

## **Forres Sandle Manor (Non-Academic) Policy**

Policy Title	<b>Safeguarding and Welfare</b>
Policy Lead (Appointment (& Initials))	<b>Deputy Head (JC)</b>
Date of Last Review	<b>June 2019</b>
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## **POLICY STATEMENT**

Safeguarding determines the actions that we take to keep children safe and protect them from harm in all aspects of their school life. As a school we are committed to safeguarding and promoting the welfare of all of our pupils.

The actions that we take to prevent harm; to promote wellbeing; to create safe environments; to educate on rights, respect and responsibilities; to respond to specific issues and vulnerabilities all form part of the safeguarding responsibilities of the school. As such, this overarching policy will link to other policies which will provide more information and greater detail.

This policy must be read in conjunction with the **FSM Child Protection policy, Staff Code of Conduct Policy and Section 1 and Annex A of the most recent version of the DfE's publication, 'Keeping Children Safe in Education'**

Within 'Keeping Children Safe in Education' (2019) and the ISI inspection guidance (2017), there are a number of safeguarding areas directly highlighted or implied within the text.

These areas of safeguarding have been separated into issues that are emerging or high risk issues (part 1); those related to the pupils as an individual (part 2); other safeguarding issues affecting pupils (part 3); and those related to the running of the school (part 4).

Any links to local or national advice and guidance can be accessed via the safeguarding in education webpages:

[www.hants.gov.uk/educationandlearning/safeguardingchildren/guidance](http://www.hants.gov.uk/educationandlearning/safeguardingchildren/guidance)

Links to online specific advice and guidance can be found at

<https://www.hants.gov.uk/socialcareandhealth/childrenandfamilies/safeguardingchildren/onlinesafety>

Links to other pages from the local authority on safeguarding can be found at

<https://www.hants.gov.uk/socialcareandhealth/childrenandfamilies/safeguardingchildren>

The procedures of the Hampshire Safeguarding Children Board can be accessed at

<http://4lscb.proceduresonline.com/hampshire/contents.html>

As a school, we review this policy at least annually in line with DfE, HSCP, HCC and any other relevant guidance.

## **AREAS OF SAFEGUARDING**

Additionally, further policies also contribute to the FSM aim of total care:

- Anti-bullying policy.
- Behaviour and Discipline policy.
- Boarding at FSM Policy.
- Confidential Reporting policy.
- Cyberbullying policy.
- E-Safety (Acceptable Usage) policy.
- First Aid policy.
- Health and Safety policy.
- Health and Welfare policy, (including Administration of Medication, Asthma, Diabetes, and Epilepsy policies).
- Intimate Care policy.
- Preventing Radicalisation policy.
- Responses to Alcohol Smoking and Substance Abuse policy
- Risk Assessments policy.
- Safer Recruitment, Selection and Disclosure policy
- Social Media policy.
- Staff Induction policy.
- Use of Reasonable Force policy
- Trips and Outings policy.
- Visitors' policy.
- Worries and Complaints Procedure
- Lower School Administration of Medicines
- Lower School Application of Sunscreen policy
- Lower School Behaviour Management
- Lower School British Values policy
- Lower School No Smoking policy
- Lower School Supervision of Children on trips policy
- EYFS Supervision Policy
- EYFS Tapestry E Learning Policy
- Lower School Use of Mobile Phones and Cameras

All employees will be made aware of and be introduced to these policies as part of their induction process. Staff are also invited to comment and add to these policies.

## **DEFINITIONS**

Within this document:

**'Safeguarding'** is defined in the Children Act 2004 as protecting from maltreatment; preventing impairment of health and development; ensuring that children grow up with the provision of safe and effective care; and work in a way that gives the best life chances and transition to adult hood. Our safeguarding practice applies to every child.

The term **Staff** applies to all those working for or on behalf of FSM, full time or part time, including Peripatetic and support staff in either a paid or voluntary capacity. This also includes parents and Governors.

**Child** refers to all young people who have not yet reached their 18 birthday. On the whole, this will apply to pupils of our school; however, the policy will extend to visiting children and students from other establishments.

**Parent** refers to birth parents and other adults in a parenting role for example: adoptive parents, guardians, step parents and foster carers.

## KEY PERSONNEL

The Designated Safeguarding Lead (DSL) for FSM is Judy Cochand (Deputy Head). The Deputy Designated Safeguarding Leads (DDSLs) are Tracy Spottiswood (Head of Lower School), Robina Upton and Jody Wells (Headmaster).

### AIMS

- To provide Staff with the framework to promote and safeguard the wellbeing of children and in doing so ensure they meet their statutory responsibilities.
- To ensure consistent good practice across the school.
- To demonstrate our commitment to protecting children.

## PRINCIPLES AND VALUES

Safeguarding is everyone's responsibility. As such it does not rest with the Designated Safeguarding Lead (DSL) and their deputies to take a lead and/or responsibility in all of the areas covered within this policy. If staff have any concerns about a child's welfare, they should act upon them **immediately**. They should also inform the DSL or one of the deputy DSLs.

Some areas, such as Health and Safety, are a specialist area of safeguarding and Charlie Inigo-Jones, School Bursar takes the lead on these.

Safeguarding processes are intended to put in place measures that minimise harm to children. There will be situations where gaps or deficiencies in the policies and processes we have in place will be highlighted. In these situations a review will be carried out in order to identify learning and inform the policy, practice and culture of the school.

All pupils at FSM are encouraged to talk to any member of staff to share concerns or talk about situations which are giving them worries. The staff will listen to the pupil, take their worries seriously and share the information with the safeguarding lead. In addition, we provide pupils with information of who they can talk to outside of FSM both within the community and with local or national organisations who can provide support or help.

## **TRANSPARENCY**

FSM prides itself on its respect and mutual tolerance. Parents/guardians have an important role in supporting FSM. Copies of this policy, together with our other policies relating to issues of safeguarding are on our website and we hope that parents and guardians will always feel able to take up any issues or worries that they may have with the school. Allegations of child abuse or concerns about the welfare of any child will be dealt with consistently in accordance with our Child Protection policy. Open communication is essential.

<b>Approved by Headmaster:</b>	<b>June 2019 (in line with KCSiE 2019)</b>
<b>Approved by Governors:</b>	<b>June 2019</b>
<b>Next Review Date:</b>	<b>May 2020</b>

## **PART 1 – HIGH RISK AND EMERGING SAFEGUARDING ISSUES**

### **Contextual Safeguarding**

In KCSiE 2019 the DfE refer to contextual safeguarding.

Safeguarding incidents and/or behaviours can be associated with factors outside the school or college and/or can occur between children outside the school or college. All staff, but especially the designated safeguarding lead (and deputies) should be considering the context within which such incidents and/or behaviours occur. This is known as contextual safeguarding, which simply means assessments of children should consider whether wider environmental factors are present in a child's life that are a threat to their safety and/or welfare. Children's social care assessments should consider such factors, so it is important that schools and colleges provide as much information as possible as part of the referral process. This will allow any assessment to consider all the available evidence and the full context of any abuse.

FSM, will consider the various factors that have an interplay with the life of any pupil about whom we have concerns within the school and the level of influence that these factors have on their ability to be protected and remain free from harm particularly when it comes to child exploitation or criminal activity.

While this term applies to this specific definition, the notion of considering a child within a specific context is also important. What life is like for a child outside the school gates, within the home, within the family and within the community are key considerations when the DSL is looking at any concerns.

### **PREVENTING RADICALISATION AND EXTREMISM**

The Prevent Duty requires that all staff are aware of the signs that a child may be vulnerable to extremist ideology and radicalisation. The risks will need to be considered for political; sexuality, environmental; animal rights; or faith based extremism that may lead to a child becoming radicalised. All staff have received Prevent WRAP training and all SLT and Governors have undertaken e-learning 'Channel' awareness training in order that they can identify the signs of children being radicalised.

Protecting children from the risk of radicalisation should be seen as part of FSM's wider safeguarding duties, and is similar in nature to protecting children from other forms of harm and abuse. As with managing other safeguarding risks, staff should be alert to changes in children's behaviour which could indicate that they may be in need of help or protection. As part of the preventative process, resilience to radicalisation will be built through the promotion of fundamental British values through the curriculum.

Any child who is considered vulnerable to radicalisation will be referred by the DSL to Hampshire children's social care, where the concerns will be considered in the MASH process. If the police Prevent officer considers the information to be indicating a level of risk a "channel panel" will be convened and FSM will attend and support this process.

*See Preventing Radicalisation Policy.*

## **GENDER BASED VIOLENCE/VIOLENCE AGAINST WOMEN AND GIRLS**

The UK government has a strategy concerning specific issues that women and girls face. Within the context of this safeguarding policy the following sections are how we respond to violence against girls. Female genital mutilation, forced marriage, honour based violence and teenage relationship abuse all fall under this strategy.

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

FGM comprises all procedures involving partial or total removal of the external female genitalia or other injury to the female genital organs for non-medical reasons. It has no health benefits and harms girls and women in many ways. It involves removing and damaging healthy and normal female genital tissue, and hence interferes with the natural function of girls' and women's bodies.

The age at which girls undergo FGM varies enormously according to the community. **The procedure may be carried out when the girl is new-born, during childhood or adolescence, just before marriage or during the first pregnancy.** However, the majority of cases of FGM are thought to take place between the ages of 5 and 8 and therefore girls within this age bracket are at a higher risk.

FGM is illegal in the UK.

There is **a statutory duty upon teachers to report to the police** where they discover (either through disclosure by the victim or visual evidence) that FGM appears to have been carried out on a girl under 18. In these situations, the DSL should be informed and the member of teaching staff **MUST** call the police to report suspicion that FGM has happened. It will be rare for teachers to see visual evidence. **At no time will staff examine pupils to confirm this.** Those failing to report such cases will face disciplinary sanctions.

For cases where it is believed that a girl may be vulnerable to FGM or there is a concern that she may be about to be genitally mutilated the staff will inform the DSL who will report it as with any other child protection concern.

While FGM has a specific definition, there are other abusive cultural practices which can be considered harmful to women and girls. Breast ironing is one of five UN defined 'forgotten crimes against women'. It is a practice whereby the breasts of girls typically aged 8-16 are pounded using tools such as spatulas, grinding stones, hot stones, and hammers to delay the appearance of puberty. This practice is considered to be abusive and should be referred to children's social care.

### **Indicators that a girl may be at risk of Female Genital Mutilation (FGM)**

- Victims of FGM are likely to come from a community that is known to practise FGM. See section 2.5 of *Multi-Agency Practice Guidelines*.
- The position of the family and the level of integration within UK society – it is believed that communities less integrated into British society are more likely to carry out FGM.



- Any girl born to a woman who has been subjected to FGM must be considered to be at risk of FGM, as must other female children in the extended family.
- Any girl who has a sister who has already undergone FGM must be considered to be at risk of FGM, as must other female children in the extended family.
- Any girl withdrawn from PSHCEE may be at risk as a result of her parents wishing to keep her uninformed about her body and rights.
- Girls of school age who are subjected to FGM overseas are thought to be taken abroad at the start of the school holidays, particularly in the summer holidays.
- A professional may hear reference to FGM in conversation, for example a girl may tell other children about it.
- A girl may confide that she is to have a 'special procedure' or to attend a special occasion to 'become a woman.'
- Parents state that they or a relative will take the child out of the country for a prolonged period.
- A girl may talk about a long holiday to her country of origin or another country where the practice is prevalent.
- Parents seeking to withdraw their children from learning about FGM.

**There are a number of indications that a girl or woman has already been subjected to FGM:**

- A girl may have difficulty walking, sitting or standing and may even look uncomfortable.
- A girl may spend longer than normal in the bathroom or toilet due to difficulties urinating. A girl may spend long periods of time away from a classroom during the day with bladder or menstrual problems.
- A girl may have frequent urinary, menstrual or stomach problems.
- There may be prolonged or repeated absences from school
- A prolonged absence from school with noticeable behaviour changes (e.g. withdrawal or depression) on the girl's return could be an indication that a girl has recently undergone FGM.
- A girl may be particularly reluctant to undergo normal medical examinations.
- A girl may confide in a professional.
- A girl may ask for help, but may not be explicit about the problem due to embarrassment or fear.
- A girl may talk about pain or discomfort between her legs.

**It is important that professionals look out for signs that FGM has already taken place so that:**

- The girl affected can be supported to deal with the consequences of FGM.
- Enquiries can be made about other female family members who may need to be safeguarded from harm.
- Criminal investigations into the perpetrators, including those who carry out the procedure, can be considered to prosecute those breaking the law and to protect others from harm.

## **Forced Marriage**

In the case of children: *'a forced marriage is a marriage in which one or both spouses cannot consent to the marriage and duress is involved. Duress can include physical, psychological, financial, sexual and emotional pressure.'*

It is important that all members of staff recognise the presenting symptoms, how to respond if there are concerns and where to turn for advice.

Advice and help can be obtained nationally through the Forced Marriage Unit and locally through the local police safeguarding team or children's social care. Policies and practices at FSM reflect the fact that while all members of staff, including teachers, have important responsibilities with regard to pupils who may be at risk of forced marriage, teachers and school leaders should not undertake roles in this regard that are most appropriately discharged by other children's services professionals such as police officers or social workers.

## **Characteristics that may indicate forced marriage**

While individual cases of forced marriage, and attempted forced marriage, are often very particular, they are likely to share a number of common and important characteristics, including:

- An extended absence from school, including truancy.
- A drop in performance or sudden signs of low motivation.
- Excessive parental restriction and control of movements.
- A history of siblings leaving education to marry early.
- Poor performance, parental control of income and students being allowed only limited career choices.
- Evidence of self-harm, treatment for depression, attempted suicide, social isolation, eating disorders or substance abuse.
- Evidence of family disputes/conflict, domestic violence/abuse or running away from home.

On their own, these characteristics may not indicate forced marriage. However, it is important to be satisfied that where these behaviours occur, they are not linked to forced marriage. It is also important to avoid making assumptions about an individual pupil's circumstances or act on the basis of stereotyping. For example, an extended holiday may be taken for entirely legitimate reasons and may not necessarily represent a pretext for forced marriage.

## **Honour Based Violence**

Honour based violence is a violent crime or incident which may have been committed to protect or defend the honour of the family or community. It is often linked to family or community members who believe someone has brought shame to their family or community by doing something that is not in keeping with their unwritten rule of conduct. For example, honour based violence might be committed against people who:

- Become involved with a boyfriend or girlfriend from a different culture or religion.

- Want to get out of an arranged marriage.
- Want to get out of a forced marriage.
- Wear clothes or take part in activities that might not be considered traditional within a particular culture.
- Convert to a different faith from the family.

Women and girls are the most common victims of honour-based violence, however, it can also affect men and boys. Crimes of 'honour' do not always include violence. Crimes committed in the name of 'honour' might include:

- Domestic abuse.
- Threats of violence.
- Sexual or psychological abuse.
- Forced marriage.
- Being held against your will or taken somewhere you don't want to go.
- Assault.

If staff believe that a pupil is at risk from honour-based violence the DSL will follow the usual safeguarding referral process, however, if it is clear that a crime has been committed or the pupil is at immediate risk the police will be contacted in the first place. It is important that if honour-based violence is known or suspected that communities and family members are NOT spoken to, prior to referral to the police or social care as this could increase risk to the child.

### **Teenage Relationship Abuse**

Research has shown that teenagers do not understand what constitutes abusive behaviour such as controlling behaviour, which could escalate to physical abuse, e.g. checking someone's phone, telling them what to wear, who they can/can't see or speak to and that this abuse was prevalent within teen relationships. Further research showed that teenagers didn't understand what consent meant within their relationships. They often held the common misconception that rape could only be committed by a stranger down a dark alley and didn't understand that it could happen within their own relationships.

This led to these abusive behaviour feeling 'normal' and therefore left unchallenged as they were not recognised as being abusive.

In response to this FSM will provide education through our 'Life skills' programme to prevent teenagers from becoming victims and perpetrators of abusive relationships by encouraging them to rethink their views of violence, abuse and controlling behaviours, and understand what consent means within their relationships.

### **Sexual Violence and Sexual Harassment between Children**

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

Within our school all staff are made aware of what sexual violence and sexual harassment might look like and what to do if they have a concern or receive a report. Whilst any report of sexual violence or sexual harassment should be taken seriously, staff are aware it is more likely that girls will be the victims of sexual violence and sexual harassment and more likely it will be perpetrated by boys.

As a school we are clear that sexual violence and sexual harassment is not acceptable, will never be tolerated and is not an inevitable part of growing up. It cannot be described as 'banter', 'having a laugh' or 'boys being boys'.

We will also take seriously any sharing of sexual images (photos, pictures or drawings) and videos; sexual jokes, comments or taunting either in person or on social media; or on-line sexual harassment.

Within FSM's Child Protection policy, there is a clear procedure for how we deal with situations where sexual assaults or behaviour considered criminal between children has taken place.

As a school we will follow the "*Sexual violence and sexual harassment between children in schools and colleges*" advice provided by the DfE

We will challenge all contact behaviours that have a sexual nature to them such as pushing or rubbing against, grabbing bottoms, breasts or genitals, pinching or flicking bras, lifting skirts or pulling down trousers and impose appropriate levels of disciplinary action, to be clear that these behaviours are not tolerated or acceptable.

See also *Peer on peer abuse & Harmful sexual behaviours (Annex 10)* within Child Protection Policy)

## **THE TRIGGER TRIO**

The term 'Trigger Trio' has been used to describe the issues of domestic violence, mental ill-health and substance misuse which have been identified as common features of families where harm to women and children has occurred.

They are viewed as indicators of increased risk of harm to children and young people. In a review of Serious Case Reviews undertaken by Ofsted, they found that in nearly 75% of these cases two or more of the issues were present.

## **Domestic Abuse**

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

- Psychological.
- Physical.
- Sexual.
- Financial.
- Emotional.

Controlling behaviour is a range of acts designed to make a person subordinate and/or dependent by isolating them from sources of support, exploiting their resources and capacities for personal gain, depriving them of the means needed for independence, resistance and escape and regulating their everyday behaviour. Coercive behaviour is an act or a pattern of acts of assault, threats, humiliation and intimidation or other abuse that is used to harm, punish, or frighten their victim. In situations of domestic abuse, both males and females can be abused or be abusers. Domestic abuse can happen in any relationship regardless of age, sexuality, gender identity, race or religious identity.

Research indicates that living within a home where domestic abuse takes place is harmful to children and can have a serious, long lasting emotional and psychological impact on their behaviour, wellbeing and understanding of what a normal relationship is.

Children witnessing domestic abuse is recognised as 'significant harm' in law. These children may become aggressive, display anti-social behaviours, suffer from depression or anxiety or fail to reach their educational potential.

It can be difficult to tell if domestic abuse is happening, because it usually takes place in the family home and abusers can act very differently when other people are around. Indicators that a child is living within a relationship with domestic abuse include:

- being withdrawn
- suddenly behaving differently
- anxiety
- being clingy
- depression
- aggression
- problems sleeping
- eating disorders
- bed wetting
- soiling clothes
- excessive risk taking
- missing school
- changes in eating habits
- obsessive behaviour
- experiencing nightmares
- taking drugs
- use of alcohol
- self-harm
- thoughts about suicide

These behaviours themselves do not indicate that a child is living with domestic abuse, but should be considered as indicators that this may be the case.

If staff believe that a child is living with domestic abuse, this will be reported to the DSL for referral to be considered to children's social care.

## **Parental Mental Health**

The term "mental ill health" is used to cover a wide range of conditions, from eating disorders, mild depression and anxiety to psychotic illnesses such as schizophrenia or bipolar disorder. Parental mental illness does not necessarily have an adverse impact on a child's developmental needs, but it is essential to always assess its implications for each child in the family. It is essential that the diagnosis of a parent/carer's mental health is not seen as defining the level of risk. Similarly, the absence of a diagnosis does not equate to there being little or no risk.

For children the impact of parental mental health can include:

- The parent/carer's needs or illnesses taking precedence over the child's needs.
- Child's physical and emotional needs neglected.
- A child acting as a young carer for a parent or a sibling.
- Child having restricted social and recreational activities.
- Child finds it difficult to concentrate- impacting on educational achievement.
- A child missing school regularly as (s) he is being kept home as a companion for a parent/carer.
- Adopting paranoid or suspicious behaviour as they believe their parent's delusions.
- Witnessing self-harming behaviour and suicide attempts (including attempts that involve the child).
- Obsessional compulsive behaviours involving the child.

If staff become aware of any of the above indicators, or others that suggest a child is suffering due to parental mental health, the information will be shared with the DSL to consider a referral to children's social care.

## **Parental Substance Misuse**

Substance misuse applies to the misuse of alcohol as well as 'problem drug use', defined by the Advisory Council on the Misuse of Drugs as drug use which has: 'serious negative consequences of a physical, psychological, social and interpersonal, financial or legal nature for users and those around them.

Parental substance misuse of drugs or alcohol becomes relevant to child protection when substance misuse and personal circumstances indicate that their parenting capacity is likely to be seriously impaired or that undue caring responsibilities are likely to be falling on a child in the family.

For children the impact of parental substance misuse can include:

- Inadequate food, heat and clothing for children (family finances used to fund adult's dependency).
- Lack of engagement or interest from parents in their development, education or wellbeing.
- Behavioural difficulties- inappropriate display of sexual and/or aggressive behaviour.
- Bullying (including due to poor physical appearance).

- Isolation – finding it hard to socialise, make friends or invite them home.
- Tiredness or lack of concentration.
- Child talking of or bringing into school drugs or related paraphernalia.
- Injuries/accidents (due to inadequate adult supervision).
- Taking on a caring role.
- Continued poor academic performance including difficulties completing homework on time.
- Poor attendance or late arrival.

These behaviours themselves do not indicate that a child's parent is misusing substances, but should be considered as indicators that this may be the case.

If staff believe that a child is living with parental substance misuse, this will be reported to the DSL for referral to be considered for children's social care.

## **Missing, Exploited and Trafficked Children (MET)**

Within Hampshire, the acronym MET is used to identify all children who are missing; believed to be at risk of or being exploited; or who are at risk of or are being trafficked. Given the close links between all of these issues, there has been a considered response to join all three issues so that cross over of risk is not missed.

### **Children Missing from Education**

All children, regardless of their circumstances, are entitled to a full-time education which is suitable to their age, ability, aptitude and any special educational needs they may have. We have a duty to establish, as far as it is possible to do so, the identity of children of compulsory school age who are missing education.

Patterns of children missing education can be an indicator of either abuse or safeguarding risks. A relatively short length of time a child is missing does not reduce risk of harm to that child, and all absence or non-attendance should be considered with other known factors or concerns.

DSL/DDSLs and staff should consider:

**Missing lessons:** Are there patterns in the lessons that are being missed? Is this more than avoidance of a subject or a teacher? Does the child remain on the FSM site or are they absent from the site?

- Is the child being exploited during this time?
- Are they late because of a caring responsibility?
- Have they been directly or indirectly affected by substance misuse?
- Are other pupils routinely missing the same lessons, and does this raise other risks or concerns?
- Is the lesson being missed one that would cause bruising or injuries to become visible?

**Single missing days:** Is there a pattern in the day missed? Is it before or after the weekend suggesting the child is away from the area? Are there specific lessons or members of staff on these days? Is the parent informing FSM of the absence on the day?

- Are missing days reported back to parents to confirm their awareness?
- Is the child being exploited during this day?
- Do the parents appear to be aware and are they condoning the behaviour?
- Are the pupil's peers making comments or suggestions as to where the pupil is at?
- Can the parent be contacted and made aware?

**Continuous missing days:**

- Has FSM been able to make contact with the parent?
- Is medical evidence being provided?
- Are siblings attending school (either our or local schools)?
- Did we have any concerns about radicalisation, FGM, forced marriage, honour based violence, exploitation?
- Have we had any concerns about physical or sexual abuse?
- Does the parent have any known medical needs? Is the child safe?

FSM will view absence as both a safeguarding issue and an educational outcomes issue. FSM will inform the local authority of any pupil who fails to attend school regularly, or has been absent without the FSM's permission for a continuous period of 10 school days or more, at such intervals as are agreed between FSM and the local authority. FSM may take steps that could result in legal action for attendance, or a referral to children's social care, or both.

**Children Missing from Home or Care**

Children who run away from home or from care, provide a clear behavioural indication that they are either unhappy or do not feel safe in the place that they are living. Research shows that children run away from conflict or problems at home or school, neglect or abuse, or because children are being groomed by predatory individuals who seek to exploit them. Many run away on numerous occasions.

The Association of Chief Police Officers has provided the following definitions and guidance.

*"Missing person is: 'Anyone whose whereabouts cannot be established and where the circumstances are out of character or the context suggests the person may be the subject of crime or at risk of harm to themselves or another.'*

*An absent person is: 'A person not at a place where they are expected or required to be.'* All cases classified as 'missing' by the police will receive an active police response – such as deployment of police officers to locate a child. Cases where the child was classified as 'absent' will be recorded by the police and risk assessed regularly but no active response will be deployed. The absent case will be resolved when a young person returns or new information comes to light suggesting that he/she is at risk. In the latter instance, the case is upgraded to 'missing'.



Within any case of children who are missing both push and pull factors will need to be considered.

Push factors include:

- Conflict with parents/carers.
- Feeling powerless.
- Being bullied/abused.
- Being unhappy/not being listened to.
- The Toxic Trio.

Pull factors include:

- Wanting to be with family/friends.
- Drugs, money and any exchangeable item.
- Peer pressure.
- For those who have been trafficked into the United Kingdom as unaccompanied asylum seeking children there will be pressure to make contact with their trafficker.

FSM will inform all parents of children who are absent (unless the parent has informed us). If the parent is also unaware of the location of their child, and the definition of missing is met, we will either support the parent to/directly contact the police to inform them.

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

Child sexual exploitation is a form of child sexual abuse. It occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or young person under the age of 18 into sexual activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial advantage or increased status of the perpetrator or facilitator. Young people may be tricked into believing they are in a loving, consensual relationship. They often trust their abuser and don't understand that they're being abused. They may depend on their abuser or be too scared to tell anyone what's happening. They might be invited to parties and given drugs and alcohol before being sexually exploited. They can also be groomed and exploited online.

The something can include food, accommodation, drugs, alcohol, cigarettes, affection, gifts, status, protection or money.

Child sexual exploitation can happen via technology without the child being aware; for example, being persuaded to post sexual images on the Internet/mobile phones without immediate payment or gain.

In all cases, those exploiting the child/young person have power over them by virtue of their age, gender, intellect, physical strength and/or economic or other resources. Violence, coercion and intimidation are common, involvement in exploitative relationships being characterised in the main by the child or young person's limited availability of choice resulting from their social/economic and/or emotional vulnerability.

Sexual exploitation can be very difficult to identify. Warning signs can easily be mistaken for 'normal' teenage behaviour.

Indicators a child may be at risk of CSE include:

- Going missing for periods of time or regularly coming home late.
- Regularly missing school or education or not taking part in education.
- Appearing with unexplained gifts or new possessions such as clothes or mobile phones.
- Associating with other young people involved in exploitation.
- Relationships with controlling or significantly older individuals or groups.
- Mood swings or changes in emotional wellbeing.
- Drug and alcohol misuse.
- Gang association and/or isolation from peers/social networks.
- Excessive receipt of texts/phone calls.
- Concerning use of internet or other social media.
- Increasing secretiveness around behaviours.
- Self-harm or significant changes in emotional well-being
- Be involved in petty crime such as shoplifting
- Inappropriate sexualised behaviour for age or suffering from sexually transmitted infections or become pregnant.
- Frequenting areas known for sex work.

However, it is also important to recognise that some young people who are being sexually exploited do not exhibit any external signs of this abuse. CSE can happen to a child of any age, gender, ability or social status. Often the victim of CSE is not aware that they are being exploited and do not see themselves as a victim. **Staff should not rely on 'checklists' alone but should make a holistic assessment of vulnerability, examining risk and protective factors as set out in the statutory guidance *Working Together*.**

As a school we educate all staff in the signs and indicators of sexual exploitation. We use the sexual exploitation risk assessment form (SERAF) to identify pupils who are at risk and the DSL will share this information as appropriate with children's social care.

We recognise that we may have information or intelligence that could be used to both protect children and prevent risk. Any relevant information that we have will be shared on the *community partnership information (CPI) form [Annex 1]*

### **Child criminal exploitation: county lines**

Child Criminal Exploitation is defined as: *'where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child or young person under the age of 18 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 threat of violence. The victim may have been*

*criminally exploited even if the activity appears consensual. Child Criminal Exploitation does not always involve physical contact, it can occur through the use of technology'*

The exploitation of children and young people for crime is not a new phenomenon as evidenced by Fagan's gang in Charles Dickens book, Oliver Twist. Children under the age of criminal responsibility, or young people who have increased vulnerability due to push/pull factors who are manipulated, coerced or forced into criminal activity provide opportunity for criminals to distance themselves from crime.

A current trend in criminal exploitation of children and young people are 'County Lines' which refer to a 'phone line through which drug deals can be made'. An order is placed on the number and typically a young person will deliver the drugs to the specified address and collect the money for the deal. These lines are owned and managed by organised crime gangs, often from larger cities, who are expanding their markets into rural areas.

Indicators that a child may be criminally exploited include:

- Increase in **Missing episodes** – particular key as children can be missing for days and drug run in other Counties
- Having unexplained amounts of money, **new high cost items** and multiple mobile phones
- Increased social media and phone/text use, almost always secretly
- **Older males** in particular seen to be hanging around and driving
- Having injuries that are unexplained and unwilling to be looked at
- Increase in **aggression, violence and fighting**
- Carrying **weapons** – knives, baseball bats, hammers, acid
- Travel receipts that are unexplained
- **Significant missing** from education and disengaging from previous positive peer groups
- Parent concerns and significant changes in behaviour that affect emotional wellbeing

We will treat any child who may be criminally exploited as a victim in the first instance and refer to children's social care in the first instance. If a referral to the police is also required as crimes have been committed on the school premises, these will also be made.

### **Trafficked Children**

Human trafficking is defined by the UNHCR in respect of children as a process that is a combination of:

- Movement (including within the UK).
- Control, through harm / threat of harm or fraud
- For the purpose of exploitation.

Any child transported for exploitative reasons is considered to be a trafficking victim. There is significant evidence that children (both of UK and other citizenship) are being trafficked internally within the UK and this is regarded as a more common form of trafficking in the UK.

There are a number of indicators which suggest that a child may have been trafficked into the UK, and may still be controlled by the traffickers or receiving adults. These are as follows:

- Shows signs of physical or sexual abuse, and/or has contracted a sexually transmitted infection or has an unwanted pregnancy.
- Has a history with missing links and unexplained moves.
- Is required to earn a minimum amount of money every day.
- Works in various locations.
- Has limited freedom of movement.
- Appears to be missing for periods.
- Is known to beg for money.
- Is being cared for by adult/s who are not their parents and the quality of the relationship between the child and their adult carers is not good.
- Is one among a number of unrelated children found at one address
- Has not been registered with or attended a GP practice.
- Is excessively afraid of being deported.

For those children who are internally trafficked within the UK indicators include:

- Physical symptoms (bruising indicating either physical or sexual assault).
- Prevalence of a sexually transmitted infection or unwanted pregnancy.
- Reports from reliable sources suggesting the likelihood of involvement in sexual exploitation/the child has been seen in places known to be used for sexual exploitation.
- Evidence of drug, alcohol or substance misuse.
- Being in the community in clothing unusual for a child i.e. inappropriate for age, or borrowing clothing from older people.
- Relationship with a significantly older partner.
- Accounts of social activities, expensive clothes, mobile phones or other possessions with no plausible explanation of the source of necessary funding.
- Persistently missing, staying out overnight or returning late with no plausible explanation.
- Returning after having been missing, looking well cared for despite having not been at home.
- Having keys to premises other than those known about.
- Low self- image, low self-esteem, self-harming behaviour including cutting, overdosing, eating disorder, promiscuity.
- Truancy / disengagement with education.
- Entering or leaving vehicles driven by unknown adults.
- Going missing and being found in areas where the child or young person has no known links.
- Possible inappropriate use of the internet and forming on-line relationships, particularly with adults.

These behaviours themselves do not indicate that a child is being trafficked, but should be considered as indicators that this may be the case. If staff believe that a child is being trafficked, this will be reported to the DSL for referral to be considered to children's social care.

## **TECHNOLOGIES**

Technological hardware and software is developing continuously with an increase in functionality of devices that people use. The majority of children use online tools to communicate with others locally, nationally and internationally. Access to the Internet and other tools that technology provides is an invaluable way of finding, sharing and communicating information. While technology itself is not harmful, it can be used by others to make children vulnerable and to abuse them. FSM will ensure appropriate filters and appropriate monitoring systems are in place whilst being careful that "over blocking" does not lead to unreasonable restrictions as to what children can be taught with regards to online teaching and safeguarding.

### **Online Safety & Social Media**

The use of technology has become a significant component of many safeguarding issues. Child sexual exploitation; radicalisation; unwanted contact, online bullying including sexting, sexual predation: technology often provides the platform that facilitates harm.

FSM will do all that it reasonably can to limit children's exposure to the above risks from its IT system through having appropriate filters and monitoring systems in place. There will also be regular reviews of our IT, e-safety and social media policies.

Staff also undergo regular e-safety training.

With the current speed of on-line change, some parents and carers have only a limited understanding of online risks and issues. Parents may underestimate how often their children come across potentially harmful and inappropriate material on the internet and may be unsure about how to respond.

FSM will therefore seek to provide information and awareness to both pupils and their parents through:

- Acceptable use agreements for children and teachers and governors.
- Curriculum activities involving raising awareness around staying safe online.
- Information included in letters, newsletters, website.
- Parents evenings/sessions.
- High profile events/campaigns e.g. Safer Internet Day.
- Building awareness around information that is held on relevant websites and/or publications.
- Social Media policy

See *E-safety Policy*, *Social Media Policy* and *e-safety Advice for Parents*

See *Online Safety Information and Support (Annex 7)*

## Cyberbullying

Central to the FSM's anti-bullying policy should be the principle that '*bullying is always unacceptable*' and that '*all pupils have a right not to be bullied*'. FSM will take note of bullying perpetrated outside school which spills over into the school and so we will respond to any cyber-bullying we become aware of carried out by pupils when they are away from the site.

Cyber-bullying is defined as "an aggressive, intentional act carried out by a group or individual using electronic forms of contact repeatedly over time against a victim who cannot easily defend himself/herself."

By cyber-bullying, we mean bullying by electronic media:

- Bullying by texts or messages or calls on mobile phones.
- The use of mobile phone cameras to cause distress, fear or humiliation.
- Posting threatening, abusive, defamatory or humiliating material on websites, to include blogs, personal websites, social networking sites.
- Using e-mail to message others.
- Hijacking/cloning e-mail accounts.
- Making threatening, abusive, defamatory or humiliating remarks in on-line forums.

Cyber-bullying may be at a level where it is criminal in character. It is unlawful to disseminate defamatory information in any media including internet sites.

Section 127 of the Communications Act 2003 makes it an offence to send, by public means of a public electronic communications network, a message or other matter that is grossly offensive or one of an indecent, obscene or menacing character.

The Protection from Harassment Act 1997 makes it an offence to knowingly pursue any course of conduct amounting to harassment.

If we become aware of any incidents of cyberbullying, we will need to consider each case individually as to any criminal act that may have been committed. FSM will pass on information to the police if it feels that it is appropriate or are required to do so.

## Youth Produced Sexual Imagery (YPSI) or Sexting and Upskirting

Youth Produced Sexual Imagery (YPSI) refers to the sharing of naked or 'nude' pictures or video through mobile phones and the internet. It also includes underwear shots and sexual poses. This is also often called 'Sexting' which might also include explicit text messaging.

This also includes **upskirting**, which typically involves taking a picture under a person's clothing without them knowing, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm;

While sexting often takes place in a consensual relationship between two young people, the use of Sexted images in revenge following a relationship breakdown is becoming more commonplace. Sexting and upskirting can also be used as a form of sexual exploitation and take place between strangers. Any situations involving children under 13 and youth produced sexual imagery must be taken seriously as potentially being indicative of a wider safeguarding or child protection concern or as being problematic sexual behaviour. All incidents of sexting will be dealt with as safeguarding concerns and should be passed to the DSL. The police and Children's Services will not however, always be involved. This will be decided on a case by case basis following review.

See *Annex 3: Sexting: Handling Incidents*

FSM will use age appropriate educational material to raise awareness and educate pupils to promote safety and deal with pressure of 'Sexting' and support pupils when incidents arise. This will be done through FSM's Life skills (PSHCEE) and ICT curriculum as well as additional coverage in assemblies and tutor based circle time and will include:

- What it is.
- How it is most likely to be encountered.
- The consequences of requesting, forwarding or providing such images, including when it is and is not abusive.
- Issues of legality.
- The risk of damage to people's feelings and reputation.
- Tools to ensure children have the strategies and skills required to manage:
  - Specific requests or pressure to provide (or forward) such images.
  - The receipt of such images.

This will include who to tell, what to say, what to do, what not to do and where to get support from within and outside of FSM.

See *Annex 4: Sexting: Further Resources*.

Parents should be aware that they can also come to the school for advice.

See also *e-safety Advice for parents*.

## **Gaming**

Online gaming is an activity in which the majority of children and many adults get involved. FSM will raise awareness:

- By talking to parents and carers about the games their children play and help them identify whether they are appropriate.
- By supporting parents in identifying the most effective way of safeguarding their children by using parental controls and child safety mode.
- By talking to parents about setting boundaries and time limits when games are played.
- By highlighting relevant resources.

## **Online reputation**

Online reputation is the opinion others get of a person when they encounter them online. It is formed by posts, photos that have been uploaded and comments made by others on people's profiles. It is important that children and staff are aware that anything that is posted could influence their future professional reputation. The majority of organizations and work establishments now check digital footprint before considering applications for positions or places on courses.

## **Grooming**

Online grooming is the process by which one person with an inappropriate sexual interest in children will approach a child online, with the intention of developing a relationship with that child, to be able to meet them in person and intentionally cause harm.

FSM will build awareness amongst children and parents about ensuring that the child:

- Only has friends online that they know in real life.
- Is aware that if they communicate with somebody that they have met online, that relationship should stay online.

Parents should:

- Recognise the signs of grooming.
- Have regular conversations with their children about online activity and how to stay safe online.

FSM will raise awareness by:

- Running cyberbullying sessions for parents.
- Include awareness around grooming as part of the school's curriculum.
- Identifying with both parents and children how they can be safeguarded against grooming.

See also *e-Safety, Cyberbullying and e-Safety advice for Parents*.



## **PART 2 – SAFEGUARDING ISSUES RELATING TO INDIVIDUAL PUPIL NEEDS**

### **Homelessness**

At FSM we recognise that being homeless or being at risk of becoming homeless presents a real risk to a child's welfare. The impact of losing a place of safety and security can affect a child's behaviour and attachments.

In line with the Homelessness Reduction Act 2017 this school will promote links into the Local Housing Authority for the parent or care giver in order to raise/progress concerns at the earliest opportunity.

We recognise that whilst referrals and/or discussion with the Local Housing Authority should be progressed as appropriate, this does not, and should not, replace a referral into children's social care where a child has been harmed or is at risk of harm

### **Special educational needs and disabilities**

Children who have special educational needs and/or disabilities can have additional vulnerabilities when recognising abuse and neglect. These can include:

- Assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's disability without further exploration;
- The potential for children with SEN and disabilities being disproportionately impacted by behaviours such as bullying, without outwardly showing any signs;
- Communication barriers and difficulties in overcoming these barriers.
- Have fewer outside contacts than other children;
- Receive intimate care from a considerable number of carers, which may increase the risk of exposure to abusive behaviour and make it more difficult to set and maintain physical boundaries;
- Have an impaired capacity to resist or avoid abuse;
- Have communication difficulties that may make it difficult to tell others what is happening;
- Be inhibited about complaining for fear of losing services;
- Be especially vulnerable to bullying and intimidation
- Be more vulnerable than other children to abuse by their peers.

As a school we will respond to this by:

- Make it common practice to enable **all** children to make their wishes and feelings known in respect of their care and treatment;
- Ensure that **all** children receive appropriate personal, health and social education (including sex education);
- Recognise and utilise key sources of support including staff in schools, friends and family members where appropriate;
- Develop the safe support services that families want, and a culture of openness and joint working with parents and carers on the part of services;
- Ensure that guidance on good practice is in place and being followed in relation to: intimate care, working with children of the opposite sex, managing behaviour that challenges families and services, issues around consent to treatment, anti-bullying and inclusion strategies and sexuality and safe sexual behaviour among the young.

### **Pupils with medical conditions (in school)**

There are separate policies outlining the school's position on this (see *Health and Welfare, Administration of Medication, Intimate Care, Asthma, Diabetes, and Epilepsy policies*). As a school we will make sure that sufficient staff are trained to support any pupil with a medical condition. All relevant staff will be made aware of the condition to support the child and be aware of medical needs and risks to the child. An individual healthcare plan may be put in place to support the child and their medical needs.

### **Pupils with medical conditions (out of school)**

There will be occasions when children are temporarily unable to attend FSM on a full time basis because of their medical needs. These children and young people are likely to be:

- Children and young people suffering from long-term illnesses.
- Children and young people with long-term post-operative or post-injury recovery periods.
- Children and young people with long-term mental health problems (emotionally vulnerable).

Where it is clear that an absence will be for more than 15 continuous school days the Education and Inclusion Service will be contacted to support with the pupil's education.

### **Intimate care**

See *Intimate Care Policy* and *Lower School Application of Sun cream Policy*

### **Fabricated or induced illness**

There are three main ways that a carer could fabricate or induce illness in a child. These are not mutually exclusive and include:

- Fabrication of signs and symptoms. This may include fabrication of past medical history.
- Fabrication of signs and symptoms and falsification of hospital charts and records, and specimens of bodily fluids. This may also include falsification of letters and documents.
- Induction of illness by a variety of means.

If we are concerned that a child may be suffering from fabricated or induced illness we will follow the established procedures of the Hampshire Safeguarding Children Board.

### **Mental Health**

Form tutors and class teachers see their pupils day in, day out. They know them well and are well placed to spot changes in behaviour that might indicate an emerging problem with the mental health and emotional wellbeing of pupils.

The balance between the risk and protective factors is most likely to be disrupted when difficult events happen in pupils' lives. These include:

- **Loss or separation** – resulting from death of a relative, parental separation, divorce, hospitalisation, loss of friendships (especially in adolescence), family conflict or breakdown that results in the child having to live elsewhere, being taken into care or adopted.
- **Life changes** – such as the birth of a sibling, moving house or changing schools or during transition from primary to secondary school.
- **Traumatic events** such as abuse, domestic violence, bullying, violence, accidents, injuries or natural disaster.

When concerns are identified, staff will provide opportunities for the child to talk or receive support within the school environment. Parents will be informed of the concerns and a shared way to support the child will be discussed. Where the needs require additional professional support referrals will be made to the appropriate team or service with the parent's agreement (or child's if they are competent as per Fraser guidelines).

*See Mental Health and Wellbeing Policy*

## **PART 3 – OTHER SAFEGUARDING ISSUES IMPACTING PUPILS**

There will be other circumstances, not amounting to abuse, which give cause for serious concern about the welfare of pupils. Questions of the young person being in mortal danger, being uncared for, engaging in antisocial or inappropriate behaviour and so on may be referred to the DSL, and as necessary, to Children's Social Care. Such cases may also be referred to Fordingbridge Surgery and through them to Children's Social Care. In each case the DSL should be informed.

### **Bullying**

See *Anti-bullying, Cyber bullying and Behaviour and Disciplinary Policies*.

### **Prejudice Based Abuse**

Prejudice based abuse or hate crime is any criminal offence which is perceived by the victim or any other person to be motivated by a hostility or prejudice based on a person's real or perceived:

- Disability.
- Race.
- Religion.
- Gender identity.
- Sexual orientation.

Although this sort of crime is collectively known as 'Hate Crime' the offender doesn't have to go as far as being motivated by 'hate', they only have to exhibit 'hostility'.

This can be evidenced by:

- Threatened or actual physical assault.
- Derogatory name calling, insults, for example racist jokes or homophobic language.
- Hate graffiti (e.g. on school furniture, walls or books).
- Provocative behaviour e.g. wearing of badges or symbols belonging to known right wing, or extremist organisations.
- Distributing literature that may be offensive in relation to a protected characteristic.
- Verbal abuse.
- Inciting hatred or bullying against pupils who share a protected characteristic.
- Prejudiced or hostile comments in the course of discussions within lessons.
- Teasing in relation to any protected characteristic e.g. sexuality, language, religion or cultural background.
- Refusal to co-operate with others because of their protected characteristic, whether real or perceived.
- Expressions of prejudice calculated to offend or influence the behaviour of others.
- Attempts to recruit other pupils to organisations and groups that sanction violence, terrorism or hatred.

At FSM we will respond by:

- Clearly identifying prejudice based incidents and hate crimes and monitor the frequency and nature of them within FSM.
- Taking preventative action to reduce the likelihood of such incidents occurring.
- Recognising the wider implications of such incidents for FSM and local community.
- Providing regular reports of these incidents to the Governing Body.
- Ensuring that staff are familiar with formal procedures for recording and dealing with prejudice based incidents and hate crimes.
- Dealing with perpetrators of prejudice based abuse effectively.
- Supporting victims of prejudice based incidents and hate crimes.
- Ensuring that staff are familiar with a range of restorative practices to address bullying and prevent it happening again.

### **Drugs and substance misuse**

See *Responses to Alcohol Smoking and Substance Abuse policy*

### **Faith Abuse**

The number of known cases of child abuse linked to accusations of “possession” or “witchcraft” is small, but children involved can suffer damage to their physical and mental health, their capacity to learn, their ability to form relationships and to their self-esteem. Such abuse generally occurs when a carer views a child as being “different”, attributes this difference to the child being “possessed” or involved in “witchcraft” and attempts to exorcise him or her. A child could be viewed as “different” for a variety of reasons such as, disobedience, independence, bed-wetting, nightmares, illness or disability. There is often a weak bond of attachment between the carer and the child. There are various social reasons that make a child more vulnerable to an accusation of “possession” or “witchcraft”. These include family stress and/or a change in the family structure.

The attempt to “exorcise” may involve severe beating, burning, starvation, cutting or stabbing and isolation, and usually occurs in the household where the child lives.

If FSM becomes aware of a child who is being abused in this context, the DSL will follow the normal referral route into children’s social care.

### **Gangs and Youth Violence**

The vast majority of young people will not be affected by serious violence or gangs. However, where these problems do occur, even at low levels there will almost certainly be a significant impact.

As a school we have a duty and a responsibility to protect our pupils. It is also well established that success in learning is one of the most powerful indicators in the prevention of youth crime. Dealing with violence also helps attainment. While pupils generally see educational establishments as safe places, even low levels of youth violence can have a disproportionate impact on any education.

Primary schools are also increasingly recognised as places where early warning signs that younger children may be at risk of getting involved in gangs can be spotted. Crucial preventive work can be done within school to prevent negative behaviour from escalating and becoming entrenched.

As a school we will:

- Develop skills and knowledge to resolve conflict as part of the curriculum.
- Challenge aggressive behaviour in ways that prevent the recurrence of such behaviour.
- Understand risks for specific groups, including those that are gender-based, and target interventions.
- Safeguard, and specifically organise child protection, when needed.
- Make referrals to appropriate external agencies.
- Carefully manage individual transitions between educational establishments, especially into Pupil Referral Units (PRUs) or alternative provision.
- Work with local partners to prevent anti-social behaviour or crime.

### **Serious Violent Crime**

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.

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

### **Looked after children and previously looked after children**

The most common reason for children becoming 'looked after' is as a result of abuse and/or neglect.

FSM will ensure that appropriate staff have the information they need in relation to a child's looked after legal status (whether they are looked after under voluntary arrangements with consent of parents or on an interim or full care order) and contact arrangements with birth parents or those with parental responsibility. They should also have information about the child's care arrangements and the levels of authority delegated to the carer by the authority looking after him/her. The designated safeguarding lead should have details of the child's social worker and the name of the virtual school head in the authority that looks after the child. A previously looked after child potentially remains vulnerable and all staff should have the skills, knowledge and understanding to keep previously looked after children safe. When dealing with looked after children and previously looked after children, it is important that all agencies work together and prompt

action is taken when necessary to safeguard these children, who are a particularly vulnerable group.

FSM will work with local authorities to promote the educational achievement of a registered pupil who is looked after.

### **Private fostering**

Private fostering is an arrangement by a child's parents for their child (under 16 or 18 if disabled) to be cared for by another adult who is not closely related and is not a legal guardian with parental responsibility for 28 days or more. It is not private fostering if the carer is a close relative to the child such as grandparent, brother, sister, uncle or aunt.

The Law requires that the carers and parents must notify the children's services department of any private fostering arrangement.

If FSM becomes aware that a pupil is being privately fostered we will inform the children's services department and inform both the parents and carers that we have done so.

### **Children and the court system**

Children are sometimes required to give evidence in criminal courts, either for crimes committed against them or for crimes they have witnessed. We know that this can be a stressful experience and therefore the school will aim to support children through this process.

Along with pastoral support, the school will use age-appropriate materials published by HM Courts and Tribunals Services (2017) that explain to children what it means to be a witness, how to give evidence and the help they can access.

We recognise that making child arrangements via the family courts following separation can be stressful and entrench conflict in families. This can be stressful for children. This school will support children going through this process.

Alongside pastoral support this school will use online materials published by The Ministry of Justice (2018) which offers children information & advice on the dispute resolution service.

These materials will also be offered to parents and carers if appropriate.

### **Children with family members in prison**

Children who have a family member in prison are at greater risk of poor outcomes including poverty, stigma, isolation and poor mental health.

This school aims to:-

- Understand and Respect the Child's Wishes  
We will respect the child's wishes about sharing information. If other children become aware the school will be vigilante to potential bullying or harassment
- Keep as Much Contact as Possible with the Parent and Caregiver

We will maintain good links with the remaining caregiver in order to foresee and manage any developing problems. Following discussions we will develop appropriate systems for keeping the imprisoned caregiver updates about their child's education.

- Be Sensitive in Lessons

This school will consider the needs of any child with an imprisoned parent during lesson planning.

- Provide Extra Support

We recognise that having a parent in prison can attach a real stigma to a child, particularly if the crime is known and particularly serious. We will provide support and mentoring to help a child work through their feelings on the issue.

Alongside pastoral care the school will use the resources provided by the National Information Centre on Children of Offender in order to support and mentor children in these circumstances.

See *KCSiE 2018 (Annex A)*

## **Parenting**

All parents will struggle with the behaviour of their child(ren) at some point. This does not make them poor parents or generate safeguarding concerns. Rather it makes them human and provides them with opportunities to learn and develop new skills and approaches to deal with their child(ren).

Some children have medical conditions and/or needs e.g. Tourette's, some autistic linked conditions, ADHD; that have a direct impact on behaviour and can cause challenges for parents in dealing with behaviours. This does not highlight poor parenting either.

Parenting becomes a safeguarding concern when the repeated lack of supervision, boundaries, basic care or medical treatment places the child(ren) in situations of risk or harm.

In situations where parents struggle with tasks such as setting boundaries and providing appropriate supervision, timely interventions can make drastic changes to the wellbeing and life experiences of the child(ren) without the requirement for a social work assessment or plan being in place.

At FSM we will support parents in understanding the parenting role and where appropriate provide them with strategies to make a difference by:

- providing details of community based parenting courses  
<http://www3.hants.gov.uk/childrens-services/familyinformationdirectory.htm>
- linking to web based parenting resources (for example  
<http://www.familylives.org.uk/>)
- referring to the school parenting worker/home school link worker (where available)



- discussing the issue with the parent and supporting them in making their own plans of how to respond differently (using evidence based parenting programmes)
- Considering appropriate early help services <http://www3.hants.gov.uk/childrens-services/childrens-trust/earlyhelp.htm>

## **PROMOTING AWARENESS**

FSM's curriculum and pastoral systems are designed to foster the spiritual, moral, social and cultural development of all our pupils. All teaching staff play a vital role in this process, helping to ensure that all pupils relate well to one another and feel safe and comfortable within the school. We expect all the teaching and medical staff to lead by example and to play a full part in promoting an awareness that is appropriate to their age amongst all our pupils on issues relating to health, safety and well-being. All staff, including all non-teaching staff, have an important role in insisting that pupils always adhere to the standards of behaviour set out in our Behaviour and Disciplinary policy and in enforcing our Anti-Bullying policy.

Time is allocated in PSHCEE and Circle time to discussions of what constitutes appropriate behaviour and on why bullying and lack of respect for others is never right, on assessing and managing risk, understanding their rights, appropriate forms of punishment and chastisement, the nature of different relationships with other people, managing pressure from peers and adults and what physical contact is acceptable and what is not. Assemblies, drama and RS lessons are used to promote tolerance and mutual respect and understanding.

All pupils know that there are adults to whom they can turn if they are worried, including the Independent Listener and the medical staff. If FSM has concerns about a child there is always a recognised requirement for sensitive communication and designated staff members are aware of the need to avoid asking leading questions. Our support to pupils includes the following:

- All pupils have access to a telephone helpline enabling them to call for support in private.
- Every classroom and public place has notices displayed informing pupils how to seek help and advice, including confidential telephone help lines and web addresses for external specialists such as Child Line, NSPCC and the Children's Commissioner.
- This information is also contained in the Journals all Year 5, 6, 7 and 8 pupils are given and the Boarders' Handbook that each new boarder receives on arrival at the school.
- Our boarding areas display advice on where pupils can seek help.
- We operate a peer mentoring scheme whereby trained older pupils are encouraged to support and offer advice to younger pupils.
- We provide leadership training to our head boys/girls and their team of prefects which specifically covers safeguarding issues and the importance of offering support and assistance to younger and to vulnerable pupils.

- We provide regular lessons to pupils on e-safety and ensure that all pupils understand and adhere to FSM's guidelines in this area. They are taught to identify the dangers and risks they may face on-line and how to deal with these issues if they arise. For more details on cyber-bullying please refer to FSM's anti-bullying policy and cyber bullying policies.

Our prefect system is regularly supervised by staff. They have been trained to ensure that they are suitable for their duties and do not abuse their roles, which are specified clearly in writing. In particular, prefects are given induction on appointment which includes how to contribute to FSM's anti-bullying practice, how to respond to allegations of serious bullying or abuse and how to act if they hear allegations of abuse.

*See Guidance for Pupils – Annex 2.*

## **PART 4 –SAFEGUARDING PROCESSES**

### **Safer Recruitment**

FSM operates a separate safer recruitment process; See *Safer Recruitment, Selection and Disclosures policy*.

FSM's SLT endeavours to ensure that we do our utmost to employ 'safe' staff by following the guidance in Safeguarding Children and Safer Recruitment in Education (pp20-55) together with KCSiE (2018), the local authority and FSM's individual procedures.

On all recruitment panels there is at least one member who has undertaken safer recruitment training. Safer recruitment means that all applicants will:

- Complete an application form.
- Provide two referees, including at least one who can comment on the applicant's experience, history and suitability to work with children.
- Provide evidence of identity and qualifications.
- Be checked through the Criminal Records Bureau (enhanced DBS).
- Be interviewed.

The process also checks:

- Mental and physical capacity.
- Right to work in the UK, as appropriate to their role and be registered with the Independent Safeguarding Authority (from 2010 onwards).

This also takes into account those disqualified from working in childcare, including disqualification by association.

### **Staff Induction**

The DSL or a DDSL will provide all new staff with training to enable them to both fulfil their safeguarding role and also to understand FSM's Safeguarding policy, the Child Protection policy, the Staff Code of Conduct, the Behaviour and Discipline Policy, the Anti Bullying Policy, E-Safety policy and part one and Part one and Annex A of Keeping Children Safe in Education (2019). This process will also identify staff members' own safeguarding and child protection training needs. All staff members sign to confirm they have received, read and understood these documents.

This induction may be covered within the annual training if this falls at the same time; otherwise it will be carried out separately during the initial starting period.

See *Staff Induction policy*.

### **Positions of Trust**

It is an offence for a person aged 18 or over to have a sexual relationship with a child under 18 where that person is in a position of trust in respect of that child, even if the relationship is consensual. As a result of their knowledge, position and/or the authority

invested in their role, all adults at FSM are in positions of trust in relation to the young people in our care. A relationship between a member of staff and a pupil cannot be a relationship between equals. There is potential for exploitation and harm of vulnerable young people and all members of staff have a responsibility to ensure that an unequal balance of power is not used for personal advantage or gratification.

Wherever possible, staff should avoid behaviour which might be misinterpreted by others, and report and record any incident with this potential.

### **Staff Code of Conduct**

Cordial relations between teaching staff and pupils are at the heart of a happy and thriving school. At the same time, in the interests of all parties, professional boundaries must be observed on all occasions. See *Staff Code of Conduct Policy*.

### **Staff: Child Ratios**

Staffing arrangements at FSM meet the needs of the children in our care and ensure their safety.

- In Nursery class there is one member of staff for every 8 children.
- In Reception class there is one member of staff for every 30 children (the size of Reception class is, however, limited to no more than 17).

See also *EYFS Supervision Policy*

### **Health and Safety**

The site, the equipment and the activities carried out as part of the curriculum are all required to comply with the Health and Safety at Work act 1974 and regulations made under the act.

All risks are required to be assessed and recorded plans of how to manage risks are in place. The plans should always take a common sense and proportionate approach to allow activities to be safe rather than preventing them from taking place. FSM has a Health and Safety policy which details the actions that we take in more detail.

See *Health and Safety and Risk Assessments policies*.

### **Site Security**

We aim to provide a secure site, but recognise that the site is only as secure as the people who use it. Therefore all people on the site have to adhere to the rules which govern it. These are:

- Doors are kept closed to prevent intrusion.
- Doors to the Main building are kept locked and are accessed by key code panels.
- Visitors and volunteers enter at the reception and must sign in.
- Visitors and volunteers are identified by (identity checks) and provided with 'Visitor Badges.'

- Visitors without visiting badges are to be investigated and escorted to Reception and signed in.
- Children are only allowed home during the school day with adults/carers with parental responsibility or permission being given.
- All children leaving or returning during the school day have to sign out and in.
- External doors of the Main building are secured further after 6.00pm.
- Boarding landing door alarms to be engaged after 9.15pm.

### **Off Site Visits**

A particular strand of health and safety is looking at risks when undertaking off site visits. Some activities, especially those happening away from FSM and residential visits, can involve higher levels of risk. If these are annual or infrequent activities, a review of an existing assessment may be all that is needed. If it is a new activity, a visit involving adventure activities, residential, overseas or an 'Open Country' visit, a specific assessment of significant risks must be carried out. This includes ensuring that the off-site providers have undertaken appropriate DBS checks for any staff that will have contact with pupils from FSM. The Bursar will support and help colleagues to manage risks and support with off site visits.

See also *Trips and Outings policy*.

### **First Aid**

See *First Aid policy*.

### **Physical Intervention (use of reasonable force)**

As a school we have a separate policy outlining how we will use physical intervention. See *Use of Reasonable Force policy*.

### **Taking and the use and storage of images**

As a school we will seek consent from the parent of a pupil and from teachers and other adults before taking and publishing photographs or videos that contain images that are sufficiently detailed to identify the individual in FSM publications, printed media or on electronic publications. We will not seek consent for photos where you would not be able to identify the individual.

We will maintain the use of such images until consent is withdrawn in writing.

Photographs should only be taken on school owned equipment and stored on the school network. In some cases, as the demand for social media recording increases, staff will need to use their own equipment for events when school equipment is not available. In these cases, staff must register these phones/cameras with the bursary, download the images immediately onto school equipment and delete the images immediately from their personal devices.

See *Taking, storing and using images of Children policy*

## **Transporting pupils**

On occasions parents and volunteers support with the task of transporting children to visits and off-site activities arranged by FSM. (This is in addition to any informal arrangements made directly between parents following school fixtures etc.)

In managing these arrangements FSM will put in place measures to ensure the safety and welfare of young people carried in parents' and volunteers' cars. This is based on guidance from the local authority and follows similar procedures for FSM staff using their cars on FSM business.

Where parents'/volunteers' cars are used on school activities FSM will notify parents/volunteers of their responsibilities for the safety of pupils, to maintain suitable insurance cover and to ensure their vehicle is roadworthy.

All parents/volunteers are therefore asked to complete and return the form attached as *Annex 6* to FSM before they offer to use their car to help with transporting pupils.

## **DISQUALIFICATION UNDER THE CHILDCARE ACT**

The Childcare Act of 2006 was put in place to prevent adults who have been cautioned or convicted of a number of specific offences from working within childcare. Previously this disqualification also extended to risk by association of anyone living within the same household and required us to carry out a self disclosure process with staff.

Staff (meaning individuals employed by FSM or local authority, those undertaking training in schools (both salaried and unsalaried), casual workers and volunteers) are covered by this legislation in the following circumstances:

- They are employed and/or provide early year's childcare (this covers the age range from birth until 1 September following a child's fifth birthday, i.e. up to and including reception age). This includes education in nursery and reception classes (e.g. teachers and support staff in a reception class) and/or any supervised activity (such as breakfast clubs, lunchtime supervision and after school care provided by FSM) both during and outside of school hours for children in the early year's age range.
- They work in childcare provided by FSM outside of school hours for children who are above reception age but who have not attained the age of 8. This includes before school settings, such as breakfast clubs, after school provision and holiday clubs. It does NOT include education or supervised activity for children above reception age during school hours including extended school hours for co-curricular learning activities, such as the school's choir or sports teams.

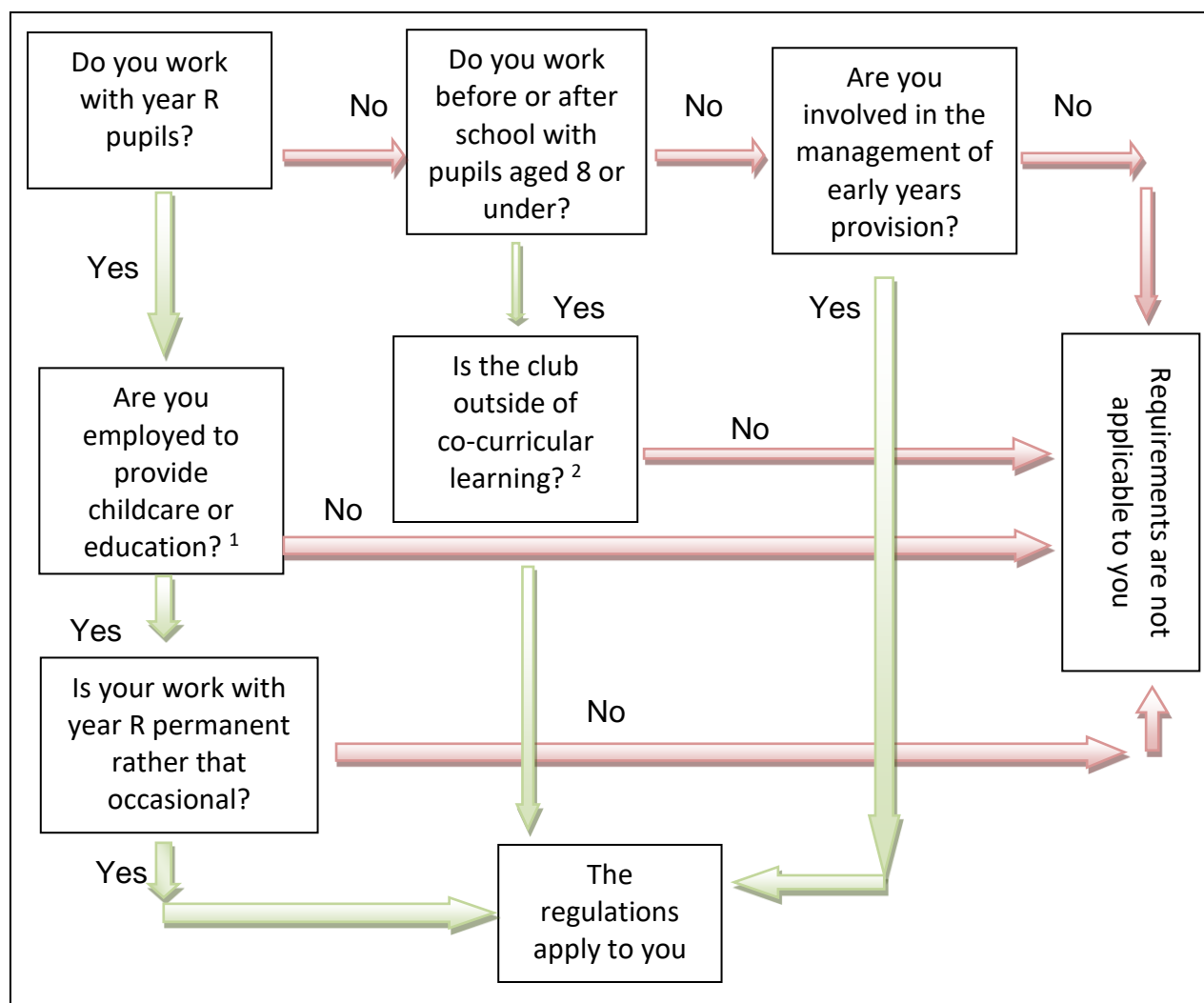
The legislation also applies to any staff directly concerned in the management of such early or later years' provision.

The risk by association element of the Act has now been refocused by the DfE and no longer applies to school staff.

We will continue to check for disqualification under the Childcare Act as part of our safer recruitment processes for any offences committed by staff members or volunteers.

## DISQUALIFICATION UNDER THE CHILDCARE ACT

The requirement of the act is applicable to a limited number of school staff and the following flowchart can be used to help confirm if staff members are required to make disclosures to Ofsted in respect of themselves or members of their household.



<sup>1</sup> Caretakers, cleaners, drivers, transport escorts, catering and office staff are not employed to provide child care

<sup>2</sup> Co-curricular learning covers activities such as school music and school sports activities

## **Community Partnership Information Form**

### **Guidance**

This form is for the sharing of non-urgent information by partner agencies that relates to the **Missing, Exploited** and **Trafficked** agenda and related issues, such as **Modern Slavery**. This form can also be used for information relating to **Community Cohesion** and related concerns such as; **Tensions, Political Unrest, Racial** and **Religious** issues, **Immigration, Asylum** and **Refugees**, and **Anti-Social Behaviour**. Information associated with **Organised Crime Group** activity, including rural, is also sought. This form is not a referral form, nor does it replace any pre-existing referral or notification mechanism. This information may be sanitised and used in subsequent partnership forums for the purposes of identifying and mitigating risk. Any questions or concerns regarding this form can be raised with your Police contact, or to FIB.

Completed forms should be sent electronically to **24/7-Intel@hampshire.pnn.police.uk**

<b>Your Details</b>			
Name			
Organisation			
Telephone		Email	
<b>Information</b> <i>including date and location</i>			
<b>Information Source</b>			
Where did this information come from?			
Name			
Date of Birth			
Address			
Can they be re-contacted?	<input type="checkbox"/> Yes <input type="checkbox"/> No		
<i>If yes, provide details</i>	Telephone                      Email		
How did they find this information out?			
When did they find this information out?			
Who else have you shared this information with?			



## GUIDANCE FOR PUPILS

In every teaching room and on each boarding landing there will be copies of the following documentation. The documents (In poster form) are designed to give the children of FSM help and guidance about how they should live their lives, help others and where they can find help when they should require it.

### **Are you Happy? - Who To Talk To?**

A comprehensive list of people and organisations on a personal, local and national level, from whom children may seek help and guidance.

### **How To Have Your Say – A Pupil's Guide**

A poster that outlines how and where a pupil can voice their opinion and find help.

### **What to do if you are being bullied?**

Advice for pupils if they are being bullies or are aware of someone that is being bullied.

### **Boarders Code of Conduct**

Guidelines for how Boarders should conduct themselves and the possible sanctions for discretions.

### **Guidelines for the Safe and appropriate use of technology**

Guidelines for how Boarders should conduct themselves when using technology within the school and the possible sanctions for discretions.

***Further guidance is given to pupils through the PSHCEE curriculum, assemblies, year group meetings and other themed events such as Anti Bullying week or Safer Internet Day.***

## SEXTING – HANDLING INCIDENTS

When an incident involving sexting comes to a member of staff's attention:

- The incident should be referred to the DSL as soon as possible.
- The DSL should hold an initial review meeting with appropriate staff.
- There should be subsequent interviews with the pupils involved (if appropriate).
- Parents should be informed at an early stage and involved in the process unless there is good reason to believe that involving parents would put pupils at risk of harm.
- At any point in the process if there is a concern a young person has been harmed or is at risk of harm a referral should be made to children's social care and/or the police immediately.

### Disclosure

As with all safeguarding concerns disclosures can happen in a variety of ways. Any direct disclosure by a pupil should be taken very seriously. They are likely to be embarrassed and worried about the consequences. It is likely that disclosure in school is a last resort and they may have already tried to resolve the issue themselves.

### Initial review meeting

The initial review meeting should consider the initial evidence and aim to establish:

- Whether there is an immediate risk to a young person or young people.
- If a referral should be made to the police and/or children's social care.
- If it is necessary to view the imagery in order to safeguard the young person – in most cases, imagery should not be viewed.
- What further information is required to decide on the best response?
- Whether the imagery has been shared widely and via what services and/or platforms. This may be unknown.
- Whether immediate action should be taken to delete or remove images from devices or online services.
- Any relevant facts about the young people involved which would influence risk assessment.
- If there is a need to contact another school, college, setting or individual.
- Whether to contact parents of the pupils involved - in most cases parents should be involved.

An immediate referral to police and/or children's social care should be made if at this initial stage:

- The incident involves an adult.
- There is reason to believe that a young person has been coerced, blackmailed or groomed, or if there are concerns about their capacity to consent (for example owing to special educational needs).
- What you know about the imagery suggests the content depicts sexual acts which

are unusual for the young person's developmental stage, or are violent.

- The imagery involves sexual acts and any pupil in the imagery is under 13.
- You have reason to believe a pupil or pupil is at immediate risk of harm owing to the sharing of the imagery, for example, the young person is presenting as suicidal or self-harming.

If none of the above apply then FSM may decide to respond to the incident without involving the police or children's social care.

The decision to respond to the incident without involving the police or children's social care would be made in cases when the DSL is confident that they have enough information to assess the risks to pupils involved and the risks can be managed within FSM's pastoral support and disciplinary framework and if appropriate local network of support.

Such an example might be: *If a young person has shared imagery consensually, such as when in a romantic relationship, or as a joke, and there is no intended malice.*

This decision will be made by the DSL with input from the Head and other members of staff if appropriate. The decision should be recorded in line with school policy.

Decisions will be reviewed throughout the process of responding to the incident.

### **Assessing the risks**

The circumstances of incidents can vary widely. If at the initial review stage a decision has been made not to refer to police and/or children's social care, the DSL should conduct a further review (including an interview with the pupils involved) to establish the facts and assess the risks.

When assessing the risks the following should be considered:

- Do the pupils involved have additional vulnerabilities?
- Why was the 'Sexting' shared? Was the young person coerced or put under pressure to produce the 'Sexting'?
- Who has shared the 'Sexting'? Where has the 'Sexting' been shared? Has it been shared on social media? Was it shared and received with the knowledge of the pupil in the 'Sexting'? Was it shared beyond its intended recipient? What steps have been taken to contain the spread?
- Are there any adults involved in the sharing of 'Sexting'?
- What is the impact on the pupils involved?
- How old is the pupil? Does the young person understand consent? Does the pupil understand the implications?
- Has the young person taken part in this kind of activity before?

DSLs should always use their professional judgement in conjunction with their colleagues to assess incidents.

## **Informing parents**

Parents should be informed and involved in the process at an early stage unless informing the parent will put the pupil at risk of harm. Any decision not to inform the parents would generally be made in conjunction with other services such as children's social care and/or the police, who would take the lead in deciding when the parents should be informed. DSLs/DDSLs may work with the pupils involved to decide on the best approach for informing parents. In some cases DSLs/DDSLs may work to support the young people to inform their parents themselves.

For further details see *Annex C: [DfE: Sexting in Schools and Colleges](#)*

## **Reporting incidents to the police**

If it is necessary to refer to the police, this may be through a safer schools officer, a PCSO (Police Community Security Officer), local neighbourhood police or by dialling 101.

Things to be aware of when making reports to the police:

- Be aware that the police are not able to offer general advice on incidents. If the children involved are named or specifics are provided they are duty-bound to record and investigate all criminal activity reported.
- When making a report through the 101 service, be aware that the person answering the call is a call handler who deals with a wide variety of crimes and may not have specialist knowledge in this area. Ensure any crime reference numbers provided are recorded.
- Safer Schools Officers (where available) are able to offer direct support to schools on prevention and advice on management of incidents.

## **Securing and handing over devices to the police**

If any devices need to be seized and passed onto the police then the device(s) should be confiscated and the police should be called. The device should be turned off and placed under lock and key until the police are able to come and retrieve it.

## **Children's social care contact and referrals**

If as a result of the investigation the DSL believes there are wider issues which meet the threshold for children's social care involvement then they should make a referral in line with their child protection procedures.

FSM will do this through the Hampshire Multi-Agency Safeguarding Hub (MASH).

## **Searching devices, viewing and deleting imagery**

### **Viewing the imagery**

Adults should **not** view youth produced sexual imagery unless there is good and clear reason to do so. Wherever possible responses to incidents should be based on what DSLs/DDSLs have been told about the content of the imagery.

The decision to view imagery should be based on the professional judgement of the DSL and should always comply with the child protection policy and procedures of FSM. Imagery should never be viewed if the act of viewing will cause significant distress or harm to the pupil.

If a decision is made to view imagery the DSL would need to be satisfied that viewing:

- Is the only way to make a decision about whether to involve other agencies (i.e. it is not possible to establish the facts from the pupils involved).
- Is necessary to report the image to a website, app or suitable reporting agency to have it taken down, or to support the pupils or parent in making a report.
- Is unavoidable because a pupil has presented an image directly to a staff member or the imagery has been found on a school device or network.

If it is necessary to view the imagery then the DSL should:

- Never copy, print or share the imagery; this is illegal.
- Discuss the decision with the Head.
- Ensure viewing is undertaken by the DSL or another member of the safeguarding team with delegated authority from the Head.
- Ensure viewing takes place with another member of staff present in the room, ideally the Head or a member of the senior management team (SMT). This staff member does not need to view the images.
- Wherever possible ensure viewing takes place on FSM premises, ideally in the Head or a member of the SMT's office.
- Ensure wherever possible that images are viewed by a staff member of the same sex as the young person in the imagery.
- Record the viewing of the imagery in FSM's safeguarding records including who was present, why the image was viewed and any subsequent actions. Ensure this is signed and dated and meets the wider standards set out by ISI for recording safeguarding incidents.

Further details on searching, deleting and confiscating devices can be found in the DfE *Searching, Screening and Confiscation* advice.

If youth produced sexual imagery has been unavoidably viewed by a member of staff either following a disclosure from a young person or as a result of a member of staff undertaking their daily role (such as IT staff monitoring FSM systems) then the DSL/DDSL should ensure that the staff member is provided with appropriate support. Viewing youth produced sexual imagery can be distressing for both pupils and adults and appropriate emotional support may be required.

### **Deletion of images**

If the school has decided that other agencies do not need to be involved, then consideration should be given to deleting imagery from devices and online services to limit any further sharing of the imagery. (The DfE *Searching, Screening and Confiscation*

advice highlights that schools have the power to search pupils for devices, search data on devices and delete youth produced sexual imagery.)

However, just as in most circumstances it is not recommended that staff view imagery, it is recommended that staff should not search through devices and delete imagery unless there is good and clear reason to do so. It is recommended that in most cases pupils are asked to delete imagery and to confirm that they have deleted the imagery. Pupils should be given a deadline for deletion across all devices, online storage or social media sites.

Pupils should be reminded that possession of youth produced sexual imagery is illegal. They should be informed that if they refuse or it is later discovered they did not delete the image they are committing a criminal offence and the police may become involved. All of these decisions need to be recorded, including times, dates and reasons for decisions made and logged in the safeguarding records. Parents should also be informed unless this presents a further risk to the pupil.

At this point FSM will invoke disciplinary measures in line with our behaviour policy.

### **Interviewing and talking to the pupil/s involved**

Once the DSL has assessed a pupil as not at immediate risk, it may be necessary to have a conversation with them and decide the best course of action. If possible, the DSL should carry out this conversation. However, if the pupil feels more comfortable talking to a different teacher, this should be facilitated where possible.

When discussing the sharing of 'sexts', it is important that the DSL:

- Recognises the pressures that young people can be under to take part in sharing such imagery and, if relevant, supports the pupil's parents to understand the wider issues and motivations around this.
- Remains solution-focused and avoids questions such as 'why have you done this?' as this may prevent the pupils from talking about what has happened.
- Reassures the young person that they are not alone and that FSM will do everything that they can to help and support them.
- Helps the pupil to understand what has happened by discussing the wider pressures that they may face and the motivations of the person that sent on the imagery.
- Discusses issues of consent and trust within healthy relationships. Explain that it is not ok for someone to make them feel uncomfortable, to pressure them into doing things that they don't want to do, or to show them things that they are unhappy about. Let them know that they can speak to the DSL if this ever happens.

The purpose of the conversation is to:

- Identify, **without looking**, what the image contains and whether anyone else has been involved.
- Find out who has seen or shared the image and how further distribution can be prevented.

### **Recording incidents**

All incidents relating to Sexting need to be recorded. This includes incidents that have been referred to external agencies and those that have not.

Points to consider are:

- Are records up to date and complete?
- Do records demonstrate both effective identification and management of the risk of harm?
- Do records demonstrate sound decision-making, appropriate responses to concerns and evidence of relevant referrals made in a timely manner?
- Do they indicate that appropriate action is taken in response to concerns and allegations in a timely manner?
- Do they show evidence of tenacity in following up concerns with relevant agencies?
- Do they provide evidence of effective partnership working and sharing of information?
- Is there evidence of attendance at or contribution to inter-agency meetings and conferences?
- Is there clarity about FSM's policy relating to the sharing of information internally, safe keeping of records, and transfer when a pupil leaves FSM?

### **Reporting incidents**

- The quickest way to get content removed from the internet is for the person who posted it to take it down. If the pupil posted the content themselves using their account, they should be asked to log in and delete it.
- If someone else posted the image or re-posted it, they should be asked to log in and delete it from any sites they've shared it on.
- If FSM knows where the content is hosted but doesn't know who posted it, or the poster refuses to take it down, the content can still be reported to an online service. If it breaches a site's Terms of Service then it will be removed.

Each provider will have a different approach to dealing with requests for the removal of content and the speed of response. More information can be found on individual providers' websites where they should make public their Terms of Service and process for reporting.

For further details see *Annex D: [DfE: Sexting in Schools and Colleges](#)*

## Annex 4

### SEXTING - WHAT RESOURCES ARE AVAILABLE?

<b>Teachers may find the following free resources and guidance helpful in their planning</b> Age ranges are only suggestions. Teachers should use their professional judgement in ensuring that any resource matches the needs and readiness of their pupils.				
Resource	Organisation	Details	Age range	Where to find it
Crossing the Line	Childnet International	A practical PSHE Toolkit for educators containing films, lesson plans and activities. The film about 'sexting' and peer pressure, 'Just send it', is rated 12 by the BBFC.	11-14* *Some activities for KS2	<a href="http://www.childnet.com/pshetoolkit">www.childnet.com/pshetoolkit</a>
Picture This	Childnet International	A teaching pack comprised of a 25-minute play script and lesson plans.	14-18	<a href="http://www.childnet.com/resources/picturethis">http://www.childnet.com/resources/picturethis</a>
I saw Alex's willy	NSPCC	Film and lesson plans aimed at younger children, Key Stages 1-2, which cover the importance of not sharing naked images.	5-11	<a href="https://www.nspcc.org.uk/preventing-abuse/keeping-children-safe/share-aware/teaching-resources/">https://www.nspcc.org.uk/preventing-abuse/keeping-children-safe/share-aware/teaching-resources/</a>
ChildLine website ChildLine Zip-It app	ChildLine ChildLine	The ChildLine website has useful information about 'sexting', which can be used as part of lessons. Zipit provides young people with witty comebacks which they can use to help diffuse situations where they are asked to send sexual pictures	Target 11- 14, but up to 18 13+	<a href="https://www.childline.org.uk/info-advice/bullying-abuse-safety/online-mobile-safety/">https://www.childline.org.uk/info-advice/bullying-abuse-safety/online-mobile-safety/</a>
Exposed	NCA-CEOP	A film and accompanying lesson plan exploring the consequences of sharing sexual imagery	14+	<a href="http://www.thinkuknow.co.uk/teachers">www.thinkuknow.co.uk/teachers</a>
Thinkuknow Toolkit	NCA-CEOP	A set of 15 lesson plans including an activity exploring the influence of the media in 'sexting'	11+	<a href="http://www.thinkuknow.co.uk/teachers">www.thinkuknow.co.uk/teachers</a>
Thinkuknow Website	NCA-CEOP	Wide range of resources providing advice and guidance for young people, parents and professionals on topics including image sharing online.	13-18	<a href="http://www.thinkknow.co.uk">www.thinkknow.co.uk</a>
First to a Million	NCA-CEOP	An interactive film and lesson plans exploring the opportunities and risks of sharing videos online.	13-18	<a href="http://www.thinkuknow.co.uk/teachers">www.thinkuknow.co.uk/teachers</a>



Guidance on teaching about consent in PSHE education	PSHE Association	General advice for schools on teaching about consent accompanied by eight lesson plans.	Key Stages 3 and 4	<a href="http://www.pshe-association.org.uk/curriculum-and-resources/resources/guidance-teaching-about-consent-pshe-education-key">www.pshe-association.org.uk/curriculum-and-resources/resources/guidance-teaching-about-consent-pshe-education-key</a>
FAQs on pornography and sharing of sexual images	PSHE Association	Guidance on existing legislation, school policies, and teaching approaches to address pornography and the sharing of sexual images.	Guidance for teachers	<a href="http://slidelegend.com/sexting-in-schools-resource-pack-international-centre-for-missing-_5a109aba1723ddb49633bb1a.html">slidelegend.com/sexting-in-schools-resource-pack-international-centre-for-missing-_5a109aba1723ddb49633bb1a.html</a>
Disrespect NoBody Discussion guide	Home Office – PSHE Association	A teaching resource which supports the Government's Disrespect NoBody campaign aimed at preventing abuse in teenage relationships.	13+	<a href="http://www.pshe-association.org.uk/curriculum-and-resources/resources/disrespect-nobody-teaching-resources-preventing">www.pshe-association.org.uk/curriculum-and-resources/resources/disrespect-nobody-teaching-resources-preventing</a>
Tagged	Children's eSafety Commissioner (Australia)	Australian film resource with lesson plans and video interviews with key characters.	14+	<a href="http://www.cybersmart.gov.au/tagged">www.cybersmart.gov.au/tagged</a>
Lockers	Webwise – the Irish Safer Internet Centre	An animation and six lesson plans including lessons on peer pressure, victim blaming and the influence of the media.	13+	<a href="http://www.webwise.ie/lockers">www.webwise.ie/lockers</a>

## TRANSPORTING OF PUPILS BY PARENTS

Dear Parent / Volunteer

On occasions parents and volunteers are kind enough to help with the task of transporting children to visits and off-site activities arranged by FSM. (This is in addition to any informal arrangements made directly between parents.) FSM is very grateful for this help. In managing these arrangements FSM would like to put in place sensible measures to ensure the safety and welfare of young people carried in parents' and volunteers' cars. This is based on guidance from the local authority and follows similar procedures for FSM staff using their cars on FSM business.

Where parents'/volunteers' cars are used on FSM activities, the Head should notify Parents'/volunteers' of their responsibilities for the safety of pupils, to maintain suitable insurance cover and to ensure their vehicle is roadworthy.

The Head or Party Leader will need to consider the suitability of parents or volunteers to carry young people in their car. It is advisable that parents or volunteers are not put in a position where they are alone with a young person.

All parents are therefore asked to complete and return the attached form to FSM before they offer to use their car to help with transporting pupils.

This form will only need to be completed once for each driver. However, please inform FSM if your circumstances change and you can no longer comply with these arrangements.

Many thanks, once again, to all parents and volunteers who have been able to help with the provision of transport. Naturally our primary concern is the safety and welfare of pupils. However, we also want to maintain a wide range of opportunities for young people to participate in off-site activities and visits.

Signed

A handwritten signature in black ink, appearing to read 'J Wells', is written over a light grey rectangular background.

Jody Wells

**DECLARATION FORM - Safeguarding statement**

At FSM, we strongly recognise the need for vigilant awareness of safeguarding issues. It is important that all staff have appropriate training and induction so that they understand their roles and responsibilities and are confident about carrying them out. Staff, pupils, parents and governors should feel secure that they could raise any issues or concerns about the safety or welfare of children and know that they will be listened to and taken seriously. This will be achieved by maintaining an ethos of safeguarding and promoting the welfare of children and young people and protecting staff. This is supported by clear behaviour, anti-bullying and child protection policies, appropriate induction and training, briefing and discussion of relevant issues and relevant learning in line with current legislation and guidelines.

FSM may require parents or volunteers who have regular unsupervised access to young people to be checked through arrangements with the Disclosure and Barring Service.

**All drivers must:**

- Hold a valid driving licence for the type of vehicle being driven.
- Be fit to drive.
- Have no medical condition which affects their ability to drive.
- Have a valid MOT for any vehicle older than 3 years old.
- Ensure that any vehicle is roadworthy, including brakes, lights, tyres, bodywork, wipers, mirrors etc.
- Ensure that any vehicle used has current road tax.
- Ensure that they adhere to the appropriate speed limit.
- Ensure that all seat belts are working and worn by everybody in the vehicle.

**Insurance:**

- Maintain valid insurance, as a minimum, for third part liability.
- Check with their insurance company and inform them that the driver occasionally conveys children on school activities (This is unlikely to affect the cost of your insurance premium).

**Safety:**

- Be familiar with, and drive in accordance with the Highway Code at all times
- Drive safely and observe the speed limit
- Before driving not to consume alcohol or drugs which may impair driving
- Ensure that all passengers wear seat belts as appropriate
- Use child proof locks on rear doors where necessary
- Child seats such as booster seats are to be used at all times according to the height and age of each child in the vehicle.

I have read and understood the above requirements and agree to comply with them. I agree to inform the FSM if circumstances change and I can no longer comply with these arrangements.

Signature:  
Name (Please print)

Date:  
Number of seats in vehicle:

### Online Safety Information and support

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

Organisation/Resource	What it does/provides
<b>thinkuknow</b>	NCA CEOPs advice on online safety
<b>disrespectnobody</b>	Home Office advice on healthy relationships, including sexting and pornography
<b>UK safer internet centre</b>	Contains a specialist helpline for UK schools and colleges
<b>swgfl</b>	Includes a template for setting out online safety policies
<b>internet matters</b>	Help for parents on how to keep their children safe online
<b>parentzone</b>	<a href="#">Be Internet Legends</a> Help for parents on how to keep their children safe online
<b>childnet cyberbullying</b>	Guidance for schools on cyberbullying
<b>pshe association</b>	<a href="#">Guidance</a> and useful teaching resources covering online safety issues including pornography and the sharing of sexual images
<b>educateagainsthate</b>	Practical advice for parents, teachers and governors on protecting children from extremism and radicalisation.
<b>the use of social media for online radicalisation</b>	A briefing note for schools on how social media is used to encourage travel to Syria and Iraq
<b>UKCCIS</b>	The UK Council for Child Internet Safety's website provides: <ul style="list-style-type: none"> <li>• Sexting advice</li> <li>• <a href="#">free online safety tool</a> for schools is provided alongside <a href="#">questions for the governing board</a> concerning online safety.</li> <li>• <a href="#">Education for a Connected World</a></li> </ul>
<b>NSPCC</b>	NSPCC advice for schools and colleges
<b>net-aware</b>	NSPCC advice for parents
<b>commonsensemedia</b>	Independent reviews, age ratings, & other information about all types of media for children and their parents
<b>searching screening and confiscation</b>	Guidance to schools on searching children in schools and confiscating items such as mobile phones
<b>lgfl</b>	Advice and resources from the London Grid for Learning

## Useful contacts

Support Service	Description	Email & Telephone No.
<b>Hampshire Safeguarding Children Partnership</b>	HSCP web enabled procedures manual offers further advice and information with regards all the safeguarding concerns contained within this policy	<a href="https://4lscb.proceduresonline.com/hampshire/index.html">4lscb.proceduresonline.com/hampshire/index.html</a>
<b>Internet Watch Foundation</b>	In the event that a site has no reporting function and if the content is a sexual image of someone under 18 you can report it to the Internet Watch Foundation (IWF). Sexual images of anyone under 18 are illegal and the IWF can work to get them removed from sites which do not have reporting procedures. Adults can report directly to the IWF here:	<a href="http://www.iwf.org.uk">www.iwf.org.uk</a> . Young people can contact ChildLine who work in partnership with the IWF and will support young people through the process.
<b>NCA-CEOP</b>	If you are concerned that a child is being sexually abused, exploited or groomed online you should report to NCA-CEOP	<a href="http://www.ceop.police.uk/safety-centre">www.ceop.police.uk/safety-centre</a>
<b>The NSPCC adults helpline</b>	The NSPCC has partnered with O2 to offer direct support to parents and other adults on issues relating to online safety.	0808 800 5002
<b>ChildLine</b>	ChildLine offers direct support to children and young people including issues relating to the sharing of sexual imagery.	<a href="http://www.childline.org.uk">www.childline.org.uk</a>
<b>The Professionals Online Safety Helpline (POSH)</b>	The POSH helpline supports professionals with an online safety concern or an online safety concern for children in their care. Professionals are able to contact the helpline to resolve issues	<a href="http://www.saferinternet.org.uk/about/helpline">www.saferinternet.org.uk/about/helpline</a>  Tel: 0844 381 4772

## **POLICY REVIEW**

As a school, we review this policy at least annually in line with DfE, HSCP and HCC and other relevant statutory guidance.

FSM monitors and evaluates its Safeguarding policy and procedures through the following activities:

- Governing body visits to the school.
- Senior Leadership Team discussion sessions with children and staff.
- Staff Safeguarding questionnaires.
- Staff Forum responses.
- Pupil questionnaires.
- Frequent scrutiny of attendance data.
- Regular analysis of a range of risk assessments.
- Regular analysis of appropriate provision for the fulfilment of other safeguarding responsibilities relevant to FSM (e.g. sufficient account must be taken of the nature, age range and other significant features of the school, such as historical issues, in the provisions made for safeguarding).
- Frequent scrutiny of governing body meeting minutes.
- Logs of bullying and/or racist behaviour incidents are reviewed regularly by the Senior Leadership Team.
- Regular review of parental concerns and parental questionnaires.
- Regular review of the use of pupil-specific common rooms.