



# Safeguarding and Child Protection Policy

*Approved by:*

**Designated Safeguarding Lead**

Paul Hume

**Date:** 4<sup>th</sup> September 2022

**Chair of Trustees**

Maria Gavrilova

**Date:** 4<sup>th</sup> September 2022

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# 1 Safeguarding Contact Details

## School

Position	Name	Phone	e-mail
Designated safeguarding lead (DSL)	Paul Hume	02083922286 07596211897	Paul.Hume@azbukafoundation.org
Deputy DSL	Maria Gavrilova	02083922286 07810013042	headteacher@azbukafoundation.org
Deputy DSL (EYFS)	Oksana Pavlykivska	02083922286 07904954122	Oksana.Pavlykivska@azbukafoundation.org
Head Teacher	Maria Gavrilova	02083922286	headteacher@azbukafoundation.org
Chair of Trustees	Maria Gavrilova	02083922286 07810013042	azbuka.foundation@gmail.com
Nominated Safeguarding Trustee	Jason Manning	07500128095	Jason.Manning@azbukafoundation.org

## Local Authority children's social services numbers

Name	Phone	Out of hours phone	e-mail
Children's services initial contact and advice	0208 7536600/6610	02087488588	
Tri-Borough Multi agency hub (MASH) Karen Duncan	0207 6413991		<a href="mailto:kduncan1@westminster.gov.uk">kduncan1@westminster.gov.uk</a>
Case consultations Tricia Hunte Charlotte Holt	020 8753 5125	020 8753 5125	
Elizabeth Spearman/ACE/Schools Children missing from education	02087536231	07818017506	<a href="mailto:Elizabeth.Spearman@lbhf.gov.uk">Elizabeth.Spearman@lbhf.gov.uk</a>

## Allegations against staff

Title	Name	Phone	e-mail
Local Authority's Designated Officer (LADO) and Safeguarding in Education manager	Megan Brown	020 8753 5125	<a href="mailto:megan.brown@lbhf.gov.uk">megan.brown@lbhf.gov.uk</a>

## Report abuse in Education

Title	Name	Phone	e-mail
NSPCC Dedicated Helpline	NSPCC team	0800 136 663	<a href="mailto:help@nspcc.org.uk">help@nspcc.org.uk</a>

## Extremism

Title	Name	Phone	e-mail
Bi-Borough Prevent Schools Officer (support and advice)	Tina Bencik	020 8753 2992 07977470316	Tina.bencik@lbhf.gov.uk

Bi-Borough Head of Prevent Officer (urgent safeguarding referrals)		020 8753 5727	
Prevent Team	Shared box	020 8753 5727	<a href="mailto:prevent@lbhf.gov.uk">prevent@lbhf.gov.uk</a> <a href="mailto:prevent3@rbkc.gov.uk">prevent3@rbkc.gov.uk</a>
DfE non-emergency advice	Team	02073407264	<a href="mailto:counter-extremism@education.gsi.gov.uk">counter-extremism@education.gsi.gov.uk</a>
Police	Non-emergency number	101	

#### Female genital mutilation (FGM)

Title	Name	Phone	e-mail
Children services Front door		02087536600	
Police	Non-emergency number	101	
Police/Local police force Hammersmith Police Station	Emergency	999	Address: Hammersmith police station 226 Shepherds Bush Road Hammersmith W6 7NX

#### Other useful contact details

Name	Phone
Childline	0800 1111
NSPCC	0808 800 5000
NSPCC Whistleblowing advice line	0800 028 0285
NSPCC Victims of Sexual harassment and abuse helpline	0800 136 663 <a href="mailto:help@nspcc.org.uk">help@nspcc.org.uk</a>
Kidscape (Anti-bullying helpline for parents)	0845 120 5204
Child exploitation Online Prevent (CEOP)	0870 000 3344
National Domestic Abuse Helpline	0800 2000 247

## 2 Introduction

- 2.1 Azbuka Russian-English Bilingual School is committed to safeguarding and promoting the welfare and wellbeing of young people and staff. We believe that everyone, without exception, has a right to be safe and to be treated with dignity and respect regardless of background and live a life free from discrimination. The School recognises that children and young people learn best when they are healthy, safe and secure.
- 2.2 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 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. (Keeping Children Safe in Education, September 2022.)
- 2.3 This policy applies to all pupils in the School.
- 2.4 The purpose of this policy is to inform all staff (including supply staff), parents (including guardians and carers), contractors, volunteers and governors about the School’s responsibilities for safeguarding children and to enable all parties to have a clear understanding of how these responsibilities should be carried out. It applies wherever staff members are working with pupils – even where this is away from the School, such as on educational visits.
- 2.5 This policy is published on the School’s website and is also available to parents of current and prospective pupils from the Designated Safeguarding Lead (Paul Hume) or the Maria Gavrilova (office@azbukafoundation.org) on request. Large print or other accessible formats can also be made available.
- 2.6 The policy is drafted in accordance with the Hammersmith and Fulham Safeguarding Partnership’s agreed local interagency procedures.  
*[Note: Multi-agency arrangements for safeguarding children are now handled by the three safeguarding partner agencies: the local authority (RBKC, Hammersmith and Fulham Council and Westminster); Integrated Care Systems previously known as clinical commissioning group); and the police (Central West Basic Command Unit). These safeguarding partners come together to form the Local Safeguarding Children’s Partnership (LSCP).*
- 2.7 This policy is also in accordance with current legislation and the following statutory guidance:
- Keeping Children Safe in Education September 2022 (KCSIE)
  - Working Together to Safeguard Children December 2020 (WTSC)
  - Prevent Duty Guidance for England and Wales July 2015 (updated April 2021)
  - Disqualification Under the Childcare Act August 2018
  - Education (Independent School Standards) Regulations 2014
  - What to do if you are worried a child is being abused – advice for practitioners March 2015
  - Safeguarding children and young people October 2018
  - Statutory framework for the Early Years Foundation Stage, September 2021
  - Children Missing Education September 2016
  - Relationships Education, Relationships and Sex Education and Health Education (2019)
  - The Equality Act (2010)
  - The Human Rights Act (1998)
- 2.8 We are advised by the local Safeguarding and Child Protection in Schools and Education Officer (manager), whom the DSL regularly consults on safeguarding matters. Contact details can be found in section 1 of this policy.

2.9 Every complaint or suspicion of abuse from within or outside the School will be taken seriously and action will be taken in accordance with this policy.

### **3 Principles**

3.1 Azbuka Russian-English Bilingual School expects all staff, governors and volunteers to share our commitment to safeguarding and promoting the welfare of all pupils in our care. To achieve this, the School seeks to create a safe School environment underpinned by a strong pastoral system, where pupils who have been subject to any form of abuse can report the matter confident that it will be taken seriously, they will not be made to feel ashamed of making a report and will be fully supported. Staff are trained to listen to pupils' concerns, identify issues early and respond appropriately following agreed procedures. The School will consider, at all times, what is in the best interest of the child.

3.2 The School will take all reasonable measures to:

- ensure that we practise safer recruitment in checking the suitability of staff, governors and volunteers (including staff employed by other organisations) to work with children and young people. Staff recruitment procedures are outlined in detail in the School's Recruitment, Selection and Disclosure Policy;
- ensure that, where staff from other organisations are working with our pupils on another site, we have received confirmation that appropriate child protection checks and procedures apply to those members of staff and that any such checks do not raise any issues of concern in relation to the suitability of those staff members working with children;
- follow the local inter-agency procedures of the Hammersmith and Fulham Safeguarding Children's Partnership and contribute to inter-agency working;
- support pupils in need through early intervention and, where appropriate, support them in co-operation with multi-agencies who are working to the Common Assessment Framework (CAF) and as part of the Team around the Child (TAC) approach;
- be alert to signs of abuse, both in the School and from outside and to protect each pupil from any form of abuse, whether from an adult or another pupil;
- deal appropriately with every suspicion or complaint of abuse and support pupils who have been abused in accordance with their agreed child protection plan;
- design and operate procedures which promote this policy, but which, so far as possible, ensure that teachers and other staff who are innocent are not prejudiced by false allegations;
- be alert to the needs of pupils with physical and mental health conditions;
- operate robust and sensible health and safety procedures;
- assess the risk of children being drawn into terrorism, including support for extremist ideas that are part of terrorist ideology, based on an understanding of the potential risk in the local area;
- identify children who may be vulnerable to radicalisation, and know what to do when they are identified;
- take all practicable steps to ensure that the School premises are as secure as circumstances permit;
- teach pupils about safeguarding issues and about how to keep themselves safe (including online and when working from home online); and
- ensure that any deficiencies in our child protection and safeguarding procedures are remedied without delay.

## 4 Roles and responsibilities

### 4.1 All staff (including trustees, supply staff and volunteers)

Safeguarding and child protection is **everyone's** responsibility. All staff are under a general legal duty to:

- contribute to providing a safe environment in which pupils can learn;
- consider at all times the best interests of the pupil and take action to enable all pupils to have the best outcomes;
- attend appropriate safeguarding and child protection training on an annual basis or additionally as directed by the DSL;
- be aware of the indicators of the different forms of abuse and neglect and of emergent mental health issues;
- assist children in need and to protect children from abuse, neglect, radicalisation and extremism;
- be familiar with the School's policies pertaining to safeguarding and child protection procedures (see section 17.9) and follow them;
- know how to access and implement the procedures, independently if necessary;
- keep a sufficient record of any significant complaint, conversation or event;
- report any matters of concern to the DSL or, where appropriate, to one of the key contacts in accordance with this policy; and
- support social services and any other agencies following any referral.

### 4.2 The Designated Safeguarding Lead (DSL)

The School has appointed a **Designated Safeguarding Lead (DSL), Paul Hume**, who is a senior member of staff and member of the School's leadership team. The DSL takes lead responsibility for safeguarding (including on-line safety) and child protection and is the first point of contact for parents, pupils, staff and others if they have any concerns about safeguarding or child protection. The School also has **two Deputy DSLs, Maria Gavrilova and Oksana Pavlykivska**, ensuring that there is always an appropriately trained and designated person in the School at all times.

The DSL will be given the time, funding, training, resources and support to ensure they are able to fulfil all the key aspects of their role as described in KCSIE (Sept 2022) effectively:

- **Managing Referrals:** the DSL will manage the referral of cases of suspected abuse, neglect, radicalisation or any other relevant issue to the Local Authority Social Care Service, Channel programme, DBS and/or Police as appropriate.
- **Working with others:** the DSL will be the principal point of contact for all staff and when co-ordinating different departments and functions within and outside the School in the management of a case. They will promote supportive relationships with parents and carers to safeguard pupils' welfare, be able to identify the causes and consequences of issues that children are experiencing and to support staff to make appropriate adjustments in the provision of educational programmes.
- **Information sharing and managing the child protection file:** the DSL is responsible for keeping child-protection files up to date with accurate and complete records of any actions or decisions taken and ensuring these confidential records are securely stored and, where appropriate, transferred to a new school promptly.

- **Raising Awareness:** the DSL is responsible for reviewing and updating the School's safeguarding policy at least annually, for ensuring that all staff members have had appropriate training regarding its implementation, and for ensuring that parents can access the policy and know that the School may make referrals where abuse or neglect is suspected.
- **Training, knowledge and skills:** the DSL will receive the appropriate level of training, together with regular updates, to ensure they are able to understand the unique risks associated with online safety, to be confident that they have the relevant knowledge and up-to-date capability required to keep children safe whilst they are online at school or School and to diagnose and respond to the specific needs of vulnerable children and work effectively with agencies such as the LADO, the Police and the Channel agency.
- **Providing support to staff:** the DSL should receive sufficient support and training so that they can support staff and help them feel confident on welfare, safeguarding and child-protection matters, including referrals and taking into account safeguarding, welfare and SEN in the provision of academic and pastoral support.
- **Understanding the views of children:** the DSL should, through training, develop the knowledge and skills needed to encourage a culture of listening to children and taking account of their wishes and feelings among all staff. They should promote an understanding of the difficulties that children may have in approaching staff about their circumstances and help staff consider how to build trusted relationships which facilitate communication.

*Note: A full description of the responsibilities of the DSL is set out in Appendix 6 of this policy.*

#### 4.3 Deputy Designated Safeguarding Leads (DDSL)

DDSLs are trained to the same standard as the DSL and, in the absence of the DSL, carry out those functions necessary to ensure the ongoing safety and protection of pupils. In the event of a long-term absence of the DSL, a deputy will assume responsibility for all the activities described above. On a day-to-day basis safeguarding activities may be delegated to a DDSL but ultimate lead responsibility for safeguarding and child protection remains with the DSL.

#### 4.4 Head Teacher

The Head Teacher is responsible for ensuring that the procedures outlined in this policy are followed on a day-to-day basis. To this end the Head Teacher will ensure that:

- the safeguarding and child protection policy and procedures adopted by the trustees are understood and followed by all staff;
- sufficient time, training, funding, support and resources necessary to enable the DSL and DDSLs to carry out their roles effectively are allocated, including the assessment of pupils and attendance at strategy discussions and other necessary meetings;
- matters which affect pupil welfare are adequately risk-assessed by appropriately-trained individuals and for ensuring that the relevant findings are implemented, monitored and evaluated;
- systems are in place for pupils to express their views and give feedback which operate with the best interests of the pupil at heart;
- all staff feel able to raise concerns about poor or unsafe practice and that such concerns are handled sensitively and in accordance with the School's Whistleblowing Policy;
- pupils are provided with opportunities throughout the curriculum to learn about safeguarding, including keeping themselves safe online;



- safer recruitment procedures are being adhered to in line with Part 3 of KCSIE, September 2022;
- she acts as the ‘case manager’ in the event of an allegation of abuse made against another member of staff (including supply staff and volunteers) and liaises with Local Authority Designated Officer (LADO); and
- she notifies the Disclosure and Barring Service and, where appropriate, the Teaching Regulatory Authority and/or the Police of anyone who has harmed or may pose a risk to a child.

4.5 Trustees The Board of Trustees has overall responsibility to ensure compliance with child protection statutory requirements and actively promote the wellbeing of pupils. It is the role of the Trustees to provide scrutiny of the safeguarding policy and safeguarding practice. The Board of Trustees takes seriously its responsibility to fulfil its duty of care in promoting the welfare of children, ensuring their security and protecting them from harm. To this end the Trustees will ensure that:

- they facilitate a whole school approach to safeguarding which involves everyone in the School, ensuring safeguarding and child protection underpin all aspects of process and policy development;
- an effective, up-to-date safeguarding child protection policy is in place that is clear and easy to understand for staff, pupils, parents and carers and is made available on the School’s website;
- other policies, as prescribed Part 2 of KCSIE, are in place and operational;
- the obligations imposed by the Human Rights Act (1998) and the Equality Act (2010) are being met;
- pupils are being taught about how to keep themselves safe, including online, and that provision to the specific needs and vulnerabilities of individual children, including those who are victims of abuse and/or have SEN/D needs;
- required pre-employment checks are being carried out in a timely way and correctly recorded in the Single Central Register;
- all staff receive safeguarding training in accordance with this policy;
- the School's safeguarding arrangements take into account the procedures and practice of the Hammersmith and Fulham Safeguarding Children’s Partnership;
- the School contributes to inter-agency working, including providing a co-ordinated offer of early help when additional needs of pupils are identified;
- child protection files are maintained and, where appropriate, such records are transferred to a pupil’s new school or School in accordance with statutory guidance;
- appropriate filters and monitoring systems are in place to keep children safe online and that these are reviewed regularly; and
- the School reports to their local authority any pupil who joins or leaves the School at non-standard transition times in line with statutory and local authority guidance.

#### 4.6 Safeguarding Trustee

The Trustees have appointed a **nominated governor (trustee) for safeguarding, Jason Manning**, to take a lead responsibility for monitoring the operation of safeguarding arrangements. This is done in a number of ways, these being:

- discussions about safeguarding matters with the DSL at least once a term and more regularly if needed;
- liaising with the local authority and/or partner agencies where appropriate; and
- conducting an annual audit of the School’s safeguarding procedures and submitting a written report to the Trustees with recommendations for further improvements. The annual written report will typically

consider: the effectiveness and implementation of relevant policies; staff safeguarding training; staff recruitment procedures; the handling of safeguarding issues; referral management; the contribution the School is making to inter-agency working; and the provision for teaching pupils how to keep themselves safe. This audit will form part of the annual review undertaken by the Board of Trustees as a whole to ensure that all policies, procedures and training provided by the School are effective and comply with the law.

4.7 The contact details for the Safeguarding Governor are set out in the contact details in section 1 of this policy.

## 5 Key personnel

The DSL at the School is **Paul Hume**, a member of the Senior Leadership Team. If the DSL is unavailable, the role will be carried out by one of the Deputy DSLs, Maria Gavrilova and Oksana Pavlykivska (EYFS). The DSL or Deputy DSLs are always available when the School is open to discuss safeguarding concerns with staff, either in person or via telephone or email.

5.1 Outside School hours and during out of term activities, a designated member of the SLT will assume temporary responsibility.

5.2 **Oksana Pavlykivska** oversees safeguarding within the EYFS.

5.3 **Maria Gavrilova** is the designated member of staff who would oversee the welfare of looked after children should any be enrolled at the school by a Local Authority.

5.4 Contact details for all the above are contained in section 1 of this policy.

## 6 Staff training

6.1 Staff training encourages all members of staff to maintain an attitude of 'it could happen here' where abuse and neglect are concerned.

6.2 Induction training for all new members of staff, including temporary employees or volunteers, includes formal child protection training which covers:

- This safeguarding policy and related policies on Anti-Bullying and Cyber-bullying, E-Safety, Mental Health and Prevent\*;
- Part 1 and Annex A of KCSIE\*;
- the role, identity and contact details of the DSL and Deputy DSLs;
- policies on acceptable use of IT and online safety (including when they are online at home)\*;
- the pupil behaviour policy\*;
- the School's safeguarding response to pupils who go missing from education;
- the staff Code of Conduct\*;
- the School's policy on Whistleblowing\*; and
- an overview the Local Safeguarding Children Partnership's procedures.

*\* Copies of these documents will be provided either in paper form or electronically as part of the induction process and new staff will be required to sign a declaration confirming they have read and understood them. A*

*proportional, risk-based approach will be taken to determine the level of information provided to temporary staff and volunteers.*

- 6.3 All staff, including the Head Teacher and volunteers involved in regulated activity, will undertake appropriate child protection training which, in line with LSCP guidance, is updated every two years. In addition, all staff will receive safeguarding updates delivered through a combination of INSET meetings and training, e-bulletin updates, and the completion of relevant e-courses on a regular basis and at least annually. Safeguarding training is coordinated by the DSL and includes online safety and Prevent training where appropriate.
- 6.4 All staff receive updated copies of the School policies referred to above and are required to confirm that they have read and understood them. In addition, Part 1 and, where appropriate, Annex B of KCSIE are reissued to staff whenever this statutory guidance is updated by the DfE. Staff training provides an opportunity to check and consolidate their understanding of the policies. Staff can also access the policies and further reading in the staff section of the School's intranet.
- 6.5 The DSL team will regularly assess the appropriate level and focus for staff training so that it can respond to specific safeguarding concerns such as mental health, online safety, radicalisation, child sexual exploitation, child criminal exploitation, sexual violence and harassment, and female genital mutilation.
- 6.6 The DSL and Deputy DSLs undertake training that is in accordance with locally-agreed procedures to provide them with the knowledge and skills necessary to carry out their role. This training includes Prevent awareness training and will be updated every two years. Additional specialist training will be obtained for those who have specific responsibility for EYFS or for Looked After Children. They also refresh their knowledge and skills at regular intervals (and at least annually) by following developments in safeguarding to:
- keep abreast of best practice for promoting a culture of listening to children;
  - remain up to date on the mechanics of inter-agency working as operated by the LSCP;
  - understand the assessment process for providing early help and intervention, for example through locally-agreed common and shared assessment processes such as early help assessments;
  - have an up-to-date working knowledge of how local authorities conduct a child protection case conferences so they can contribute to these effectively when required to do so;
  - be alert to the specific needs of children in need, those with special educational needs and young carers;
  - understand and support the School with regard to the requirements of the Prevent duty and provide advice and support to staff on protecting children from the risk of radicalisation; and
  - be able to keep proper written records of concerns and referrals.
- 6.7 New appointees to the Board of Trustees receive appropriate safeguarding and child protection (including online) training at induction. This training is designed to ensure they understand their responsibilities as Trustees and equip them with the knowledge to provide strategic challenge to test and assure themselves that the School's safeguarding policies and procedures are effective and support the delivery of a robust whole school approach to safeguarding. All members of the Board of Trustees receive update training at least on an annual basis.

## **7 Hierarchy of intervention**

- 7.1 Hammersmith and Fulham publishes [Threshold of Needs Guide.pdf \(rbkc.gov.uk\)](https://www.rbkc.gov.uk/threshold-of-needs-guide) that all agencies, professionals and volunteers in the borough can use to consider how best to meet the needs of individual children and young

people. This guidance provides a summary of thresholds for intervention in relation to a continuum of need, ranging from children who need no additional intervention to those who require intensive help and specialist support. Children's needs are not static and they may experience different needs – at different points on the continuum – throughout their childhood years.

7.2 Within the continuum, there are four levels of intervention:

#### **Level 1: Universal**

These are children all of whose health and developmental needs will be met by universal services such as housing, mainstream education, primary health care, community resources alone. Children and young people at this level are achieving expected outcomes. There are no identified unmet needs, or the need is at a low-level and can be met by the universal services or with some limited additional advice or guidance. Children, young people, parents and carers can access these services directly.

#### **Level 2: Early help and targeted support**

These are children whose needs are not clear, not known or not being met. They may be vulnerable and showing early signs of abuse and/or neglect. Children and young people at this level are in need of coordinated early help and support from services to prevent problems from escalating and becoming difficult to resolve.

#### **Level 3: Children and families with complex needs**

Children and families at this level will be facing complex problems which will require an integrated and coordinated response from a number of agencies (eg children's social services, CAMHS, health services). Children at this level, often described as children 'in need', are unlikely to achieve or maintain a satisfactory level of health or development, or their health and development will be significantly further impaired, without the provision of external services.

#### **Level 4: Children with acute needs**

These are children who are suffering or are likely to suffer significant harm. This is the threshold for child protection. These children are likely to have already experienced adverse effects and to be suffering from poor outcomes.

## **8 Early help**

- 8.1 Azbuka Russian-English Bilingual School recognises the importance of providing early help to pupils to provide support for a problem as soon as it arises, to prevent it from escalating. We recognise that young people may face many challenges that put them in need of support and ensure that staff are aware of them. These include: stress, peer pressure, body image concerns, mental health and relationship issues.
- 8.2 Pupils are encouraged to raise concerns as soon as they are identified, either through their class teacher or directly to the Designated Safeguarding Lead, so that effective early support can be provided.
- 8.3 If staff believe that a pupil could benefit from early help, they should discuss the matter with the DSL who will, taking into account the local authority's threshold criteria, consider what action should be taken.
- 8.4 If early help is provided, the situation will be monitored carefully and a referral to children's social services made if the pupil's situation does not appear to be improving.
- 8.5 The School has various mechanisms to help identify emerging problems, including a thorough pupil recruitment process, the School's pastoral system, the PSHE programme and assemblies and various policies, including Anti-

Bullying and Cyber-bullying, E-Safety, Mental Health and Prevent, Relationship and Sex Education, Staff training also prepares staff to identify children who might benefit from early help.

8.6 The School recognises the increased vulnerability of young people who:

- are disabled or have special educational needs (whether or not they have a statutory Education, Health and Care plan) as they are more prone to peer-group isolation or bullying (including prejudice-based bullying);
- do not have English or Russian as a first language;
- are living away from home for the first time;
- are faced with challenging family circumstances;
- are looked after children;
- are acting as a young carer;
- are showing early signs of abuse, neglect or mental health problems; and
- may be subject to discrimination and maltreatment on the grounds of race, religion, ethnicity, sexual orientation or sexual identity.

Such children may be more likely to need early help. Also, recognising abuse or neglect may be more difficult for these young for many reasons, including:

- assumptions that indicators of possible abuse such as behaviour, mood or injury relate to a pupil's disability without further exploration;
- that pupils with special educational needs or disabilities can be disproportionately impacted by bullying/child-on-child abuse without outwardly showing any signs;
- communication barriers and difficulties overcoming these barriers; and
- a disabled pupil's understanding of abuse.

## 9 What to look out for and when to be concerned

9.1 All staff should be aware of the types and signs of abuse and neglect so that they are able to identify pupils who may be in need of help or protection. They also must be mindful that children may not feel ready or know how to tell someone that they are being abused, exploited, or neglected, and/or may not recognise their experiences as harmful. To reduce barriers to a potential disclosure it is incumbent on staff to build trusted relationships with children which facilitate communication. Staff must also exercise professional curiosity and speak to the DSL if they have concerns.

9.2 **Child abuse** is a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Harm can include ill treatment that is not physical as well as witnessing ill treatment of others. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Children may be abused by an adult or adults or by another child or children (child-on-child abuse). Serious bullying is a form of abuse and therefore will be treated as a child protection concern if there is reasonable cause to suspect a child is suffering, or likely to suffer, significant harm.

9.3 Staff should be aware of the four main categories of child abuse which are commonly identified:

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

- **Emotional abuse:** the persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. It may involve conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability as well as overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyber-bullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.
- **Sexual abuse:** involves forcing or enticing a child or young person to take part in sexual activities, not necessarily a high level of violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse. Sexual abuse can take place online, and technology can be used to facilitate offline abuse. Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children. The sexual abuse of children by other children is a specific safeguarding issue (also known as child-on-child abuse) and is covered in greater detail later in this policy (section 20).
- **Neglect:** the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to: provide adequate food, clothing or shelter (including exclusion from home or abandonment); protect a child from physical and emotional harm or danger; ensure adequate supervision (including the use of inadequate care-givers); or ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

#### 9.4 Other forms of abuse which staff should be aware of are:

- Children missing from education
- Child sexual exploitation (CSE)
- Child criminal exploitation (CCE)
- County lines
- Domestic abuse
- Honour-Based Abuse (HBA) and Female Genital Mutilation (FGM)
- Forced marriage
- Radicalisation
- Child-on-child
- Sexual violence and harassment (including upskirting)

Further information is provided in Appendices 2 and 3 and in Part 1 and Annex B of KCSIE.

## 10 Contextual safeguarding

All staff should be aware that safeguarding incidents and/or behaviours can be associated with factors outside the School and/or can occur between young people outside these environments. This is known as contextual safeguarding. All staff should consider, and especially those within the safeguarding team, whether pupils are at risk of abuse or exploitation in situations outside their families. Extra-familial harms take a variety of forms and young people may be vulnerable to multiple harms including (but not limited to) sexual exploitation, criminal exploitation, and serious youth violence.

## 11 Signs of abuse

11.1 All staff need to be aware that pupils may be reticent about reporting abuse generally, and particularly so about child-on-child abuse, and therefore need to be vigilant for potential indicators that abuse may be taking place and to inform the DSL team of any concerns they might have.

11.2 Possible signs of abuse include the following (but are not limited to and do not necessarily mean that abuse is occurring):

- the pupil discloses that he or she has been abused, or asks a question which gives rise to that inference
- the pupil has an injury that cannot be reasonably or consistently explained, or is unusual in type or location
- a pattern or frequency of injuries is emerging
- the pupil engages in extreme or challenging behaviour or there is a sudden change in the pupil's behaviour
- the pupil asks to drop subjects with a particular teacher and seems reluctant to discuss reasons
- the pupil appears neglected (eg dirty, hungry, inadequately clothed)
- the pupil appears reluctant to return home or has been openly rejected by parents or guardians
- the pupil's development is delayed in terms of emotional progress
- the pupil withdraws emotionally – showing a lack of trust in adults
- the pupil shies away from being touched or flinches at sudden movements
- the pupil loses or gains weight

11.3 Further guidance is provided in Appendix 2. Other sources of information on the signs of abuse include: the DfE advice note [What to do if you're worried a child is being abused \(2015\)](#) and the [NSPCC website](#).

## 12 Listening to pupils and record keeping

12.1 The School provides a range of opportunities for pupils to be listened to. Pupils can speak with teachers or a member of the DSL team. Concerns can also be brought to our attention via the pupil council, during school special assemblies, ongoing P4C sessions or via the confidential suggestions and worries box which is located in the school hall. Contact details for external agencies such as Childline and Office of the Children's Commissioner are available in common room areas, school hall and by the Library.

12.2 If a pupil discloses that he or she has been abused or neglected in some way, the member of staff should:

- immediately stop any other activity to listen;
- listen carefully to the pupil and keep an open mind - do not interrupt or be afraid of silences;

- keep in mind that some pupils may face additional barriers to telling someone because of their vulnerability, disability, sex, ethnicity, and/or sexual orientation;
- limit the questioning to the minimum necessary for clarification using “what, when, how, where” but avoid using leading questions such as, “has this happened to your siblings?” which may prejudice an investigation;
- not make any attempt to investigate the incident themselves or make a decision as to whether or not the pupil has been abused;
- reassure the pupil, but never promise not to tell anyone. Instead, explain who has to be told to ensure that proper action is taken in accordance with this policy;
- discuss the conversation with the DSL as soon as possible and take no further action unless instructed to do so by the DSL or the Head Teacher;
- only share information on a need-to-know basis; and
- **make a full written record of the conversation as set out below.**

12.3 Staff must record in writing all concerns, discussions and decisions made about a pupil as soon as possible on a cause of concern form (See Appendix 5). The recording must be a clear, precise and factual account of the conversation or observations. Where a child has made a disclosure, the record must include details of:

- its date, time and place
- what was said and done by whom and in whose presence
- any noticeable non-verbal behaviour or words used by the child.

The record should be signed by the person making it, using names, not initials. Any other evidence (for example, scribbled notes, mobile phones containing text messages, clothing, computers) must be kept securely and passed on to the DSL as soon as possible. No copies should be retained by the member of staff or volunteer.

Where a report includes an online element, staff should, where possible, avoid viewing illegal images of a child and under no circumstances should such images be forwarded electronically. Further guidance is available on what to do if viewing an image is unavoidable on:

- <https://www.gov.uk/government/publications/searching-screening-and-confiscation>
- <https://www.gov.uk/government/groups/uk-council-for-child-internet-safety-ukccis>

## **13 Procedure to be followed by staff if they have concerns about a pupil’s welfare**

13.1 If a member of staff has concerns about a pupil’s welfare, including any mental health concerns, **they must inform the DSL as soon as possible**, unless the concerns involve an allegation against a member of staff, in which case the procedures set out in the section *Allegations against members of staff (including supply staff, contractors and volunteers)* should be followed. Staff should not assume that somebody else will take action and share information that might be critical in keeping a pupil safe.

13.2 All concerns, discussions, decisions made and the reasons for those decisions should be recorded in writing. If in doubt about recording requirements, staff should discuss with the DSL.

13.3 If a teacher discovers that an act of female genital mutilation (FGM) appears to have been carried out on a girl under 18, the teacher **must** report this to the police. Unless the teacher has a good reason not to, they should



also still inform the DSL. This statutory duty does not apply to suspected cases of FGM or those at risk of FGM, which should both be addressed in accordance with the safeguarding procedures described in this policy. (For further details, see Annex A of KCSIE and '[Guidance for Schools](#)' information.)

13.4 The normal safeguarding procedures outlined in this Policy must be used when there are concerns about children who may be at risk of being drawn into terrorism.

13.5 Parents can report to the DSL on the welfare of any pupil in the School, whether their own child or not. If preferred, parents may discuss concerns in private with the pupil's teacher or other member of staff, who will notify the DSL.

13.6 Any member of staff may refer a matter to children's social services directly. This could happen in exceptional circumstances such as in an emergency or if there is a genuine concern that appropriate action has not been taken.

## **14 Duties of the DSL on being notified of a concern about a pupil's welfare**

14.1 When the DSL is notified of any concerns about a pupil's welfare, he or she will decide on the appropriate course of action. In particular, the DSL will decide whether a referral should be made to children's social services.

14.2 Factors that the DSL should bear in mind when making their decision include:

- the best interests of the child
- the nature and seriousness of the complaint
- contextual factors
- the referral threshold set by the Local Safeguarding Children Partnership
- the pupil's wishes or feelings
- the inter-agency procedures of the Local Safeguarding Children Partnership
- where relevant, local information sharing protocols relating to Channel referrals.

14.3 If the DSL decides not to make a referral, but to support the pupil with early help, the DSL will keep the situation under review and consider a later referral to children's social services if the pupil's situation does not appear to be improving.

14.4 Members of the DSL team are responsible for maintaining written safeguarding records. These records are confidential and the only personnel within the School who have access to them are the DSL/DDSLs. Such records will include:

- a clear and comprehensive summary of the concern;
- details of how the concern was followed up and resolved; and
- a note of any actions taken, decisions reached and the outcome.

## **15 Making a referral to children's social services**

15.1 When a pupil is not considered at risk of harm, but still has an unmet need that could mean they are in a Child in Need, a referral should be made as soon as possible by the DSL to Children's Social Care in the local authority in which the pupil lives. Parental consent for referrals of this type is not required in these circumstances. However, it is best practice for such concerns to be discussed first with parents and any subsequent referral to be made transparently with their knowledge. Where a child and family would benefit from coordinated support from one or more agency (for example: education, health, housing, police) there should an inter-agency early-help

assessment and procedures will be put in place by children's services to arrange this. The School will coordinate with the local agencies involved.

- 15.2 If a pupil is in **immediate danger** or is at **risk of harm**, a referral should be made to children's social services and/or the police **immediately**. Further guidance on when to call the police is provided by the [NPCC - when to call the police](#). The School is not required to obtain parental consent prior to a referral being made.
- 15.3 If the initial referral is made by telephone, the DSL should confirm the referral in writing. Confirmation of the referral and details of the decision on what action will be taken should be received from the Local Authority within one working day. If this is not received, the DSL should contact children's social services again.
- 15.4 If the DSL is not sure whether a referral should be made, he/she will consult with children's social services on a no-names basis. However, if at any stage sufficient concern exists that a pupil may be at risk of harm or in immediate danger, a referral to children's social services and/or the police will be made immediately.
- 15.5 Anyone can make a referral, although if a referral is made by someone other than the DSL, the DSL should be informed as soon as possible.
- 15.6 The School is not required to obtain parental consent prior to a referral being made to statutory agencies.
- 15.7 If, after a referral, the pupil's situation does not appear to be improving, the DSL should contact children's social services again to follow the matter up and ensure that their concerns are addressed and the pupil's situation improves.
- 15.8 Where relevant, the School will co-operate with the Channel panel and the police in providing any relevant information so that each can effectively carry out its functions to determine whether an individual is vulnerable to being drawn into terrorism. The School will respond to requests for information from the police promptly and in any event within five to ten working days.
- 15.9 Where a child and family would benefit from coordinated support from one or more agency (for example: education, health, housing, police) there should be an inter-agency early help assessment and procedures will be put in place by children's services to arrange this. The School will coordinate with the local agencies involved.

## **16 Informing parents**

- 16.1 Parents will usually be informed of any action to be taken under these procedures. However, there may be circumstances when the DSL will need to consult with the Local Authority Designated Officer (LADO), children's social services, the police and/or the Head Teacher before discussing details with parents.
- 16.2 For Channel referrals, the DSL will consider seeking the consent of the pupil (or their parent/guardian) when determining what information can be shared. Whether or not consent is sought will be dependent on the circumstances of the case but may relate to issues such as the health of the individual, law enforcement or protection of the public.
- 16.3 When the School decides to refer a particular complaint of abuse to social services or the police, the parents/guardian and pupil will be informed in writing of their right to make their own complaint or referral to social services or the police, where appropriate, and will be provided with contact names, addresses and telephone numbers.
- 16.4 For the avoidance of doubt, referrals do not require parental consent. Staff must act in the best interests of the child, even if this means making a referral against the parents' wishes.

## **17 Allegations about members of staff, supply staff and volunteers**

### **17.1 Guidance to staff**

Guidance is given to staff to be circumspect about placing themselves in situations which may

- put themselves or their pupils at risk of harm; or
- give rise to allegations of abuse.

To reduce the risk of allegations, staff should be aware of safer working practices and should be familiar with the detailed guidance on acceptable behaviour and actions contained in the Staff Code of Conduct, which is issued to all staff. Particular care should be taken where staff have one-to-one meetings with a pupil.

### **17.2 The following procedures will be used where it is alleged that a member of staff or volunteer has:**

- behaved in a way that has harmed a child, or may have harmed a child;
- possibly committed a criminal offence against or related to a child;
- behaved towards a child or children in a way that indicates he or she would pose a risk of harm to children; or
- behaved or may have behaved in a way (in or outside of School) that indicates they might not be suitable to work with children. The incident may not necessarily involve children but may raise concerns that such behaviour might be replicated against a child (eg domestic violence at home).

These procedures aim to strike a balance between the need to protect children from abuse and the need to protect staff and volunteers from false, malicious or unfounded allegations. The procedures follow Part four of *KCSIE* (September 2022).

### **17.3 Reporting an allegation about staff**

If an allegation is made about staff that appears to meet the criteria in paragraph 17.2:

- Where an allegation is made about a member of staff, supply staff, the DSL or volunteer, the matter should be reported immediately to the Head Teacher, or in the Head Teacher's absence, to the Nominated Safeguarding Trustee, Jason Manning. The adult to whom the allegation relates should not be informed without the explicit consent of the Local Authority Designated Officer (LADO).
- Allegations about the Head Teacher should be reported directly to the LADO without the Head Teacher being informed.
- Allegations about a Trustee should be reported to the Chair of Trustees. If the allegation is against the Chair of Trustees, the matter should be reported directly to the LADO.
- The Head Teacher or Trustee who receives any such allegation is referred to in these procedures as the 'case manager'.

### **17.4 Action to be taken by the case manager**

- Before contacting the LADO, the case manager will conduct basic enquiries in line with Hammersmith and Fulham's procedures to establish the facts to help determine whether there is any foundation to the allegation. Nothing must be done at this initial stage that could jeopardise a future police investigation.
- If the case manager is unsure whether the allegation meets the criteria in para 17.2 above, the LADO will be consulted for advice.
- Any allegations meeting the criteria in para 17.2 will be dealt with in accordance with the Local Safeguarding Children Partnership's procedures. All such allegations must be dealt with as a priority so as to avoid any delay.

- The case manager will immediately (and in any event within one working day) discuss the matter with the LADO – the person designated by the local authority to be involved in the management of allegations against people who work with children - before further action is taken. The case manager may also consult with the DSL, but no attempt will be made to investigate the allegation until the LADO is consulted. The purpose of the initial discussion between the case manager and the LADO is to consider the nature, content and context of the allegation and agree a course of action. All discussions with the LADO should be recorded in writing.
- The initial sharing of information and evaluation may lead to a decision that no further action is to be taken in regard to the individual facing the allegation or concern, in which case this decision and a justification for it will be recorded by both the case manager and the LADO, and agreement reached on what information should be put in writing to the individual concerned and by whom.
- In situations where a person is deemed an immediate risk to children or where there is evidence of a possible criminal offence, the case manager may, in consultation with the LADO, request police involvement from the outset.
- Any allegations of serious harm or abuse by any person living, working or looking after children in the nursery or EYFS years (whether that allegation relates to harm or abuse committed on the premises or elsewhere) will be notified to Ofsted as soon as practicable (and within 14 days at the latest), and include details of the action taken in respect of the allegations.
- Allegations against a teacher who is no longer teaching and historical allegations will be referred to the police.
- Where an adult makes an allegation to the School that they were abused as child, the individual will be advised to report the allegation to the police. Non-recent allegations made by a pupil will be reported to the LADO in line with Hammersmith and Fulham’s procedures for dealing with such allegations. The LADO will then coordinate with the children’s social care and the police.

#### 17.5 Disclosure of information

- The case manager will inform the accused person of the allegation as soon as possible after the LADO has been consulted and, if appropriate, local authority children’s social care and the police.
- The parents of the pupil involved will be informed of the allegation as soon as possible if they do not already know of it, although where external agencies are involved, the case manager will not inform the accused or the parents until it has been agreed what information can be disclosed. Parents will be kept informed of the progress of the case, only in relation to their child: no information can be shared regarding the member of staff.
- The timing and extent of disclosures, and the terms on which they are made, will be dependent upon and subject to the laws on confidence and data protection and the advice of external agencies.

#### 17.6 Investigation

- Investigations will usually be undertaken by a senior member of School staff, under the guidance of the LADO. However, depending on the nature and complexity of an allegation, the investigation may instead be conducted by external agencies, such as social services or the police. In some cases, the LADO may ask for further enquiries to be made before a formal decision is reached about how to proceed. When this occurs, the LADO will provide specific guidance as how and by whom the investigation should be conducted.
- Where an external agency is conducting the investigation rather than the School, the School will cooperate fully with external investigators. No internal investigation into possible breaches of the School’s disciplinary code will commence until any external investigation or criminal proceedings are complete.

- The case manager will monitor the progress of the case to ensure that it is being dealt with as quickly as possible in a thorough and fair way. Wherever possible, the first review should take place within four weeks of the initial assessment. Subsequent reviews will take place at fortnightly (and no longer than monthly) interval whilst the investigation is ongoing.
- It is recognised that the School may have to consider an allegation against an individual not directly employed by the School; for example, supply teachers provided by an employment agency or business. The School will ensure allegations are dealt with properly. Prior to ceasing using a supply teacher due to safeguarding concerns, the facts will be found out and the LADO liaised with to determine a suitable outcome. Azbuka School will take the lead in the investigation, to ensure that the allegation is dealt with properly and to recognise the fact that the agency would not have direct access to pupils or other school staff. They would therefore not be able to collect the facts or liaise with the LADO, police and/or children's social services. The agency will be made fully aware of the issues and be fully involved, even though the School is taking the lead. For example, the School will discuss with the agency whether it is appropriate to suspend the person they have supplied, or redeploy them, whilst the investigation is carried out. Supply staff will be advised to contact their trade union for representation. If there is an allegation meeting, it will address issues such as information sharing, to ensure that any previous concerns or allegations known to the agency are taken into account by the School.
- The School will not cease its investigations if the person involved leaves, resigns, ceases to provide their services, or refuses to cooperate. Records will be kept of the nature of the allegation and any supporting evidence used to determine whether or not, on the basis of information available, the allegation is substantiated. The person involved will be notified in writing of the outcome of the investigation process.
- In accordance with DfE statutory guidance, the following definitions will be used when determining the outcome of allegation investigations:
  - Substantiated: there is sufficient evidence to prove the allegation
  - Malicious: there is sufficient evidence to disprove the allegation and there has been a deliberate act to deceive or cause harm to the person subject to the investigation.
  - False: there is sufficient evidence to disprove the allegation
  - Unsubstantiated: there is insufficient evidence to either prove or disprove the allegation. The term, therefore, does not imply guilt or innocence
  - Unfounded: to reflect cases where there is no evidence or proper basis which supports the allegation being made

#### 17.7 Support

- The School has a duty of care towards its employees and will ensure that effective support is provided for anyone facing such an allegation. A representative will be appointed to keep him or her informed of the progress of the case and to consider what other support is available.
- The School will not prevent social contact with work colleagues and friends, when staff are suspended, unless there is reason to believe this may be prejudicial to the gathering and presentation of evidence
- Support will also be offered to the pupil(s) affected and their parents or guardian. The School will consult with the children's social services, or the police as appropriate, as to how this can be done in the most appropriate and effective way.

#### 17.8 Suspension

- Suspension will not be an automatic response to an allegation and will only be considered in a case where there is cause to suspect a pupil or other pupils at the School is or are at risk of significant harm or the

allegation is so serious that it might be grounds for dismissal. The School will consider whether the result that would be achieved by suspension could be obtained by alternative arrangements, such as redeployment. A member of staff will only be suspended if there is no reasonable alternative. The School will balance the need to ensure the safety and welfare of the pupil with the need for a full and fair investigation. The LADO will be consulted as to the appropriate action to take.

- If suspension is deemed appropriate, the reasons and justification will be recorded by the School and the individual notified of the reasons for the suspension. The School will ensure that the suspended person is given the contact details for the representative who has been appointed to keep him or her informed about the progress of the case.
- If it is decided that the person who has been suspended should return to work, the School will consider how to facilitate this; for example, whether a phased return would be appropriate. The School may provide a mentor and will also consider how to manage contact with the pupil who made the allegation.

#### 17.9 Confidentiality and information sharing

The School will make every effort to guard the privacy of all parties during and after an investigation into an allegation. It is in everyone's best interest to maintain this confidentiality, in order to ensure a fair investigation with minimum impact for all parties.

A breach of confidentiality will be taken seriously and may warrant its own investigation. It is a criminal offence to publish information that could lead to the identification of a member of staff who is the subject of an allegation before they are charged with an offence. Publication includes any speech, writing, relevant programme or other communication, in whatever form, which is addressed to the public at large or any section of the public.

The case manager will take advice from the LADO, police and children's services, as appropriate, to agree:

- Who needs to know about the allegation and what information can be shared
- How to manage speculation, leaks and gossip, including how to make the parents or guardian of the pupil involved aware of their obligations with respect to confidentiality
- What, if any, information can be reasonably given to the wider community to reduce speculation
- How to manage press interest if, and when, it arises
- Where the police are involved, wherever possible the School will ask the police to obtain consent from the individuals involved to share their statements and evidence for use in any subsequent disciplinary process initiated by Azbuka School.

#### 17.10 Malicious or unsubstantiated allegations

- If an allegation by a pupil is shown to have been deliberately invented or malicious, the DSL will consider whether the child and who has made the allegation is in need of help or may have been abused by someone else and this is a cry for help. In such circumstances, a referral to local authority children's social care may be appropriate. The School will also consider whether any disciplinary action is appropriate against the individual who made it.
- If a parent has made a deliberately invented or malicious allegation the Head Teacher will consider whether to require that parent to withdraw their child or children from the School, on the basis that they have treated the School or a member of staff unreasonably.
- Whether or not the person making the allegation is a pupil or a parent (or other member of the public), the School reserves the right to contact the police to determine whether any action might be appropriate.

### 17.11 Substantiated allegations

- If an allegation is substantiated and the member of staff, contractor or volunteer is dismissed because they are unsuitable to work with children a report to the Disclosure and Barring Service will be made promptly, and in any event within one month of the person leaving the School.
- Settlement agreements, including a form of words for a reference, will not be used in cases where a member of staff, volunteer or contractor resigns or ceases to provide his or her service, where there are allegations that indicate the person is a risk or poses a risk of harm to children. Resignation or ceasing to provide services will not prevent a referral being made to the Disclosure and Barring Service where appropriate.
- If a teacher has been dismissed, or would have been dismissed had they not resigned, in cases involving unacceptable professional conduct, conduct that may bring the profession into disrepute or a conviction for a relevant offence, the School will give separate consideration to whether a referral should be made to the Teaching Regulation Agency. The School will follow the advice set out in the TRA documents: [Teacher misconduct: information for teachers](#) and [Teacher misconduct: the prohibition of teachers](#) (as updated from time to time) to decide whether a referral should be made.
- At the conclusion of a case in which an allegation is substantiated, the LADO will review the circumstances of the case with the case manager to determine whether any improvements could be made to the School's procedures to prevent the occurrence of similar events in the future. Consideration will also be given to how the investigation process was managed, including, where appropriate, the use of suspension of the accused. The case manager will produce a written report that will be presented to the Trustees without delay.

### Record keeping and references

- Details of allegations that are found to be malicious will be removed from personnel records. For all other allegations, a comprehensive summary of the allegation, details of how the allegation was followed up and resolved, and a note of any action taken and decisions and the outcome i.e. substantiated, unfounded or unsubstantiated will be kept on the employee's file. A copy of this summary will be provided to the individual concerned, where agreed by local authority children's care or the police, and a declaration on whether the information will be referred to in any future reference. Such records will be retained at least until the employee reaches the normal pension age (or for a period of ten years from the date of the allegation, if this is longer).
- When providing employer references, Azbuka School will not refer to any allegation or history of allegations that has been proven to be false, unsubstantiated or malicious. Factual information (not opinions) will be included in references, where an allegation has been substantiated..

### 17.12 Learning lessons

Throughout the investigation process into a safeguarding allegation about a member of staff and at the conclusion of a case, irrespective of whether the allegation is substantiated, the School will review the circumstance of the case to see if there are any improvements that can be made in its practice or policy which may prevent similar cases in the future. Such reviews will be conducted by the case manager in consultation with the LADO and will also consider how future investigations of a similar nature could be carried out more effectively, including any issues arising from any decision to suspend a member of staff, the duration of the suspension and whether or not the suspension was justified. The case manager will submit a report the Governing Body summarising the outcome of the review.

## 18 Low-level concerns

- 18.1 As part of a whole School approach to safeguarding, Azbuka School seeks to promote a culture in which all concerns about all adults working in or on behalf of the School are dealt with promptly and appropriately. The purpose of the School's low level concerns policy is to create and embed a culture of openness, trust and transparency in which our values and expectations of staff behaviour as set out in the Code of Conduct are constantly lived, monitored and reinforced by all staff.
- 18.2 A "low-level" concern is any concern – no matter how small, and even if no more than causing a sense of unease or a nagging doubt – that an adult has acted in a way that:
- Is inconsistent with the School's Code of Conduct, including inappropriate conduct outside of work; and
  - Does not meet the allegation threshold (see 17.2) or is otherwise not serious enough to consider a referral to the LADO. If the School is in any doubt as to whether the information shared about a member of staff meets the harms threshold, advice from the LADO will be sought.
- NB: The term 'low-level' does not mean that the concern is insignificant; it simply means the behaviour does not meet the allegation threshold as defined in KCSIE.
- 18.3 Inappropriate behaviour can exist on a wide spectrum, from that which is inadvertent or thoughtless through to that which is ultimately intended to enable abuse. Examples of such behaviour could include but are not limited to: being overly friendly with pupils; showing favouritism; taking photographs of pupils on a personal device; or humiliating pupils.
- 18.4 Low level concerns may arise in several ways and from a number of sources: for example, suspicion; complaint; or disclosure made by a pupil, parent or another adult within or outside the organisation; or as a result of vetting checks undertaken.
- 18.5 Staff are required to report any concerns about any adult (including a person employed by a supply agency or a contractor) to the Head Teacher. If the Head Teacher is unavailable, the concern should be raised with the DSL so that the matter can be dealt in a timely manner but the Head Teacher should be informed as soon as possible. In the cases of supply staff and contractors, their employers will be notified so any patterns of inappropriate behaviour can be identified. Where the concern relates to the Head teacher, it should be reported directly to LADO. Such reports should be made without undue delay. Staff do not need to be able to determine whether their concern is a low-level concern or whether it meets the threshold of an allegation. This determination will be made by the Head Teacher or the LADO when the matter has been investigated.
- 18.6 The Head Teacher or DSL will gather as much evidence as possible by speaking directly to the member of staff concerned (unless the concern has been raised anonymously), to the individual concerned and to any witnesses. If the Head Teacher is the subject of the concern the LADO will provide advice as to how the investigation process should be managed.
- 18.7 A member of staff may find themselves in a situation which could be misinterpreted or might appear compromising to others. Equally, a member of staff, for whatever reason, may have behaved in a manner which, on reflection, falls short of the standard set out in the Staff Code of Conduct. Under such circumstances, the member of staff should make a self-referral to the Head Teacher as soon as possible. Doing so demonstrates transparency, facilitates effective management of the issue and can reduce the risks of misunderstandings and false allegations.
- 18.8 Full details of how the Head Teacher will go about investigating low-level concerns are set out in the Staff Code of Conduct. In brief, the Head Teacher will collect as much evidence as possible by speaking directly to the person who raised the concern, the individual involved and to any witnesses.



18.9 All low-level concerns, including those determined to be unfounded, will be recorded in writing by the Head Teacher. The record will include details of the concern, the context in which the concern arose, and any actions taken and decisions reached (and the rationale for them), and the eventual outcome. The name of the individual sharing their concerns will be noted. If the individual wishes to remain anonymous, then this will be respected as far as reasonably possible. Records of low-level concerns are confidential and securely stored by the DSL in accordance with the Data Protection Act 2018 and the UK General Data Protection regulation until the individual ceases to be employed by the School.

18.10 Low-level concerns which relate exclusively to safeguarding (and not to misconduct or poor performance) will not be referred to in employment references provided by the School. However, where a low-level concern (or group of concerns) has met the threshold for referral to the LADO and found to be substantiated, it will be referred to.

18.11 Records of low-level concerns will be reviewed at least termly by the DSL and Head Teacher in conjunction with The Nominated Safeguarding Trustee to ensure that all such concerns are being dealt with promptly and appropriately, and that any potential patterns of concerning, problematic or inappropriate behaviour are identified. Where a pattern of behaviour is identified consideration will be given to whether disciplinary procedures should be invoked, the matter should be escalated to the LADO and, more broadly, whether existing policies need to be revised and/or additional training is required to address wider cultural issues and minimise the risk of recurrence in the future.

## **19 Arrangements for dealing with child-on-child abuse and allegations**

19.1 Most instances of pupils causing harm to each other will be dealt with under the School's Anti-bullying and Behaviour Policies. However, all staff should be aware that safeguarding concerns can arise as a result of conduct by a pupil towards another (sometimes referred to as child-on-child abuse). Examples of pupils' conduct towards each other that could raise safeguarding concerns are:

- bullying (including cyberbullying, prejudice-based and discriminatory bullying) physical violence such as hitting, kicking, biting etc
- abuse in intimate personal relationships between peers;
- physical violence 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, such as rape, assault by penetration and sexual assault (this may include an online element which facilitates, threatens and/or encourages 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 strip, touch themselves sexually, or to engage in sexual activity with a third party;
- upskirting, which typically involves taking a picture under a person's clothing (not necessarily a skirt) without their permission and or knowledge with the intention of viewing their genitals or buttocks (with or without underwear) to obtain sexual gratification, or to cause humiliation or distress. (Upskirting is now a criminal offence. Anyone of any gender can be a victim.)
- consensual and non-consensual sharing of nude and/or semi-nude images and/or videos (also known as sexting, or youth-produced sexual imagery); 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).

19.2 Evidence shows that boys are more likely to be perpetrators and girls to be victims of child-on-child abuse. Child-on-child abuse also often manifests itself differently for boys than it does for girls. For example, girls seem to be at greater risk of sexual assault and/or exploitation whereas boys seem to be at greater risk of physical gang-related violence and serious youth violence.

19.3 Pupils with Special Educational Needs or Disabilities are particularly vulnerable to child-on-child abuse.

19.4 A child or young person who is (or is perceived to be) lesbian, gay, bisexual or transsexual (LGBT) may mean that they can be targeted by other children and subjected to harm because of this. This risk can be compounded where such pupils lack a trusted adult with whom they can be open. With this in mind, the School provides a number of 'safe spaces' for these children to speak out and share their concerns.

19.5 Whilst sexual harassment and sexual violence are forms of child-on-child abuse to which the comments and measures below concerning awareness, education and reporting apply, their particular nature requires extra commentary, which is provided in section 20.

19.6 Azbuka School has an important role in developing pupils' understanding of what constitutes child-on-child abuse and instilling behavioural norms that minimise the risk of it taking place. With this in mind, staff should be aware of the importance of:

- not assuming child-on-child abuse is not occurring because known cases are rare when it may in fact be that such abuse is occurring and are simply going unreported by pupils;
- enforcing the School's rules which are explicit about the high standards of behaviour and courtesy the School expects;
- implementing in a consistent way its Behaviour Policy;
- being clear that sexual violence or sexual harassment is not acceptable, will never be tolerated and is not an inevitable part of growing up;
- not tolerating or dismissing any form of child-on-child abuse as 'banter', 'just having a laugh', 'boys being boys' or 'part of growing up' as this can lead to a culture of unacceptable behaviours and an unsafe environment for pupils; and
- implementing the School's anti-bullying strategy.

Other strategies in place to prevent the occurrence of child-on-child abuse include:

- providing developmentally appropriate PSHE lessons and P4c sessions and assemblies which develop pupils' understanding of acceptable behaviour. Themes covered that are particularly relevant to child-on-child abuse include: consent, gender roles, stereotyping and equality, healthy relationships, and power imbalances in relationships
- having systems in place to for any pupils to raise concerns with staff, knowing that they will be listened to, believed and valued
- delivering targeted work on assertiveness and keeping safe for those pupils identified as being potentially vulnerable
- having robust supervision arrangements

19.7 All staff will be trained to manage a report of child-on-child sexual violence or sexual harassment. If a pupil discloses that they or another pupil has been the victim of child-on-child abuse, the guidance for gathering and recording the information provided in Section 12 of this policy should be followed.

- 19.8 If an allegation of child-on-child abuse has been made the DSL must be informed as soon as possible. Where the DSL considers that the behaviour meets the local authority threshold criteria (ie where there is reasonable cause to suspect a pupil is suffering or is likely to suffer significant harm), the case will be referred to the local authority using the procedures set out in this policy. The School will take advice from children's social services on when and how to inform the pupil about the allegations and how the investigation of allegations should be conducted. It will also take all appropriate action to ensure the safety and welfare of all pupils involved including those accused of abuse. Further details on how cases of child-on-child abuse will be managed is contained in Part 5 of KCSIE (September 2022).
- 19.9 A pupil against whom an allegation of abuse has been made may be suspended during the subsequent investigation and the School's policies on behaviour and discipline will apply.
- 19.10 If it proves necessary for a pupil to be interviewed by the police in relation to allegations of abuse, the School will ensure that, subject to the advice of children's social services, parents are informed as soon as possible and that an appropriate adult supports the pupil during the interview.
- 19.11 Both the victim and the perpetrator will be treated as being at risk and safeguarding procedures in accordance with this policy will be followed. The DSL as part of these procedures will produce a welfare risk assessment which will consider the needs of all those involved (victim, perpetrator and other pupils at the School) and the measures that need to be taken to protect and keep them safe. When compiling the risk assessment appropriate weight will be given to: the wishes of the victim; the nature of the alleged incident; the ages of those involved; whether the incident was an isolated one or part of a pattern; any power imbalance between the victim and perpetrator; any ongoing risks to the victim and other pupils; and any relevant contextual factors. Children's social services will independently risk assess the situation and any report produced by them will be used to inform and update the School's own risk assessment which, in any event, will be reviewed on a regular basis.

## **20 Child-on-child sexual harassment and sexual violence**

20.1 Children's sexual behaviour exists on a wide continuum, ranging from normal and developmentally expected to inappropriate, problematic, abusive and violent. Behaviour outside the normative range is called harmful sexual behaviour (HSB) because it is harmful to others or the pupil themselves. HSB can occur online and/or face-to-face and can also occur simultaneously between the two. (For a table that presents key features of the continuum, please see Appendix 7.)

Central to determining whether sexual behaviour between children can be considered harmful is the age and development of those involved. For example, sexual behaviour can be considered harmful if one of the children is much older, particularly if there is more than two years' difference, or if one of the children is pre-pubescent and the other is not. However, a younger child can abuse an older child if they have power over them, for example, if the older child is disabled or smaller in stature. For some there may be a link between viewing online pornography and subsequent HSB.

HSB can escalate over time. Early intervention when inappropriate behaviour is identified can help prevent problematic, abusive and/or violent behaviour in the future. It should be noted that the majority of young people displaying HSB do not become sexual offenders as adults.

20.2 Sexual harassment refers to 'unwanted conduct of a sexual nature' and can occur online and offline and both inside and outside of school. Sexual harassment can take a wide variety of forms:

- Sexual comments, such as: telling sexual stories, making lewd comments or sexualized remarks about a person's clothes or appearance, using sexualised names, sexual jokes or taunting etc

- Physical behaviour, such as deliberately brushing against someone, interfering with clothing (flicking bra straps, lifting up skirts etc), pulling trousers down, upskirting, displaying pictures, drawings or photos of a sexual nature
- Online sexual harassment, such as non-consensual sharing of images and videos (nudes and semi-nudes), sharing unwanted explicit content, sexualised online bullying, unwanted sexualised comments and messages, sexual exploitation and coercing others into sharing images of themselves or performing acts they are not comfortable with online

20.3 Sexual violence includes acts such as sexual assault, assault by penetration, rape and causing someone to engage in sexual activity without consent (this could include forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party). A key feature of such acts is that the sexual activity takes place without the consent of the victim. Consent can only be given if an individual has the freedom and capacity to choose to participate in a sexual act. Consent to sexual activity may be given to one sort of sexual activity but not another and can be withdrawn at any time during sexual activity.

20.4 Sexual harassment and sexual violence can occur between pupils of any age and sex. However, staff should be aware that some groups are at greater risks than others. Girls, pupils with SEND, and LGBT pupils are more likely to be victims of these types of abuse. Evidence shows that boys are more likely to be perpetrators and girls to be victims. Young people who are victims of sexual harassment and sexual violence will find the experience stressful and distressing. This will, in all likelihood, adversely affect their educational attainment.

20.5 Pupils may not find it easy to tell staff about their abuse verbally. They can show signs or act in ways that they hope adults will notice and react to. In some cases, the victim may not make a direct report. For example, a friend may make a report, or a member of staff may overhear a conversation that suggests a child has been harmed, or a child's own behaviour might indicate that something is wrong.

20.6 All staff will be trained to manage a report of child-on-child sexual violence and sexual harassment. It is essential that **all** victims are reassured that they are being taken seriously, regardless of how long it has taken them to come forward, and that they will be supported and kept safe. Abuse that occurs online or outside of the School should not be downplayed and should be treated equally seriously. A victim should never be given the impression that they are creating a problem by reporting sexual harassment or sexual violence. Nor should a victim ever be made to feel ashamed for making a report, or their experience minimised. It is also important to emphasise that the law is in place to protect children and young people rather than criminalise them.

20.7 Section 12 of this policy provides general guidance for listening to pupils and record-keeping. Effective safeguarding practice in the context of claims of sexual harassment or violence further requires the following:

- If possible, reports should be managed with two members of staff present, (preferably one of them being the Designated Safeguarding Lead or a Deputy).
- Where the report includes an online element, staff should know and following the [searching, screening and confiscation advice \(for schools\)](#) and [UKCIS advice on sharing nudes and semi-nudes](#). **The key consideration is for staff not to view or forward illegal images of a child.** The UKCIS advice provides more details on what to do when viewing an image is unavoidable. In some cases, it may be more appropriate to confiscate any devices to preserve any evidence and hand them to the police for inspection.
- The recognition that an initial disclosure to a trusted adult may only be the first incident reported, rather than representative of a singular incident and that trauma can impact memory and so pupils may not be able to recall all details or timeline of abuse.

20.8 The School will respond appropriately to all reports and concerns about sexual harassment and/or sexual violence both online and offline, including those that have happened outside of the School. The DSL/DDSLs are

likely to have a complete safeguarding picture and be the most appropriate people to inform the School's initial response. Important considerations will include:

- the wishes of the victim in terms of how they want to proceed\*;
- the nature of the alleged incident(s), including whether a crime may have been committed and/or whether harmful sexual behaviour has been displayed;
- the ages and developmental stages of the children involved;
- any power imbalance between the children (eg whether the alleged perpetrator(s) is/are significantly older, more mature and confident);
- whether the victim has a disability or learning difficulty;
- whether the alleged incident is a one-off or a sustained pattern of abuse (sexual abuse can be accompanied by other forms of abuse and a sustained pattern may not just be of a sexual nature);
- the risk of intra familial harms and the need for siblings to be supported following an incident;
- whether there are ongoing risks to the victim, other children, adult pupils or school or School staff;
- and other related issues and wider context, including any links to child sexual exploitation and child criminal exploitation.

\*Note: The victim of sexual harassment or violence may ask the School not to tell anyone but the DSL has to balance the victim's wishes against their duty to protect the victim and other pupils in the School. The general rule of thumb is, if a pupil is at risk of harm, is in immediate danger or has been harmed, a referral to local authority social care should be made. Rape, assault by penetration and sexual assaults are crimes and must therefore be reported to the police.

20.9 The DSL will reach a judgement about which of the following four ways is the most appropriate for handling the case:

- Internal management: handled entirely within the School.
- Early help: where the pupils concerned do not require referral to statutory services but may benefit from assistance from an external agency.
- Local authority children's social care: where a child has been harmed, is at risk of harm, or is in immediate danger.
- Report to the police: in addition to the above, where the seriousness of the concern merits it.

In all but the first circumstance, how the case is managed will be determined in conjunction with the local authority MASH (Multi Agency Safeguarding Hub) team and/or the police. The School will follow the guidance as set out in detail in KSCIE (2022), Part 5.

20.10 The School will do all that it reasonably can to protect the anonymity of pupils involved in any report of sexual harassment or sexual violence. Amongst other things, this will mean carefully considering which staff should know about the report and any support that will be put in place for those involved.

20.11 Risk and needs assessments are integral to the management of most cases of sexual harassment and all cases involving sexual violence. These assessments must be formulated on a case-by-case basis and should be conducted **immediately** once an incident comes light rather than waiting for the outcome (or even the start) of a local authority children's social care and/or police investigation. Where sexual violence is alleged to have occurred the risk and needs assessment should consider:

- The victim, especially their protection and support

- Whether there may have been other victims
- The alleged perpetrator(s)
- All other children at the School, especially any actions that are appropriate to protect them from the alleged perpetrators
- The time and location of the incident, and any action required to make the location safer

Risk assessments will be recorded in writing and kept under regular review by the DSL to ensure the risk mitigation measures that have been put in place are effective and reflect changing circumstances. It is highly likely that these risk assessments will be informed by assessments made by social workers and/or sexual violence specialists.

20.12 Where a report has been made to the police, the School will seek their advice and agree what information can be disclosed to staff and others, in particular, the alleged perpetrators and their parents or carers. Central to this discussion will be how the victim can best be protected. Thereafter the DSL will continue to work closely with the police (and any other agencies as required) and keep up to date with how any investigation is progressing. The fact that another body is investigating or has investigated an incident does not necessarily prevent the School from coming to its own conclusion, on the balance of probabilities, and imposing a sanction accordingly. However, the School will consider if, by taking any action, an external investigation and/or any subsequent prosecution could be compromised. There may also be circumstances in which it would be unreasonable or irrational to reach its own view about what has occurred while an independent investigation is ongoing. The School will be guided by the police and/or local authority children's social care when making this decision.

20.13 Where allegations of sexual harassment or sexual violence are contested there can be lengthy delays before the police investigation process is complete. Under such circumstances, a determination made will need to be made on a risk assessment basis as to whether it is viable for both the victim and alleged perpetrator to continue their education at the School. Consideration will be given to: stress and trauma to the victim; the potential for the suspected person to intimidate the victim or witnesses; and the need to protect the rights of the alleged perpetrator to education, privacy and family life. The decisions taken must be proportionate to the alleged offence and balance the right so the victim and perpetrator(s) and will be guided by advice provided by children's social services and the police.

20.14 Not all cases reported to the police are progressed and those that are may result in a not guilty verdict. The fact that an allegation was withdrawn or could not be substantiated does not necessarily mean that it was unfounded. Under these circumstances, the School will discuss with the victim how the situation is to be managed and ongoing support will be provided to them and the alleged perpetrator(s).

20.15 Where a police investigation into sexual harassment or sexual violence concludes the allegations are substantiated, the School will, if it has not already done so, consider what sanctions it wishes to impose in line with its behaviour policy. The sanction imposed will be proportionate to the offence and the circumstances in which it took place. Serious cases are highly likely to result in the permanent exclusion of the perpetrator(s). Where an offence justifies a lesser sanction, consideration will also be given to how best to keep the victim and perpetrator(s) a reasonable distance apart on School premises (including during before and after school-based activities) and on transport to and from school. Any arrangements will take account of the wishes of the victim and will be discussed with their parents or carers and those of the perpetrator(s). Support arrangements will be put in place for both the victim and the perpetrator(s).

20.16 Sexual assault can result in a range of health needs, including physical, mental, and sexual health problems and unwanted pregnancy. Where pupils have a health need arising from sexual assault or abuse, the School will assist them in gaining access to suitable specialist support services.

20.17 If a report of sexual violence or sexual harassment is determined to be unsubstantiated, unfounded, false or malicious, the DSL will consider if disciplinary action should be taken against the pupil who made the allegation and/or whether a referral to local authority children's social care is appropriate.

## **21 Other safeguarding arrangements**

### **21.1 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.

Only appropriately trained professionals should attempt to make a diagnosis of a mental health problem. Staff, however, are well placed to observe pupils 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 young people have suffered abuse and neglect, or other potentially traumatic adverse childhood experiences, 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, immediate action should be taken by raising the issue with the DSL, who may in turn contact an appropriate external agency.

### **21.2 Teaching pupils to keep themselves safe**

The School has an important role to play in preventative education which prepares pupils for life in modern Britain and creates a culture of zero tolerance to behaviours such as sexism, misogyny/misandry, homophobia, biphobic and sexual violence/harassment. This culture is underpinned by the School's behaviour policy and pastoral support systems. The framework for educating pupils about these issues and a number of others pertaining to well-being is provided by the statutory guidance Relationships Education, Relationships and Sex Education and Health Education (2019). This guidance requires the following topics to be taught in age- and developmentally-appropriate ways: healthy and respectful relationships; boundaries and consent; stereotyping, prejudice and equality; body confidence and self-esteem; recognising abusive relationships; sexual harassment and sexual violence; concepts of, and laws relating to, sexual consent, sexual exploitation, grooming, coercion, rape, harassment, domestic abuse and honour-based violence. The principal means by which these are explored is via timetabled PSHE lessons but this reinforced, where appropriate, Azbuka assembly Topics, P4C weekly sessions, NSPCC training and visits, reading and writing projects, and the creative arts. Pupils are also taught how to identify risks and how to modify behaviour to mitigate these risks.

Staff are also aware of the ongoing need to promote fundamental British values as a means of building resilience to the risks of radicalisation.

### **21.3 Online safety**

The widespread use of digital communications technologies, such as personal mobile devices and the internet, presents young people with a host of opportunities for learning, participation, creativity and self-expression. At the same time, it has become a significant component of many safeguarding issues, including child exploitation, radicalisation and sexual predation. Issues of online safety can be broadly categorised into four areas of risk:

1. **Content:** Being exposed to illegal, inappropriate or harmful online content such as spam, pornography, fake news, substance abuse, violence, misogyny, anti-Semitism, racism, radicalisation and extremism, and lifestyle sites that promote anorexia, self-harm or suicide.
2. **Contact:** Being subjected to harmful online interaction with other users. Examples include: peer-to-peer pressure, exposure to viruses and malware, anonymous online chat sites, cyber-bullying commercial advertising, personal data or identity theft, cyber-stalking, and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes.
3. **Conduct:** Personal online behaviour that increases the likelihood of being harmed oneself or causing harm to others. Examples include threats to: health and well-being, such as gaming or social network addiction; online disclosure of personal information and ignorance of privacy settings; online bullying; making, sending and receiving explicit images (eg consensual and non-consensual sharing of nudes and semi-nudes and/or pornography, sharing other explicit images); and illegal conduct, including hacking, plagiarism, and copyright infringement of digital media, such as music and film.
4. **Commerce:** Risks such as online gambling, inappropriate advertising, phishing and or financial scams. If you feel your pupils or staff are at risk, please report it to the Anti-Phishing Working Group (<https://apwg.org/>).

The School manages access to the internet via 3G/4G/5G using filters and monitoring systems to ensure the School's network and IT equipment are being used in a safe and appropriate manner. Further details are provided in the School's Acceptable Use of IT and E-Safety Policies. Even so, the School recognises that some pupils may have unlimited and unrestricted access to the internet by using personal devices to access mobile phone networks. This access means some pupils, could potentially use these devices to bully, control or sexually harass, share indecent images, view and share pornography and other harmful content. The School employs a range of strategies to promote an understanding of online risks and to discourage misuse:

- exploring e-safety in detail via the curriculum and pastoral events;
- ensuring systems are in place to facilitate early disclosure of potentially harmful online incidents;
- providing information to parents about how the School uses filters and monitors online use and, more generally, to promote understanding of the varied and evolving nature of online risks; and
- deterrence through the use of robust sanctions against those found to have abused others online.

#### 21.4 Mobile phones and cameras

The School provides mobile phones for trips and cameras for taking photographs when necessary. Mobile phones should not be used when supervising or teaching pupils. Images of pupils must not be taken or stored on any personal mobile phone. If a phone is to be used for School blogs or School social networks (FB, Instagram, website) on educational visits or school lessons or visits, permission must be obtained from the Head Teacher and reference to their use and subsequent safety of data must be referred to in the trip risk assessment.

Photographs and videos are taken of pupils by staff for a variety of purposes, including displays of work/activities, personal records of achievement and for the School website and newsletters. Written permission is obtained when a pupil joins the School (School Terms and Main Registration form) and this also indicates the level of consent, including where images may be used (personal records only or personal records and on the School website or in School publications). The DSL will ensure that all staff are aware of the names of pupils who may not be photographed or where there is limited consent. Images of pupils on the website will not be named. Images may only be captured on School cameras and the images may only be stored on those cameras and on the School's password-protected computers. Once images have been transferred from a camera onto a



computer the images should be deleted from the camera immediately. Additional copies may be stored on flash drives but these must be stored securely in a locked cupboard. Images must not under any circumstances be transmitted by staff to other individuals over the internet.

When taking photographs or recording video footage, staff should have regard to the following guidance:

- all pupils must be appropriately dressed
- images that only show a single pupil with no surrounding context should be avoided - photographs of three or four pupils are more likely to include the learning context
- use photographs that represent the diversity of pupils participating
- do not use images that are likely to cause distress, upset or embarrassment
- do not use images of a pupil who is considered vulnerable, unless parents or a guardian have given specific written permission

The SLT will review (at least annually), stored images and delete unwanted and out-of-date material.

Parents should be made aware of the need for sensitivity and respect when filming/photographing events featuring their own child or children. Staff should monitor the use of cameras at these events and ask anyone behaving inappropriately to cease filming/taking photos.

#### 21.5 Risk assessment

The School recognises that the evaluation of risks and putting in place measures to mitigate those risks contributes to promoting the welfare and protection of pupils. Risk assessments may pertain to the whole School, to specific curricular or extra-curricular activities that have hazards associated with them, or to individual pupils or staff. The procedures for conducting, recording and monitoring risk assessments are set out in full in the School's Risk Assessment Policy.

#### 21.6 Staff recruitment

The School is committed to safer recruitment processes. Members of teaching and non-teaching staff at the School, including part-time staff, temporary and supply staff, and visiting staff such as musicians and sports coaches are subject to the background checks required under the Education (Independent School Standards) Regulations 2014 and in accordance with the latest version of KCSIE. For most appointments, an enhanced DBS check with 'barred list' information will be required. Following EU exit and in line with the KCSIE September 2021 updates, Azbuka will also check the past conduct of individuals who have lived or worked overseas. At least one member of any staff recruitment panel will have had Safer Recruitment training. The School's separate Recruitment, Selection and Disclosure Policy contains further details about how the process of staff recruitment is conducted.

#### 21.7 Children missing from education procedures

All staff are aware that children going missing, particularly repeatedly, is a potential indicator of a range of safeguarding issues such as: neglect, sexual abuse or exploitation, child criminal exploitation, mental health problems, substance abuse, travelling to conflict zones, female genital mutilation or forced marriage. The School has clear procedures in place for following up on unexplained absences and, where necessary, reporting to the local authority pupils who are missing from School for more than 10 school days (continuous). The procedure includes the requirement to record any incident, the action taken and the reasons given by a parent for a pupil being missing.

The School has a legal duty to inform the Local Authority if a pupil is to be removed from the roll at a non-standard transition point; ie where a compulsory school-aged pupil leaves the School before completing the School's final year. When this notification is made the following information has to be provided by the School: full name of the pupil; name, address and telephone number of the parent the pupil lives with; details of any new address for the child and parent; the name of the pupil's destination School and expected start date; and the reason why the pupil is leaving the School.

The School is also legally required to notify the Local Authority within five days of adding a pupil's name to the admissions register at a non-standard transition point. The notification includes all the details contained in the admissions register for the new pupil; specifically, their full name; sex; name and address known to be a parent of the pupil (and an indication of which parent the pupil normally lives with and which parents hold parental responsibility); address of new or additional places of residence; at least one contact telephone numbers at which the parent can be contacted in an emergency\*; date of birth; and name and address of last School attended (if any).

*\*Note: In line with KCSIE 2022, it is the School's policy to hold a minimum of two emergency contact numbers for each pupil.*

#### 21.8 The Prevent Duty

All Schools are subject to a duty under section 26 of the Counter-Terrorism and Security Act 2015 to have "due regard" to the need to prevent people from being drawn into terrorism. This duty is known as the Prevent duty. There are four specific elements to the School's approach to meeting the statutory requirements imposed by the Prevent duty. In summary these are:

- Risk assessment – working with the Local Authority, who provide contextual information about the area, the School assesses the risk of pupils being drawn into terrorism, including extremist ideologies
- Working in partnership – liaising closely with the LSCP to ensure pupils requiring support are referred at a suitably early stage
- Staff training – enabling staff to identify pupils at risk of being drawn into terrorism and to challenge extremist ideas
- IT policies – to provide guidance to pupils as to how to stay safe online (see the School's Acceptable Use Policy) and set out the filtering and monitoring mechanisms in place.

#### 21.9 Visiting speakers

Any member of staff who wishes to invite a speaker to address pupils must provide details of the individual to the SLT in order that they may carry out a vetting procedure. The event organiser will undertake a search via the internet to research the background of the individual and consider taking up references from other schools at which they have spoken at in the past. The event organiser should also consider carefully whether the views being expressed, or likely to be expressed, constitute extremist views that risk drawing people into terrorism or are shared by terrorist groups. In these circumstances the event will not be allowed to proceed.

It is not necessary to undertake a DBS check on every speaker. In cases where specific vetting checks are not prescribed by KCSIE, the visiting speaker will be accompanied at all times by a member of staff to ensure there is no unsupervised access to pupils. However, if a DBS check is deemed necessary, the appropriate details will be recorded on the School's SCR.

#### 21.10 Confidentiality and information sharing

The School will keep all child protection records confidential, allowing disclosure only to those who need the information in order to safeguard and promote the welfare of children. The School will co-operate with police and children's social services to ensure that all relevant information is shared for the purposes of child protection investigations.

Where a pupil who is subject to a child protection plan is moving to another school, the DSL will ensure their child protection file is securely transferred as soon as possible and within 5 days for an in-year transfer or within the first 5 days of the start of a new term to allow the new school to have support in place when the child arrives.. This file will be transferred separately from the main pupil file to the DSL at the new school and confirmation of safe receipt will be obtained. The DSL should also consider if it would be appropriate to share any information with a new school in advance of a pupil leaving. For example, information that would allow the new school to continue supporting victims of abuse and have support in place for when the pupil arrives. Where allegations have been made against staff, the School will consult with the LADO and, where appropriate, with the police and social services to agree the information that should be disclosed and to whom.

Information sharing is essential for effective safeguarding and promoting the welfare of children, including in relation to their to their education. 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. Information that is relevant to safeguarding is regarded as 'special category personal data' and as such can be shared securely on a need-to-know basis. Further non-statutory guidance [Information Sharing](#) was published by the Government in July 2018. See Appendix 4.

#### 21.11 Whistleblowing

All staff are required to report to the Head Teacher any concerns about:

- poor or unsafe safeguarding practices at the School;
- potential failures by the School or its staff to properly safeguard the welfare of pupils; or
- other wrongdoing in the workplace that does not involve the safeguarding and welfare of pupils.

If the member of staff feels unable to raise their concern with the Head Teacher (or a member of SLT) or if they believe any concern has not been dealt with, they should contact 0800 028 0285. The NSPCC whistleblowing advice line is available for staff who do not feel able to raise safeguarding concerns internally (see section 1 for contact details). Any member of staff can whistleblow without fear of detriment (retribution or disciplinary action) provided the report was made in good faith. Malicious allegations may be considered as a disciplinary offence.

#### 21.12 School premises, security and visitors

- The School will take all practicable steps to ensure that all School buildings are as secure as circumstances permit. Staff need to use their swipe cards/codes to gain access to School buildings and main School door.
- All staff are identified by photo ID cards worn at all times during School-related activities and duties. A Visitors' Book is kept in the Reception area. All visitors must read the Visitors Rules, sign in on arrival and sign out on departure and are escorted whilst on School premises by a member of staff. All visitors will be given a name badge with the title 'Visitor', which must be clearly displayed and worn at all times whilst on the School's premises.

#### 21.13 Use of School premises for non-school activities

The School hires and rents out facilities to organisations, both during term time and the holidays. Where activities and courses are provided by the School (such as for Easter revision courses), this policy and all other arrangements for child protection will apply. Where services or activities are supplied by another organisation, the School will seek reassurance that the body concerned has appropriate safeguarding and child protection policies and procedures in place (including inspecting these as needed), regardless of whether or not the pupils who make use of these services or activities are on the School roll. This requirement forms part of any lease or hire agreement made with third parties and failure to comply with this will lead to the termination of the contract or agreement.

#### 21.14 Monitoring this Policy

- Any child protection incidents at the School will be followed by a review of the safeguarding procedures in the School and a report to the Trustees. Where an incident involves a member of staff, the LADO will be asked to assist in this review to determine whether any improvements can be made to the School's procedures. The DSL will monitor the content and operation of this policy and present an annual report to the School Trustees.
- The DSL will monitor the operation of this policy and procedures on a day-to-day basis and will provide regular updates at Senior Leadership Team meetings. In addition, the DSL will present a quarterly report to the Trustees, as part of the Head Teacher's Report.
- The Board of Trustees will undertake an annual review of the policy and implementation of its procedures including good co-operation with local agencies and of the efficiency with which the related duties have been discharged. The Trustees will draw on the expertise of staff, including the DSL, when considering amendments to policies and/or arrangements related to safeguarding.
- Any deficiencies or weaknesses in child protection and safeguarding arrangements identified at any time will be remedied without delay.

#### 21.15 Other relevant policies

The following policies should be read in conjunction with this policy:

- Behaviour and Anti-Bullying Policy
- Health and Safety Policy
- Outings Policy and Procedures
- Recruitment and Employment Policy
- Whistleblowing Policy
- Staff Behaviour Policy (Code of Conduct for Staff (with Low-Level Concerns Annex))
- E-Safety Policies
- Relationships Education, Sex Education and Health Education Policy

## Appendix 1: Other types of abuse

- **Child abduction and community safety incidents:** child abduction is the unauthorised removal or retention of a minor of a minor from a parent or anyone with legal responsibility for the child. Child abduction can be committed by parents or other family members; by people known but not related to the victim (such as neighbours, friends and acquaintances); and by strangers. The most common form of abduction is by a parent or family member and often occurs in the wake of an acrimonious separation or divorce where there is a dispute over custody arrangements. Abduction by strangers is much rarer. There are a variety of reasons why strangers abduct children, including:
  - Sexual interest in the child by the offender
  - Offender's desire to control, dominate, and cause harm to the child and /or a child's family
  - Emotional/mental health issues
  - Financial motives where the abductor intends to profit from the abduction by demanding a ransom or by trafficking the child (see sections on child sex exploitation, child criminal exploitation and modern slavery below)

Other community safety incidents in the vicinity of a school can raise concerns amongst children and parents, for example, people loitering nearby or unknown adults engaging children in conversation.

- **Children missing from education:** all children of compulsory school age, regardless of their circumstances, are entitled to a full-time education which is suitable to their age, ability, aptitude and any special needs they may have. A child going missing from education is a potential indicator of abuse or neglect, including possible sexual abuse, sexual exploitation or radicalisation. The School will report to the Local Authority instances of prolonged unauthorised absence or a pupil being removed from the School roll under the circumstances outlined in KCSIE. In cases where a pupil has a prolonged period of authorised absence for a reason such as long-term illness, the School will be proactive in terms of providing support to both the parents and the pupil.

**Child sexual exploitation (CSE):** CSE occurs where an individual or group takes advantage of an imbalance of power\* to coerce, manipulate or deceive a child or young person under the age of 18 into sexual activity (a) in exchange for something the victim needs or wants (for example, food, drugs, alcohol money or affection) 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. CSE does not always involve physical contact; it can also occur through the use of technology. CSE can affect any child or young person (male or female) under the age of 18 years, including 16- and 17-year-olds who can legally consent to have sex. It can include both contact (penetrative and non-penetrative acts) and non-contact sexual activity and may occur without the child or young person's immediate knowledge (eg through others copying videos or images they have created and posted on social media).

*\*An imbalance of power is commonly associated with age difference, it can also be due to a range of other factors including gender, sexual identity, cognitive ability, physical strength, status, and access to economic and other resources.*

- **child criminal exploitation:** Child criminal exploitation (CCE): CCE is where 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 being forced to work in cannabis factories, being coerced into moving drugs or money across the country (county lines), forced to shoplift or pickpocket, or being forced or manipulated into threatening/committing serious violence to others.

- **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'. Exploitation is an integral part of the county lines offending model with children and vulnerable adults exploited to move (and store) drugs and money. Offenders will often use coercion, intimidation, violence (including sexual violence) and weapons to ensure compliance of victims. Children can be targeted and recruited into county lines in a number of locations including schools, further and higher educational institutions, pupil referral units, special educational needs schools, children's homes and care homes. Children are often recruited to move drugs and money between locations and are known to be exposed to techniques such as 'plugging', where drugs are concealed internally to avoid detection. Children can easily become trapped by this type of exploitation as county lines gangs create drug debts and can threaten serious violence and kidnap towards victims (and their families) if they attempt to leave the county lines network. One of the ways of identifying potential involvement in county lines are missing episodes (both from home and school), where the victim may have been trafficked for the purpose of transporting drugs and a referral to the National Referral Mechanism should be considered. If a child is suspected to be at risk or involved in county lines, a safeguarding referral should be considered alongside consideration of availability of local services/third sector providers who offer support to victims of county lines exploitation.
- **Children and the court system:** Children are sometimes required to give evidence either as witnesses in the criminal courts or as part of family court procedure. This can be stressful and may reflect existing conflict and difficulties in the family. Staff members should be aware that any child who is involved in the court process may be at risk of a particular safeguarding issue. The Ministry of Justice has produced age appropriate guides for children who may have to give evidence in the criminal courts.
- **Children with family members in prison:** Children with a parent in prison are at risk of poor outcomes including poverty, stigma, isolation and poor mental health. National Information Centre on Children of Offenders provides information designed to support professionals working with offenders and their children to help mitigate the negative consequences for those children.
- **Cybercrime.** Cybercrime is criminal activity committed using computers and/or the internet. It is broadly categorised as either 'cyber-enabled' (crimes that can happen off-line but are enabled at scale and at speed on-line) or 'cyber dependent' (crimes that can be committed only by using a computer). Cyber-dependent crimes include:
  - unauthorised access to computers (illegal 'hacking');
  - denial of Service (Dos or DDoS) attacks or 'booting'. These are attempts to make a computer, network or website unavailable by overwhelming it with internet traffic from multiple sources; and
  - making, supplying or obtaining malware (malicious software) such as viruses, spyware, ransomware, botnets and Remote Access Trojans with the intent to commit further offence.

Children with particular skill and interest in computing and technology may inadvertently or deliberately stray into cyber-dependent crime. If there are concerns about a child in this area, the Designated Safeguarding Lead (or a Deputy), should consider referring into the Cyber Choices programme. This is a nationwide police programme supported by the Home Office and led by the National Crime Agency, working with regional and local policing. It aims to intervene where young people are at risk of committing, or being drawn into, low-level cyber-dependent offences and divert them to a more positive use of their skills and interests.

- **Domestic abuse:** Domestic abuse can encompass a wide range of behaviours and may be a single incident or a pattern of incidents involving: physical or sexual abuse; violent or threatening behaviour; controlling or coercive behaviour, economic abuse; psychological, emotional or other abuse. For the definition to apply, both parties must be aged 16 or over and personally connected. Types of domestic abuse include intimate partner violence, abuse by family members, teenage relationship abuse and child to parent violence and abuse. Anyone can be a victim of domestic abuse, regardless of gender, age, ethnicity, socio-economic status sexuality or background. Domestic violence can take place inside or outside the home.

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 impact on children's health, wellbeing, development, and ability to learn. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result.

- **Serious violence:** All staff should be aware of indicators, which may signal that children are at risk from, or are involved with serious violent crime. These may include increased absence from School, a change in friendships or relationships with older individuals or groups, a significant decline in performance, signs of self-harm or a significant change in wellbeing, 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.
- **Homelessness:** Being homeless or being at risk of becoming homeless presents a real risk to a young person's welfare. The DSL and deputies are aware of contact details and referral routes in to the Local housing Authority so that they can raise /progress concerns at the earliest opportunity. Indicators that a family may be at risk of homelessness include household debt, rent arrears, domestic abuse and anti-social behaviour as well as the family being asked to leave a property. In most cases college staff will be considering homelessness in the context of children who live with their families and intervention will be on that basis.
- **Honour-based abuse (HBA).** So-called 'honour-based' abuse (HBA) 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. Abuse committed in the context of preserving 'honour' often involves a wider network of family or community pressure and can include multiple perpetrators. All forms of HBV are abuse, are illegal in the UK (regardless of the motivation) and should be handled and escalated as such.
  - **FGM:** FGM comprises all procedures involving partial or total removal of the external female genitalia or other injury to the female genital organs. It is illegal in the UK and a form of child abuse with long-lasting harmful consequences. Victims of FGM are likely to come from a community that is known to practise FGM. Staff should note that girls at risk of FGM may not yet be aware of the practice or that it may be conducted on them, so sensitivity should always be shown when approaching the subject.

All staff must be aware of the law requiring tutors to report cases to the police where they discover (either through disclosure by the victim or visual evidence) that FGM appears to have been carried out on a girl aged under 18. The duty to report resides with the tutor who becomes aware of the case not the DSL, although the DSL should be informed unless the tutor has a good reason for not doing so. The report should be made orally by calling 101 within 24 hours of the issue coming to light. Failure to report a case of FGM can result in disciplinary sanctions.

- **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 is where a person does not consent or where they cannot consent (if they have learning disabilities, for example). Nevertheless, some communities use religion and culture as a way to coerce a person into marriage.
- **Modern slavery:** Modern slavery encompasses human trafficking and slavery, servitude, forced or compulsory labour. Exploitation can take many forms, including, sexual exploitation, forced labour, slavery, servitude, forced criminality and the removal of organs. The [modern slavery statutory guidance](#) provides more information on how to identify and support victims.
- **Radicalisation and extremism:** ‘Radicalisation’ refers to the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups. ‘Terrorism’ is defined as an action that endangers or causes serious violence to a person/people; causes serious damage to property; or seriously interferes or disrupts an electronic system. The use or threat must be designed to influence the government or to intimidate the public and is made for the purpose of advancing a political, religious or ideological cause. ‘Extremism’ is defined in the Prevent strategy as vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs. This also includes calling for the death of members of the armed forces. Extremist views may result in terrorist activity which is where is an action or actions endangers or causes serious violence to a person/people; causes serious damage to property; or seriously interferes or disrupts electronic systems. The use of threat of terrorist activity must be designed to influence the government or intimidate the public and is made for the purpose of advancing a political, religious or ideological cause.

There are various reasons why a young person might become interested in extremism:

- a search for answers to questions about identity, faith and belonging
- a desire for ‘adventure’ and excitement
- a desire to enhance self-esteem of the individual and promote ‘street cred’
- the discovery of and identification with a charismatic individual and, through them, attraction to a group which can offer identity, social network and support
- a sense of grievance that can be triggered by personal experiences of racism or discrimination

The School has a legal duty to have due regard to the need to prevent people from being drawn into terrorism and this is an aspect of safeguarding. Being drawn into terrorism includes not just violent extremism but also non-violent extremism, which can create an atmosphere conducive to terrorism and can popularise views which terrorists exploit. Schools should be safe spaces in which children and young people can understand and discuss



sensitive topics, including terrorism and the extremist ideas that are part of terrorist ideology, and learn how to challenge these ideas.

There is no single way of identifying an individual who is likely to be susceptible to a terrorist ideology. As with managing other safeguarding risks, staff should be alert to changes in behaviour which could indicate that they may be in need of help or protection. Young people at risk of radicalisation may display different signs or seek to hide their views. School staff should use their professional judgement in identifying young people who might be at risk of radicalisation and discuss their concerns with the DSL.

On the basis of this information the DSL may conclude that a referral to the Channel Programme is appropriate. The Channel programme is run in every local authority and addresses all kinds of extremism, including those related to Islamism or the extreme-right. The support provided could include assistance with education or employment, and ideological mentoring to provide vulnerable individuals with skills to protect themselves from being drawn into extremism. An individual's engagement with the programme is entirely voluntary at all stages.

- **Sharing nudes and semi-nudes.** The term 'sharing nudes and semi-nudes' refers to the sending or posting of nude or semi-nude images, videos or live streams by young people under the age of 18 online. It is also known by the names 'youth-produced sexual imagery' or 'sexting'. While sharing photos and videos online and via smartphones is part of daily life for many people, enabling them to share their experiences, connect with friends and **record** their lives, there are risks associated with the production and distribution of sexual and explicit images both in terms of the law (Protection of Children Act 1978, as amended by the Sexual Offences Act 2003) and in relation to the possible impact on a child's well-being if images are shared more widely than they originally intended.

Creating and sharing sexual photos and videos of under-18s is illegal. Also, consensual and non-consensual sharing of nude or semi-nude images and/or videos can be an indicator that children are at risk. Consequently, a member of the DSL team should be notified as soon as possible if an incident comes to light in which a pupil under the age of 18:

- has created and shared sexual imagery of themselves with a peer under the age of 18;
- has shared sexual imagery created by another person under the age of 18 with another person; or
- is in possession of sexual imagery created by another person under the age of 18.

**Management of an incident.** Any direct disclosure by a pupil should be taken seriously. Pupils who make such disclosures are likely to be embarrassed and worried about the consequences. Typically, they will have tried to handle the problem themselves and they will consider notifying a member of staff as a last resort. Given the potential seriousness of the situation, the DSL must be informed as soon as possible. The DSL will conduct an initial review, which will include meeting relevant staff and the pupils, to consider:

- whether there is an immediate risk to any child or young person;
- if a referral should be made to the police and/or local authority children's social care;
- if it is necessary to view the image(s) in order to safeguard the pupil – **in most cases, images or videos should not be viewed;**
- what further information is required to decide on the best response;
- whether the image(s) has been shared widely and via what services and/or platforms;

- whether immediate action should be taken to delete or remove images or videos from devices or online services or to confiscate the device used (if possible);
- any relevant facts about the pupil involved which would influence the DSL's risk assessment; and
- whether to inform the parents informed or whether involving them would put young person at risk of harm.

**Viewing the Imagery.** Staff **must not** ask to see the imagery but should confiscate the device on which it is held and pass it on to the DSL. If a device is confiscated, it should be turned off and locked away securely until it is passed on to the DSL or an external agency such as the police. Staff must not intentionally view any nudes and semi-nudes unless there is good and clear reason to do so. The decision to view any imagery should be based on the professional judgement of the DSL. Imagery should never be viewed if the act of viewing will cause significant distress or harm to those involved. The DSL must further be satisfied that it is the only way to make a decision about whether to involve other agencies, i.e. that it is necessary (i) to contact a reporting agency (such as the [IWF](#)) to have it taken down; or (ii) to support the pupil or parent in making a report; or (iii) or that is unavoidable because the pupil has shown it directly to a staff member or because the imagery has been found on School equipment. Along with our own Safeguarding and Child Protection procedures, the School will follow the advice given in [Sharing nudes and semi nudes: advice for education settings working with children and young people \(December 2020\)](#).

**Referral.** Once the DSL has sufficient information, a decision will be taken over whether the matter should be dealt with internally or referred to local authority children's social care and/or the police. The DSL will be informed by the need to ensure the welfare and protection of the pupil. Records will be kept of the information available and the rationale for any decisions taken.

A referral will always be made to children's social care and/or the police immediately if the incident involves:

- involves an adult.
- If there is reason to believe that a young person has been coerced, blackmailed or groomed, or there are concerns about their capacity to consent
- What you know about the images or videos suggests the content depicts sexual acts which are unusual for the young person's developmental stage, or are violent
- You have reason to believe a child or young person is at immediate risk of harm owing to the sharing of nudes and semi-nudes, for example, they are presenting as suicidal or self-harming

**Support.** It is vital that continuing support be given to the pupil so that they know they are not alone. Pupils must be advised on how to report sexual images or videos, how to get them taken down and how to delete it from their accounts. Pupils must also be made aware of the importance of not sharing the image further. Most online service providers offer a reporting function for account holders and some offer a public reporting function to enable a third party to make a report on behalf of the child or young person. Pupils can use the [IWF](#) and [Childline's Report Remove tool](#) to report images and videos they are worried have been, or might be, shared publicly.

**Deletion of imagery.** If the School decides that other agencies do not need to be involved, then consideration should be given to deleting nudes and semi-nudes from devices and online services to limit any further sharing. In most cases, pupils should be asked to delete the imagery and to confirm that they have deleted them. Any decision to search a pupil's device and delete imagery should be based on the professional judgement of the DSL.

**Recording incidents.** All incidents relating to nudes and semi-nudes being shared need to be recorded. This includes incidents that have been referred to external agencies and those that have not been reported out to police or local authority children's social care. Copies of imagery should not be taken.

## Appendix 2: Further information on signs of abuse

### Physical abuse

Physical signs	Behavioural signs
<ul style="list-style-type: none"> <li>• Unexplained bruises and welts on the face, throat, arms buttocks thighs or lower back in unusual patterns or shapes which suggests the use of an instrument</li> <li>• Unexplained burns, especially burns found on palms, soles of feet, abdomen or buttocks</li> <li>• Scald marks –immersion burns produce ‘stocking’ or ‘glove’ marks on feet and hands or upward splash marks which may suggest hot water has been thrown over a child</li> <li>• Human bite marks</li> <li>• Broken bones</li> </ul>	<ul style="list-style-type: none"> <li>• Behavioural extremes (withdrawal, aggression or depression)</li> <li>• Unbelievable or inconsistent explanations of injuries</li> <li>• Fear of parents being contacted</li> <li>• Flinching when approached or touched</li> <li>• Truancy or running away from home</li> </ul>

### Emotional abuse

Physical signs	Behavioural signs
<ul style="list-style-type: none"> <li>• Eating disorders, including obesity or anorexia</li> <li>• Speech disorders (stammering)</li> <li>• Nervous disorders (rashes, hives, facial tics, stomach aches)</li> </ul>	<ul style="list-style-type: none"> <li>• Fear of parent being approached</li> <li>• Fear of making mistakes</li> <li>• Developmental delay in terms of emotional progress</li> <li>• Cruel behaviour towards children, adults or animals</li> <li>• Self-harm</li> <li>• Behavioural extremes, such as overly compliant-demanding, withdrawn-aggressive, listless-excitabile</li> </ul>

### Sexual abuse

Physical signs	Behavioural signs
<ul style="list-style-type: none"> <li>• Torn, stained or bloody underclothes</li> <li>• Pain or itching in genital area</li> <li>• Bruises or bleeding near genital area or anus</li> <li>• Sexually transmitted infections</li> <li>• Pregnancy</li> <li>• Discomfort when walking or sitting down</li> </ul>	<ul style="list-style-type: none"> <li>• Self-harm</li> <li>• Sexual knowledge or behaviour (promiscuity) that is beyond their age/developmental level</li> <li>• Sudden or unexplained changes in behaviour</li> <li>• Avoidance of undressing or wearing extra layers of clothing</li> <li>• Truancy</li> <li>• Regressive behaviours (bed-wetting or fear of dark)</li> </ul>

### Neglect

Physical signs	Behavioural signs
<ul style="list-style-type: none"> <li>• Height and weight significantly below age level</li> </ul>	<ul style="list-style-type: none"> <li>• Erratic attendance at School</li> </ul>

<ul style="list-style-type: none"> <li>• Poor hygiene (lice, body odour etc)</li> <li>• Inappropriate clothing for weather conditions</li> <li>• Indicators of prolonged exposure to the elements (sunburn, chapped extremities, insect bites)</li> <li>• Constant hunger, sometimes stealing food from others</li> </ul>	<ul style="list-style-type: none"> <li>• Chronic hunger or tiredness</li> <li>• Having few friends</li> <li>• Assuming adult responsibilities</li> </ul>
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### Child sexual exploitation

Physical signs	Behavioural signs
<ul style="list-style-type: none"> <li>• Tiredness or mood swings</li> <li>• Bruising</li> <li>• Sexually transmitted diseases</li> <li>• Pregnancy</li> </ul>	<ul style="list-style-type: none"> <li>• Sudden decline in School performance, punctuality, attendance</li> <li>• In possession of expensive goods</li> <li>• Going to place they cannot afford</li> <li>• Age-inappropriate clothing</li> <li>• Inappropriate sexualised behaviour</li> <li>• Secretive</li> <li>• Mixing with older people</li> <li>• Misuse of drugs and alcohol</li> </ul>

### Child criminal exploitation and county lines

Physical signs	Behavioural signs
<ul style="list-style-type: none"> <li>• See sections on physical and sexual abuse</li> <li>• Carrying weapons</li> <li>• Have been the victim or perpetrator of serious violence (eg knife crime)</li> </ul>	<ul style="list-style-type: none"> <li>• Self-harming</li> <li>• Persistently going missing from School or home and/or being found out of area</li> <li>• Unexplained acquisition of money, clothes or mobile phones</li> <li>• Excessive receipt of texts/phone calls and/or having multiple handsets</li> <li>• Relationships with controlling older individuals or groups</li> <li>• Significant decline in School performance</li> <li>• Gang association or isolation from peers or social networks</li> <li>• Involved in receiving requests for drugs via a phone line, moving drugs, handing over and collecting money for drugs</li> </ul>

## Female genital mutilation

Physical signs	Behavioural signs
<ul style="list-style-type: none"><li>• Difficulty walking, sitting or standing</li><li>• Bladder or menstrual problems</li><li>• Severe pain and bleeding</li><li>• Infections such as tetanus, HIV and hepatitis B and C</li></ul>	<ul style="list-style-type: none"><li>• Abroad for a prolonged period</li><li>• Unusual behaviour after a period of absence</li><li>• May talk of a 'special procedure' or 'special occasion to become a woman'</li><li>• Spending longer periods in the bathroom</li><li>• Reluctance to undergo normal medical examinations</li></ul>

## Forced marriage

Physical signs	Behavioural signs
<ul style="list-style-type: none"><li>• Cut or shaved hair as a form of punishment for being disobedient</li></ul>	<ul style="list-style-type: none"><li>• Absence from School</li><li>• Failure to return from visit to country of origin</li><li>• Self-harm or attempted suicide</li><li>• Running away from home</li><li>• Early marriage of siblings</li><li>• Sudden announcement of engagement to a stranger</li></ul>

## Grooming

Physical signs	Behavioural signs
See section on sexual abuse	<ul style="list-style-type: none"><li>• Spending increasingly prolonged time online</li><li>• Having older boyfriends or girlfriends</li><li>• Secretiveness about who they are talking to online and what sites they visit</li><li>• Possession of electronic devices such as mobile phones or webcams that parents have not provided</li><li>• Engaging less with their usual friends</li><li>• Using sexual language that you would not expect them to know</li><li>• Going to unusual places to meet people</li><li>• Using drugs and/or alcohol</li><li>• Going missing from home or School</li></ul>

## Radicalisation

Physical signs	Behavioural signs
<ul style="list-style-type: none"><li>• out of character changes in dress, behaviour and peer relationships</li></ul>	<ul style="list-style-type: none"><li>• Showing sympathy for extremist causes</li><li>• Glorifying violence</li><li>• Evidence of possessing illegal or extremist literature</li><li>• A sudden disrespectful attitude towards others</li><li>• Unwilling to engage with or being abusive to pupils who are different</li><li>• Increased secretiveness, especially in relation to internet use e.g. changing online identity or having more than one online identity</li><li>• Unwillingness or inability to discuss their views</li><li>•</li><li>• Feeling persecuted</li><li>• Embracing conspiracy theories</li><li>• Advocating messages similar to illegal organisations such as 'Muslims Against Crusades' or other non-proscribed extremist groups such as the English Defence League</li></ul>

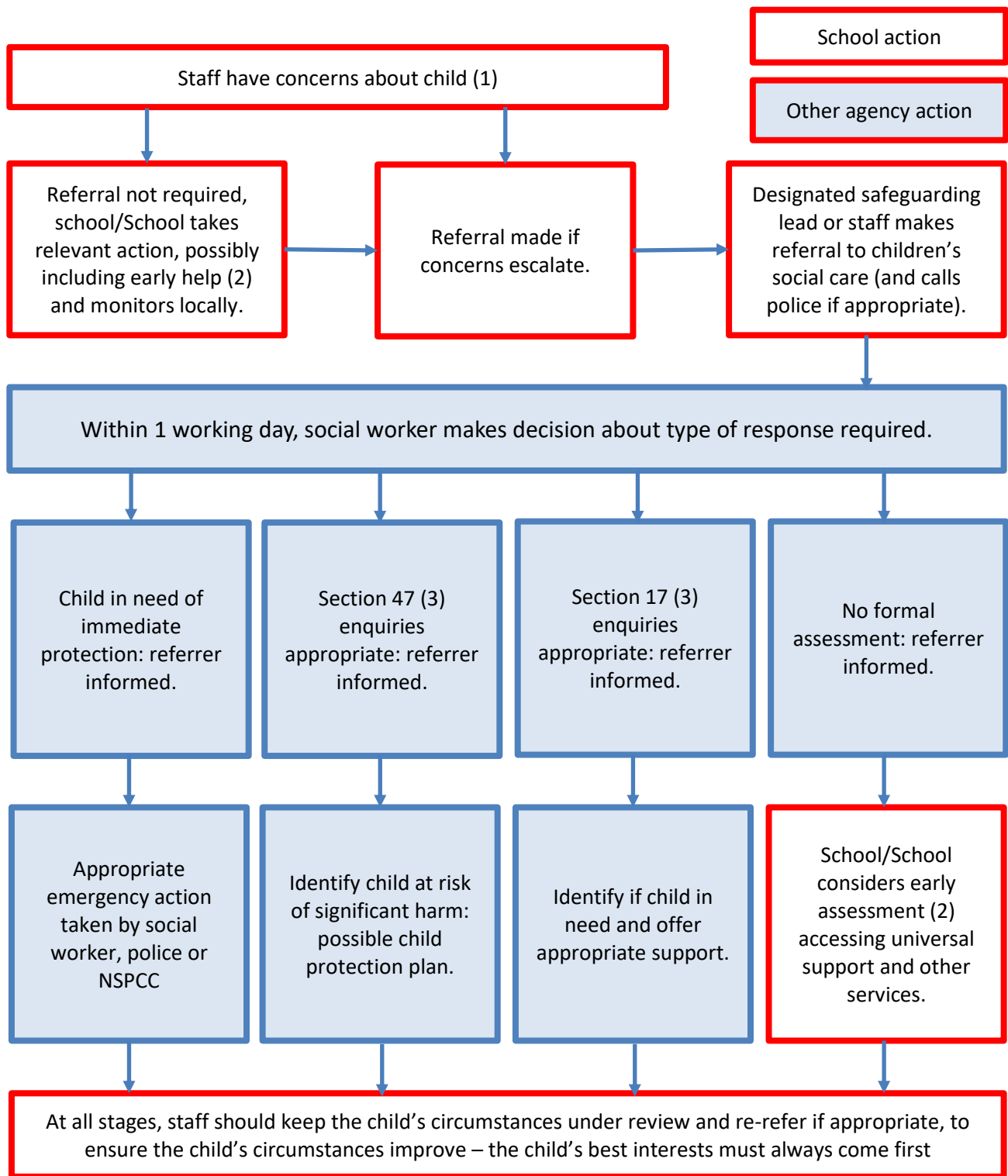
**Broad government guidance on the following is also available via the GOV.UK website (see Part one: Keeping children safe in education September 2022)**

- [bullying including cyberbullying](#)
- [children missing education](#)
- [child missing from home or care](#)
- [child sexual exploitation](#)
- [domestic violence](#)
- [drugs](#)
- [fabricated or induced illness](#)
- [faith abuse](#)
- [female genital mutilation \(FGM\)](#)
- [gangs and youth violence](#)
- [gender-based violence/violence against women and girls \(VAWG\)](#)
- [hate](#)
- [mental health](#)
- [missing children and adults](#)
- [private fostering](#)

- [preventing radicalisation](#)
- [relationship abuse](#)
- [sexting](#)
- [trafficking](#)

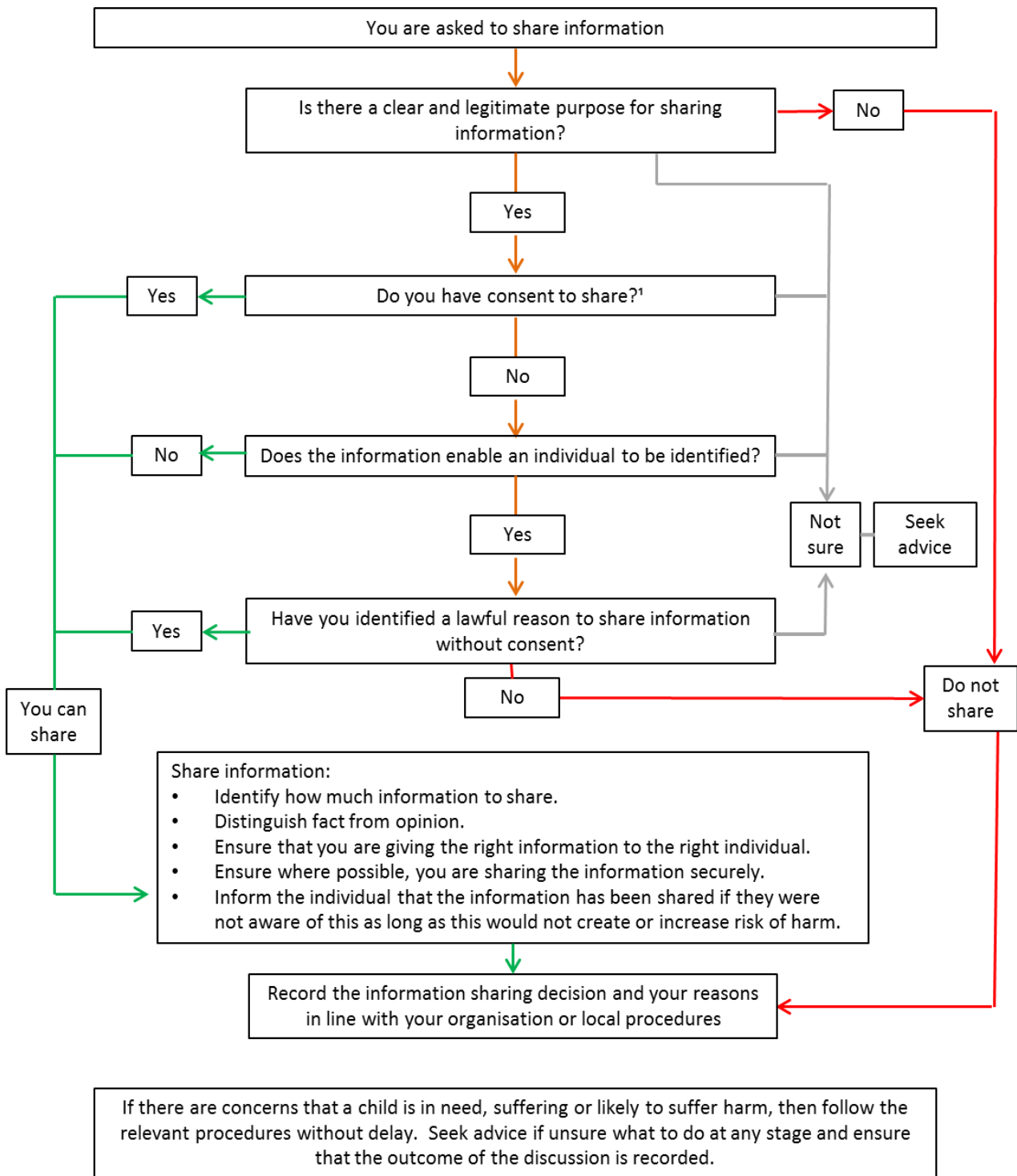


### Appendix 3: Actions where there are concerns about a child (KCSIE, September 2022)



1. Cases where there is a concern or allegation made against a staff member refer to the Head Teacher or LADO (see Section 15)
2. Early help involves providing support as soon as problem emerges. Where coordinated early help is required, an early help inter-agency assessment will be arranged.
3. Referrals will follow the processes set out in Hammersmith and Fulham's threshold guidance

## Appendix 4: Flowchart of when and how to share information



## Appendix 5 Child Protection Expression of Concern Form

This form should be completed when there is cause for concern and given to your Designated Safeguarding Lead as soon as possible.

Details of Pupil:
Child's Name:

Details of the person reporting concerns:
Full Name:

**Do these concerns relate to a specific incident/disclosure? If YES complete Section A; If NO, omit section A and move straight to Section B**

Section A:
Date and time of incident/disclosure:
Location of incident/disclosure:
Date this form was completed:
Other persons present:

Section B:
Details of concern/disclosure/incident: (What was said, observed, reported)
Action taken: (What did you do following the incident/disclosure/concern?)
Any other relevant information:

Signed:	Date:
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**For completion by the Designated Safeguarding Lead (DSL):**

DSL Response
Action taken by DSL:
Rationale for decision making/actions taken:
Outcome of action taken by DSL:
Follow up action by DSL:
Feedback given to person reporting the concerns:

Signed by DSL:	Date:
Full Name:	

**Checklist for DSL:**

- ✓ Concern described in sufficient detail?
- ✓ Distinguished between fact, opinion and hearsay?
- ✓ Child's own words used? (Swear words, insults or intimate vocabulary should be written down verbatim)
- ✓ Jargon free?
- ✓ Free from discrimination/stereotyping or assumptions?
- ✓ Concern recorded and passed to DSL in a timely manner?

## Appendix 6: DSL Job Description

### Job description for the Designated Safeguarding Lead (DSL and DDSLs)

The School is committed to safeguarding and promoting the welfare of children and young people and expects all staff and volunteers to share this commitment

<p><b>Summary of the role</b></p>	<ul style="list-style-type: none"> <li>• To take lead responsibility for safeguarding and child protection (including online safety) occurring at the School and to support all other staff in dealing with any child welfare and child protection concerns that arise.</li> <li>• To provide advice and support to other staff on matters of child welfare, safeguarding and child protection.</li> <li>• To take part in strategy discussions and inter-agency meetings and to support other staff to do so, and to contribute to the assessment of pupils.</li> <li>• To promote and safeguard the welfare of pupils in the School.</li> <li>• Whilst the activities of DSL can be delegated to appropriately trained deputies (DDSLs), the ultimate lead responsibility for child protection remains with the DSL. This lead responsibility cannot be delegated.</li> </ul>
<p><b>Main duties and responsibilities</b></p>	<p><b>Further specifics:</b></p>
<p><b>Availability</b></p>	<p>You are expected to:</p> <ul style="list-style-type: none"> <li>• ensure during term time that you or a Deputy will always be available during School hours (9am – 5pm) to discuss any safeguarding concerns; and</li> <li>• arrange adequate and appropriate cover arrangements for any out of hours/out of term activities.</li> </ul>
<p><b>Managing referrals</b></p>	<p>You are expected to refer cases:</p> <ul style="list-style-type: none"> <li>• of suspected abuse and neglect of any pupil at the School to the local authority children's social care and support staff who make referrals to local authority children's social care;</li> <li>• to the Channel programme where there is a radicalisation concern and support staff who make referrals to the Channel programme;</li> <li>• where a person is dismissed or left due to risk/harm to a child to Disclosure and Barring Service (<b>DBS</b>); and</li> <li>• where a crime has been committed to the Police.</li> </ul>
<p><b>Working with others</b></p>	<p>You are expected to:</p> <ul style="list-style-type: none"> <li>• act as a source of support, advice and expertise for all staff;</li> <li>• act as a point of contact with the three safeguarding partners: the local authority (Hammersmith and Fulham); the Integrated Care Systems; and the Police;</li> <li>• liaise with the Head Teacher to inform him of issues; especially ongoing enquiries under section 47 of the Children Act 1989 and police investigations;</li> <li>• ensure that an 'appropriate adult' is present if a pupil is being questioned or detained by the police;</li> </ul>

	<ul style="list-style-type: none"> <li>• as required, liaise with the “case manager” (as per Part 4 of KCSIE) and the designated officer (LADO) at the local authority for child-protection concerns in cases which concern a staff member;</li> <li>• liaise with staff (especially tutors, pastoral support staff, IT staff, First Aiders, counsellors and the named persons with oversight for SEND) on matters of safety, safeguarding and welfare (including online and digital safety) and when deciding whether to make a referral by liaising with relevant agencies so that children’s needs are considered holistically;</li> <li>• promote supportive engagement with parents in safeguarding and promoting the welfare of children, including where families may be facing challenging circumstances; and</li> <li>• work with the Head Teacher and relevant strategic leads, taking lead responsibility for promoting educational outcomes by knowing the welfare, safeguarding and child protection issues that children in need are experiencing, or have experienced, and identifying the impact that these issues might be having on children’s attendance, engagement and achievement at the School. This includes: <ul style="list-style-type: none"> <li>○ ensuring that the School knows who its cohort of children are who have or have had a social worker, understanding their academic progress and attainment, and maintaining a culture of high aspirations for this cohort; and,</li> <li>○ supporting teaching staff to provide additional academic support or reasonable adjustments to help children who have or have had a social worker reach their potential, recognising that even when statutory social care intervention has ended, there is still a lasting impact on children’s educational outcomes.</li> </ul> </li> </ul>
<b>Information sharing and managing the child protection files</b>	<p>You are expected to:</p> <ul style="list-style-type: none"> <li>• ensure that child protection files are kept up to date.</li> <li>• ensure that information is kept confidential and stored securely.</li> <li>• ensure that records include: <ul style="list-style-type: none"> <li>○ a clear and comprehensive summary of the concern;</li> <li>○ details of how the concern was followed up and resolved; and</li> <li>○ a note of any action taken, decisions reached and the outcome.</li> </ul> </li> <li>• ensure that files are only accessed by those who need to see them and that where the file or content within it is shared, this happens in line with information-sharing advice, as set out in Part 1 and Part 2 of KSCIE.</li> <li>• ensure, when a pupil leaves the School, that: <ul style="list-style-type: none"> <li>○ their child protection file is transferred to the new school or School as soon as possible (within 5 days for an in-year transfer or within the first 5 days of the start of a new term); and</li> <li>○ their child protection file is transferred separately from the pupil’s main file in a secure manner and confirmation of receipt is received from the destination school or School; and</li> </ul> </li> <li>• consider whether it is appropriate to share any information with the new school or School in advance of the pupil leaving.</li> </ul>

<p><b>Raising awareness</b></p>	<p>You are expected to:</p> <ul style="list-style-type: none"> <li>• ensure each member of staff has access to, and understands, the School’s safeguarding policy and procedures, especially new and part-time staff;</li> <li>• ensure the School’s safeguarding policy is reviewed annually (as a minimum) and the procedures and implementation are updated and reviewed regularly, and work with the Board regarding this,</li> <li>• ensure the safeguarding policy is available publicly and parents know that referrals about suspected abuse or neglect may be made and the role of the School in this;</li> <li>• link with the safeguarding partner arrangements to make sure staff are aware of any training opportunities and the latest local policies on local safeguarding arrangements; and</li> <li>• help promote educational outcomes by sharing the information about the welfare, safeguarding and child protection issues that children who have or have had a social worker are experiencing with teachers and School leadership staff.</li> </ul>
<p><b>Training, knowledge and skills</b></p>	<p>You are expected to ensure your child protection training and that of the DDSLs is sufficient and appropriate to provide the knowledge and skills required to carry out this role. This training must be updated every two years. All members of the DSL team should also undertake Prevent awareness training.</p> <p>In addition to the formal training, the knowledge and skills of members of the DSL team should be supplemented and refreshed at regular intervals, as required, and at least annually, to allow them to understand and keep up with any developments relevant to their role so that they:</p> <ul style="list-style-type: none"> <li>• understand the assessment process for providing early help and statutory intervention, including local criteria for action and local authority children’s social care referral arrangements;</li> <li>• have a working knowledge of how local authorities conduct a child-protection case conference and a child-protection review conference and be able to attend and contribute to these effectively when required to do so;</li> <li>• understand the importance of the role the Designated Safeguarding Lead has in providing information and support to local authority children social care in order to safeguard and promote the welfare of children;</li> <li>• understand the lasting impact that adversity and trauma can have, including on children’s behaviour, mental health and wellbeing, and what is needed in response to this in promoting educational outcomes;</li> <li>• are alert to the specific needs of children in need, those with Special Educational Needs and Disabilities (SEND), those with relevant health conditions and young carers;</li> <li>• understand the importance of information sharing, both within the School, and with the three safeguarding partners, other agencies, organisations and practitioners;</li> <li>• understand and support the School with regards to the requirements of the Prevent duty and be able to provide advice and support to staff on protecting children from the risk of radicalisation;</li> <li>• are able to understand the unique risks associated with online safety and be confident that they have the relevant knowledge and up to date capability required to keep children safe whilst they are online at School;</li> </ul>

	<ul style="list-style-type: none"> <li>• can recognise the additional risks that children with SEN and disabilities (SEND) face online (for example, from online bullying, grooming and radicalisation) and are confident they have the capability to support SEND children to stay safe online;</li> <li>• obtain access to resources and attend any relevant or refresher training courses; and</li> <li>• encourage a culture among all staff of listening to pupils and taking account of their wishes and feelings, in any measures the School may put in place to protect them.</li> </ul>
<b>Providing support to staff</b>	<p>Training should support the Designated Safeguarding Lead in developing expertise, so they can support and advise staff and help them feel confident on welfare, safeguarding and child-protection matters. This includes, specifically, to:</p> <ul style="list-style-type: none"> <li>• ensure that staff are supported during the referrals processes; and</li> <li>• support staff to consider how safeguarding, welfare and educational outcomes are linked, including to inform the provision of academic and pastoral support.</li> </ul>
<b>Understanding the views of children</b>	<p>It is important that all children feel heard and understood. Therefore, designated safeguarding leads (and deputies) should be supported in developing knowledge and skills to:</p> <ul style="list-style-type: none"> <li>• encourage a culture of listening to children and taking account of their wishes and feelings, among all staff, and in any measures the School may put in place to protect them; and,</li> <li>• understand the difficulties that children may have in approaching staff about their circumstances and consider how to build trusted relationships which facilitate communication.</li> </ul>
<b>Holding and sharing information.</b>	<p>The critical importance of recording, holding, using and sharing information effectively is set out in Parts 1, 2 and 5 of KCSIE, and therefore members of the DSL team should:</p> <ul style="list-style-type: none"> <li>• understand the importance of information sharing, both within the School, and with other schools and Schools on transfer including in-year and between primary and secondary education, and with the safeguarding partners, other agencies, organisations and practitioners;</li> <li>• understand relevant data-protection legislation and regulations, especially the Data Protection Act 2018 and the General Data Protection Regulation; and</li> <li>• be able to keep detailed, accurate, secure written records of concerns and referrals and understand the purpose of this record-keeping.</li> </ul>



## Appendix 7: Hackett's Continuum of Sexual Behaviours

Hackett (2010) has proposed a continuum model to demonstrate the range of sexual behaviours presented by children and young people, from those that are normal, to those that are highly deviant.

Normal	Inappropriate	Problematic	Abusive	Violent
<b>Developmentally expected</b>	Single instances of inappropriate sexual behaviour	Problematic and concerning behaviours	Victimising intent or outcome	Physically violent sexual abuse
<b>Socially acceptable</b>	Socially acceptable behaviour within peer group	Developmentally unusual and socially unexpected	Includes misuse of power	Highly intrusive
<b>Consensual, mutual, reciprocal</b>	Context for behaviour may be inappropriate	No overt elements of victimisation	Coercion and force to ensure victim compliance	Instrumental violence which is physiologically and/or sexually arousing to the perpetrator
<b>Shared decision making</b>	Generally consensual and reciprocal	Consent issues may be unclear	Intrusive	Sadism
		May lack reciprocity or equal power	Informed consent lacking, or not able to be freely given by victim	
		May include levels of compulsivity	May include elements of expressive violence	

Reference: Hackett, S (2010). Children, young people and sexual violence. In Barter, C and Berridge, D (eds) *Children behaving badly? Exploring peer violence between children and young people*. London: Blackwell Wiley.