This Policy applies to schools within Inicio Educational Trust

Safeguarding and Child Protection Policy 2024

Approved by:	Inicio Trust Board	Date of Adoption: September 2023
Reviewed in:	May 2024	Reviewed by: Ms Lindsey Gulczynski – DSL Chislehurst School for Girls
Next review due:	September 2025	

Contents

Key contacts for Safeguarding at Inicio Educational Trust 4
Introduction 4
Aims 4
Staff Training 5
Procedures 6
Information Sharing and Confidentiality 7
Supporting Children and Young People 8
Supporting Staff 9
Supervision 10
Specific Safeguarding Areas 10
Mental Health 10
Private Fostering 10
Students Placed in Alternative Provision 11
Looked After Children, Previously Looked After Children and Children with a Social Worker 11
Special Educational Needs and Disabilities 12
Attendance, Children Absent from education and "Child Missing in Education Procedures" 12
Preventing radicalisation and the Prevent Duty 12
Maintaining Professional Boundaries 13
Reasonable Force 13
Safer Recruitment 14
Handling Disclosures 14
Allegations against Staff and Low Level Concerns: The Role of the Local Authority Designated Officer (LADO) 17
Child on child abuse and child on child sexual violence and sexual harassment 20
Types of abuse 24
Useful Contacts 31
Other related policies 32

Terms of reference:

IET or The Trust: Inicio Educational Trust

Schools: this references the schools who are part of IET – Biggin Hill Primary School, Bullers Wood School for Girls, Bullers Wood School for Boys, Charles Darwin School, Chislehurst School for Girls

DSL: Designated Safeguarding Lead – contact details provided in individual schools' policies

Staff: this includes staff from all IET schools – both support staff and teaching staff, volunteers and agency staff

Governors: all those with responsibility for governance across the Trust, including governors, trustees and members

Safeguarding and Child Protection Policy 2024-2025

Key contacts for Safeguarding at Inicio Educational Trust

CEO – Terry Millar
Trustee with responsibility for Safeguarding – Lisa Morris

For individual school contacts, please see individual schools procedures in appendices

Introduction

The Governors and staff of Inicio Educational Trust (IET) fully recognise the responsibility they have for the safeguarding and protection of students**:** safeguarding is the "golden thread" that runs through all aspects of each school's policies, procedures and practices, creating a strong culture of safeguarding. All Governors and staff, including volunteers and supply staff, have a full and active part to play in protecting children and young people from harm. All staff and Governors believe that our schools should provide a caring, positive, safe and stimulating environment, which promotes the holistic development and well-being of every individual.

For the purpose of this policy, safeguarding and promoting the welfare of children is defined as: "providing help and support to meet the needs of children as soon as problems emerge, protecting children from maltreatment, whether that is within or outside the home, including online, preventing the impairment of children's mental and physical health or development, ensuring that children grow up in circumstances consistent with the provision of safe and effective care and taking action to enable all children to have the best outcomes."
The term "children" refers to all under the age of 18 years. (Keeping children safe in education, Statutory guidance for schools and colleges, DfE, September 2024).

In line with KCSIE, whilst all children and young people must be protected from harm, the Trust acknowledges that some students are potentially at greater risk of harm, given their specific needs. This may include, but is not limited to, young people experiencing difficulties with mental health, those who are privately fostered, young people in local authority care, those in alternative provision or students with special educational needs and/or disabilities, it may also include those children who's parent/carer may have a mental or physical illness, children who experience poverty or lack of access to resources or overcrowding in their home or children who have previously experienced abuse.

Aims

To ensure effective Safeguarding and Child Protection by:

- acting on the early signs of abuse and neglect
- maintaining effective and accurate records
- listening to the views of the child or young person
- re-assessing concerns when situations do not improve
- sharing information with the right people within and between agencies in a timely manner
- making effective professional challenges to those who appear to not be taking action

(Keeping Children Safe in Education, DfE, 2024)

In addition:

- Supporting the development of our young people in ways that will foster security, confidence and independence and to equip students with the knowledge and understanding to make safe choices and manage potential risk
- To raise awareness of all staff including volunteers and supply staff of the need to safeguard young people and of their responsibilities in identifying and reporting possible cases of abuse
- To provide a systematic means of monitoring young people known or thought to be at risk of harm
- To have clear procedures and protocols in place which will be followed by all staff in cases of suspected abuse and /or the need for care
- To develop, promote and maintain productive working relationships with other agencies
- To ensure that all adults who have unsupervised access to children and young people whilst in the Trust's care have been checked as to their suitability and have an enhanced Disclosure and Barring Service (DBS) check and all necessary measures are in place to ensure Safer Recruitment.
- Utilise any other legislation or guidance which impacts on child protection and safeguarding such as Human Rights Act 1998, Equality Act 2010 and Public Sector Equality Duty

Staff Training

Designated Safeguarding Lead:

In line with statutory guidance, each school's Designated Safeguarding Lead (DSL) and Deputy DSLs will undertake refresher training every two years.

New staff induction:

Child Protection/Safeguarding (including online safety and PREVENT) is an integral part of the new staff and governor induction programme and all new members of staff and governors are issued with a copy of this policy, Part One and Annex B (further information), the Staff Code of Conduct and the Behaviour Policy. Where a new member of staff joins the school mid-term, safeguarding induction is delivered at the first available opportunity.

Annual Training:

All members of staff including governors and trustees in Inicio Educational Trust will receive safeguarding training every year, including online safety. A register is kept to record the date of training and which members of staff have received this training, with "catch up" sessions arranged for those who were not present. The Child Protection Policy is updated and re-issued to staff annually, accompanied by the most current version of KCSIE Part One and Part Five (or Annex A, condensed version), Annex B of KSCIE~~,~~ the Staff Code of Conduct and the Behaviour Policy. All staff sign annually to say they have read and understood this statutory

documentation. Governors also receive annual safeguarding training and sign to say they have read the relevant documentation, which includes the Governor's Code of Conduct and the full version of Keeping Children Safe in Education. Governors, the Senior Leadership Team, Safeguarding and other relevant pastoral and attendance staff are also directed to the full version of Keeping Children Safe in Education 2024.

Briefings and Additional Training:

Individual schools will decide the most effective method for delivering updates related to Child Protection and Safeguarding throughout the academic year to their staff and parents/carers.

Procedures

The Trust follows key statutory and non-statutory guidance issued by the Department for Education including "Keeping Children Safe in Education" (updated September 2024) and "Working Together to Safeguard Children" (Updated December 2023). Keeping children safe in education 2024 (publishing.service.gov.uk)

Trust School's will ensure the following:

- That all members of staff have up-to-date information on current Safeguarding issues, develop their understanding of the signs and indicators of abuse, know how to respond to a student who discloses and understand their responsibilities to refer all concerns to the DSL or Deputy DSLs, and to report concerns about another staff member to the Headteacher or the Chair of the Local Governing Board if the concern is about the Headteacher.
- That all members of staff receive a copy of the Child Protection and Safeguarding Policy, Part One (or Annex A Condensed version) and Annex B, the Staff Code of Conduct and the Behaviour Policy annually and sign to say documentation has been received and understood.
- That every member of staff (including temporary staff, supply staff and volunteers) know the name of their DSL and Deputies and other trained staff along with their school's systems for reporting concerns about a child or young person
- That parents/carers are made aware of the Trusts Child Protection and Safeguarding Policy and procedures and have access to this via the Trust and respective school's website
- That the Trustees will receive termly reports outlining the current safeguarding context in each of their schools in the Trust
- That written records are made, held securely and shared appropriately where necessary and with the necessary consent
- That effective links with external agencies are developed and maintained
- That plans are in place to meet the needs of young people on a Child Protection Plan, Child In Need Plan and/or in the care of the Local Authority (Looked After Children): this must include a swift response to absence from the staff responsible for attendance monitoring v and priority contact with Social Care/Education Welfare Service if a young person's whereabouts and safety cannot be confirmed.
- Procedures for Child Missing in Education (CME) are followed, as directed by the Local Authority
- Any allegations made against members of staff are responded to as laid down in this policy

- Safer Recruitment procedures are always followed with members of the Senior Leadership Team and relevant Governors undertaking Safer Recruitment Training *(School Staffing Regulations 2009*). It is a requirement that at least one member of an interview panel has undergone Safer Recruitment Training *(Staffing and employment advice for schools,* October 2021).

Information Sharing and Confidentiality

"Information sharing in a safeguarding context means the appropriate and secure exchange of personal information, between practitioners and other individuals with a responsibility for children, in order to keep them safe from harm."

"Information sharing is essential for identifying patterns of behaviour, or circumstances in a child's life that may be evidence that they are at risk of harm or are being harmed and need some form of support or protection."

"Data protection legislation (the DPA 2018) and UK General Data Protection Regulation (UK GDPR) does not prevent the sharing of information for the purposes of safeguarding children, where it is necessary, proportionate and justified to do so."

Information Sharing: Advice for practitioners providing safeguarding services for children, young people, parents and carers, May 2024.

https://assets.publishing.service.gov.uk/media/66320b06c084007696fca731/Info_sharing_advice_content_May_2024.pdf

Sharing with or without consent

Consent should be sought for sharing sensitive and confidential information e.g. when making a referral to an external agency such as the Bromley Wellbeing Service or Bromley's Early Intervention and Family Support Service (EIFS) referral. Staff should be explicit about what, why and how the information will be shared in order to secure informed consent.

Information may be shared without consent where there is a clear risk of significant harm to a child or young person or this involves a crime or the prevention of a criminal offence. Where this decision has been made, reasons behind this judgement will be documented for future reference.

The sharing of information must give due consideration to the laws relating to confidentiality, data protection and human rights, but these laws do not act as a barrier to sharing information, when there is a legitimate and justified reason for doing so i.e. to prevent harm. It is important only to share as much proportionate information as is needed and records should be accurate, relevant and up to date. For further advice, staff can contact the member of staff with responsibility for Data Protection within their school. "Fears about sharing information **must not** be allowed to stand in the way of the need to safeguard and promote the welfare of children" (KCSIE, 2024)

NB: at the point of a referral to social care, staff will always take advice on whether to contact the parent/carer directly to make them aware of the referral or if this should be delayed until further advice received, to serve the best interests of the child or young person.

Confidentiality

Detailed confidential information will only be shared with wider staff members such as Pastoral Leaders and other pastoral leaders or trip leaders where, when not doing so, would impact on the school's ability to support the young person and keep them safe. Records are maintained as per GDPR guidance, each school may utilise a different method for this as laid out in their individual procedures document.

All staff are aware that they have a professional responsibility to disclose information with other agencies in order to safeguard children. All staff are aware that they cannot make a promise to a young person to keep information disclosed to themselves and will inform the young person that information will be passed on to the relevant staff such as the Designated Safeguarding Lead.

Confidential files are maintained securely and confidential files are transferred at transition to the next school/education setting via electronic transfer where compatible software is available, recorded delivery or hand delivery with receipt with details of transfer recorded on school systems. **The child protection file must be transferred to a student's new education setting within 5 days for an in-year transfer or within 5 days of the start of the new academic year, once the School has been formally made aware that the child has on rolled at a new education provision.**

Supporting Children and Young People

Support will be given to students by:

- promoting a caring, safe and positive environment within each school
- establishing and maintaining an ethos where our young people feel secure and are encouraged to talk and are listened to by all adults within each school
- ensuring all young people know there is an adult in the school whom they can approach if they are worried or in difficulty and that staff determine how to best build trusted relationships with children which facilitate communication
- encouraging self-esteem and self-assertiveness while not condoning aggression or bullying
- ensuring that staff are aware that children may not feel ready or know how to tell someone that they are being abused, exploited or in any other way harmed and that they should maintain a professional curiosity and raise concerns with the DSL
- liaising and working together with all other support services and those agencies involved with the safeguarding of children
- notifying social services as soon as there is a significant concern and seeking advice when needed
- ensuring that appropriate information is forwarded at transition to a student's new school, college or other education placement
- Delivery of **"**Safeguarding in the Curriculum" which is considered to be preventative education**:** taking part in the PSHE, Assembly and Personal Development Curriculum which equips young people with the skills they need to stay safe from harm, minimise risk and seek additional support if required. This includes safety online and the new statutory requirement for Relationships and Sex Education (September 2020).
- Signposting to relevant services for young people and their parents/carers for them to access either in school, in the local area or online

- Contacting the police as necessary

DSL and other staff work together to share key information about vulnerable students with wider staff on a "need-to-know basis", in order to make adjustments where needed to promote positive educational outcomes for individuals. This sharing of information is always approached with the utmost sensitivity, balancing the young person's need for confidentiality with the need to keep them safe and well-supported in all aspects of their school life. Information about a student's academic progress, attendance etc. is shared with social care as part of the assessment process and on-going reviews of progress.

Early intervention is key. All staff should be alert to the potential need for early help, particularly for children who have specific vulnerabilities, e.g.:

- SEND and/or health conditions
- Mental health needs
- Young Carers
- Shown signs of being at risk from anti-social/criminal behaviour (gang-related, county lines, Child Criminal Exploitation etc.)
- A history of missing episodes
- Shown signs of being at risk of Child Sexual Exploitation (CSE)
- Shown signs of being at risk of radicalisation
- A family member in prison or are affected by parent's offending
- Difficult home circumstances due to substance misuse, domestic abuse, adult mental health issues within the home
- Misused substances themselves
- Returned to parent/carer from being in care
- Shown signs of being at risk from HBV (Honour Based Violence)
- Been privately fostered
- Been persistently or severely absent from education, particularly on repeat occasions and/or for prolonged periods
- Children who are LGBT or perceived to be and whom lack a trusted adult
- Children who may experience discrimination due to a disability, race, religion or belief, sex or sexual orientation
- Children who have experienced Adverse Childhood Experiences

Sources of support

- IET schools access a wide range of supportive services appropriate for their local context – see appendices for Useful Contacts
- DSLs from each school attend Bromley Borough's DSL termly forum to gather information about services available, updates to Bromley's local offer and to network with professionals from other schools' and agencies.
- Each school attends the Mental Health Leads Network lead by Bromley borough

<u>Supporting Staff</u>

Staff who have become involved with a young person who has suffered harm, or appears to be likely to suffer harm, may find the situation stressful and upsetting. School's will support such staff by providing an opportunity to talk this through with the DSL or to seek further support as appropriate. Staff are also signposted to supportive services such as Education Support Charity.

Supervision

Supervision is a formal, child centred process that provides a forum for practitioners to discuss child protection and safeguarding cases and plan "next steps" for children and families, reflect on practice, manage concerns before they escalate, understand and adhere to the policies and shared values of the organisation and "offload" and consider the emotional impact of their role on their wellbeing.

Supervision takes place through:

- line-management meetings with the DSL and Deputy DSL's
- advice and support from Bromley Borough's Safeguarding in Education Officer
- meetings between the Safeguarding Link Governor and the DSL, to review practice and provide challenge

Specific Safeguarding Areas

Safety Online

Advice and guidance for students about staying safe online is delivered via different means in each of the Trust School's – please see individual school's procedure document for specific information.

Staff are aware that technology is often a significant factor in abuse, and that online and face-to-face abuse can run concurrently. This includes aspects related to grooming (CSE, radicalisation and Child Criminal Exploitation).

Filtering and monitoring processes are in place which are lead by IET ICT staff in conjunction with the DSL in each school.

Mental Health

Difficulties with poor mental health can in themselves represent a safeguarding concern, but this may also be an indicator that a child or young person is suffering abuse or has experienced this in the past. All staff know and understand the systems for referral for both additional student support and to share concerns about safeguarding and child protection.

Each IET school has a Senior Mental Health Lead and parents/carers are aware of how to make contact with this member of staff.

For further information, see each School's policy on Mental Health and Wellbeing.

Private Fostering

Private fostering is when a child or young person of up to 16 years of age (or 18 if the child is disabled) is in the care of someone, for 28 days or more, who:

- Is not his or her parent
- Does not have parental responsibility
- Is not a close relative i.e. a grandparent, sibling, aunt or uncle (whether blood relative or by marriage) or a step-parent.

Responsibility for the safeguarding and welfare of the young person remains with the adult who has Parental Responsibility (usually a parent). However, it is the duty of the Local Authority to ensure that the welfare of children who are privately fostered within the local area are being satisfactorily safeguarded and promoted. By law, all private fostering arrangements must be registered with the local authority where the private foster carer lives.

Students Placed in Alternative Provision

For a variety of reasons, a small number of students at any given time may be educated in off-site provision, arranged by the school where they remain on roll.

In line with statutory guidance, the school who has placed the student in Alternative Provision has clear procedures in place to exchange information, monitor progress and check on attendance, acknowledging that those requiring Alternative Provision often have complex needs and increased vulnerabilities which could place them at escalated risk, the school continues to be responsible for the safeguarding of that student. Where a young person has social services involvement, the school will continue to liaise with the social worker and attend all relevant meetings e.g. core groups, CIN meetings.

Each School monitors attendance of students in Alternative Provision, in liaison with the Borough or direct with the establishment.

Visits are made by the school where the student is on roll, for quality assurance purposes and to ensure that placements remain secure and to be satisfied that the placement meets the student's needs. Each school who places a student in Alternative Provision, receives an annual statement from the alternative provider to formally confirm that all necessary safeguarding checks including staffing checks have been undertaken.

Looked After Children, Previously Looked After Children and Children with a Social Worker

For children who are currently looked after, each school liaises closely with representatives from the home borough's Virtual School and Social Care Team to maintain and update the Child Looked After's Personal Education Plan (PEP) and to put in place agreed actions in order to meet targets set at the PEP meeting.

Previously Looked After Children and those leaving care through adoption can also remain vulnerable and need continued support under the guidance of the Designated Teacher for Children Looked After.

The Designated Teacher for CLA and Previously Looked After Children, will also promote the educational achievement of children who have left care through adoption, special guardianship or child arrangements orders or who were adopted out of state care outside of England and Wales.

Each school will also liaise with the Virtual School regarding students who have a social worker or whom have had a social worker within the previous 6 years to seek advice and information in order to improve attendance, attainment and progress as per non-statutory Department of Education guidance.

It is important to remember that Looked After Children and Previously Looked After Children are not a homogenous group and should be treated as per their individual needs and circumstances.

https://bromleychildcare.proceduresonline.com/p_educ_lac.html

For further information, see individual school's policy on Looked After Children.

Special Educational Needs and Disabilities

Students with Special Educational Needs and/or Disabilities "can face additional safeguarding challenges", as they may be more prone to isolation from peers, experience difficulties with communication or have any safeguarding concerns masked by their Special Needs (Keeping Children Safe in Education, September 2024).

It is important to remember that Students with Special Educational Needs and Disabilities are not a homogenous group and should be treated as per their individual needs and circumstances.

For further information, see the SEND Policy for each school and the School's SEND Information Report.

Attendance, Children Absent from education and "Child Missing in Education Procedures"

IET recognises the pivotal role played by staff responsible for attendance in the safeguarding children and young people. Staff responsible for attendance in each school will liaise with the DSL and take stringent action to ensure the whereabouts of children in their care which are outlined in each school's procedure document and attendance policies.

Stringent attendance procedures can prevent the risk of children who are often absent from school becoming "children missing in education".

For further information related to safeguarding and attendance, see each School's Attendance Policy.

Preventing radicalisation and the Prevent Duty

All schools are subject to a duty under section 26 of the Counter-Terrorism and Security Act 2015 to have "due regard" to the need to prevent people from being drawn into terrorism, to stop them becoming terrorist or supporting terrorism (Prevent duty guidance 2023). Children and young people can be vulnerable to extremist ideologies and radicalisation:

Extremism: the vocal or active opposition to the fundamental values of democracy, the rule of law, individual liberty and the mutual respect and tolerance of different faiths and beliefs.

Radicalisation: the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups.

Protecting children and young people from the risk of extremism and radicalisation is part of the Trust's approach to safeguarding and includes:

- Teaching students about the risks of extremist ideologies and radicalisation, as part of Safeguarding in the Curriculum and online safety
- Promotion of community cohesion, British Values and SMSC (Spiritual, Moral, Social and Cultural)
- Staff training, including new staff induction
- Each school in the Trust having an up to date risk-assessment and named Prevent lead
- The management of allegations against staff in line with this policy
- Concerns about a child referred to the Safeguarding Team; all concerns tracked and monitored, referral to external agencies where required e.g. social care, the Prevent team (via the School's Youth Policing Team, the borough's Prevent Lead or MASH)
- Each school using a Visitors Protocol including Visiting Speakers Policy, , site-security and "lockdown" emergency procedures
- Firewalls to filter content accessed through the School's ICT network
- Filtering and monitoring systems and procedures in place on school devices

Maintaining Professional Boundaries

All staff in IET are aware of Child Protection and Safeguarding through on-going training in line with statutory guidelines. Staff must always maintain professional boundaries when working with young people and their families. Standards of professional conduct are outlined in detail in the Teachers Standards and individual School's Staff Code of Conduct.

For further information, see the Staff Code of Conduct for each school

Reasonable Force

Under the Use of Reasonable force: advice for headteachers, staff and governing bodies 2013, all School Staff have the legal power to use "Reasonable force". This refers to any actions carried out by school staff that involves a degree of physical contact with a student, usually used to control or restrain in order to prevent a student from hurting themselves, hurting others, damaging property or causing disorder. This can range from guiding or directing a student using the arm as a "barrier", to intervening to end or prevent a physical altercation to actual restraint to prevent harm or risk of harm to the young person or others. Reasonable means "using no more force than is needed" and in the unlikely event of needing to use reasonable force, school staff should always act in a way to minimise possible risk of injury and maximise safety of all involved, taking into account the context and any needs of the young people involved (e.g. SEND, Medical Needs). Teachers and all school staff have a "duty of care" towards their students: whilst staff do not have a *duty* to employ reasonable force, staff must be aware that failing to take action may put young people at risk and therefore in some circumstances, breach the "duty of care". Where reasonable force has been used to prevent a young person hurting themselves, hurting others, damaging property or causing disorder, the member of staff can expect the full support of the leadership team.

For further information on reasonable force and complaints against its use, see the section on allegation management below and the School's Behaviour Policy. The full Government Guidance, "*Use of reasonable force Advice for Head Teachers, Staff and Governing Bodies July 2013*" can be accessed at www.gov.uk.

Safer Recruitment

- The Trust will implement their responsibilities for safer recruitment strategies as outlined in Keeping Children Safe in Education 2024 with at least one member of any interview panel having received Safer Recruitment training
- As part of the Safer Recruitment process, all staff being offered positions within the school have their offers made subject to the receipt of satisfactory references, clear enhanced DBS check, Prohibition From Teaching and Barred List checks and Prohibition from Management of Schools checks (where required). Candidates should also be aware that online searches will be carried out as part of due diligence checks.
- Each school keeps a Single Central Record as a record of all staff and third parties, including supply staff and volunteers, showing the checks that have been carried out, the date on which they were carried out and the identification seen.
- Volunteers who come into unsupervised contact with students will be required to have an advanced DBS certificate; this includes parents/carers/other family members involved in part of a residential exchange visit (homestay).

Visitors to the School

Visitors must sign in and out and wear a visitor badge and lanyard at all times. All visitors must be collected from Reception by the member of staff with whom they have an appointment. The member of staff is responsible for them whilst they are on the school premises. Please also refer to each school's Visiting Speakers Policy for further details.

Individuals and organisations contracted by the school to work with or provide services to students will be expected to adhere to this policy and their compliance will be monitored. Any such contractors will be subject to the appropriate level of DBS check, if any such check is required (for example because the contractor is carrying out teaching or providing some type of care for or supervision of students regularly). Contractors for whom an appropriate DBS check has not been undertaken will be supervised if they will have contact with students and a risk assessment will be in place.

Visitors from other IET schools must sign in at reception and have their own lanyards.

Lettings

Assurance is sought through completion of a disclaimer, that organisations who use any site in the IET has appropriate safeguarding and child protection policies and procedures in place and this forms part of the lease or hire agreement. School's will follow the guidance in KCSIE 2024 regarding allegations made about staff at lettings using school sites.

Handling Disclosures

The Designated Safeguarding Lead or Deputies will be informed immediately:

- if there is suspicion that a child or young person is being abused
- if there is evidence that a child or young person is being abused

The Headteacher (or Designated Safeguarding Lead) will be informed immediately:

- in the event of a complaint of abuse made by a child or young person against an employee of the school or any other person external to the school who works with children and young people, or the Chair of the Local Governing Body if the complaint is about the Headteacher.

The DSL (or Deputies in liaison with DSL) will decide whether to make a referral to children's social care, whilst it is best practice for the DSL or Deputy DSL's to make a referral, it is important to note that any staff member can refer their concerns to children's social care directly. If, at any point, there is a risk of immediate serious harm to a child or young person then a referral is made to children's social care immediately. If the situation does not appear to be improving, the staff member with concerns should press for re-consideration. Concerns should always lead to help being provided at some point (*"Keeping children safe in education: Statutory guidance for schools and colleges" September 2024*). Staff may also take advice from the linked document: when-to-call-the-police--guidance-for-schools-and-colleges.pdf (npcc.police.uk)

What to do when a child or young person discloses abuse:

- Stay calm, reassuring and supportive
- If it is not possible to talk with the young person straight away, arrange a time and place to talk that is more suitable as soon as is possible after the initial contact
- Explain that you cannot promise to keep secrets
- Do not make any other promises
- Listen
- Do not press for details or 'lead' any discussion with questions: doing so could jeopardise any further investigations if it is thought that the student was asked leading questions
- Remain neutral – do not make judgements or assumptions as your behaviour could impact on the young person
- Record any signs of visible physical injury and their location, but do not ask a young person to remove items of clothing to do this; if needed, seek the advice of a first-aid trained member of staff
- Do not take photographs of any physical signs of injury: photographic evidence and/or medical examination will form part of any child protection investigation and will be carried out by the appropriate agencies
- Record any other details you feel are relevant e.g. general appearance or demeanour of the young person
- Pass on this information as soon as possible to the School's DSL or Deputy DSLs. Information should be reported/recorded accurately using the schools system.
- If the abuse involves images or videos of indecent images, staff must not view any images but must contact the police for advice

Where a staff member is unsure or needs support or advice, they should always contact a member of the Safeguarding team.

NB: it is not the School's role to investigate allegations of abuse or make judgements: this is the role of the Social Care Professionals and/or the Police.

Summary of actions following suspicion or allegation of abuse – by the DSL or Deputy DSL:

- Seek advice from MASH (Multi-Agency Safeguarding Hub) from the borough where the child resides
- Complete a written referral using the relevant form/online form
- Completion a referral to relevant Early Help agency if not meeting thresholds for social care
- Period of monitoring if situation remains unclear.

Making a referral

- Advice should always be sought from the MASH Team if there is uncertainty about whether to make a referral
- All referrals should be sent by completing the relevant borough's referral form.
- With few exceptions, the parents should be informed that a referral is being made: the school will always seek advice from the MASH team at the point of referral and will follow their guidance. Exceptions might include concerns regarding forced marriage, female genital mutilation or sexual abuse or where informing parents/carers may put the young person at further risk.
- Referrals are recorded and held confidentially.
- As part of the assessment led by social services, each School will provide information as requested e.g. on attendance, progress, presentation etc and will take part in any meetings such as professionals meetings or strategy meetings as required
- If Social Care agree that an assessment is to be carried out, this is completed within 45 working days, the outcome should be shared with the person making the referral
- In serious cases where the young person cannot return home, temporary foster care or a private arrangement with a family member is agreed as led by Social Care.

Statutory Assessments (Children Act 1989):

Section 17: Child in Need

Section 47: A child suffering or likely to suffer significant harm (Child Protection) – these can be single agency or joint agency investigations (social services and police)

Follow-up meetings

Following referrals to Social Care or completion of an Early Intervention and Family Support Service referral (EIFS) there will be a number of key meetings, depending on the context and level of assessment. These can include:

- Strategy Meetings (multi-agency, held at borough level)
- Initial and Review Case Conferences (Child Protection)
- Core group meetings (Child Protection)
- Child in Need Meetings (CIN)
- Team Around the Child or Team Around the Family Meetings (Early Help)
- Professionals Meetings

Trust schools are committed to having a representative attend these meetings wherever practicably possible and to provide a full written report in the rare cases where it is not. Minutes and key action points are recorded, shared with relevant staff and actioned as appropriate. All minutes are recorded in the student's confidential file.

Early Help Assessment's (EHA) and Early Intervention and Family Support Service (EIFS)

The Early Help Assessment is designed as an assessment tool to facilitate early help and co-operation between agencies to improve outcomes for children/young people in need. On occasions, Social Care may advise the school to complete an Early Help Assessment or an Early Intervention and Family Support Service referral (EIFS) if the young person does not meet the threshold for a referral to Social Care. If the school does not agree that this is an appropriate course of action, these concerns must be logged with Social Care and reasons given.

An Early Help Assessment or Early Intervention Family Support Service Referral may be used if:

- If the school is concerned about how the child/young person is progressing in terms of their health, welfare, behaviour, learning or any other aspect of their wellbeing
- A request is received from the child/young person or parent/carer for more support
- There is a concern about the child/young person's appearance or behaviour, but their needs are unclear or are broader than the School alone can address
- To identify the needs of the child/young person and/or to pool knowledge and expertise with other agencies to support the child/young person better (multi-agency approach)
- To refer the family for Early Help services such as Bromley Children's Project

Additional information: if there are general concerns about a young person but these are not clear, the young person should be monitored closely and further enquiries made.

In the event that there is a disagreement between agencies working with children or young people, schools' will refer to the borough's procedures on **"Escalating Concerns: Protocol for Resolution of Professional Disagreement Between Agencies Working with Children in Bromley".** Should the disagreement involve a different borough, the appropriate protocol can be obtained from the relevant borough.

Allegations against Staff and Low Level Concerns: The Role of the Local Authority Designated Officer (LADO)

In the event of an allegation against a member of staff (including supply staff and volunteers), this should be referred to the Headteacher immediately. If the Headteacher is the subject of the allegation, then it should be referred to the Chair of Governors for the respective school.

In the event that there is an allegation made about an individual or organisation who has been using the school premises for the purposes of running activities for children, even children who are not on roll at the IET school, the organisation's DSL will be contacted and there may be

advice sought from the LADO. In the event of the Headteacher's absence, allegations should be taken to the next most senior member of staff on site or the DSL.

The Headteacher/Chair of Governors will ensure that the CEO is aware of all allegations and updated as required.

If an allegation meets the **following criteria**, this should be reported to the Local Authority Designated Officer (LADO) within 24 hours of the allegation being made:

- An allegation that a member of staff has behaved in a way that has harmed a student or may have harmed a student
- An allegation that a member of staff may have committed a criminal offence against or relating to a student
- An allegation that a member of staff has behaved towards a student or students in a way that indicates she/he would pose a risk of harm
- An allegation that a member of staff has behaved or may have behaved in a way that indicates they may not be suitable to work with children.

If the allegation meets the above criteria, the LADO must be contacted BEFORE the member of staff is informed of the allegation so that advice can be taken and next steps clearly agreed. Investigation of the allegation (Internal Management Investigation or IMI) will only be undertaken by the school under the explicit direction of the LADO. In the event of an allegation, the following must be noted:

- The member of staff who is the subject of the allegation must be made aware of the allegation as soon as this is practicable, but only once the LADO has been advised and the follow-up action agreed
- The wellbeing of all parties involved should be considered, with signposting to sources of support where appropriate
- The member of staff should be kept informed throughout by a named representative of the School and can contact their union or another colleague for additional support if they wish
- Consideration can be given to suspension of normal duties for the member of staff, but only if there is a risk of harm or potential harm and all alternative options to avoid this have been considered, using a risk assessment approach
- The parents/carers of the student/s involved should be informed and kept up-to-date with the progress of the case by a named member of staff: advice from the LADO should be sought regarding sharing of information
- Unless there is a criminal prosecution, parents/carers must be advised by the LADO of the outcome of the case, including the outcome of any disciplinary hearing
- Parents/carers should be aware that there are reporting restrictions in place (Education Act 2011) to prevent identification of those staff involved, including the use of social networking sites.
- Concerns which do not meet the threshold of harm are considered Low Level Concerns and should be reported to the Headteacher or DSL who will take a triage approach to determine next steps. All low-level concerns are recorded and reviewed regularly as per Keeping Children Safe in Education, to help identify patterns and trends. Children who make repeated false, unsubstantiated, unfounded or malicious allegations may

be in need of additional help. A pattern of low-level concerns about a member of staff may lead to the threshold of harm being met and a referral being made to the LADO.

Allegations against supply staff

Supply staff are not employed directly by the school, instead this is through an agency, who is the actual employer. Where an allegation is made against a supply teacher, the School will immediately contact both the agency concerned and the LADO. The school will continue to support any investigation that is required. (Keeping Children Safe in Education, DfE, 2024)
Low level concerns which are shared about supply staff and contractors should be notified to their employers, so that any potential patterns of inappropriate behaviour can be identified.

Allegations against staff regarding use of excessive force

As with all allegations against staff, a complaint about the use of excessive force should be investigated thoroughly using the same criteria and process outlined above. Where it can be shown that a member of staff has acted within the law and used reasonable force to prevent injury, damage to property or disorder, this would form the basis of any defence. "Whether the force is reasonable will always depend on the particular circumstances of the case: the use of force is reasonable if it is proportionate to the consequences it is intended to prevent" *("Use of reasonable force Advice for Head Teachers, Staff and Governing Bodies, DfE, July 2013").*

Outcome of LADO Investigation

The following will be used by the Schools within the Trust and the LADO when determining the outcome of allegations:

Outcome	Definition	Subsequent Action
SUBSTANTIATED	There is sufficient evidence to prove the allegation	Comprehensive summary of allegation, findings and actions held on personnel file – copy to the accused including decision on actions taken by the School in discussion with the LADO. Details should be included in references.
UNSUBSTANTIATED	There is insufficient evidence to prove or disprove the allegation so neither guilt or innocence can be implied	Comprehensive summary of allegation, findings and actions held on personnel file – copy to the accused including decision on actions taken by the School in discussion with the LADO. Details should be included in references.
MALICIOUS	There is sufficient evidence to disprove the allegation and that there has been a deliberate act of deception	Consideration should be given to making a referral to social care or other relevant services as there may be underlying concerns, including undisclosed abuse from another source. Disciplinary actions should be considered for the accuser, where allegations are proved to be false

FALSE	There is sufficient evidence to disprove the allegation	and/or malicious: this should include involving the police where appropriate. **Details should be removed from the staff member's personnel record unless they give consent for them to be held and should not be referred to in references.**
UNFOUNDED	There is no evidence or proper basis which supports the allegation being made	

For **substantiated** or **unsubstantiated** allegations, the following will be held in the staff member's personnel file:

- a clear and comprehensive summary of the allegation
- details of how the allegation was followed up and resolved including any action taken
- the decision reached and the outcome as categorised above

A copy of this will be provided to the member of staff and will include a declaration on whether the information will be referred to in any future reference. Records should be held for 10 years from the date of the allegation, or until the member of staff reaches retirement, unless it relates to an allegation of **sexual abuse.** The 10 year retention period does not apply to allegations of sexual abuse: *"Schools and colleges have an obligation to preserve records which contain information about allegations of sexual abuse for the Independent Inquiry into Child Sexual Abuse (IICSA)".*

Where substantiated, a referral to the DBS must be made: *"schools have a legal duty to refer to the DBS anyone who has harmed, or poses a risk of harm, to a child".* This includes those members of staff who resign or cease to provide their services: the school will not enter into any settlement or "compromise agreements". The school will also decide whether a referral should be made to the Teacher Regulation Agency for consideration of possible prohibition from teaching.

Child on child abuse and child on child sexual violence and sexual harassment

Documents referred to:

- Keeping Children Safe in Education – Department for Education - 2024
- Child on Child Abuse Toolkit – Farrer and Co – 2023 – as recommended by Bromley Children's Safeguarding Partnership
- Sexual violence and sexual harassment between children in schools and colleges – Ofsted - September 2021
- Safeguarding.network.co.uk

The governors, senior leadership team and all staff members including volunteers at IET are committed to the prevention, early identification and appropriate management of child on child abuse as defined below, both within and beyond school.

Definitions:

For these purposes, child-on-child abuse is any form of physical, sexual, emotional or financial abuse and coercive control, exercised between children, and within children's relationships (both intimate and non-intimate), friendships and wider peer associations. Child-on-child abuse can take various forms including (but not limited to): serious bullying (including cyber-bullying), relationship abuse, domestic violence and abuse, child sexual exploitation, youth and serious youth violence, harmful sexual behaviour, and/or prejudice-based violence including, but not limited to, gender-based violence and misogyny.

Examples of online child-on-child abuse would include sexting, online abuse, child-on-child grooming, the distribution of youth involved sexualised content, and harassment.

Children abusing other children can take many forms, including physical aggression, bullying, sexual violence and harassment and abuse within intimate relationships. Child-on-child abuse can also relate to initiation activities, known as "hazing", as part of joining a group or gang.

In particular, IET:

- Believe that in order to protect children, all schools should be aware of the nature and level of risk to which their students are or may be exposed to, and put in place a clear and comprehensive strategy which is tailored to their specific safeguarding context, and take a whole-school community Contextual Safeguarding approach to preventing and responding to child-on-child abuse.
- Recognise national and increasing concern about this issue and wish to implement this policy in order to mitigate harmful attitudes and child-on-child abuse in the school setting and encourage parents to hold us to account on this issue so that if their child is feeling unsafe as a result of the behaviour of any of their peers, they should inform the School so that it can ensure that appropriate and prompt action is taken in response.
- Believe it is not acceptable to merely take a reactive approach to child-on-child abuse in response to alleged incidents of it and we believe that to tackle child-on-child abuse proactively, it is necessary to focus on all four of the following areas: systems and structures, prevention, identification and response/interventions.
- Recognise that abuse is abuse and should never be passed off just as "banter" "just having a laugh" or "part of growing up" and all staff working with children should maintain an attitude of "it could happen here"
- Understand that alleged perpetrators of abuse may also be victims themselves and so a safeguarding approach is taken to all individuals involved in concerns or allegations about child on child abuse including those who have alleged to have been abused or those who have alleged to have abused their peers, in addition to any sanctioning work that may also be required for the latter.
- The Designated Safeguarding Lead will take into consideration a number of factors such as the wishes of the victim in how they want to proceed, the ages of the children involved, any power imbalance between the children and any intra familial harm amongst other factors, when deciding on the initial response.

- Whilst the term “child” or “children” is defined as a person aged under 18, the Trust have chosen not to restrict our approach to child-on-child abuse under this policy to children but also adopt a wider interpretation of our safeguarding responsibilities so that they apply to all students, regardless of their age. There are some young people who are students in school’s who are over the age of 18 (where a 6th form exists) and who may still require intervention. There may be some differences in the response/intervention taken which is age appropriate for example in our potential for referring to external agencies for support.
- Use the term “victim” as this is a widely recognised and understood term, however, we recognise that not everyone who has been subjected to abuse, considers themselves as a victim or would want to be described in this way. IET will be conscious of the use of language such as “victim” and “perpetrator” when managing any incident.

Sexual violence and sexual harassment between children

Children’s sexual behaviour, relative to their age and stage of development, can range from “normal” to “inappropriate, problematic abusive or violent”, referred to as “harmful sexual behaviour”. Children and young people displaying such behaviours may well have suffered their own trauma and abuse. (*“Sexual Violence and Harassment Between Children In Schools and Colleges” 2021*)

Sexual violence and/or harassment can occur between children of any age, sex or gender, individually or in groups and can take place in a range of settings, including online or between children or young people in different educational settings. Face-to-face and online abuse can run concurrently. Allegations of sexual violence or harassment are never acceptable and will always be taken seriously, both for the victim and also the alleged perpetrator(s). We understand that it is important to explain that the law is in place to protect children and young people rather than criminalise them, and this is explained in a way that avoids alarming or distressing them.

The Trust recognises the potentially serious impact on victims, both in terms of social interactions, general wellbeing, mental health and educational progress. Victims will be offered appropriate support, both within schools and/or with referrals to external agencies as needed. The Trust acknowledges that some groups are statistically more at risk than others: girls, those with SEND and young people who identify or are identified by others as LGBT and other groups who may have vulnerabilities.

All staff are responsible for creating and promoting a strong culture of intolerance to all forms of sexual violence and harassment and reinforcing the message that it is not acceptable or “an inevitable part of growing up”. This includes though delivery of the RSE curriculum, modelling appropriate behaviours and language and challenging and reporting negative behaviour.

An understanding of consent is vital: “consent is about having the freedom and capacity to choose” (KCSIE, 2024). Consent can be given to one type of sexual activity but not another and can be withdrawn at any time. A child under the age of 13 can never consent to any sexual

activity. Sexual intercourse, in all forms, without consent is rape. Information on consent is explicitly communicated in a number of ways and are specifically adapted for the specific context.

Definitions in line with the Sexual Offences Act 2003

SEXUAL VIOLENCE e.g.	SEXUAL HARASSMENT e.g.
Rape	Sexual comments, jokes, taunting, telling of sexual stories
Assault by penetration	Unwanted physical contact e.g. deliberately brushing up against someone or interfering with another's clothes
Sexual assault	Displaying images of a sexual nature
	Online e.g. sharing of nudes/semi-nudes or youth produced sexual imagery, comments or threats on social media
	"Up-skirting" i.e. taking a picture under clothing (not necessarily a skirt, applies to all genders) without permission (Voyeurism Offences Act 2019)

The Trust and staff must also be aware that sexual violence or harassment can also take place between adults in the school or from students, directed towards adults: any such concerns must be reported to the Headteacher, Senior Deputy or DSL (*"Sexual Violence and Harassment Between Children In Schools and Colleges" 2021*)

Decisions around reports of sexual violence or harassment are likely to be time-sensitive and complex. The DSL or Deputies can call the NSPCC dedicated advice line for professionals: 0808 800 5000 or contact help@nspcc.org.uk. This will be particularly important when the wishes of the victim conflict with wider child protection principles outlined above i.e. need to be balanced against the school's duty to protect both the victim and other children and young people.

For further information, see "Sexual Violence and Harassment Between Children In Schools and Colleges" *(DfE September 2021).*

Signs and symptoms of child on child abuse

Signs that a child may be suffering from child on child abuse can also overlap with those indicating other types of abuse and can include, but are not limited to:

- Disengagement from classes or struggling to carry out school related tasks to their usual standard
- Physical injuries
- Experiencing difficulties with mental health and/or emotional wellbeing
- Becoming withdrawn and/or shy; experiencing headaches, stomach aches, anxiety and/or panic attacks; suffering from nightmares or lack of sleep or sleeping too much

- Broader changes in behaviour, such as alcohol or substance misuse
- Changes in appearance and/or acting in a way that is not appropriate for the child's age
- Abusive behaviour towards others

This list is not exhaustive, and if a child or young person displays these signs, it does not necessarily indicate abuse. Staff must be alert to behaviour that might cause concern and think about what the behaviour might signify. Children should be encouraged to share with them any underlying reasons for their behaviour and, where appropriate, staff might need to engage parents/carers to understand the context more fully.

Where a child exhibits any behaviour that is out of character or abnormal for his/her age or stage of development, staff should always consider whether an underlying concern is contributing to their behaviour and, if so, what the concern is and how the child can be supported going forwards.

Threshold for decisions related to child on child

If the following threshold is met which determines significant harm, then the incident will be considered to be child on child abuse and will be recorded accordingly with procedures for handling child on child abuse followed on a case-by-case basis.

Degree and extent of physical harm: *may include but not limited to;* significant bruising, broken bones, need for Accident and Emergency or other medical treatment, etc.
Duration and frequency of abuse: *may include but not limited to*; how often this abuse has occurred and over how long a period of time.
Extent and evidence of premeditation: *may include but not limited to;* the background and relationship between individuals involved, the motivation of the actions, any evidence that this was a premeditated act.
Degree of threats or coercion: *may include but not limited to;* threats to kill or harm being made to the victim or about the victim, threats to embarrass, humiliate or otherwise cause emotional harm to the victim or about the victim, the extent to which these threats have been shared with the wider community or the extent to which they have been shared with victim and the mechanism for sharing these threats. Coercion could also include financial coercion.

Types of abuse

"Abuse, neglect and safeguarding issues are rarely stand-alone events that can be covered by one definition or label. In most cases, multiple issues will overlap with one another" (*KCSIE 2024*). **Contextual safeguarding** and other harms outside the home, calls for a broader view of a young person's experience and potential risks, not just within school and the home, but also in the local area and wider community, including online.

Abuse: a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm, or by failing to act to prevent harm. Harm can include ill treatment that is not physical as well as the impact of witnessing ill treatment of others. This can be particularly relevant, for example, in relation to the impact on children of all forms of domestic abuse including where they see, hear or experience its effects. Children may be abused in a family or in an institutional or community setting by those known to them or more rarely by strangers. Abuse can take place wholly online or may be used to facilitate offline abuse.

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

Indicators of physical abuse (*NSPCC*):

- Injuries not consistent with the explanation given for them
- Injuries which occur to the body in places which are not normally exposed to falls or rough games
- Injuries which have not received medical attention
- Reluctance to change for or participate in PE
- Bruises, bites, burns or fractures for example, which do not have an accidental explanation
- The child gives inconsistent accounts for the cause of injuries
- “Frozen watchfulness” (a child who is unresponsive to its surroundings but is clearly aware of them)

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

Indicators of emotional abuse (*NSPCC*):

- Depression, aggression, extreme anxiety, changes or regression in mood or behaviour
- Obsessions or phobias
- Sudden underachievement or lack of concentration
- Seeking adult attention and not mixing well with other children

- Sleep or speech disorders
- Negative statements about self
- Highly aggressive or cruel to others
- Extreme shyness or passivity
- Running away, stealing and lying

Sexual abuse: involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (including via the internet). Sexual abuse is not solely perpetrated by adult males, women can also commit acts of sexual abuse, as can other children (child on child sexual abuse).

Indicators of sexual Abuse (*NSPCC*):

- Allegations made by the child regarding sexual abuse
- Child has an excessive preoccupation with sexual matters and inappropriate knowledge of adult sexual behaviour for their age
- Repeated urinary infections or unexplained stomach pains
- Child is sexually provocative or seductive with adults/peers
- Inappropriate bed sharing arrangements at home
- Severe sleep disturbances with fears, phobias, vivid dreams or nightmares
- Eating disorders such as anorexia or bulimia

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

Signs of possible neglect (*NSPCC*):

- Unkempt, body odour, unwashed, uncombed hair or untreated lice
- Clothing that is dirty, too big or too small or inappropriate for weather conditions
- Frequently left unsupervised or alone
- Frequent diarrhoea
- Frequent tiredness
- Untreated illnesses, infected cuts or physical complaints which the carer does not respond to

- Frequently hungry
- Overeating “junk” food

For full definitions, see “Keeping children safe in education: Statutory guidance for schools and colleges”, September 2024

Specific Safeguarding Issues

Safeguarding and child protection issues manifest themselves in many ways, both in school, at home and in the wider environment (known as contextual safeguarding). These potential issues include; bullying, cyber-bullying and sharing nudes or semi-nudes (also known as sexting or youth produced sexual imagery), child on child abuse, sexual violence, harassment and child sexual exploitation (CSE), domestic abuse, drug and alcohol misuse, fabricated or induced illness, faith abuse, female genital mutilation (FGM), forced marriage, gangs and child criminal exploitation including “County Lines”, youth violence and initiation rituals, relationship abuse, gender-based violence/violence against women and girls (VAWG), mental health and radicalisation.

Key examples of these issues are referred to in more detail below. **For further detailed information and links to sources of support and advice, see KCSIE, September 2021 (www.gov.uk) or visit the NSPCC website: www.nspcc.org.uk**

Child criminal exploitation (CCE)

CCE is where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child into any criminal activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial or other advantage of the perpetrator or facilitator and/or (c) through violence or the threat of violence. The victim may have been criminally exploited even if the activity appears consensual. CCE does not always involve physical contact; it can also occur through the use of technology.

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

County lines is a term used to describe gangs and organised criminal networks involved in the transportation and sale of illegal drugs. Children and vulnerable adults are exploited to move and store drugs and money. Offenders will often use coercion, intimidation, violence (including sexual violence) and weapons to ensure compliance of victims.

Child Sexual Exploitation (CSE)

Child Sexual Exploitation (CSE) is a form of child sexual abuse and whilst may involve physical contact, this may include non contact activities such as involving children in the production of sexual images, forcing children to look at sexual images or watch sexual activities. CSE can occur over time or be a one off occurrence and may happen without the child’s immediate knowledge. CSE can affect any child who has been coerced into engaging in sexual activities which includes 16 and 17 year olds who can legally consent to have sex.

What marks out exploitation is an imbalance of power in the relationship. The perpetrator always holds some kind of power over the victim which increases as the exploitative relationship develops. Sexual exploitation involves varying degrees of coercion, intimidation or enticement, including unwanted pressure from peers to have sex, sexual bullying including cyberbullying and grooming.

Signs of possible CCE/CSE:

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

Staff at IET are aware of the potential signs and indicators of CSE/CCE and concerns or suspicions are reported using the school systems.

Domestic abuse

This is defined as "an incident or pattern of incidents of controlling, coercive, threatening behaviour, violence or abuse between those aged 16 or over who are, or have been, intimate partners of family members. This can be psychological, physical, sexual, financial or emotional. Children can be the victims of domestic abuse, they may see, hear or experience the effects of abuse at home and/or suffer domestic abuse in their own intimate relationships (teenage relationship abuse).

IET school's have signed up to Operation Encompass, which aims to alert school's where there has been an incident of Domestic Abuse where children have been present.

Homelessness

Being homeless or being at risk of becoming homeless presents a real risk to a child or young person's welfare. Staff who are aware that a family is facing these risk factors should share this information using the school's systems of reporting concerns.

Parents/carers will be signposted to supportive services such as Shelter and the DSL may consider a referral to Children's Social Care if it is felt that a child or children are at risk of harm.

The Homelessness Reduction Act 2017 places a legal duty on English councils to ensure that everyone who is homeless or at risk of becoming homeless has access to meaningful help. This duty focuses on early intervention and encourages those at risk to seek support as soon as possible.

It should be recognised that 16 and 17 year olds may be living independently from parents and guardians and will require a different level of support. Children's services will be the lead

agency for these young people and the Safeguarding/Pastoral Teams ensure that appropriate referrals are made and practical support put in place where possible.

So-called "Honour-based abuse" (HBA)

HBA refers to incidents or crimes which have been committed to protect or defend the honour of the family and/or community. These can include FGM and forced marriage. All forms of HBA are abuse regardless of the motivation and should be reported using the school system of reporting concerns.

Female Genital Mutilation (FGM)

IET follows Bromley Borough's FGM Protocol (August 2023). FGM is defined as "all procedures which involve partial or total removal of the external female genitalia or injury to the female genital organs whether for cultural or other nontherapeutic/medical reasons" WHO January 2023. This practice is illegal in the UK and a form of child abuse with long lasting and serious consequences for the victim. The Serious Crime Act 2015 places a mandatory duty on teachers to report disclosure or other evidence of actual FGM on those under 18 years direct to the police. Teachers cannot delegate this mandatory duty to another individual but should report this immediately to the DSL and will be fully supported through this process.

Where there is risk or suspicion that FGM has been carried out or is planned to be carried out or the young person is 18 years or over, this should be reported to the DSL without delay who will contact social services. For further detailed information on FGM, see Bromley Borough's FGM Protocol (August 2023). https://www.bromleysafeguarding.org/articles.php?id=637

Indicators of FGM being likely to take place: (*NSPCC*):

- Long holiday taken to country of origin or families country of origin or another country where the practice is prevalent
- Parents state that they will be taking daughter or their siblings out of school/country for a long period of time
- Family do not engage with health professionals
- Family already known to social care in relation to other safeguarding concerns
- Student may talk about FGM hypothetically
- Student has requested support from a nurse/other professional but has not disclosed why

Indicators that FGM has already taken place:

- Student has difficulty walking, sitting, does not want to take part in PE and this was not a problem previously
- Student requests to go to the toilet more than usual without a medical reason
- Student is often absent from school due to menstrual, urinary or stomach problem

https://nationalfgmcentre.org.uk/

Forced Marriage

Forcing a person into marriage without full and free consent is a crime in England and Wales. This can take the form of violence or the threat of violence, or through emotional or psychological means and concerns should be raised using the school system.

Threat of Radicalisation/Extremism

Extremism is the vocal or active opposition to our fundamental values including democracy, the rule of law, individual liberty and the mutual respect and tolerance of different faiths and beliefs, which also includes calling for the death of members of the armed forces.

Radicalisation is the process of a person legitimising support for, or use of, terrorist violence.

Terrorism is an action that endangers or causes serious violence to a person/people, causes serious damage to property or seriously interferes or disrupts an electronic system and must be designed to influence the government or intimidate the public with the purpose of advancing a political, religious or ideological cause.

The Trust recognises that vulnerable young people can be targeted by extremists in a process of "grooming" that can lead to high risk and potentially criminal behaviour. IET schools will respond to any concerns regarding possible radicalisation using a safeguarding approach: the young person/people involved need support and protection, not punitive action, in order to prevent future criminal activity. Any concerns are logged to reflect the fact that seemingly minor issues may build up to create a bigger picture. Engagement with parents/carers is essential and concerns should be shared unless doing so would put the young person at significant risk.

The School will work with the Prevent team (led by the Metropolitan Police) to secure specialist support via the Channel Programme if appropriate and to assess the risk of young people from IET schools being drawn into extremist ideologies. General and more specialist staff training including new staff induction incorporates the Prevent strategy and includes potential signs and indications that a young person may be at risk. All staff know that the Designated Safeguarding Lead and the Headteacher are also the leads on Prevent and a risk assessment is reviewed at least annually.

Youth Produced Sexual Imagery

Youth Produced Sexual Imagery (YPSI) is known by several different names including sharing nudes/semi nudes and sexting and include images being sent or posted online, videos or live streams of nude or semi-nude images by anyone under the age of 18.

Whilst this activity is illegal, it can also be very harmful for the young person involved as once the image has been shared, they can lose control of this, leading to great distress.

For clarity around the language involved in the legislation:

- Possess – means "to have", whether as a physical photograph or as an image on an electronic device

- Distribute and show – meaning to have passed the image on which could include sending the image via an app on a smartphone
- Make – meaning to take the photograph or record the video
- Indecent images – this term is not defined in law, however it could include nude or semi-nude sexual posing or sexual activity with a child.

Children make and send sexual images for a range of reasons and each case will be investigated in it's own right with the response also differing between case to case. As with all safeguarding issues, the welfare of the young person or people involved is the School's primary concern and all concerns of this nature will be reported to the DSL.

Useful Contacts

Organisation	Purpose	Contact details
Bromley Children's and Families Hub	*To report concerns about a child or young person living in Bromley Borough*	Telephone: 0208-461 7373/7379/7404/7309/7026 Out of hours: 0300 303 8671 Fax: 0208-313-4400 Email: mash@bromley.gov.uk Civic Centre, Stockwell Close, Bromley, BR1 3UH
Bromley LADO	*To report concerns about adults who work with children*	Gemma Taylor Consultation to Bromley's Local Authority Designated Officer (LADO) (Page 1 of 2) Education Safeguarding | Bromley Education Matters
Bromley Safeguarding Children Partnership	*Coordinates services and procedures to protect and promote the welfare of children and young people in Bromley*	Telephone: 0208 461 7816 Email: BSCP@bromley.gov.uk www.bromleysafeguarding.org St Blaise, Room B40a, Civic Centre, Stockwell Close, Bromley BR1 3UH
Bromley Wellbeing Service	*a single point of access for the emotional well-being of Bromley's children, aged 0-18*	Telephone: 0203 770 8848 https://bromley-y.org/ email: info@bromleyy.org
Bromley Well – young	*Supporting young carers aged 4-19 years to manage caring relationships whilst enjoying childhood*	Bromleywell.org.uk 0808 2787898 https://www.bromleywell.org.uk/
Bexley Children's services	*'Front Door' service, a single point of contact to refer a child, young person and/or family*	Telephone: 0208 303 7777 email: childrenssocialcare.admin@bexley.gov.uk
Bexley Safeguarding Partnership for Children & Young People	*Coordinates services and procedures to protect and promote the welfare of children/young people in Bexley*	Telephone: 0203 045 4320 email: bscb@bexley.gov.uk www.bexleylscb.org.uk 221 Erith Road, Bexleyheath, Kent, DA7 6H2
Royal Borough of Greenwich Children's Services	*to report concerns about a child or young person living in Greenwich Borough*	Telephone: 0208 921 3172 Out of hours: 020 8854 888 MASH Consultation Line: 020 8921 2267 Email: MASH-referrals@royalgreenwich.gov.uk Royal Borough of Greenwich MASH, 1st Floor The Woolwich Centre, 35 Wellington Street, London SE18 6HQ

Greenwich Safeguarding Children Partnership	*Coordinates services and procedures to protect and promote the welfare of children and young people in Greenwich*	Phone: 020 8921 4477. Email: safeguardingboard@royalgreenwich.gov.uk www.greenwichsafeguardingchildren.org.uk Greenwich Safeguarding Children Partnership
Lewisham Children's Social Care	*to report concerns about a child or young person living in Bromley Borough*	Telephone: 0208 314 6000 out of hours:020 8314 6000 www.lewisham.gov.uk Lewisham Children's Social Care, First Floor, Laurence House, 1 Catford Road, SE6 4RU
Lewisham Safeguarding Children Partnership	*Coordinates services and procedures to protect and promote the welfare of children and young people in Lewisham*	Telephone: 020 7138 1446 Email:safeguardingpartnership@lewisham.gov.uk Kaleidoscope Child Development Centre 32 Rushey Green, Catford SE6 4J
Childline - 0800 1111 **www.childline.org.uk** **www.nspcc.org.uk** Whistleblowing Helpline: 08000280285 / help@nspcc.org.uk Tackling Child Sexual Exploitation https://stop-ce.org/ssss/ and text helpline 116000 (NWG Network) OR www.met.police.uk/tellsomebody https://www.ceop.police.uk/Safety-Centre (online sexual abuse and grooming) Met Police Confidential Anti-Terrorist Hotline: 0800 789 321		

Other related policies

There are a number of other policies where safeguarding is also of particular reference, please see individual school's websites for these policies:

- Behaviour (including the use of reasonable force)
- Mental Health and Wellbeing
- Looked After Children
- Relationships and Sex Education
- Attendance (including Child Missing in Education Procedures)
- Medical Needs and First Aid
- SEND
- ICT, New Technologies and E-Safety
- Trips and Visits
- Equality and Diversity
- Whistleblowing Policy – see IET policy found on IET website
- Visiting Speakers Policy