah Vardy. Email: svardy@greenshawlearningtrust.co.uk, telephone: 020 8715 1078.

The GLT Head of HR :

Jenny Cain Email: jcain@greenshawlearningtrust.co.uk, telephone: 020 8715 1078.

RECOGNITION OF ABUSE – GUIDANCE FOR PROFESSIONALS

PHYSICAL ABUSE

Physical abuse may take many forms e.g. hitting, shaking, throwing, poisoning, burning, scalding, drowning or suffocating a child.

It may also be caused when a parent or carer feigns the symptoms of, or deliberately causes, ill health to a child. This unusual and potentially dangerous form of abuse is now described as fabricated or induced illness in a child.

The first indication of concern about a child's welfare is not necessarily the presence of a serious injury. Concerns may be aroused by:

- Bruises or other marks on a child's body
- Remarks made by the child, another child, a parent or another adult
- Observations of the child's behaviour or reactions
- Unexplained changes in the child's behaviour or personality
- Evidence of disturbance or explicit detail in a child's written or diagrammatic work
- Neglect or failure to thrive including failure to gain weight or actual weight loss
- Change in manner of social interaction
- An explanation which is inconsistent with an injury
- Several different explanations provided for an injury
- Unexplained delay in seeking treatment
- The parents/carers are uninterested or undisturbed by an accident or injury
- Parents are absent without good reason when their child is presented for treatment
- Repeated presentation of minor injuries (which may represent a 'cry for help' and if ignored could lead to a more serious injury)
- Family use of different doctors and A&E departments
- Reluctance to give information or mention previous injuries

In an abusive relationship the child may:

- Appear frightened of the parent/carer
- Act in a way that is inappropriate for his/her age and development

The parent or carer may:

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

Bruising

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

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

Bite Marks

Bite marks can leave clear impressions of teeth. Human bite marks are oval or crescent shaped. Those over 3cm in diameter are more likely to have been caused by an adult or older child.

A medical opinion should be sought where there is doubt over the origin of the bite.

Burns and Scalds

It can be difficult to distinguish between accidental and non-accidental burns and scalds, and will always require experienced medical opinion. Any burn with a clear outline may be suspicious e.g.:

- Circular burns from cigarettes (but may be friction burns if along the bony protuberance of the spine)
- Linear burns from hot metal rods or electrical fire elements
- Burns of uniform depth over a large area
- Scalds that have a line indicating immersion or poured liquid (a child getting into hot water of its own accord will struggle to get out and cause splash marks)
- Old scars indicating previous burns/scalds which did not have appropriate treatment or adequate explanation

Scalds to the buttocks of a small child, particularly in the absence of burns to the feet, are indicative of dipping into a hot liquid or bath.

Fractures

Fractures may cause pain, swelling and discolouration over a bone or joint.

Non-mobile children rarely sustain fractures.

There are grounds for concern if:

- The history provided is vague, non-existent or inconsistent with the fracture type
- There are associated old fractures
- Medical attention is sought after a period of delay when the fracture has caused symptoms such as swelling, pain or loss of movement
- There is an unexplained fracture in the first year of life

Scars

A large number of scars, or scars of different sizes or ages, or on different parts of the body, may suggest abuse.

EMOTIONAL ABUSE

Emotional abuse is the persistent emotional ill treatment of a child such as to cause severe and persistent effects on the child's emotional development, and may involve:

- Conveying to children that they are worthless or unloved, inadequate or valued only insofar as they meet the needs of another person
- Imposing developmentally inappropriate expectations
- Causing children to feel frightened or in danger – e.g. witnessing domestic violence
- Exploitation or corruption of children

Some level of emotional abuse is involved in most types of ill treatment of children, though emotional abuse may occur alone.

Emotional abuse may be difficult to recognize, as the signs are usually behavioural rather than physical. The manifestations of emotional abuse might also indicate the presence of other kinds of abuse.

The indicators of emotional abuse are often associated with other forms of abuse. The following may be indicators of emotional abuse:

- Developmental delay
- Abnormal attachment between a child and parent/carer e.g. anxious, indiscriminate or no attachment
- Indiscriminate attachment or failure to attach
- Aggressive behaviour towards others
- Scapegoated within the family
- Frozen watchfulness, particularly in pre-school children
- Low self-esteem and lack of confidence
- Withdrawn or seen as a 'loner' – difficulty relating to others

SEXUAL ABUSE

Sexual abuse involves forcing or enticing a child or young person to take part in sexual activities, whether or not the child is aware of what is happening, and includes penetrative (i.e. vaginal or anal rape or buggery) and non-penetrative acts.

It may also include non-contact activities, such as involving children in looking at or in the production of pornographic materials, watching sexual activities or encouraging children to behave in sexually inappropriate ways.

Recognising Sexual Abuse

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

Recognition can be difficult, unless the child discloses and is believed. There may be no physical signs and indications are likely to be emotional/behavioural.

Some behavioural indicators associated with this form of abuse are:

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

Some physical indicators associated with this form of abuse are:

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

NEGLECT

Neglect involves 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 and development.

This may involve failure to provide adequate food, shelter or clothing, failure to protect from physical harm or danger or failure to ensure access to appropriate medical care or treatment. It may also include neglect of a child's basic emotional needs.

Recognising Neglect

Evidence of neglect is built up over a period of time and can cover different aspects of parenting. Indicators include:

- Failure by parents or carers to meet the basic essential needs e.g. adequate food, clothes, warmth, hygiene and medical care
- A child seen to be listless, apathetic and unresponsive with no apparent medical cause
- Failure of a child to grow within normal expected pattern, with accompanying weight loss
- Child thrives away from home environment
- Child frequently absent from school

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

SELF HARM

For many students self harm is considered to be a means of releasing pain and stress often caused by other aspects of abuse. Students will often hide the signs of self harming by covering their arms and legs, particularly in PE. They may also seem to be excessive with the need to keep their body covered during the hot weather.

Typical signs of self harming are:-

- Patches of cutting to the arms and legs.
- Deep scratches
- Burns
- Hitting or punching things.

Self harming can also include the use of alcohol and sexual activity.

APPENDIX B

CHILD PROTECTION DISCLOSURE – guidance for staff

Disclosures or information may be received from students, parents or other members of the public. The school recognises that those who disclose such information may do so with difficulty having chosen carefully to whom they speak.

Accordingly, all staff will handle disclosures sensitively. Such information cannot remain confidential and staff will need to inform the Designated Safeguarding Lead immediately.

DO NOT DELAY

- tell the Designated Safeguarding Lead as soon as you can – it may be necessary to interrupt a meeting to do this – do not leave notes in designated person's pigeonhole as they may not get back to check their post until the end of the day once the child has gone home
- early referral gives more time to offer help to the student and family before the situation becomes severe or serious
- when the matter is already severe or serious, early referral gives more time for others to protect the student.
- the Designated Safeguarding Lead may consult the Attendance Officer or Children's Social Services through MASH.

MAKE WRITTEN NOTES

As soon as possible after the event, a brief statement should be written ensuring that the following points have been addressed:

- Who made the disclosure (if a student also add their Tutor group and if an adult their relationship to the child)?
- The time, approximately, and the date of the disclosure and the events being described
- The nature of the conversation, what may have prompted the disclosure, what was said and by whom. This should be as exact as possible.
- Any injuries that have been observed and their nature. A skin map may be used to detail the injury and its location on the body.
- Facts should be recorded accurately and it should be made clear when an opinion is being expressed and what that opinion is based upon.

CONCERN FROM SOMETHING THE CHILD SAYS

Listen – do not ask questions or interrogate. You may clarify information.

Remain calm – if you are shocked, upset or angry the student will sense this and this could stop them from saying more.

Reassure the student that they have done nothing wrong – tell them it is all right to talk. Do not express your feelings or judgements regarding any person alleged to have harmed a child.

Do not promise to keep it secret – tell the student you cannot keep the matter secret and will need to take advice from someone who can help.

Explain sensitively that you have a responsibility to share this information with the Designated Safeguarding Lead. Explain that only those who need to know will be told.

REFERRAL PROCESS

If a member of staff wishes to make a referral to Social Services or to the Police, they should consult the Designated Safeguarding Lead within the school or deputy who will assist with this. However, referral must not be delayed – if the Designated Safeguarding Lead or deputy is not available, a senior member of staff should be advised and the referral made. The Multi-Agency Safeguarding Hub will be happy to discuss concerns even if you are not sure at that stage that a referral needs to be made.

REMEMBER:

- if in doubt, consult;
- do not ignore concerns, even if these are vague;
- your first responsibility is to the student; and
- if you need help or support to manage your own feelings, this can usually be provided.

APPENDIX C

Police Definitions

Definition of Sexual

- Penetration, touching or any other sexual activity will be sexual if...
a reasonable person would consider that it is...
 - (a) Sexual by nature
 - (b) Sexual because of its circumstances or purpose

Definition of Touching

- (a) with any part of the body
 - (b) with anything else
 - (c) through anything
- This includes touching of clothing

Definition of Rape

A person commits rape if he intentionally penetrates his penis with another's:

- Vagina
- Anus
- Mouth
- Without their consent
-and he does not reasonably believe they consent

Consent is a question of fact

- The victim can be taken NOT to have consented in certain circumstances. This is called evidential presumption.
- If the victim is under 13yrs, she/he CANNOT CONSENT in the eyes of the law.
- It is sufficient to prove penetration and the child's age.

Assault by 'Penetration'

A person commits this offence if:

- They intentionally penetrate the vagina or anus of another with any part of their body (ie fingers into vagina) or anything else (object)
- The other does not consent to the penetration.
- The person reasonably believes that the other does not consent.
- **If the victim is under 13 Yrs, she/he CANNOT CONSENT in the eyes of the law.**

Offence of 'Sexual Touching'

A person commits this offence if:

- They intentionally touch another
- The touching is sexual
- The other does not consent
- The person reasonably believes they do not consent.

- **If the victim is under 13 Yrs, she/he CAN NOT CONSENT in the eyes of the law.**

Maximum sentences that can be imposed

- RAPE: Life imprisonment
- Assault by Penetration: Life imprisonment
- Sexual touching: Victim under 13yrs the max is 14 years imprisonment, otherwise 10 years.

None of these offences have age limitations, which mean that they can be committed by anybody of any age.

APPENDIX D

Assessment Framework

