Rye College Policy

Policy Title:	Safeguarding and Child Protection Policy
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Academy Responsibility:	Executive Head, Head of School, DSL, ADSL
Trust Responsibility:	Chief Executive Officer and Director of Communication and Compliance
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Purpose of the policy

This policy details the academy's intentions regarding the protection of children and young people in its care. Child protection is part of the safeguarding process. It focuses on protecting individual children identified as suffering or likely to suffer significant harm. This includes child protection procedures, which detail how the academy responds to concerns about a child.

Safeguarding is a term, which is broader than 'child protection' and relates to the action taken to promote the welfare of children and young people up to the age of 18 and to protect them from harm. Safeguarding is everyone's responsibility. Safeguarding is defined in 'Working together to safeguard children 2018' as:

- Protecting children from maltreatment;
- Preventing impairment of children's physical and mental health and 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.

Aquinas Church of England Education Trust (the Trust) and Rye College always acts in the best interests of the child or young person and ensures that all reasonable steps are taken to promote their wellbeing and prevent harm to them. Having safeguards in place within an organisation not only protects and promotes the welfare of children but also enhances the confidence of trustees, colleagues, volunteers, parents/carers and the general public. We endeavour to promote a child centric approach to safeguarding which acts in the best interests of the child taking their views into account where possible.

Statement of Principles and Values

This policy applies to all colleagues, trustees, members of Aquinas Advisory Councils (AAC), volunteers, contractors and visitors. The Trust and the academy are committed to:

- The welfare and protection of the child or young person being paramount;
- No child or group of children being treated any less favourably than others in being able to access services, which meet their particular needs;
- All children without exception have the right to protection from abuse regardless of gender, sexual orientation, ethnicity, disability, sexuality or beliefs;
- The policy being reviewed, approved and endorsed by the board of trustees annually or when legislation changes;
- Taking seriously all concerns and allegations of abuse, which may require a referral to children's social care services, the independent Local Authority Designated Officer (LADO) for allegations against colleagues, trustees and other volunteers, and in emergencies, the police;
- Keeping children, young people, parents, and carers aware of the policy and procedures as appropriate;
- A safer recruitment, selection, vetting and induction process for all colleagues and volunteers;
- Implementing the procedures of the East Sussex Safeguarding Children Partnership (ESSCP) where appropriate;
- Protecting children and young people from all forms of abuse prevalent at the time and for adapting existing or developing new procedures to ensure their safety.

Child Protection Statutory Framework

- Children Act 1989;
- United Convention of the Rights of the Child 1991;
- The General Data Protection Regulations and the Data Protection Act 2018;
- Human Rights Act 1998;
- Sexual Offences Act 2003;
- Children Act 2004;
- Safeguarding Vulnerable Groups Act 2006;
- Protection of Freedoms Act 2012;
- Children and Families Act 2014;
- Equality Act 2010;
- Public Sector Equality Duty;
- Keeping Children Safe in Education (2021) [KCSIE];
- Special educational needs and disability (SEND) code of practice: 0 – 25 years – Statutory guidance for organisations, which work with, and support children and young people who have special educational needs or disabilities; HM Government 2014;
- Information sharing: Advice for practitioners providing safeguarding services to children, young people, parents and carers; HM Government 2018;

- Working together to safeguard children: a guide to inter-agency working to safeguard and promote the welfare of children; HM Government 2018 updated in December 2020.
- Education Act 2002;
- Common Assessment Framework for Children and Young People 2007;
- The Children (Private Arrangements for Fostering) Regulations 2005;
- Prevent Duty for England and Wales (2015) under section 26 of the Counter-Terrorism and Security Act 2015;
- Section 5B of the Female Genital Mutilation Act 2003 (as inserted by section 74 of the Serious Crime Act 2015);
- ESSCP interagency child protection and safeguarding procedures;
- Use of Reasonable Force – DfE Guidance (2013);
- Children missing education statutory guidance for local authorities (2016);
- Child sexual exploitation - Definition and a guide for practitioners, local leaders and decision makers working to protect children from child sexual exploitation (2017);
- Sexual Violence & Sexual Harassment between Children in Schools and Colleges – DfE Guidance (2021).

Relevant Trust and academy policies

This policy must be read in conjunction with related Trust and academy policies, detailed below, which together form the basis of child protection at the academy.

The Trust's policies on:

- Academy Admission Arrangements;
- Allegations of abuse against colleagues;
- Complaints;
- Confidentiality Statement;
- CPD and Training;
- Data Protection;
- Disclosure Statement;
- Equality;
- Grievance and Disciplinary;
- Health and Safety;
- Induction;
- Lone worker;
- Positive Handling;
- Relationship, Health and Sex Education;
- Safeguarding;
- Safer Recruitment;
- Whistleblowing.

Academies' individual policies on:

- Accessibility Plan;
- Administration of medicine and first aid;

- Attendance;
- Appropriate physical contact including restraint;
- Behaviour including anti-bullying;
- Child Looked After;
- Complaints;
- E-safety and acceptable use;
- Health and safety procedures;
- Missing children;
- Personal and intimate care;
- Photography of children and young people;
- Relationships Education and Relationships and Sex Education;
- SEND.

The policies are supported by the Trust's Employee handbook and the operational procedures outlined for each individual academy. This includes the academy procedures for dealing with disclosures and concerns about a child or young person including the recording and sharing of information.

COVID-19 Critical Incident

For those children who are unable to attend school from the commencement of the academic year 2020-2021 due to a reason connected with the COVID-19 pandemic, the academy will, on a regular basis, keep in touch with the student and family in order to ensure wellbeing of the student. Colleagues will monitor for signs of neglect or harm and report and escalate concerns as detailed in this policy.

Where the academy is required to close for some or all of its students and colleagues due to a reason connected with the COVID-19 pandemic, or students are learning remotely due to a reason connected with the pandemic, the COVID-19 appendix as detailed in the Trust's Safeguarding Policy shall apply.

For the period of the COVID-19 critical incident, a DSL or DDSL who has been trained will continue to be classed as a trained DSL or DDSL even if they miss their refresher training. However, training should be accessed as soon as possible.

Categories of Harm

The Trust and the academy acknowledge that children and young people can face abuse in a myriad of ways and from numerous sources. It is vital that all colleagues reassure and support victims, always taking any disclosure seriously and reporting it in accordance with the academy's safeguarding reporting procedures. Victims should be encouraged to make disclosures and never be made to feel ashamed of doing so. Victims of sexual harassment and violence should never be made to feel that they are creating a problem.

The main categories of harm, as identified by KCSIE, are:

Abuse and neglect are forms of maltreatment and harm of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Children may be abused in a family or

in an institutional or community setting; by those known to them or more rarely, by a stranger. They may be abused by an adult, adults, another child, or children. Categories of abuse are:

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

Signs and indicators are found at **Appendix 1.**

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. It is illegal in the UK to subject a child or young person to FGM or to take a child abroad to undergo FGM. There is a mandatory duty on all colleagues to report cases of FGM to the police.

A child for whom FGM is planned is at risk of significant harm through physical and emotional abuse. Where a child is thought to be at risk of FGM, there is a need to act quickly before the child is abused in the UK or taken abroad to undergo the procedure.

The Prevent Strategy

The Prevent Strategy is a countrywide initiative, which aims to work with young people and their families to prevent extremist behaviour and or radicalisation. The three key areas of concern are animal extremist behaviour, racist behaviour and terrorist behaviour. The academy supports the Prevent Strategy and will refer a student if they feel there is enough evidence to warrant it.

The Prevent Strategy places a duty on the academy to have "due regard to the need to prevent people from being drawn into terrorism". In order to achieve this, the academy must undertake a risk assessment, work in partnership, train colleagues and have appropriate IT policies. Further details are found at **Appendix 1.**

Other

Although it is not possible to provide a definitive list of all incidences, which may impact on the safety of a child or young person, colleagues should also be aware of the following:

- Bullying (including cyber bullying) – please see the academy's anti-bullying, e-safety and acceptable use policies;
- Children missing from education – please see **Appendix 1** and the academy's attendance policy;
- Child Sexual Exploitation – please see **Appendix 1;**
- Domestic violence – please see **Appendix 1** and the academy's attendance/ missing children policy;
- Fabricated or Induced illness – please see **Appendix 1;**
- Forced marriage – please see **Appendix 1;**
- Honour based violence – please see **Appendix 1;**
- Peer on Peer Abuse including up-skirting – please see **Appendix 1;**
- Sexual Behaviour and Harassment - please see **Appendix 1;**

- Criminal Exploitation – please see **Appendix 1;**
- Serious Violence and sexual harassment – please see **Appendix 1;**
- Mental Health – please see **Appendix 1**;
- Online Safety – please see **Appendix 1**.

Early Help and the Common Assessment Framework (CAF)

The identification of children and young people who would benefit from early help is vital to safeguarding. Early help is the provision of support as soon as a problem emerges; this may continue as regular Team around the Child (TAF) meetings. The academy will provide all relevant information to support this process. Further details are provided in **Appendix 1**.

Child Protection Plan (CPP) and a Child in Need (CHIN)

Following a referral to the MASH team and subsequent family assessment, a child may be subject to a CPP or considered a CHIN. These interventions are led by a named social worker.

A child in need is defined under the Children Act 1989 as a child who is unlikely to achieve or maintain a reasonable level of health or development, or whose health and development is likely to be significantly or further impaired, without the provision of services; or a child who is disabled. Local authorities are required to provide services for children in need for the purposes of safeguarding and promoting their welfare. Children in need are assessed under section 17 of the Children Act 1989. The academy will provide as much information as possible as part of the referral process so that the social care assessment can take into consideration whether the child is being harmed in contexts outside the home.

Where there is reasonable cause to suspect that a child is suffering or is likely to suffer significant harm, the local authority is able to undertake an investigation under S.47 of the Children's Act 1989. This may result in a child protection S.47 investigation.

Children with Specific Characteristics

Children Looked After and previously looked after – colleagues and volunteers should have an awareness of issues around safeguarding children looked after. Appropriate colleagues must have information they need about the legal status of the looked after arrangements and the care arrangements for the child/ young person. Further details are found in **Appendix 1** and in the academy's, Children Looked After Policy.

Children with Special Educational Needs (SEN) or disabilities – Colleagues and volunteers should also be aware of the additional vulnerabilities of children and young people with SEN and disabilities as they can face additional safeguarding challenges and additional barriers can exist when recognising abuse and neglect within this group. This can include:

- Assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's disability without further exploration;
- Children and young people with SEN or disabilities can be disproportionately impacted by things like bullying, without outwardly showing any sign;
- Communication barriers and the difficulties overcoming these barriers.

Further details can be found in the academy's SEND Policy.

Private fostering – Private fostering is when a child or young person of up to 16 years old (or 18, if the child is disabled) is provided with care and accommodation of someone who:

- Is not his or her parent;
- Does not have parental responsibility;
- Is not a close relative.

Close relatives are defined as grandparents, brothers, sisters, uncles, aunts (whether of full blood or half blood or by marriage) or step-parent under the Children Act 1989.

A child is not privately fostered if the adult caring and accommodating them has done so for less than 28 days and does not intend to do so for longer. If a child or young person is being looked after by anyone else for more than 28 days, the local authority must be notified:

(www.eastsussex.gov.uk/childrenandfamilies/childrenincare/fostering/becomeafostercarer/types/privatefostering)

Parental responsibility refers to all the rights, duties, powers, responsibilities and authorities that a parent has by law in relation to a child, as defined by section 3 of The Children Act 1989.

Academies will ensure that when a child is registered, the relationship with the registering adult is established including details of who holds parental responsibility with reference to court order, if appropriate.

When identifying cases of private fostering, staff will have to consider whether the child:

- Is new to the school.
- Mentions their living arrangements.
- Is accompanied to school by an unfamiliar adult.
- Goes missing from education for a concerning length of time.
- Or, their carer is vague about the child's living arrangements, education, needs, etc.
- Has come from overseas and has asked what the purpose of the visit is and if their parents came with them.
- Is an unaccompanied asylum seeker.
- Has been trafficked.

The Academy will cooperate with any LA arrangements after a referral has been made.

Roles and Responsibilities

The Trust
The Trustees are ultimately responsible for safeguarding and child protection at the academy. However, the Trustees have delegated the responsibility for safeguarding and child protection at the academy to the Executive Headteacher/Head of School. The Trust will monitor and quality-assure the safeguarding and child protection activities of the academy through the work of the Chief Executive Officer, the Education Director and the Director of Communications and Compliance.

Executive Headteacher/Head of School

The Executive Headteacher/Head of School will ensure that the academy:

- Has a safeguarding and child protection policy in place as approved by the Trust and its procedures are in accordance with national and or local guidance and locally agreed inter-agency procedures, and that the policy and procedures are made available to parents and other stakeholders on the website or on request.
- Regularly reviews its safeguarding procedures and implements recommendations from the Trust or relevant third party.
- All policies and procedures within the Trust's/academy's safeguarding suite of policies are implemented and followed by colleagues.
- Has the necessary policies dealing with behaviour, bullying, relationships and safety: physically, mentally and eSafety.
- Provides regular training and updates for all staff.
- Operates safer recruitment procedures and makes sure that all appropriate checks are carried out on colleagues and volunteers who work with students. A single central record of the checks will be maintained.
- Has procedures in place for the prompt induction of colleagues and volunteers in relation to all safeguarding and child protection policies and procedures relevant to the academy.
- Has procedures for dealing with allegations of abuse against colleagues and volunteers that comply with guidance from the local authority and locally agreed inter-agency procedures. Allegations against the Executive Headteacher shall be referred to the Chief Executive Officer of the Trust.
- Has a Designated Safeguarding Lead (DSL) and Assistant Designated Safeguarding Leads (DDSL) to take responsibility for child protection and safeguarding with the appropriate job descriptions, they are suitably trained and sufficient resources and time are allocated to enable the DSL ad DDSL to discharge their responsibilities.
- Provides appropriate safeguarding training for all colleagues and updates on the types of abuse identified and ensures that staff and the safeguarding team receive appropriate training in relation to the prevalent forms of abuse at any time. Thereby ensuring that colleagues feel able to raise concerns about poor or unsafe practice. Additionally, colleagues acknowledge awareness of the safeguarding suite of policies and Part 1 of Keeping Children Safe in Education. Appropriate training is also provided to supply staff and volunteers.
- Where a form of abuse increases in prevalence such as online safety, criminal exploitation and peer on peer abuse, more particularly sexual violence and harassment between children and young people, additional training is provided to staff.
- Remedies, without delay, any deficiencies or weaknesses regarding child protection arrangements.
- Where services or activities are provided on the academy premises by another body, the body concerned has appropriate policies and procedures in place in regard to safeguarding children and child protection and liaises with the academy on these matters where appropriate.
- All processing and sharing of personal data of the child will be undertaken in accordance with data protections principles as detailed in the Trust's data protection policy.

- Reviews the policy and procedures at least annually and these are implemented at the academy, especially in relation to forms of abuse that may be prevalent at any given time.
- Has a programme for raising awareness of safeguarding issues for pupils and parents?
- Complies with its legal duty to provide support to privately fostered pupils, colleagues understand private fostering and how to identify a child who may be privately fostered and such cases are reported to the Local Authority.
- Implements the requirements of the DfE statutory guidance on Relationships Education, Relationships and Sex Education and Health Education and complies with the Trust policy, thereby ensuring that children and young people are respectful of each other and are able to build positive and healthy relationships.

DSL and DDSL

The DSL and DDSL will be responsible for the following:

Referrals

- Consider all reported concerns of abuse and disclosures and ensure the protection of the victim.
- Refer cases of suspected abuse or allegations to the relevant investigating agencies and the LADO.
- Refer cases of suspected extremist behaviour to **Prevent** and cases of FGM to the police.
- Act as a source of support, advice and expertise within the academy.
- Liaise with the Executive Headteacher/Head of School in circumstances where the Executive Headteacher/Head of School is not the DSL or DDSL, to inform them of any issues and ongoing investigations and ensure there is always cover for this role.
- Children should also be assessed in the context of wider factors that 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 colleagues are aware of these and are able to inform the referral process.
- Work with and contribute to the work of the three safeguarding partner arrangements.
- Work with social care and any named social worker.

Training

- Have undertaken the requisite DSL training and refresher training at two yearly intervals to keep their knowledge and skills up to date.
- Recognise how to identify signs of abuse and neglect and when it is appropriate to make a referral.
- Have a working knowledge of the ESSCP Procedures, completion of a Common Assessment Framework paperwork, the conduct of a child protection case conference and be able to attend and contribute to these.
- Understand the key purpose of listening to the young person, to secure the young person's narrative.
- Understand and be able to initiate early intervention services.
- Understand the threshold process for Child in Need.

- Recognise the additional risks that children with SEN and disabilities (SEND) face online, for example, from online bullying, grooming and radicalisation and are confident they have the capability to support SEND children to stay safe online.
- Understand the unique risks associated with online safety and have the relevant knowledge and up to date capability required to keep children safe whilst they are online at school or college.
- Ensure that all colleagues have access to and understand the academy's child protection policy and the requirements of KCSIE.
- Ensure that all colleagues have annual safeguarding training and receive additional safeguarding information throughout the academic year to support the protection of children. Appropriate training is also provided to supply staff and volunteers.
- Ensure that all colleagues have induction training and maintains a record of all training undertaken by colleagues.
- Keep detailed accurate secure written records of reported concerns and the outcomes. Records are kept in accordance with data protection principles and communicated effectively to third parties and a new provision where necessary.
- Obtain access to resources and attends any relevant or refresher training courses at least every two years, including specialist training and updates from the ESSCP.
- The DSL will keep abreast of changes to safeguarding guidance and national recommendations such as peer on peer abuse and in particular sexual violence and harassment between children and young people.

Raising Awareness

- Ensure the academy safeguarding and child protection policy and procedures are updated and reviewed, annually.
- Ensure parents are made aware of the academy safeguarding and child protection policy which alerts them to the fact that referrals may be made and the role of the academy in this.
- Where a child/young person leaves the academy, ensure that information is passed to the new school prior to them starting if possible and that any files are transferred to the new school separately from the main student file as soon as possible. If a child goes missing or leaves to be educated at home, then the child protection file should be copied and forwarded to the relevant named Social Worker.
- Where the parents inform the academy that they wish to elect for home education, the Local Authority is alerted in order that they can endeavour to undertake a home visit to discuss this with the parents.
- Appoint at least one person to deputise, who has also attended the appropriate higher-level training with the ESSCP.
- Ensure that colleagues who come into contact with child protection issues are supported.
- Ensure that parents and students are aware of issues of increasing concern such as online safety, criminal exploitation and peer on peer abuse, more particularly sexual violence and harassment between children and young people, and additional guidance, advice and support is provided for parents to keep their children safe and for students and young people to support their safety.

Working with Partners

- Are trained in inter-agency working that is provided by, or to standards agreed by the ESSCP.
- Contribute to the work of the three safeguarding partner arrangements.
- Liaise with the three safeguarding partners and works with other agencies in line with Working Together to Safeguard Children. The DSL should be guided by the NPCC guidance 'When to call the police' when considering calling the police and what to expect when they do.
- Develop effective links with relevant statutory and voluntary agencies and attends and/or contributes to child protection conferences in accordance with local procedures and guidance.

Private Fostering

- Respond to private fostering concerns that colleagues may have about a child by referring it to the LA.
- Offer training and advice to staff in regard to private fostering.
- Liaise with the LA, where appropriate.
- Assist with advising and supporting carers to undertake their duties while a privately fostered child is living with them.

Colleagues (including supply staff) and Volunteers

It is the responsibility of all colleagues and volunteers to:

- Ensure the safety and protection from harm of children and young people in their care.
- Familiarise themselves with KCSIE, the academy's safeguarding and child protection policy and related policies as detailed in the academy's safeguarding and child protection policy.
- Report all allegations of abuse against a colleague to the headteacher of the academy.
- Keep confidential personal data regarding a child, young person or another colleague except where the disclosure is to DSL/headteacher/executive headteacher and the disclosure is necessary for safeguarding reasons.
- Fully comply with the Trust and academy's safeguarding and child protection policies and procedures and inter- related policies.
- Attend annual safeguarding training and any updates provided throughout the academic year through staff briefings and bulletins.
- Report all causes of concern, however minor, to the DSL in accordance with the procedures detailed in Appendix 2 and as elaborated on in the safeguarding training. The DSL or DDSL must be informed of any of the following concerns:
  - Any suspicion that a child or young is injured, marked, or bruised in a way which is not readily attributable to the normal knocks or scrapes received in play**.**
  - Any explanation given which appears inconsistent or suspicious.
  - Any behaviours which give rise to suspicions that a child or young person may have suffered harm (e.g. worrying drawings or play)**.**
  - Any concerns that a child may be suffering from inadequate care, ill treatment, or emotional maltreatment**.**

- Any concerns that a child or young person is presenting signs or symptoms of abuse or neglect**.**
- Any significant changes in a child or young person's presentation, including non-attendance.
- Any hint or disclosure of abuse from any person.
- Any concerns that the child or young person has fabricated or induced illness.
- Any concerns that the child or young person is a victim of Faith abuse.
- Any concerns that the child or young person is at risk of forced marriage.
- Any concerns that a child is at risk from gangs and youth violence.
- Any concerns that a child or young person is at risk of, or has been through, Female
- Genital Mutilation (FGM).
- Any concerns that a child or young person is at risk from people trafficking.
- Any concerns regarding person(s) who may pose a risk to children or young people (e.g. living in a household with children present)**.**
- Understand private fostering and their responsibilities in relation to it.

Reporting Concerns

Any colleague (including supply staff) who has a concern for a child or young person, however insignificant this may appear to be, should seek advice from one of the DSL or DDSL immediately, such concerns to include incidences occurring outside school hours and off the school site.

Concerns that are more serious must be reported immediately and brought to the attention of the DSL as soon as possible. If they are not available, the DDSL should be consulted. It is the duty of the DSL and DDSL to take advice from children's social care and complete a referral to social care when appropriate and complete a referral to social care when appropriate. If a child or young person makes a disclosure of abuse to any member of colleagues, they should follow the procedure set out in **Appendix 2.** Volunteers must also follow this procedure.

If there is a risk of immediate harm to a child or young person a referral will be made to children's social care immediately. In certain circumstances it will also be appropriate to notify the police; in the case of FGM this is a mandatory requirement. Any colleague can make a referral and the process detailed in **Appendix 2** should be followed.

Working in Partnership

The Trust and the academy recognise the importance of working in partnership with the local safeguarding partners (the local authority; a clinical commissioning group for an area within the local authority; and the chief officer of police for an area (any part of which falls) within the local authority area) and other relevant agencies in a co-ordinated manner and the academy procedures take into account the safeguarding procedures of the ESSCP.

The Homelessness Duty – Public authorities are required to refer any child or young person they consider to be homeless, or threatened with homelessness, to a housing authority. Thus, the academy should be aware of this duty and refer any such concerns to social care.

Confidentiality

All colleagues have a responsibility to share information regarding the protection of children and young people with the DSL. Information sharing is vital in identifying and tackling all forms of abuse. In order to safeguard the child or young person, following any disclosure or reporting of a concern by a colleague or volunteer, all matters must be kept confidential within the safeguarding team and the colleague or volunteer. The sharing of information within the academy, the parents and other agencies will be determined by the headteacher and the DSL and it will be undertaken in accordance with the principles of data protection. Colleagues are referred to the Trust's Confidentiality Statement for further details.

Whilst, among other obligations, the Data Protection Act 2018 places duties on organisations and individuals to process personal information fairly and lawfully and to keep the information they hold safe and secure, this is not a barrier to sharing information where the failure to do so would result in a child being placed at risk of harm. Fears about sharing information cannot be allowed to stand in the way of the need to promote the welfare and protect the safety of children.

The processing conditions detailed in the Data Protection Act 2018 enable the Trust and the academy to process, store and share information for safeguarding purposes, including information, which is sensitive and personal, and should be treated as 'special category personal data'. The 'safeguarding of children and individuals at risk' is a processing condition that allows the sharing of special category personal data without consent of the data subject where there is good reason to do so and it is not possible or reasonably practicable to obtain consent or, to do so would place the child or young person at risk.

Communication with Parents

Any concerns regarding a child or young person following a disclosure or the reporting of a concern by a colleague or volunteer, will be communicated to the parent/carer where it is in the interests of the child or young person to do so and where such communication will not result in further harm to the child or young person. Communication with the parent/carer will be determined by the Executive Headteacher/Head of School and the DSL, having taken advice from the MASH team.

Record Keeping

Accurate records will be made as soon as practicable. The procedure to be followed is detailed at **Appendix 2**.

Allegations of Abuse against colleagues

The highest possible standards of behaviour are expected from colleagues, supply staff and volunteers in relation to their interaction with students at all times. The Trust has procedures in place to deal with allegations made against colleagues, supply staff and volunteers as detailed in the Trust and academy policies detailed above.

Any concerns that involve an allegation against a colleague, supply staff or volunteer should be referred immediately to the Executive Headteacher/Head of School who will contact the appropriate personnel within East Sussex County Council to discuss and agree action to be taken. Where the allegation relates to supply staff, the Executive Headteacher/Head of School will advise the appropriate personnel within the local authority, the relevant agency employer and support any

investigation that is required. If the allegation is against the Executive Headteacher/Head of School, then the Chief Executive Officer of the Trust should be informed directly, who will make the necessary decisions. The academy has a legal duty to refer colleagues to the Disclosure and Barring Service if the harm test (to satisfy the harm test there needs to be credible evidence of a risk of harm to children or young people) has been satisfied or relevant conduct has been identified. The Executive Headteacher/Head of School is responsible for the referral.

Colleagues (including supply staff) must be aware of the Trust whistleblowing policy and procedures at the academy. If colleagues, supply staff or volunteers do not feel able to raise an issue in accordance with this policy and procedures, then they should contact the designated officer at the Local Authority.

Allegations which meet the Harms Threshold

This is where any member of staff, including supply, contractor or volunteer has:

- Behaved in a way that has harmed a child, or may have harmed a child and/or;
- Possibly committed a criminal offence against or related to a child and/or;
- Behaved towards a child or children in a way that indicates he or she may pose a risk of harm to children, and/or;
- Behaved or may have behaved in a way that indicates they may not be suitable to work with children.

In all such cases, the DSL will be responsible for ensuring that the child is not at risk and the Head of College/Executive Headteacher will liaise with the Local Authority's Designated Officer for Safeguarding (LADO) in relation to the allegation and consequential investigation, following the relevant LADO procedures and the Trust's Allegations of Abuse against Staff policy.

There are circumstances when it is appropriate for colleagues to use reasonable force to safeguard children. The term 'reasonable force' covers the broad range of actions used by colleagues that involve a degree of physical contact to control or restrain children. This can range from guiding a child to safety by the arm, to more extreme circumstances such as breaking up a fight or where a young person needs to be restrained to prevent violence or injury. 'Reasonable' in these circumstances means 'using no more force than is needed'. The use of force may involve either passive physical contact, such as standing between students or blocking a student's path, or active physical contact such as leading a student by the arm out of the classroom.

The decision on whether or not to use reasonable force to control or restrain a child is down to the professional judgement of the colleagues concerned and should always depend on individual circumstances. When using reasonable force in response to risks presented by incidents involving children with SEN or disabilities or with medical conditions, colleagues should consider the risks carefully recognising the additional vulnerability of these groups. Consideration should be given in relation to making reasonable adjustments pursuant to the Equality Act 2010 and the requirement not to discriminate under the Public Sector Equality Duty.

By planning positive and proactive behaviour support, through individual plans for more vulnerable children, and agreeing them with parents and carers, the occurrence of challenging behaviours can be reduced and thus the need to use reasonable force.

Colleagues should review the Trust's positive handling policy and the academy's risk assessment and processes in relation to positive handling.

Concerns that do not meet the Harm Threshold

Although this conduct does not meet the threshold, the Trust considers such conduct to be inappropriate and in breach of the code of conduct for colleagues. The process for dealing with such concerns is also dealt with in the Trust's Allegations of Abuse against Staff policy.

All such concerns will be recorded by the DSL and held securely in accordance with data protection principles. This will enable the Trust and academy to identify patterns of harmful conduct and the internal processes that will be followed.

Safer Recruitment

The Trust and the academy have a duty to prevent people who pose a risk of harm from working with children or young people. Consequently, the Trust and academy check colleagues and volunteers who work with children, taking proportionate decisions on whether to ask for any checks beyond what is required and ensuring volunteers are appropriately supervised. The Trust has a safer recruitment policy and procedures and the academy has appropriate induction procedures. For further details, please see these policies. Colleagues are also referred to the Trust's Disclosure Statement.

Reviewing

This policy will be reviewed on an annual basis or immediately in light of changes at a national, regional or trust level.

December 2019 BBL
September 2020 BBL
January 2021 BBL
April 2021 BBL
September 2021 BBL

EQUALITIES

We recognise that our students bring with them a wide variety of behaviours influenced by life experiences outside college. We aim to respond to each case professionally, objectively and compassionately. We are sensitive when working with children and families with specific needs and experiences and we continuously seek ways to promote successful partnerships. The basis of differentiation will vary dependant on the needs of each case but we will take into account the views of parents and families, colleagues and external agencies together with any Statement of Special Educational Need or Education, Health and Care Plan. We will also ensure compliance with the Trust's Equality Policy taking into account students with protected characteristics and making reasonable adjustments for students with a disability within the meaning of the Equality Act 2010. Both the college and Trust respects the Public Sector Equality Duty (PSED) that requires public bodies to have due regard to the need to eliminate discrimination, advance equality of opportunity and foster good relations between different people when carrying out their activities. By following the Trust's Equality Policy, the college seeks to eliminate unlawful discrimination, harassment and victimisation and other conduct prohibited by such legislation.

DATA PROTECTION

Rye College [The Academy] processes personal data in accordance with the data protection principles embodied in the General Data Protection Regulations (GDPR) and the Data Protection Act 2018.

The Academy complies with the requirements of the data protection legislation as detailed in the Trust Data Protection Policy.

All colleagues are aware of the principles of data protection and will not process personal data unless necessary. The Academy safeguards the personal data it collects through the operation of the Trust's data protection policy and processes and the IT policy. In addition, the Academy has taken steps to ensure that all its contracts that process data have the GDPR compliant provisions.

Appendix 1

Signs and Indicators of the Categories of Abuse

Detailed below are the categories of abuse that colleagues must be aware of and know how to identify.

Physical abuse

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

Indicators include

A pattern of the following injuries:

- Unexplained bruises;
- Cuts and scratch marks;
- Cigarette burns;
- Broken bones;
- Scalds;
- Bites.

Any injury which the child, parent or carer:

- Tries to hide;
- Avoids treatment;
- Gives several different explanations;
- Gives an unlikely explanation.

Emotional Abuse

Emotional abuse is the persistent emotional maltreatment of a child or young person such as to cause severe and persistent adverse effects on the emotional development of the child or young person. It may involve conveying to the child or young person that they are worthless or unloved, inadequate or valued only insofar as they meet the needs of another person. It may feature age or developmentally inappropriate expectations being imposed. These may include interactions that are beyond developmental capability, as well as overprotection and limitation of exploration and learning or preventing the child/ young person participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying causing children or young people frequently to feel frightened or in danger or the exploitation or corruption of children/ young people. Some level of emotional abuse is involved in all types of maltreatment of a child/ young person, though it may occur alone.

Indicators include:

- Is not growing or putting on weight;
- Is timid or withdrawn;

- Is over-demanding of attention;
- Has violent mood swings;
- Relates poorly to others.

Sexual Abuse, Behaviour, Harassment and Violence

Sexual abuse involves forcing or enticing a child or young person to take part in sexual activities, including prostitution, whether or not the child is aware of what is happening. The activities may involve physical contact, including penetrative (e.g. rape, buggery or oral sex) or non-penetrative acts. They may include non-contact activities, such as involving children in looking at or in the production of, pornographic material or watching sexual activities or encouraging children to behave in sexually inappropriate ways. Sexual abuse can take place online, and technology can be used to facilitate offline abuse. Sexual behaviour, harassment and violence, as defined by KCSIE, are elements of sexual abuse. Sexual, behaviour, harassment and violence are not acceptable and will not be tolerated in school or at all.

It must be remembered that a criminal offence may have been committed by the perpetrator who is known to the victim. **Up skirting** is also a criminal offence and is where someone takes a picture under a person's clothing (not necessarily a skirt) without their permission and/or knowledge, with the intention of viewing their genitals or buttocks (with or without underwear) to obtain sexual gratification, or cause the victim humiliation, distress or alarm. It is a criminal offence. Anyone of any gender, can be a victim. This is a criminal offence and should be reported to the police under the Voyeurism (Offences) Act.

For colleagues, identifying inappropriate sexual behaviour can be a complex task.

Indicators include:

- Unexplained bruising or repeated instances of bruising;
- Is sore or bleeding in the genital or anal area;
- Is reluctant to undress;
- Is reluctant to go to the toilet;
- Frequently complains of abdominal pains;
- Says that someone has done something bad to them but that it is a secret;
- Regularly soils her/himself;
- Is withdrawn or has mood swings;
- Suffers night terrors or sleep disturbance;
- Avoids physical contact;
- Is overly compliant with the requests of others;
- Possesses money or gifts which cannot be accounted for;
- Is pregnant;
- A significant age difference between children involved in sexual behaviour. An adolescent who seems interested in younger children may give cause for concern;
- Sexual behaviour involving bribery, threats or force. Children or young people without the intellectual or physical resources to resist abuse are particularly vulnerable;
- A level of sexual knowledge inconsistent with what would normally be expected for someone of that age;

- Sexually intrusive/aggressive behaviour;
- Unwillingness to come into school;
- Complaining about missing possessions;
- Easily distressed and frightened;
- Odd drawings and sexually explicit language;
- Damaged or incomplete work;
- Consensual and non-consensual sharing of nudes and semi-nude images and/or videos.

Peer on Peer Abuse

The sexual abuse of children by other children is a specific safeguarding issue in education and also referred to as peer on peer abuse. Sexual harassment and violence can occur between children of any age and gender and it can happen in any setting even where there are no reported incidences.

It is not tolerated in any form. The academy seeks to minimise the risk of peer on peer abuse through the application of its Behaviour Management and Anti-Bullying policies, training for colleagues and education for students.

All colleagues are aware that safeguarding issues can manifest themselves as peer on peer abuse and this can be inside and out of school and online. It is essential that all inappropriate behaviour is challenged and nothing should be downplayed as "banter", "just having a laugh" or "part of growing up" so as to normalise such behaviour.

Colleagues should understand that even if there are no reported allegations it does not mean that it is not happening and as such colleagues should be vigilant and report any potential signs in accordance with the academy's reporting procedures. Consequently, colleagues should be alert to potential signs of abuse.

Indicators include:

- Physical abuse such as biting, kicking and hitting.
- Sexually harmful behaviour such as sexual violence, harassment (see KCSIE definitions), assault and touching which can occur between two children of any age and sex. Some groups are more at risk: girls, children with special educational needs and disabilities and LGBT children. See the government guidance on sexual harassment (May 2018).
- Sexually harmful language or abuse such as inappropriate sexual language. It can occur online or offline and some groups are more at risk: girls, children with special educational needs and disabilities and LGBT children.
- Bullying such as physical, verbal (including gender based) and cyber bullying.
- Initiation/hazing type violence and rituals.
- Abuse in intimate personal relationships between peers.
- Up-skirting.
- Consensual and non-consensual sharing of nudes and semi-nude images and/or videos.
- Causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party.

THE INITIAL RESPONSE TO A REPORT OF SEXUAL ABUSE OR HARASSMENT OF ANY KIND (INCLUDING PEER ON PEER SEXUAL ABUSE) IS IMPORTANT AS IT CAN SERVE TO ENCOURAGE VICTIMS AS OPPOSED TO DETER THEM.

THUS, COLLEAGUES AND SAFEGUARDING TEAMS MUST TAKE ALL REPORTS SERIOUSLY. REPORTS OF SEXUAL ABUSE ARE LIKELY TO BE COMPLEX AND REQUIRE DIFFICULT PROFESSIONAL DECISIONS TO BE MADE AND THUS IT IS VITAL THAT THE ACADEMY'S PROCEDURES AS DETAILED IN APPENDIX 2 ARE FOLLOWED.

IT IS ESSENTIAL THAT ALL VICTIMS ARE REASSURED THAT THEY ARE BEING TAKEN SERIOUSLY AND THAT THEY WILL BE SUPPORTED AND KEPT SAFE. A VICTIM SHOULD NEVER BE GIVEN THE IMPRESSION THAT THEY ARE CREATING A PROBLEM BY REPORTING SEXUAL VIOLENCE OR SEXUAL HARASSMENT. NOR SHOULD A VICTIM EVER BE MADE TO FEEL ASHAMED FOR MAKING A REPORT. THEY SHOULD BE SUPPORTED AND LISTENED TO WITHOUT JUDGMENT. THEY SHOULD BE SUPPORTED TO RETURN TO SCHOOL WITH THE NECESSARY RISK ASSESSMENT AND PASTORAL SUPPORT PLAN IN PLACE, WHICH SHOULD BE DISCUSSED WHERE APPROPRIATE WITH PARENTS AND REVIEWED REGULARLY.

When there has been a report of sexual violence, the DSL will make an immediate risk and needs assessment and advise on the initial response. The assessment will consider:

- The victim, especially their protection and support;
- The alleged perpetrator especially in relation to peer on peer abuse; and
- All the other children (and, if appropriate, adult learners and colleagues) at the academy, especially any actions that are appropriate to protect them.

Risk assessments are recorded and will be kept under review. The DSL will ensure that the Academy is engaging with children's social care and specialist services who may need to undertake additional professional risk assessments. The advice of the professional should be followed including informing the alleged perpetrator of the allegations. Where a crime has been committed it will be reported to the police in parallel to a referral to social care. Thereafter, police guidance on the disclosure of information will be followed together with steps to be taken to protect the victim and other pupils to ensure that children are protected and any police investigation or criminal prosecution is not compromised.

Important considerations for the academy in order to support the victim and perpetrator will include:

- The wishes of the victim in terms of how they want to proceed; however, if we believe that a crime has been committed or the MASH team need to be notified in order to safeguard the victim we may have to act in any event. The victim must be advised on the next steps and supported. The needs and wishes of the victim should be paramount in any response. The priority is to make the victim's daily experience as normal as possible.
- Dialogue with the victim should be kept open and encouraged to obtain the full picture. The victim should be able to choose his/her trusted adult.
- The nature of the alleged incident(s) and whether a crime may have been committed.
- The ages of the students involved, their maturity, any power imbalance if it is peer to peer abuse.
- If the alleged incident is a one-off or a sustained pattern of abuse.
- Are there ongoing risks to the victim, other students or colleagues?

- The response must be proportional to the incident and support tailored on a case-by-case basis. The support required regarding a one-off incident of sexualised name-calling is likely to be vastly different from that for a report of rape.
- In the case of peer to peer abuse, the support for the alleged perpetrator.
- In cases of rape alleged, the alleged perpetrator should be removed from any classes they share with the victim and consideration should be given to how best to keep the victim and alleged perpetrator a reasonable distance apart in school or on transport to and from school. These actions are in the best interests of both children and should not be perceived to be a judgment on the guilt of the alleged perpetrator.
- For other reports of sexual violence and sexual harassment, the proximity of the victim and alleged perpetrator and considerations regarding shared classes and other areas in school should be considered immediately.
- A victim of sexual violence is likely to be traumatised and, in some cases, may struggle in a normal classroom environment. While schools and colleges should avoid any action that would have the effect of isolating the victim, in particular from supportive peer groups, there may be times when the victim finds it difficult to maintain a full-time timetable and may express a wish to withdraw from lessons and activities. This should be because the victim wants to, not because it makes it easier to manage the situation. If required, schools and colleges should provide a physical space for victims to withdraw.
- Schools may need to support victims for a long time and schools should do everything reasonable to protect the victim from bullying and harassment as a result of the disclosure.

However, ultimately of paramount concern is the welfare of a victim. Although considering the wishes of the victim is important, it is not wise to promise confidentiality as it is likely that the information will have to be shared with the appropriate professionals. Each reported allegation must be considered on a case by case basis and the academy will determine whether:

- The allegation can be managed internally where it may be a one-off incident and the children or young people concerned are not in need of early help or statutory intervention and it would be appropriate to handle the case internally in all the circumstances. Nevertheless, there should be a zero-tolerance approach and the concern, actions, decisions and reasons should be recorded.
- The allegation does not require statutory intervention but the children or young people would benefit from early help. Again, underpinned by a zero-tolerance approach.
- The case needs to be referred to Children's Social Care where the child or young person has been harmed or is at risk of harm.
- The case needs to be reported to the Police. As a part of any the criminal process consideration should be given to how the victim will be supported where the perpetrator is given bail and/or there are delays in the criminal process.

Whichever course of action is pursued it is vital that the victim is supported at all times. It is important that all actions are regularly reviewed and processes updated to reflect the lessons learned. Where patterns of behaviour or incidents emerge, consideration should be given to whether there are wider school issues which would benefit from improved education for students and training for colleagues.

All concerns, discussions, decisions and reasons should be recorded even where the allegation is ultimately found to be unsubstantiated and unfounded.

Consideration should be given to whether children and young people are at risk of abuse or exploitation in situations outside their families. Extra-familial harms can lead to children and young people being vulnerable to multiple harms including (but not limited to) sexual exploitation, criminal exploitation, and serious youth violence.

Neglect

Neglect is the persistent failure to meet a child/ young person's basic physical and/or psychological needs, likely to result in the serious impairment of the child/ young person'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/ young person from physical and emotional harm or danger, ensure adequate supervision (including the use of inadequate care-givers) and ensure access to appropriate medical care or treatment. It may also include neglect of or unresponsiveness to a child's basic emotional needs.

Indicators include

- Are regularly hungry – they may steal food from other children.
- Are always dirty.
- Wear inappropriate clothing – e.g. summer clothes in winter.
- Have parents who fail to make or keep medical appointments.
- Are pale, listless and underweight.
- Are unsupervised in the family home for long periods or at inappropriate times.
- Are expected to "parent" younger siblings.

Being homeless or being at risk of becoming homeless presents a real risk to a child's welfare and can result in neglect and thus harm. The DSL will be aware of referral routes in to the Local Housing Authority so that concerns can be raised at the earliest opportunity. This will be undertaken in parallel to a referral to social care.

Prevent Strategy

Radicalisation refers to the process by which a person comes to support terrorism and forms of extremism. There is no single way of identifying an individual who is likely to be susceptible to an extremist ideology. It can happen in many different ways and settings. Specific background factors may contribute to vulnerability which are often combined with specific influences such as family, friends or online, and with specific needs for which an extremist or terrorist group may appear to provide an answer. The internet and the use of social media in particular has become a major factor in the radicalisation of children and young people.

Protecting children and young people from the risk of radicalisation should be seen as part of the academy's wider safeguarding duties, and is similar in nature to protecting children/ young people from other forms of harm and abuse. The Prevent Strategy requires colleagues and volunteers to take action when they observe behaviour of concern and to report all concerns to the DSL.

As with managing other safeguarding risks, colleagues should be alert to changes in behaviour which could indicate that they may be in need of help or protection. Academy colleagues should use their professional judgement in identifying children/ young people who might be at risk of radicalisation and act proportionately.

In terms of the legal requirements of the Prevent Duty:

- Risk assessment – the academy has trained colleagues to identify children at risk of being drawn into terrorism and to challenge extremist ideas. Any concerns following such assessment will be acted upon.
- Working in Partnership – The academy ensures that its safeguarding arrangements take into account the policies and procedures of existing partnerships such as ESSCP. The academy works closely with other agencies to ensure safeguarding is paramount.
- Colleague training – The Headteacher, DSL and DDSL have undertaken the appropriate Prevent training which reflects the context of the local area and the designation of the academy. All other colleagues have received the necessary Prevent awareness training. The training programme at the academy and within the Trust ensures that all colleagues receive regular updates.
- Internet Safety – The academy ensures that children and young people are safe from terrorist and extremist material when accessing the internet within the academy. Internet use in lessons is planned in advance and monitored, so that children and young people cannot access inappropriate material, including websites promoting extremist views. The filtering is appropriately set and regularly reviewed. A programme of online safety takes place including work with children and families both in and out of academy hours. Further advice is available on the academy website.

Channel is a voluntary, confidential support programme, which focuses on providing support at an early stage to people who are identified as being vulnerable to being drawn into terrorism. Prevent referrals may be passed to a multi-agency Channel panel, which will discuss the individual referred to determine whether they are vulnerable to being drawn into terrorism and consider the appropriate support required. A representative from the school may be asked to attend the Channel panel to help with this assessment. An individual's engagement with the programme is entirely voluntary at all stages.

Anyone with a concern can contact the Local Authority. All concerns should be reported to: prevent@sussex.pnn.police.uk.

Other potential forms of abuse

Children Subject to Domestic Violence
Domestic violence is defined by the Home Office as: 'Any incident or pattern of incidents of controlling, coercive, threatening behaviour, violence or abuse (psychological, physical, sexual, financial or emotional) between adults who are or have been, intimate partners or family members, regardless of gender or sexuality'. The main characteristic of domestic violence is that the behaviour is intentional and is calculated to exercise power and control within a relationship.

Domestic violence usually has a negative impact on a child or young person. Children who witness domestic violence can experience long lasting emotional and psychological issues.

Where incidents of domestic violence are reported to the academy, the DSL should be informed immediately to ensure that the student is safe (5.11 of the London Child Protection Procedures and the supplementary document Safeguarding Children Abused Through Domestic Violence (London Board, 2007).

Operation Encompass is a police and education early information sharing partnership enabling schools to offer immediate support for children and young people experiencing domestic abuse. Information is shared by the police with the academy's DSL prior to the start of the next school day after officers have attended a domestic abuse incident thus enabling appropriate support to be given, dependent upon the needs and wishes of the child. Children experiencing domestic abuse are negatively impacted by this exposure. Operation Encompass aims to mitigate this harm by enabling immediate support.

Children Missing from Education

All colleagues should be aware that when a child or young person is absent or missing from school, they could be at risk of significant harm through neglect, physical or sexual abuse, or exploitation and child criminal exploitation.

It may indicate mental health problems, risk of substance abuse, risk of travelling to conflict zones, risk of female genital mutilation or risk of forced marriage. Concerns should be reported to the safeguarding team. The DSL should be informed immediately if the academy is informed by a parent that their child is missing; referrals will be made to the Police, Education Welfare Officer and Social Services, as appropriate (Section 6 of the London Safeguarding Procedures and, Safeguarding Children Missing from Education (London Board, 2006).

Early intervention would be beneficial in order to identify the existence of any underlying safeguarding risk and to help prevent the risks of a child going missing in future.

In addition, the academy will monitor attendance and take action where a pupil fails to attend school or attendance is poor in accordance with its attendance policy. In order to safeguard pupils at least two emergency contacts for the pupil should be maintained.

Forced Marriage

A 'forced' marriage' is a marriage conducted without the valid consent of both parties and where duress is a factor. Duress cannot be justified on religious or cultural grounds. Any information received by a colleague or volunteer must be reported to the DSL.

Honour Based Abuse

Honour based abuse is the term used to describe incidences or crimes which have been committed to protect or defend the honour of the family and/or the community, including female genital mutilation (FGM), forced marriage, and practices such as breast ironing. Abuse committed in the context of preserving "honour" often involves a wider network of family or community pressure and can include multiple perpetrators. These are incidences in which predominantly women are injured or killed for perceived immoral behaviour, which is deemed to have breached the honour code of a

family or community, causing shame. Any information relating to such incidents should be reported to the DSL immediately for further action.

Child sexual exploitation (CSE)

It is defined in the DfE guidance as a form of child sexual abuse, 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. The power imbalance can be due to a range of factors including age, gender, sexual identity, cognitive ability, physical strength, status, and access to economic or other resources. It can occur over time or be a one-off occurrence, and may happen without the child's immediate knowledge such as sharing videos or images on social media.

This form of abuse involves exploitative situations, contexts and relationships where children or young people receive something (for example food, accommodation, drugs, alcohol, gifts, money or in some cases simply affection) as a result of engaging in sexual activities. Sexual exploitation can take many forms ranging from the seemingly 'consensual' relationship where sex is exchanged for affection or gifts, to serious organised crime by gangs and groups. It can involve physical abuse, including penetrative or non-penetrative acts or non-contact activities such as involving children in the production of sexual images, forcing children to look at sexual images or watch sexual activities, encouraging children to behave in sexually inappropriate ways or grooming a child in preparation for abuse including via the internet.

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 cyber-bullying and grooming. The abuse can be a one-off occurrence or a series of incidents over time and range from opportunistic to complex organised abuse. It can involve force and/or enticement-based methods of compliance and may, or may not, be accompanied by violence or threats of violence. However, it also important to recognise that some children and young people, who are being sexually exploited, do not exhibit any external signs of this abuse.

Child sexual exploitation can affect any child or young person (male or female) under the age of 18 years, including 16- and 17-year olds who can legally consent to have sex. It can include both contact and non-contact sexual activity and may occur without the child or young person's immediate knowledge.

Children rarely self-report child sexual exploitation so it is important that practitioners are aware of potential indicators of risk, including:

- Acquisition of money, clothes, mobile phones etc. without plausible explanation;
- Gang-association and/or isolation from peers/social networks;
- Exclusion or unexplained absences from school;
- Leaving home/care without explanation and persistently going missing or returning late;
- Excessive receipt of texts/phone calls;
- Being under the influence of drugs/alcohol;

- Inappropriate sexualised behaviour for age/sexually transmitted infections;
- Evidence of/suspicions of physical or sexual assault;
- Relationships with controlling or significantly older individuals or groups;
- Multiple callers (unknown adults or peers);
- Frequenting areas known for sex work;
- Concerning use of internet or other social media;
- Increasing secretiveness around behaviours;
- Self-harm or significant changes in emotional well-being;
- The child exhibits self-assurance, maturity and self-confidence beyond their age;
- The child has a rehearsed story that seems very similar to previous cases of trafficked children that colleagues have heard in other incidents, training programmes or read about from materials produced by charities;
- Signs of physical or sexual abuse are present;
- The child's educational record contains missing links or unexplained moves;
- The child appears malnourished or has an eating disorder;
- The child is not registered with a GP;
- The child displays signs of misusing alcohol or drugs;
- The child displays signs of self-harm;
- The child does not appear to have good relationships with the adults they live with;
- The child seems to have limited freedom of movement in society;
- The child appears tired, disengaged, excessively frightened or sexually promiscuous;
- The child dresses inappropriately for their age;
- The child is regularly picked up from school by an adult without parental responsibility, and who is much older than themselves;
- The child is displaying signs that they may have been brought into the country illegally for the purposes of adoption;
- Children who have older boyfriends or girlfriends;
- Children who suffer from sexually transmitted infections or become pregnant.

Fabricated or Induced illness

A parent or carer fabricates or induces the illness of the child or young person or fabricates SEN which is or may result in harm to the child or impacts on the welfare of the child. This can take the form of:

- Regular days off school as a result of a non-substantiated illness.
- Unusual and/or un-prescribed medication.
- Fabricated or unaccountable reasons for absence.

Child Criminal Exploitation:

As with Child Sexual Exploitation, criminal exploitation of children and young people occur where an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a child or young person into criminal activity. The power imbalance is due to a range of factors including age, gender, sexual identity, cognitive ability, physical strength, status, and access to economic or other resources. The abuse may be in exchange for something the victim needs or wants and/or will be to the financial benefit or other advantage (such as increased status) of the perpetrator or facilitator and/or through violence or the threat of violence.

The abuse can be perpetrated by individuals or groups, males or females, and children or adults. The abuse can be a one-off occurrence or a series of incidents over time and range from opportunistic to complex organised abuse. It can involve force and/or enticement-based methods of compliance and may, or may not, be accompanied by violence or threats of violence. Victims can be exploited even when activity appears consensual. It does not always involve physical contact; it can also occur through the use of technology. Child criminal exploitation can include children being forced to work in cannabis factories, being coerced into moving drugs or money across the country, forced to shoplift or pickpocket, committing vehicle crime or to threaten other young people.

Both boys and girls are at risk of being criminally exploited, albeit that the signs may be different. Criminally exploited children are also at higher risk of child sexual exploitation. Some of the following can be indicators:

- 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.

County Lines

Criminal exploitation of children is a widespread form of harm and involves the grooming and exploitation of children and young people to carry drugs and money across geographical areas.

COUNTY LINES IS A TERM USED TO DESCRIBE GANGS AND ORGANISED CRIMINAL NETWORKS INVOLVED IN EXPORTING ILLEGAL DRUGS USING DEDICATED MOBILE PHONE LINES OR OTHER FORM OF "DEAL LINE". OFFENDERS WILL OFTEN USE COERCION, INTIMIDATION, VIOLENCE (INCLUDING SEXUAL VIOLENCE) AND WEAPONS TO ENSURE COMPLIANCE OF VICTIMS. CHILDREN CAN BE TARGETED AND RECRUITED IN SCHOOL OR ONLINE USING SOCIAL MEDIA.

OFFENDERS WILL OFTEN USE COERCION, INTIMIDATION, VIOLENCE AND WEAPONS TO ENSURE COMPLIANCE OF VICTIMS. CHILDREN CAN BE TARGETED AND RECRUITED INTO COUNTY LINES IN SCHOOLS, FURTHER AND HIGHER EDUCATIONAL INSTITUTIONS, PUPIL REFERRAL UNITS, SPECIAL EDUCATIONAL NEEDS SCHOOLS, CHILDREN'S HOMES AND CARE HOMES. ALTHOUGH THE CHILD WILL BE INVOLVED IN COMMITTING A CRIME, IT IS IMPORTANT TO RECOGNISE THAT THEY ARE ALSO A VICTIM.

Modern Slavery

Modern slavery encompasses human trafficking and slavery, servitude and forced or compulsory labour. Exploitation can take many forms, including: sexual exploitation, forced labour, slavery, servitude, forced criminality and the removal of organs.

CONSEQUENTLY, CHILDREN MISSING FROM EDUCATION OR FROM HOME FOR PERIODS OF TIME COULD BE AN IDENTIFIER OF THIS TYPE OF HARM. IN SUCH CASES, CONSIDERATION MUST BE GIVEN TO A REFERRAL TO THE NATIONAL REFERRAL MECHANISM TOGETHER WITH A SAFEGUARDING REFERRAL.

Cybercrime

This is a criminal activity involving computers. Children with particular skill and interest in computing and technology may inadvertently or deliberately stray into cyber-dependent crime.

Serious Violence

Indicators that children are at risk of being involved or are involved in serious violent crime include:

- Increased absence from school.
- Changes in friendship groups or relationships with older individuals or groups.
- A significant decline in academic performance.
- Self-harm or a significant change in wellbeing.
- Signs of assault or unexplained injuries.
- Unexplained gifts or new possessions indicate that children have been approached by or are involved with individuals associated with criminal networks or gangs.

All colleagues should be aware of the range of risk factors which increase the likelihood of involvement in serious violence, such as being male, having been frequently absent or permanently excluded from school, having experienced child maltreatment and having been involved in offending, such as theft or robbery.

Early Help

Any child may benefit from early help, but all colleagues should be particularly alert to the potential need for early help for a child who:

- Is disabled and has specific additional needs.
- Has special educational needs (whether or not they have a statutory education, health and care plan).
- Is a young carer.
- Is showing signs of being drawn into anti-social or criminal behaviour, including gang involvement and association with organised crime groups.
- Is frequently missing/goes missing from care or from home.
- Is misusing drugs or alcohol themselves.
- Is at risk of modern slavery, trafficking or exploitation.
- Is in a family circumstance presenting challenges for the child, such as substance abuse, adult mental health problems or domestic abuse.
- Has returned home to their family from care.
- Is showing early signs of abuse and/or neglect.
- Is at risk of being radicalised or exploited.
- Is a privately fostered child.
- Having a parent/carer in custody.

Initially colleagues should discuss early help requirements with the DSL. If appropriate, the DSL will support the colleague in liaising with other agencies and setting up an inter-agency assessment. The child should be kept under constant review and consideration should be given to a referral to children's social care if the child's situation doesn't appear to be improving.

Detailed information on early help and statutory assessment can be found in Chapter 1 of 'Working together to safeguard children'.

Early Help Procedures
- This will be a referral to the Single Point of Access.
- In some cases, it might be appropriate to make a request for Early Help from a Key Worker.
- Parents must agree for the Academy to contact Children's Services to request Early Help (Key Worker) for support.

Other Considerations
CHILDREN ARE SOMETIMES REQUIRED TO GIVE EVIDENCE IN CRIMINAL AND CIVIL COURTS WHICH CAN BE STRESSFUL FOR THEM. WHERE COLLEAGUES ARE MADE AWARE OF SUCH INSTANCES, THE DSL SHOULD BE ADVISED SO THAT ADDITIONAL PASTORAL SUPPORT CAN BE PUT IN PLACE AND THE GOVERNMENT GUIDANCE FOLLOWED AS DETAILED IN THE CHILDREN AND COURT SYSTEM SECTION OF KEEPING CHILDREN SAFE IN EDUCATION.

Children Looked After (CLA) and previously Looked After Children

The Headteacher will inform colleagues of a child's care status and determine the extent to which information is shared with other colleagues. The academy will:

- Maintain a register of children in public care and ensure all relevant education and care information is available and it is kept up to date.
- Ensure that all colleagues are aware of the difficulties and educational disadvantage faced by children in public care and understand the need for high expectations and positive systems of support to overcome them.
- Act as an advocate for children in public care.
- Hold a supervisory brief and monitor the educational progress of all children who are in public care.
- Supervise the smooth induction of a new child in public care into the academy.
- Act as a named person for the child.
- Promote the involvement of these children in extra-curricular activities and intervene if there is evidence of individual underachievement, absence from academy etc.
- Ensure that each child or young person has a Personal Education Plan (PEP) and that school-based access to services and support is in place.
- Liaise with any appropriate external agencies, those with parental responsibility and ensure there is a speedy transfer of information and report on the progress of all children and young people in public care to Looked after Children Services.
- Ensure that appropriate colleagues develop knowledge of the Social Care Department and Education procedures by attending training events organised by the Local Authority and other providers and then cascade training to colleagues as appropriate.
- Monitor students' achievement and progress within the academy.
- On admission, records will be requested from the previous academy, where appropriate, and a meeting held to inform the PEP.
- Consult and involve the child or young person in decisions about themselves according to their age and understanding.

- Be aware of previously looked after children as they remain potentially vulnerable and thus the above may also be relevant to them.

Mental Health

Mental health problems of children and young people can, in some cases, be an indicator that they have suffered or are at risk of suffering abuse, neglect or exploitation. Students whose behaviour suggests that they may be experiencing a mental health problem or be at risk of developing one should be identified and monitored and the concern reported in the usual way to the safeguarding team.

Where children and young people have suffered abuse and neglect, or other adverse childhood experiences, this can have a lasting impact on their mental health, behaviour and education. Concerns regarding a student's mental health should also be reported in the usual way so that immediate action can be taken.

Mental health and the academy will be promoted by the senior mental health lead.

Online Safety

The Trust and the academy are aware of the importance of providing safe and secure technology to all students, whether in school or accessing teaching and learning remotely. As teaching and learning is increasingly undertaken on the internet and digitalised, the Trust and the academy are vigilant regarding the potential harm of inappropriate online material. Consequently, appropriate filters and monitoring systems are in place and their appropriateness is regularly reviewed.

The academy will endeavour to protect and educate students and colleagues in their use of technology and establish mechanisms to identify, intervene in, and escalate any concerns where appropriate. Areas of concern can be classified as follows:

- Content: being exposed to illegal, inappropriate or harmful content, such as pornography, fake news, racism, misogyny, self-harm, suicide, anti-Semitism, radicalisation and extremism.
- Contact: being subjected to harmful online interaction with other users such as peer on peer abuse pressure, commercial advertising and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes.
- Conduct: personal online behaviour that increases the likelihood of, or causes, harm such as making, sending and receiving explicit images and online bullying.
- Commerce: risks such as online gambling, inappropriate advertising, phishing and or financial scams.

Appendix 2

Procedures to be followed on disclosure

Where a colleague:

- Has a suspicion that a child or young person is being harmed or at risk of harm;
- Notes behaviours or actions in a child or young person which give rise to suspicions that the student may have suffered abuse;
- Receives hints or a disclosure of any type of abuse from a child or young person or from one of his/her friends.

The colleague has a duty to report his or her concerns as soon as possible to the DSL, or, in his or her absence, to the DDSL or Headteacher as appropriate. Where the Headteacher or DSL does not act on a colleague's concern, the Trust's Whistleblowing Policy can be implemented or the colleague can contact the NSPCC for advice on 0800 028 0285 between 8am and 8pm or emailing help@nspcc.org.uk.

Academy Procedure

Colleagues should enter their concern on 'MyConcern'.

This is automatically emailed to all colleagues on the Safeguarding Team.

DSL will read and action – please note they may come to you for additional details.

Procedure to be followed when making a referral

Safeguarding lead manager assesses to see if the child is at immediate risk of significant harm. If so, they should phone SPoA immediately making it clear their concern is about immediate risk.

Speak to student re concern and if necessary parents, if in doubt ring and follow the advice given by SPoA.

Single Point of Access   SPoA

Phone: 01323 464222

General enquiries: 0–19.SPOA@eastsussex.gov.uk

Record all information on 'My Concern'

Record Keeping

All records are kept electronically on 'MyConcern'.

Hard copies of minutes / notes/ files from previous schools are kept in a locked filing cabinet in the Lead DSL's office. A spare set of keys are located securely in Reception.

All verbal conversations are recorded on 'MyConcern'.

Action Following a Child Protection Referral

Contact is made with Children's Services after 24 hours if none is received.

Details of any Children's Services involvement e.g. name, email and telephone number of Lead Assessment person is recorded on the front page of the student's profile on 'MyConcern'.

Any actions, emails or information is recorded on the student's file in 'MyConcern'.

East Sussex Safeguarding Children Partnership Procedure

The DSL and DDSL trained in and conversant with the ESSCP's procedures further details of which are found at www.esscp.org.uk/.

Monitoring of disclosures and referral

Students who have Children's Services involvement are discussed weekly in the Student Hub meeting.

Referrals are uploaded onto 'MyConcern' along with minutes of the meeting.

Specific procedures relating to Sexual Abuse

Students who disclose Sexual Abuse MUST not be questioned. Record all information in the student's own words. You may ask for clarification if you are unsure of the meaning.

Keep the student with you, reassure but do not promise anything.

Contact SPoA immediately.

Follow the advice they give.

Specific procedures relating to Peer-on-peer Abuse

Students who disclose Peer on Peer Abuse - Record all information in the student's own words. You may ask for clarification if you are unsure of the meaning.

Keep the student with you, reassure but do not promise anything. If necessary contact SPoA.

Investigate using the serious incident paperwork.

Collect statements from students.

Contact parents and invite in.

Support to be provided

- Place2Be
- Risk Assessment
- Early Help
- SPoA level 4 referral

- School nurse

Working with Examination Boards

As part of their child and vulnerable adult safeguarding policies, some examination boards may ask the college to annually complete a declaration regarding the suitability of dramatic and/or artistic performances. This is to ensure that the content and themes of assessed performances are appropriate for a school setting and appropriate to the age group of the students that are performing. Whilst this is a matter of professional judgement, the responsibility within the examination centre to consider the appropriateness of selected material in relation to the establishment and individual students.