

JKHS SAFEGUARDING/CHILD PROTECTION POLICY

Introduction

The school mantra, devised by the student council, is Ready, Resilient and Respectful.

Key Post Holders

Designated Safeguarding Lead (DSL): Kristian Phillips, Interim Deputy Headteacher
kristianphillips@jkhs.org.uk

Deputy Designated Safeguarding Lead (DDSL): Georgina Lewis, Safeguarding Officer
g.lewis@jkhs.org.uk

Designated Looked After Child Teacher (DLAC): Kristian Phillips, Interim Deputy Headteacher
kristianphillips@jkhs.org.uk

Designated Safeguarding Governor: Mrs Moira Lee
m.lee@jkhs.org.uk

Other Deputy Designated Safeguarding Leads:

Julian Morgan – Headteacher

Dr Luke Moseley – Deputy Headteacher

James Bolt – Assistant Headteacher

Fiona Moore – Assistant Headteacher

Jordan Salway – Assistant Headteacher

If you have any questions or concerns about this policy, or about safeguarding in general, you must speak to the Designated Safeguarding Lead (DSL). We expect all members of the school community to operate an ‘it does happen here is’ mentality and expect all staff, governors and volunteers to place safety for students as the highest priority.

The school has a responsibility and duty to always put the needs of the child first. The Child Protection and Safeguarding policy will help to enable cases of suspected or identified abuse to be properly considered and pursued. All adults, including temporary staff, volunteers and governors at John Kyrle High School are directed to put this policy into practice in their work with students at all times.

In line with the “Keeping Children Safe in Education 2025”, and Working Together to Safeguard Children 2023, we want all our young people to feel that they work and socialise in a secure and caring environment, free from any kind of abuse or neglect. To this end, we will also be vigilant in how we:

- protect young people from maltreatment
- prevent impairment of young people’s mental and physical health or development by supporting their emotional and social needs as well as their educational needs
- ensure young people grow up in circumstances consistent with the provision of safe and effective care
- ensure young people are encouraged to respect each other’s values and support each other
- take action to enable all young people to receive support which matches their individual needs, including those who may have experienced abuse
- ensure young people feel safe and secure at school
- encourage young people to speak freely and voice their values and beliefs



- raise awareness of child protection issues and contribute to the prevention of abuse, victimisation, bullying, exploitation, extreme behaviours, discriminatory views and risk-taking behaviours whilst equipping young people with the skills needed to keep them safe
- continue to ensure there is a zero-tolerance approach to sexual violence and sexual harassment
- develop and then implement procedures for identifying and reporting cases, or suspected cases, of abuse and neglect
- ensure the wishes and feelings of a young person are taken into account when determining any action to take and what services to provide
- support young people who have been abused/neglected in accordance with his/her agreed child protection plan
- ensure regular updates are given to all staff via email, the school bulletin and through in-house training
- ensure all staff receive whole school safeguarding training every year.
- Kristian Phillips, Designated Safeguarding Lead (DSL), and Georgina Lewis, Deputy Designated Safeguarding Lead and Safeguarding Officer (DDSL), receive training every 2 years
- DDSLs receive training every 2 years
- ensure we practise safer recruitment in checking the suitability of staff and volunteers to work with young people
- ensure any new staff receive an immediate induction to safeguarding and a follow up on-line training course.
- Induction involves staff reading and understanding:
 - Keeping Children Safe in Education Part One, Part 5 and Annex B
 - Safeguarding and Child Protection Policy
 - Children Missing Education (within the Safeguarding and Child Protection Policy)
 - Behaviour Policy
 - Staff Code of Conduct
 - Prevent
 - Child-on-Child Abuse (within the Safeguarding and Child Protection Policy)

This safeguarding policy links with other policies within John Kyrle High School, which include (but are not limited to):

- Staff Code of Conduct
- Safer Recruitment
- Whistleblowing
- Online Safety
- Behaviour
- Child-on-Child Abuse
- Health and Safety
- RSE statement
- RESPECT policy
- Protected characteristics statement

Key Definitions

Safeguarding is defined in Keeping children safe in education 2025 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
- taking action to enable all children to have the best outcomes.

Child Protection is defined as –

- activity that is undertaken to protect specific children who are suspected to be suffering, or likely to suffer, significant harm. This includes harm that occurs inside or outside the home, including online. (Working Together, DfE 2023 pg. 8)

This includes, but is not limited to, safeguarding children in specific circumstances, such as:

• Neglect	• Physical abuse
• Emotional abuse	• Sexual abuse
• Bullying, including online and prejudice-based bullying	• Racist, disability and homophobic or transphobic abuse
• Gender based violence / violence against women and girls	• Radicalisation and /or extremist behaviour
• Exploitation and trafficking, both sexual and criminal	• Child on Child abuse
• Teenage relationship abuse	• Substance abuse
• Gang / youth violence including initiation / hazing	• Domestic abuse / violence
• Female Genital Mutilation	• Forced Marriage
• Fabricated / induced illness	• Poor parenting
• Online including grooming via social networking, online gaming, video messaging	• The impact of new technologies on sexual behaviour: e.g. Youth Produced Sexual imagery
• Self-Harm behaviours	• Children with mental health difficulties or illness
• Up skirting	• Contextual/extra familiar risks

Rationale

Staff working with young people at John Kyrle High School are advised to maintain an attitude “it does happen here’ where safeguarding is concerned. We recognise that teachers and other adults at the school are well placed to observe young people and note any early signs and symptoms that could lead to the early detection of child abuse and neglect. The mutual respect, trust, confidence and discussion that develop between staff and young people can lead to young people wanting to disclose information on abuse that is



occurring at home, in school and in their neighbourhoods. A culture of openness and transparency where all staff understand their role and responsibility to safeguard and promote the welfare of all young people is embedded.

We will include opportunities in the PSHE and RSE curriculum (at JKHS this is called RESPECT), in IT, during assemblies and via visiting speakers when teaching young people about safeguarding, including online safety. Capturing the voice of our young people remains a priority and this contributes to our safe, resilient, and robust ethos in school. Issues are also addressed through other areas of the curriculum, for example, English, History, Drama, Art.

All staff are trained to be aware of the incidence, gravity, signs, symptoms, nature and categories of abuse and neglect, and to deal with the disclosure of abuse and neglect. All staff need to be aware of the routines and the role of the education support services and other agencies so that they can fulfil their responsibility and follow the procedures identified by the local safeguarding children board.

John Kyrle High School will fulfil our local and national responsibilities as laid out in the following documents:

- Working Together to Safeguard Children 2024 (DfE)
- Keeping Children Safe in Education 2025 (DfE)
- Information Sharing (HM Govt July 2018) and Information sharing advice for safeguarding practitioners (updated 2024)
- The procedures of Herefordshire Safeguarding Children Partnership
- The Children Act 1989 (and 2004 amendment)
- The Education Act 2002 s175/s157
- What to do if you are worried a child is being abused (DfE 2015)
- Use of reasonable force in schools (DfE 2013)
- Mental Health and Behaviour in Schools: Departmental Advice (DfE 2018)
- Preventing and Tackling Bullying: Advice for Headteachers, Staff and Governing Bodies (DfE 2017)
- Prevent Duty, Counter Terrorism and Security Act 2015
- Prevent duty guidance for England and Wales (updated 2024)
- Serious Crime Act 2015
- Sharing Nude and Semi-Nude Images guidance 2020 Sharing nudes and semi-nudes: advice for education settings working with children and young people (updated 2024)
- Criminal exploitation of children and vulnerable adults county lines (Home Office guidance) updated 2023
- Child missing from home or care (DfE statutory guidance) Children who run away or go missing from home or care (updated 2014)
- Child sexual exploitation advice for practitioners (DfE advice for practitioners) Child sexual exploitation: definition and guide for practitioners 2017
- Children missing education (DfE advice for schools) updated 2024
- Drugs: advice for schools 2012 (DfE and ACPO guidance)
- Working together to improve school attendance 2024

Curriculum

Safeguarding, including online safety, is covered through our broad and balanced curriculum, through assemblies and in tutor periods. Students are given advice on how to keep themselves safe online; the dangers of drugs; the dangers of political and religious extremism. In addition, the school covers a variety of relevant issues in Relationships and Sex Education (RSE) including for example, Chelsea's Choice, a play and workshop session performed by a theatre group on the signs and dangers of Child Sexual Exploitation (CSE). We recognise that a one-size fits all approach may not be appropriate for all young people and some benefit from a more personalised approach. The school also works in close liaison with the police, the PCSO and



numerous external agencies. JKHS has an active mental and emotional wellbeing group, as well an anti-bullying group.

The Board of Governors

The board of governors will:

- ensure that they comply with their duties under legislation
- ensure they facilitate a whole-school approach to safeguarding, this means ensuring safeguarding and child protection are at the forefront and underpin all relevant aspects of process and policy development
- have regard to 'Keeping Children Safe in Education 2025 to ensure that the policies, procedures and training are effective and comply with the law at all times.

The board of governors will ensure that:

- the school contributes to inter-agency working in line with the statutory guidance within 'Working Together to Safeguard Children 2023'. This includes providing a co-ordinated offer of early help when additional needs of young people are identified and contributing to inter-agency plans to provide additional support to young people subject to child protection plans
- the school provides an appropriate safeguarding response in accordance with the Effective Support document and local safeguarding procedures in order to safeguard young people
- the school provides a child-on-child abuse policy
- procedures are in place within the child protection policy to minimise child-on-child abuse and these are well understood across all staff
- online safety is considered with increasing work online, which poses concerns around potentially harmful and inappropriate online material. The governors will ensure that appropriate filters and monitoring systems are in place
- the school completes regular safeguarding training, including online safety training and ensures that all young people are taught about safeguarding and online safety
- safeguarding training for staff, including online safety training, is considered as a whole-school approach to safeguarding and curriculum planning
- the school maintains information about the legal status of all young people including whether a looked after young person is subject to S20 voluntary, interim or full care order, contact details for persons with parental responsibility, level of delegated authority, details of the social worker and the virtual head in the authority that looks after the young person
- there is a designated teacher with the appropriate training skills and knowledge appointed to promote the academic achievement of looked after young people and young people previously looked after
- the school/DSL/DDSL take into account the procedures and practice of the local authority as part of the inter-agency procedures set up by the Multi-Agency Safeguarding Arrangement (HSCP). This includes working with Children's Social Care from other authorities when young people attend school in Herefordshire but live outside of Herefordshire
- the school shares information with other professionals in the interests of safeguarding young people in accordance with the guidance within 'Working Together to Safeguard Children 2023' and 'Information Sharing: advice for practitioners providing safeguarding services to children, young people, parents and carers 2018'
- the school follows local procedures for sharing intelligence in relation to Child Sexual Exploitation with West Mercia Police and the Point of Contact for CSE within Herefordshire Council
- the school initiates appropriate safeguarding responses to young people who go missing from education, particularly on repeat occasions, to help identify the risk of abuse and neglect, including sexual abuse, exploitation or radicalisation and help to prevent the risks of them going missing in the future



- the headteacher ensures that safeguarding policies and procedures which have been adopted by the governors are consistently implemented
- the school has a code of conduct policy which will, amongst other things, include staff/young person relationships and communications including the use of social media and other online platforms
- the school has procedures for managing allegations and concerns about adults that work or volunteer with young people and that these include the procedures for making referrals to the Disclosure and Barring Service, LADO and the Teacher Referral Agency as the teaching professional body where appropriate
- the school operates safer recruitment procedures and ensures that appropriate checks are carried out on all new staff and relevant volunteers in accordance with 'Keeping Children Safe in Education 2025'
- the DSL is a member of the senior leadership team and has lead responsibility for safeguarding which is not delegated. This is clearly defined within the role holder's job description and this person must have appropriate authority, time, training, funding and resources to undertake this role as per Annex C of 'Keeping Children Safe in Education 2025'
- the DSL maintains management oversight of any work undertaken by the DDSL
- any DDSL has the appropriate training skills and knowledge to undertake the operational function of the DSL as per Annex C of 'Keeping Children Safe in Education 2025'
- the DSL and DDSL undertake higher-level training to ensure they have the appropriate training, skills and knowledge to carry out this role. In addition, the DSL and DDSL will update their knowledge by receiving safeguarding updates via the designated safeguarding officer network events, attendance at training and learning events offered by the HSCP, online updates via NSPCC or attendance at professional development events
- the headteacher and all other staff who work with young people undertake safeguarding training in accordance with 'Keeping Children Safe in Education 2025' and that they receive annual safeguarding updates to ensure their continual professional development
- these updates take account of HSCP priorities, the local context, the needs of young people and other identified training needs
- there is a policy as cited in 'Keeping Children Safe in Education 2025' that provides a response to low-level concerns
- all training will incorporate safeguarding young people in specific a circumstance that includes, but is not limited to Child Sexual Exploitation (CSE), Female Genital Mutilation (FGM), vulnerability to radicalisation and child-on-child abuse
- the training will ensure that child-on-child abuse is never seen as 'banter' or part of growing up and incorporates issues of sexually harmful behaviours such as sexual touching or assault and gang initiation or hazing type violence. The training recognises how alcohol use, drug use, truancy and youth generated sexualised imagery increases risks of harm to young people. In addition, the training will also ensure staff have the skills and knowledge about the additional vulnerability of looked after young people
- the school has appropriate safeguarding responses for young people who go missing from education which should include holding more than one emergency contact number for young people
- temporary staff and volunteers are made aware of the school's policies and procedures for child protection and their responsibilities
- the school remedies any deficiencies or weaknesses brought to its attention without delay; and recognises the importance of utilising the expertise of the DSL/DDSL in shaping safeguarding arrangements
- there are appropriate online filtering and monitoring systems within the school which safeguards young people from accessing inappropriate or harmful online material. Over blocking of material which could impair young people's independent research and learning will be avoided. The appropriate IT systems (Smoothwall) are in place to notify the safeguarding team of any concerns in relation to potential harmful content that are accessed on school accounts



- the school and governors understand that within alternative provisions, young people may have complex needs and may have an additional risk of harm (see further information via 'Alternative provision – DfE Statutory Guidance 2013')
- the curriculum is delivered in such a way to include educating young people about how to stay safe which will include Relationships and Sex Education (RSE), online safety and broader safeguarding messages within RESPECT
- there are processes in place which enable young people to express their wishes and feelings and provide feedback
- the governors review its policies/procedures annually (further details on specific policies are cited in KCSiE 2025)
- the nominated governor for child protection at the school is Moira Lee. The nominated governor is responsible for liaising with the headteacher and DSL over all matters regarding child protection issues
- the governors and members will ensure that appropriate policies are in place in order for appropriate action to be taken in a timely manner to support young people's welfare
- the role is strategic rather than operational; they will not be involved in concerns about individual young people
- a member of the board of governors, usually the chair, is nominated to liaise with the designated officer(s) from the relevant local authority and partner agencies in the event of allegations of abuse made against the headteacher

Inspection

From November 2025, Ofsted's inspection of school provision will be carried out under Ofsted's Education Framework. John Kyrle High School will be aware of the new inspection guidance and the requirements from Ofsted. Inspectors will always report on whether or not arrangements for safeguarding young people are met or not met.

Types of abuse - neglect and exploitation

As a school we recognise that abuse, neglect and safeguarding issues are rarely standalone events that can be covered by one definition or label. In most cases multiple issues will overlap with one another. All staff always remain vigilant and always raise any concerns with the DSL/DDSL.

- **Abuse** – a form of maltreatment of a young person. Somebody may abuse or neglect a young person by inflicting harm or by failing to act to prevent harm. Young people may be abused in a family or in an institutional or community setting by those known to them, or more rarely, by others. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Young people may be abused by an adult or adults or by another young person or young people. KCSiE 2025 definition has been updated:
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 others. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Children may be abused by an adult or adults or by another child or children.
- **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 young person. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a young person.



- **Emotional abuse** – the persistent emotional maltreatment of a young person such as to cause severe and adverse effects on the young person’s emotional development. It may involve conveying to a young person that they are worthless or unloved, inadequate or valued only in so far as they meet the needs of another person. It may include not giving the young person 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 young people. These may include interactions that are beyond a young person’s developmental capability as well as overprotection and limitation of exploration and learning, or preventing the young person participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may also involve serious bullying (including cyberbullying), causing young people to frequently feel frightened or in danger, or the exploitation or corruption of young people. Some level of emotional abuse is involved in all types of maltreatment of a young person, although it may occur alone.
- **Sexual abuse** – involves forcing or enticing a young person to take part in sexual activities, not necessarily involving violence, whether or not the young person 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 young people in, or looking at, or in the production of, sexual images, watching sexual activities, encouraging young people to behave in sexually inappropriate ways, or grooming a young person in preparation for abuse. Sexual abuse can take place online, and technology can be used to facilitate offline abuse. Sexual abuse is not solely perpetrated by adult males, women can also commit acts of sexual abuse, as can other young people. The sexual abuse of young people by their peers is a specific safeguarding issue (known as child-on-child abuse) in education. At John Kyrle High School all staff are aware of this and there are procedures in place for dealing with it.
- **Neglect** – the persistent failure to meet a young person’s basic physical and/or psychological needs, likely to result in a serious impairment of the 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 young person from physical or 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 young person’s basic emotional needs.

Specific safeguarding issues

All staff have an awareness of safeguarding issues that can put young people at risk of harm e.g. bullying including cyberbullying, inappropriate sexual behaviour, sexual harassment, sexual exploitation, domestic violence, drug taking, alcohol misuse, fabricated or induced illness, gangs and youth violence, hate, mental health, radicalisation and trafficking, deliberately missing education, consensual and non-consensual sharing of nudes and semi-nude images and/or videos.

Reporting concerns

Any member of staff who:

- has any concerns about a young person’s welfare
- has a suspicion that a young person is marked or bruised in a way that is not readily attributed to ‘normal’ knocks and scrapes
- notes behaviours or actions in a young person which give rise to suspicions that the young person may have suffered abuse or neglect or may be at risk of suffering abuse or neglect



- receives hints or a disclosure of any type of abuse or neglect from a young person or from one of his/her friends or a parent and/or carer or an adult
- has a professional curiosity

Staff have a duty to report their concerns immediately to the DSL, Kristian Phillips, the DDSL, Georgina Lewis, or, in their absence, to a senior member of staff. Staff must not assume a colleague or professional will or has taken action. The DSL/DDSL provides support to staff members to carry out their safeguarding duties and liaises closely with other services such as children's social care and the police.

In the first instance, this must be done verbally and also in written format to the DSL/DDSL. However, as in all cases where a referral to outside agencies is a possibility, accurate written records are vital. It is important that staff do not investigate or follow up suspicions of child abuse themselves, for instance by speaking with and/or questioning young people or a parent and/or carer. Staff members must never promise a young person that they will not tell anyone else about a disclosure, as this may ultimately not be in the best interests of the young person. Staff will be able to reassure the young person that they are being taken seriously and that they will be supported and kept safe.

All staff can make an informed decision as to whether to refer a case to social services, this will be in consultation with the 'Right Help Right Time' document. This may be immediately following the expression of concern or after discussion with the young person, his/her parents or carers, other staff, and other agencies as appropriate. While staff must be circumspect about using 'hearsay' evidence, it must not be discounted without thought. Gossip is often, but not always, untrue. Such evidence may, together with other indicators, give us warning of an abusive situation. Where a young person is suffering or is likely to suffer from harm, it is important that a referral to social services (and if appropriate, the police) is made immediately. Parents/carers will be informed of the referral unless informing them may place the young person at increased risk of harm. It is an essential requirement for all staff to record any conversation or contact that might be useful as evidence. Where referrals are not made by DSL/DDSL, they must be informed, as soon as possible, that a referral has been made.

In the event of a professional disagreement in relation to a specific concern or referral, the school will follow the procedures for resolution of professional disagreements, also known as escalation procedures.

It is the responsibility of the designated member of staff, together with the headteacher, to notify children's social care if there is an unexplained absence of more than two days of a young person who is on the child protection register.

It is the responsibility of the DSL, together with the headteacher to ensure that when a young person on the child protection register leaves the school, their information is transferred to the new school immediately and the young person's social worker is informed.

All records must be kept securely, separate from the main student file, and in locked locations. Records include a clear and comprehensive summary of the concern, how the concern was followed up and resolved as well as actions taken, decisions reached and the outcome. Access to safeguarding and child protection records is restricted.

The role of the DSL is fulfilled in line with expectations, in that he/she will:

- take lead responsibility for safeguarding and child protection
- refer cases of suspected abuse/neglect/exploitation allegations/crimes to the relevant investigating agencies, including the police

- act as a source of support, advice and expertise within the school when deciding whether to make a referral by liaising with, and supporting staff who make referrals. This is in accordance with the 'Right Help Right Time' document
- recognise how to identify signs of abuse or neglect and when it is appropriate to make a referral
- ensure the young person's wishes and feelings are taken into account and enable young people to express their views and give feedback
- liaise with the headteacher to inform him/her of any issues and ongoing investigations and ensure there is always cover for this role
- have a working knowledge of how the Herefordshire Safeguarding Children Partnership (HSCP) operate, the conduct of a child protection case conference and be able to attend and contribute to these effectively when required to do so. Herefordshire Safeguarding Children Board is part of the West Midlands Safeguarding Children Procedures. Herefordshire Safeguarding Children Board visit <https://herefordshiresafeguardingboards.org.uk>
- have a good understanding of processes, procedures and responsibilities of other agencies such as social care
- promote educational outcomes by working closely with staff members and sharing information whilst maintaining a culture of high aspirations
- ensure all staff members/regular visitors have induction training covering safeguarding and child protection and are able to recognise and report any concerns immediately as they arise
- ensure safeguarding supervision is provided where appropriate to staff, particularly those who are involved in the case management of vulnerable young people and their families
- be able to keep detailed, accurate and secure written records of referrals and/or concerns and have due regard to information sharing guidance
- inform staff of the relevant details only when their having knowledge of a situation will improve their ability to deal with a young person
- understand the importance of information sharing with school and with safeguarding partners/agencies
- take part in strategy/discussions and inter-agency meetings and/or support other staff to do so
- obtain access to resources and attend any relevant or refresher training courses with updates at the very least, annually
- ensure this policy is updated and reviewed annually and work with the board of governors regarding this
- ensure each member of staff has access to, and understands, this policy and procedures
- promote supportive engagement with parents/carers in safeguarding and promoting the welfare of young people/families
- ensure parents/carers see copies of this policy which alerts them to the fact that referrals may be made and the role of the school in this to avoid conflict later
- ensure parents/carers are kept up to date regarding any concerns or developments by the appropriate members of staff. The DSL will not disclose to a parent/carer any information held on a young person if this would put the young person at risk of significant harm
- support staff to provide academic support or reasonable adjustments to help young people who have or have had a social worker to reach their potential
- understand the assessment process for providing Early Help
- understand the lasting impact that adversity and trauma can have, including on young people's behaviour, mental health and wellbeing, and what is needed in responding to this in promoting educational outcomes
- are alert to the specific needs of young people with SEND, health conditions and young carers
- understand and support staff in providing advice on protecting young people from radicalisation and make referral to CHANNEL as required
- understand the difficulties young people may have in approaching staff about their own circumstances



The DDSL is trained to the same level as the DSL and undertakes this role operationally with direct oversight and management from the DSL who maintains lead responsibility.

The headteacher, and all other staff who work with young people, undertake appropriate training to equip them to carry out their responsibilities for child protection effectively. All staff receive appropriate safeguarding training which is regularly updated. Staff receive safeguarding and child protection updates (via email, bulletins and meetings) as required but at least annually to provide them with relevant skills and knowledge to safeguard young people effectively. Temporary staff and volunteers who work with young people are made aware of the school's arrangements for child protection and their responsibilities.

Child protection and safeguarding issues are recurrent items on every main meeting of the full board of governors. In addition, the safeguarding committee receives a report at each meeting on any safeguarding and child protection issues that have arisen over the past term.

At John Kyrle High School we ensure young people know they can talk to staff. We foster an environment that gives young people an open forum to talk things through and report any concerns they may have. This could be a form tutor, a teacher, head of year, pastoral support officer, senior team mentor, support staff or external agencies who visit the school.

Any young person who opens up about something which has happened to them or someone they know might be worried about the consequences or that nobody will believe them. Young people may struggle to share what they are feeling.

What to say to a young person and how to respond:

- listen carefully to what they are saying
- stay calm
- reassure the young person
- let them know they have done the right thing by telling you
- tell him/her you are pleased that she/he is speaking to you
- tell them it's not their fault
- take them seriously and remind them they will be supported and kept safe
- explain you are going to speak to someone who will be able to help, you must not promise confidentiality
- check you have understood correctly what the young person is trying to tell you
- praise the young person for telling you
- do not make any comments about any alleged offender
- record all you have heard in detail using the young person's language
- explain to the young person who you are going to tell and why that person needs to know
- keep the young person with you and speak to the DSL, DDSL or a member of the senior leadership team immediately
- continue to reassure the young person

Listening to and supporting a young person who has made a disclosure can be traumatic for the adult involved. Support is available for staff should they require it through the DSL, DDSL or the Employee Assistance Programme.

Staff behaviour



The highest possible standards of behaviour are expected from staff, governors and volunteers. In particular staff should be on their guard against:

- treating young people as peers by adopting their mannerisms or slang
- giving inappropriate details to young people of their personal lives
- seeming to favour particular young people
- using physical contact with young people that is secretive or of a nature that could be considered indecent
- not following school policy on searching young people
- using emotional abuse against young people by ignoring, ridiculing, humiliating, intimidating, bullying or continually singling out any young person for negative attention
- dressing inappropriately
- failing to report concerns

All staff should also manage behaviour effectively to ensure a good and safe educational environment where there is a clear understanding of the needs of all young people. All staff should focus on securing improved outcomes for all young people as part of a rich and rounded curriculum.

The school has a procedure for low-level concerns – see appendix 14.

Use of reasonable force

There are circumstances when it is appropriate for staff at John Kyrle High School to use reasonable force to safeguard young people. Such 'reasonable force' covers a range of actions used by staff that involve a degree of physical contact to control or restrain a young person/people. 'Reasonable' means 'using no more force that is needed'. The use of force may involve passive physical contact or active physical contact. In all of these types of circumstances, we will adhere to the DfE's Use of reasonable force in schools 2013

As a school we are very much about creating individual plans in order to minimise the likelihood of challenging behaviour, and when it does occur, that there is less use of physical restraint and other restrictive methods. Such methods could include risk assessments, pastoral support plans and modified timetables (verified by a medical practitioner and the local authority). When considering the use of reasonable force towards young people with SEND, mental health or medical conditions, the risks should be carefully considered. A number of staff have undertaken 'Team-Teach' training in the reduction of risk, restraint and restriction.

What staff do if a young person is suffering or likely to suffer from harm

If a young person is suffering or likely to suffer from harm, an immediate referral must be made to children's social care and/or the police immediately. Anyone can make a referral. Where referrals are not made by DSL/DDSL, they must be informed, as soon as possible, that a referral has been made.

Making a referral to children's social care

Should any staff member need to make a referral to social care, the following procedures must be followed:

- for Herefordshire young people:
 - contact 01432 260800 during the day or 01905 768020 out of hours
 - advise the duty team of your concerns
 - if a referral is advised then go to <https://herefordshiresafeguardingboards.org.uk> and click on the link to download the multi-agency referral form
- for Gloucestershire young people:
 - contact 01452 426565 (option 1)



- advise the duty team of your concerns
- if a referral is advised then go to www.gscb.org.uk
- type 'MARF' into the search box and click on 'I'm a professional' to complete the form

Consent has to be gained from the parent/carer in respect of any referral made unless, by doing so, it would put a young person at significant harm. Both Herefordshire and Gloucestershire are very willing to offer advice in respect of consent.

Both Herefordshire and Gloucestershire will also state which email address the referral form should be sent to. Please ensure a copy of the form is taken and speak to the DSL/DDSL or a member of the senior leadership team immediately.

If, after a referral, a young person's situation does not appear to be improving, the referrer supported by the DSL/DDL will consider following local escalation procedures.

Safeguarding concerns or allegations made against staff (including supply staff and volunteers)

The school will comply with the HSCP procedures for managing allegations and concerns about adults that work or volunteer with young people in all circumstances. This procedure must be used in any case in which it is alleged that a member of staff (including supply staff), governor, visiting professional or volunteer has:

- behaved in a way that has harmed a young person or may have harmed a young person
- possibly committed a criminal offence against or related to a young person; or
- behaved in a way that indicates he/she may pose a risk of harm to young people
- behaved or may have behaved in a way that indicates they may not be suitable to work with young people

Although it is an uncomfortable thought, it needs to be acknowledged that there is the potential for staff in school to abuse or mistreat young people.

All staff working within our school must report any potential safeguarding concerns about an individual's behaviour towards young people immediately. Allegations or concerns about colleagues and visitors must be reported direct to the headteacher unless the concern relates to the headteacher. If the concern relates to the headteacher, it must be reported immediately to the chair of governors, Paul Deneen at pauldeneen@jkhs.org.uk. Concerns must be reported directly to the local authority designated officer (LADO) in children's social care who will liaise with the chair of governors and decide on any action required.

If the headteacher is not available, the member of staff must report their concerns to the most senior member of staff available who will make contact with the LADO and discuss the concerns. Contact into the LADO must happen at the earliest possible opportunity and within one working day.

The LADO in Herefordshire can be contacted on 01432 261739.

The LADO may request a referral, if this is requested the referral will be completed and submitted within one working day.

The school will engage with the LADO at all stages of the management of the allegation/concern and comply with the statutory guidance contained within 'Keeping Children Safe in Education 2025' and the local procedures published by the HSCP.



The school will consider whether it is necessary to suspend the member of staff while the allegation or concern is investigated. However, all reasonable alternatives to manage the risk will be considered. Due consideration will be given to the view of the LADO in relation to suspension or in-work safeguards whilst a matter is investigated.

Should the school dismiss a member of staff/volunteer as a result of a substantiated allegation or should a member of staff/volunteer resign before an investigation has been completed, in accordance with statutory duty, a referral to the Disclosure and Barring Service (DBS) will be made.

If the member of staff is engaged in teaching work, the school will in accordance with published guidance from the DfE consider whether a referral to the Teacher Regulation Authority (TRA) must be made.

The school will adhere to the statutory guidance contained within 'Keeping Children Safe in Education' with regard to record keeping, confidentiality, references and compromise or settlement agreements.

What staff do if they have concerns about safeguarding practices within the school

All staff and volunteers should feel able to raise concerns about poor or unsafe practice and potential failures in the school's safeguarding regime and that such concerns will be taken seriously by the senior leadership group.

Appropriate whistleblowing procedures, which are suitably reflected in staff training and staff behaviour policies, are in place for such concerns to be raised with the school's senior leadership group.

Where a staff member feels unable to raise an issue with their employer or feels that their genuine concerns are not being addressed, other whistleblowing channels are open to them.

The NSPCC whistleblowing helpline is available for staff who do not feel able to raise concerns regarding child protection procedures internally. Staff can call: 0800 028 0285 – line is available from 8.00am to 8.00pm, Monday to Friday and email: help@nspcc.org.uk.

Safer recruitment and selection

The school pays full regard to 'Keeping Children Safe in Education 2025'. Safer recruitment practice includes scrutinising applicants, verifying identity and academic or vocational qualifications, obtaining professional and character references, checking previous employment history and ensuring that a candidate has the health and physical capacity for the job. It also includes undertaking interviews and undertaking appropriate checks through the Disclosure and Barring Service (DBS), and Prohibition Order checks in respect of the following which will include GTCE sanctions. For best practice, the name on the birth certificate must be checked.

John Kyrle High School acknowledge that Section 128 checks must be completed on governors and those taking up a management position. A Section 128 would prohibit someone:

- from taking up a management position in an independent school, academy, or in a free school as an employee
- from being a governor of an academy or free school trust
- from being a governor or member of a proprietor body of an independent school
- from being a governor on any governing body in an independent school, academy or free school that retains or has been delegated any management responsibilities



All recruitment materials include reference to the school's commitment to safeguarding and promoting the wellbeing of young people.

The following people at John Kyrle High School have undertaken safer recruitment training:

- Julian Morgan –Headteacher
- Kristian Phillips –Designated Safeguarding Lead
- Luke Mosely – Deputy Headteacher
- Helen Richardson – Headteacher PA
- Georgina Lewis – Safeguarding Officer

At least one of the above will be involved in **all** staff/volunteer recruitment processes and sit on the recruitment panel.

Safety on and off site

The safety of young people inside school, moving around, arriving and leaving the school site are important considerations. Arrangements for this are set out in our 'health and safety policy'.

Risk assessments must be completed and approved before any trips away from the site are undertaken. Trip lists must also be shown to the DSL/DDSL, in advance of the trip, to ensure all young people are safe to leave the school site.

Young people should be offered facilities for changing that offer them the level of privacy and safety appropriate to their age.

Online safety

John Kyrle High School has an effective whole-school approach to online safety. All staff are aware that technology is a significant component in many safeguarding and wellbeing issues. Online safety is reflected throughout our broad and balanced curriculum with a view to protecting and education young people.

Online safety has four areas of risk:

Content: illegal, inappropriate or harmful content – pornography, fake news, racism, self-harm, suicide, radicalisation and extremism.

Contact: harmful online interaction with other users – child-on-child pressure, advertising, adults posing as children or young people, grooming and exploitation.

Conduct: online behaviour that could cause harm – making, sending and receiving explicit images, sharing of nudes and semi-nudes and online bullying.

Commerce: online gambling and scams.

All staff will do all they reasonably can to limit exposure to the above risks. A joint effort will be made to keep young people safe online with advice and support given to parents/carers should they need it (including when at home).

How John Kyrle High School monitors and responds to online safety, mobile and smart technology



John Kyrle High School has an Internet filtering policy where internet activity for all young people is monitored daily and any concerns are raised and investigated by the senior leadership team or the safeguarding team. Where there is a clear safeguarding concern this is dealt with under John Kyrle High School's Safeguarding/Child Protection Policy.

Usage of all computers on the school network is monitored in real time. The system automatically emails the DSL/DDSL and e-safety lead, as well as the network manager, if it detects that usage is concerning. This includes internet use but also general PC use. Where there are safeguarding concerns involving mobile devices outside the school's filtering policy, these will be dealt with in the same way as though it is a school device.

Where there are safeguarding concerns with internet access whether this is through the school's internet system or the student's own device, appropriate action is taken to minimise any future issues, including, but not limited to, the following:

- restriction of internet access within school where appropriate
- informing teaching staff to more closely monitor the student's computer usage
- restricting a student's access to their own devices within school
- appropriate education/training for both student and parents/carers by the e-safety co-ordinator. A joint effort will be made to keep young people safe online (including when they are online at home).

Regardless of whether any action is taken, a record will be kept of the incident. Internet access will be restricted for some young people where appropriate. In this case staff will be made aware of any restrictions put in place. Where the safeguarding concerns relate to the student's own device, the school may choose to restrict the student's access to this device by restricting possession during the school day. Restrictions will be monitored on a regular basis but at least once every half term by the DSL, DDSL and the e-safety coordinator.

How the school ensures internet policies and filtering are up-to-date

The most extreme and illegal websites are automatically blocked through the school's Internet filtering provider and make use of the Internet Watch Foundation (IWF) list. The filter updates automatically, using the guidance from Keeping Children Safe in Education and the IWF.

The internet filtering categories are monitored and reviewed annually through the e-safety committee and modified as appropriate. This committee involves the DSL, other appropriate members of senior staff, the e-safety coordinator, teaching staff, governors, parents/carers and young people. Filtering categories are dynamically updated by the Sophos filtering system.

Youth produced sexualised imagery

The school recognises the impact of online social communication and the issue of sending or posting sexually suggestive images including nude or semi-nude photographs via mobiles or over the internet. The school pay due regard to the guidance issued by the UK Council for Child Internet Safety in relation to how to respond to incidents.

All staff must have an awareness of safeguarding issues that can put young people at risk of harm. Behaviours linked to issues such as drug taking, and/or alcohol misuse, deliberately missing education and consensual and non-consensual sharing of nude and semi-nude images and/or videos can be signs that young people are at risk.

In all cases where an incident of youth produced sexual imagery is reported the following actions will be undertaken:



- the incident will be reported to the DSL/DDSL as soon as possible
- the DSL/DDSL will hold an initial review discussion or meeting with appropriate school staff
- interviews will be held with the young people involved (if appropriate)
- parents/carers will be informed at an early stage and involved in the process unless there is good reason to believe that involving parents/carers would put the young person at risk of harm
- at any point in the process if there is a concern a young person has been harmed or is at risk of harm, a referral must be made to children's social care and/or the police immediately

An immediate referral will be made to the police and social care in the following circumstances:

- the incident involves an adult
- there is reason to believe that a young person has been coerced, blackmailed or groomed, or if there are concerns about their capacity to consent (for example, owing to special educational needs)
- the imagery suggests the content depicts sexual acts which are unusual for the young person's developmental stage, or are violent
- the imagery involves sexual acts and any young person in the imagery is under 13
- there is reason to believe a young person is at immediate risk or harm owing to the sharing of imagery, for example the young person is presenting as suicidal or self-harming

If none of the above applies, the school may choose to deal with the incident without involving the police or social care. This will usually be the case where the DSL/DDSL is confident they have enough information to assess the risks to the young people involved and the risks can be managed within the school pastoral support and disciplinary framework.

All decisions and rationale for decision making will be recorded. All decisions will be based on the best interests of the young person/people.

The school will pay due regard to the DfE guidance: 'Searching, Screening and Confiscation advice.'

Adults in the school will not view youth produced sexual imagery unless there is good and clear reason to do so. Wherever possible the DSL/DDSL will respond to an incident based on what they have been told about the imagery. All incidents will be recorded.

More information is available in Appendix 6.

Use of Artificial Intelligence (AI) in Safeguarding

The school recognises the growing role of Artificial Intelligence (AI) in education and administration. While AI can enhance learning and streamline operations, its use must align with our safeguarding principles to ensure the safety and wellbeing of all students.

Ethical Use - AI tools must be used ethically and responsibly. Staff and students are expected to use AI in ways that support learning and personal development, without compromising privacy, dignity, or safety.

Data Protection -any AI system that processes personal data must comply with data protection laws. Staff must ensure that student data is not shared with AI platforms.

Monitoring and Oversight - the school will monitor the use of AI tools to prevent misuse, including the generation of harmful, discriminatory, or inappropriate content.



Education and Awareness - students will be educated on the safe and responsible use of AI, including understanding its limitations, potential biases, and the importance of critical thinking.

Reporting Concerns - any concerns about the misuse of AI, including the creation or sharing of harmful content, must be reported to the Designated Safeguarding Lead (DSL) or a DDSL immediately and recorded via MyConcern.

Parents and carers

All parents and carers are made aware of this policy and the duties and responsibilities of the school with regard to safeguarding and child protection.

Parents/carers must always be made to feel welcomed and encouraged to discuss any concerns they have about their child at home. At first instance, such concerns should be made known to the tutor or the head of year.

Although we need to encourage partnership between home and school, the school acknowledges that the protection of the young person is paramount. Parents and/or carers and young people should be aware that all staff are responsible for safeguarding. This could involve asking parents/carers to clarify their child is safe/fit to attend school via a GP route. There may also be occasions when external agencies are consulted before parents and/or carers because it considers contacting them may increase the risk of significant harm to a young person.

Contextual safeguarding

Contextual safeguarding is an approach to understanding, and responding to, young people's experiences of significant harm beyond their families. It recognises that the different relationships that young people form in their neighbourhoods, schools and online can feature violence and abuse. There are times when parents/carers have little influence over these contexts, and young people's experiences of extra-familial abuse can undermine parent/carer-young person relationships.

Schools may have some influence over/within extra-familial contexts, and recognise that assessment of, and intervention with, these spaces are a critical part of safeguarding practices. Contextual safeguarding at John Kyrle High School, therefore, expands the objectives of child protection systems in recognition that young people are vulnerable to abuse in a range of social contexts. Such abuse takes a variety of different forms including (but not limited to) sexual exploitation, criminal exploitation, sexual abuse, serious youth violence and county lines.

John Kyrle High School staff work effectively with external agencies both in the local community and further afield. Local intelligence is shared with the appropriate agencies in a prompt and timely manner.

Child abduction and community safety incidents

Young people can be abducted by parents, family members, neighbours, friends, acquaintances and by strangers. Other community incidents in the vicinity of a school can raise concerns amongst young people and their parents/cares.

At John Kyrle High School we give young people practical advice on how to keep themselves safe.

Early Help

Staff are prepared to identify young people who may benefit from early help. Early help, or early intervention, is support given to families when: a challenge first develops a new or continuing difficulty doesn't meet the

threshold for specialist support - for instance from social services or the NHS mental health service for young people, known as CAMHS. Staff are alert to the potential need for early help for a young person who:

- is disabled/has specific educational needs
- has SEND
- has a mental health need
- is a young carer
- is at risk of modern slavery/trafficking or criminal exploitation
- is at risk of being radicalised or exploited
- is in a family circumstance presenting challenges for the young person such as drug and alcohol misuse, adult mental health issues and domestic abuse
- is misusing drugs or alcohol themselves
- is a privately fostered young person
- is frequently missing/goes missing from care or from home
- is persistently absent from education, including persistent absences for part of the school day
- is showing signs of engaging in anti-social behaviour or criminal behaviour including gang involvement and association with organised crime groups or county lines
- has a family member in prison, or is affected by parental offending
- is at risk of 'honour'-based abuse such as Female Genital Mutilation or Forced Marriage
- has returned home to their family from care
- is showing early signs of abuse/neglect
- is showing repeated self-harming
- has gender inequality.

Staff will discuss early help requirements with the DSL/DDSL in the first instance. It is important for young people and their families to receive the right help at the right time to address risks and prevent issues escalating.

SEND

Whilst all young people should be protected, it is important that all staff recognise some groups of young people are potentially at greater risk of harm.

Young people who have special education needs and/or disabilities (SEND) or certain health issues, can face additional safeguarding challenges. Additional barriers can exist when recognising abuse and neglect in this group of young people. We must not assume that indicators of possible abuse or neglect relate to a young person's condition/SEND without further exploitation. For young people with the most profound difficulties, with little or no verbal communication and a need for intimate care, their vulnerability is extremely high. They may also be prone to peer group isolation as well as impacted behaviours such as bullying/prejudice-based bullying. Extra pastoral support is in place for young people with SEND as well as appropriate support for communication.

When working with young people with disabilities, practitioners need to be aware of those additional vulnerabilities to abuse and neglect such as:

- assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the young person's disability without further exploitation
- young person with special educational needs and disabilities can be disproportionately impacted by things like bullying without outwardly showing any signs
- communication barriers and difficulties in overcoming these barriers



Possible indicators of abuse and/or neglect may also include:

- a bruise in a site that might not be of concern on an ambulant young person such as the shin, might be of concern on a non-mobile young person
- not getting enough help with feeding leading to malnourishment
- poor toileting
- lack of stimulation
- unjustified and/or excessive use of restraint
- rough handling, extreme behaviour modification such as deprivation of medication, food or clothing, disabling wheelchair batteries
- unwillingness to try to learn a young person's means of communication
- ill-fitting equipment, for example callipers, sleep board, inappropriate splinting
- misappropriation of a young person's finances; or
- inappropriate invasive procedures

Private fostering arrangements

A private fostering arrangement occurs when a young person under the age of 16 (under 18 for young people with a disability) is provided with care and accommodation by a person who is not a parent, person with parental responsibility for them or a relative in their own home. A young person is not privately fostered if the person caring for and accommodating them has done so for less than 28 days. Should the school become aware of any private fostering arrangements, the DSL/DDSL has a legal duty to inform the local authority.

Looked after young people and previously looked after young people

Staff at John Kyrle High School have the skills, knowledge and understanding to keep looked after young people safe. A previously looked after young person potentially remains vulnerable and it is important that early help and prompt action is taken when necessary to safeguard this particularly vulnerable group. The designated teacher who works to promote the educational achievement of young people who are looked after and previously looked after is Kristian Phillips.

Care leavers

Young people who cease to be looked after and become care leavers will be supported by staff at John Kyrle High School. Any issues of concern affecting the care leaver will be discussed and the appropriate support given.

Adopted young people

Adopted young people should have an enjoyable childhood, and benefit from excellent education, with a wide range of opportunities to develop their talents and skills, which in turn will lead to a successful adult life.

Staff at John Kyrle High School work in partnership with the young person's adoptive parents in helping adopted young people achieve positive outcomes in their education, as well as assisting in their social and emotional development.

Young people can suffer from a range of emotional and behavioural difficulties. John Kyrle High School aim to provide adopted young people with the right support, educational and otherwise.

Young people who need a social worker (Child in Need and Child Protection Plans)

Young people may need a social worker due to safeguarding or welfare needs. A young person's experiences of adversity and trauma can leave them vulnerable to further harm as well as educationally

disadvantaged in facing barriers to attendance, learning, behaviour and mental health.

The DSL/DDSL and all staff will be aware of young people who have a social worker so that decisions can be made in the best interests of their safety, welfare and educational outcomes.

Homelessness

Young people affected by homelessness often feel an overwhelming sense of displacement. This can lead to practical, emotional and behavioural challenges. Homelessness could also cause severe emotional trauma leading to stress, anxiety and problematic behaviours. Bad housing can also affect a young person's ability to learn at school and study at home as well as a real risk to welfare.

At John Kyrle High School staff share appropriate information in a timely way and discuss any concerns about a young person with the DSL/DDSL. This will include identifying where current or changing housing arrangements might affect or present a risk to young people. We will be alert to the needs and risks of harm that abusers or potential abusers may pose and respond proactively to them when dealing with a housing situation. This does not replace a referral into social services where a young person has been harmed or is at risk of harm.

Indicators that a family/young person may be at risk of homelessness include:

- debt
- rent arrears
- domestic abuse
- anti-social behaviour
- non-completion of homework
- changes in behaviour
- anxiety or depression

Housing authorities have a duty to safeguard and promote the welfare of young people and to co-operate to promote the well-being of all young people, including 16-17 year olds.

Herefordshire Housing Association, Legion Way, Hereford. Tel: 0300 777 4321

Gloucestershire Housing Association, St Catherine Court, Gloucester. Tel: 01452 421755

Young People Missing from Education (CME)

All staff are aware of the importance of regular attendance to school for all young people.

John Kyrle High School will inform the local authority of any young person who fails to attend school regularly or has been absent without permission for 10+ days. A young person going missing from education is a potential indicator of a range of safeguarding issues including neglect, sexual abuse and child sexual exploitation. It may also be a sign of criminal exploitation including county lines as well as poor mental health and substance abuse. The school follows the procedure for unauthorised attendance and staff are alert when considering the risks of potential safeguarding concerns such as conflict zones, Female Genital Mutilation and forced marriage. 'Safe and well' checks via the police are also instigated. If there are any safeguarding concerns or a young person is known to social services, a referral to Herefordshire Multi-Agency Safeguarding Hub (MASH) must be made straight away on 01432 260800 – refer to guidelines for reporting missing persons <http://hscb.herefordshire.gov.uk>. In Gloucestershire, the number for MASH is 01452 426565.

Parents/carers may also be asked to bring their child into school or be visited at home should a young person not have been in attendance at school in order to verify that they are safe and well.

Elective home education

Where a parent/carer has expressed their intention to remove a young person from school with a view to educating at home, any child protection/safeguarding concerns will be discussed with the local authority.

Inappropriate sexual behaviour and sexual harassment

At John Kyrle High School our aim is to foster healthy and respectful relationships between young people through our RESPECT programme.

We have a whole-school approach to preventing child-on-child sexual violence and sexual harassment. Our values and standards are high and our preventative RESPECT programme prepare young people for life in modern Britain. Our approach to inappropriate sexual behaviour, sexual harassment and sexual violence is clear in that it is not acceptable, will never be tolerated and is not an inevitable part of growing up.

For staff, identifying inappropriate sexual behaviour can be a complex task. Young people are normally sexually curious and may behave inappropriately with each other – the boundary between sexual harassment and sexually abusive behaviour can be difficult to define.

Indicators of sexually abusive behaviour include:

- a significant age difference (4+ years) between young people involved in sexual behaviour. An adolescent who seems interested in younger people would give rise to concern
- sexual behaviour involving bribery, threats or force. 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
- sexually intrusive/aggressive behaviour – for example poking objects or parts of bodies into their orifices.

Defining behaviour as sexual harassment is difficult and a major issue is likely to be whether the sexual contact is consensual or not. A boy groping a girl, a girl groping a boy or young person of the same sex being groped, may be incidents of inept behaviour by an immature adolescent; it may indicate that the young person has the potential to become a sexual offender; it may indicate that they themselves are a victim of abuse. In all cases, it is essential that these incidents are treated seriously.

Some common signs of abuse

- Unwillingness to come to school
- Complaining about missing possessions
- Unexplained bruising or time-repeated bruising
- Easily distressed
- Odd drawing and sexually explicit language
- Damaged or incomplete work

Any concerns or disclosures must be passed onto the DSL/DDSL immediately. The needs of the victim must be addressed, in addition to ensuring that the perpetrator is dealt with in such a way that they realise the seriousness of their behaviour. Parents/carers of young people should be contacted to give them an opportunity to support their son/daughter (as long as by contacting them this does not present a safeguarding risk and providing other external agencies have advised otherwise). It must be remembered that a criminal offence may have been committed and the parents/carers of the victim have the right to pursue a complaint against someone who has assaulted their son/daughter. It must also be remembered that one or both parents/carers or a close relative may be the perpetrators.



What is child-on-child abuse?

Child-on-child abuse is sexual, emotional or physical abuse that happens between young people of a similar age or stage of development. It can happen between any number of young people and can affect any age group.

It can be harmful to the young people who display it as well as those who experience it. Young people can experience child-on-child abuse in a wide range of settings, including:

- at school
- at home or in someone else's home
- in public spaces/the local community
- online and other social media platforms

It can take place in spaces which are supervised or unsupervised. Within a school context, for example, child-on-child abuse might take place in spaces such as toilets, social areas, corridors and when young people are walking home (Contextual Safeguarding Network, 2020). Staff at John Kyrle High School remain vigilant in and out of school and regularly talk to young people about physical spaces/locations they may have concerns about. These are acted upon at once. The local skate park has been identified as a location of concern. This information has been passed to the police.

As young people develop healthily, it is normal for them to display certain types of behaviour. It is important that adults, who work or volunteer with young people, can identify if any behaviour has become harmful, abusive or coercive, and respond proportionally to keep all the young people involved safe.

We recognise that child-on-child abuse can manifest itself in many ways such as:

- child sexual exploitation
- youth produced sexual images
- sexually harmful behaviour
- grooming
- upskirting
- on and offline serious bullying
- teenage relationship abuse
- coercion
- prejudice youth violence
- initiation violence and rituals
- serious youth violence and gang association (county lines)
- radicalisation

Some of these behaviours will need to be handled with reference to other policies in John Kyrle High School such as the behaviour policy, child protection/safeguarding and online safety policy/ICT usage.

This policy concentrates on child-on-child abuse in the context of sexual harassment and sexual violence, physical abuse and emotional abuse. It is compliant with the statutory guidance on child-on-child abuse as set out in "Keeping Children Safe in Education update document" and should be read in conjunction with the "Safeguarding Partnership Regional Policy and Procedures" and relevant practice guidance issued by it.

In regarding to harmful sexual behaviour we are adopting the NSPCC's definition as:

“Sexual behaviours expressed by children...that are developmentally inappropriate, may be harmful towards self or others, or be abusive towards another child...or adult”.

We will also use Simon Hackett’s continuum model to demonstrate the range of sexual behaviours and the “Brook Traffic Lights” (see Appendix 12).

Note: professionals must attend a group Traffic Light Tool group training session or complete the online course to be able to use the tool safely and, therefore, the tool cannot be shared with staff who have not completed training.

Physical Abuse

While a clear focus of child-on-child abuse is around sexual abuse and harassment, physical assaults and initiation violence and rituals from one young person to another can also be abusive. These are equally not tolerated, and if it is believed that a crime has been committed, will be reported to the police. The principles from the school’s behaviour policy will be applied in these cases, with recognition that any police investigation will need to take priority.

Online Behaviour

Many forms of child-on-child abuse have an element of online behaviour including behaviours such as cyber-bullying and youth produced sexual images. Policies and procedures concerning this type of behaviour can be found in the behaviour policy, the child protection/safeguarding policy and online safety policy/ICT usage.

The most extreme and illegal websites are automatically blocked through the school’s internet filtering provider and make use of the Internet Watch Foundation (IWF) list. The filter updates automatically, using the guidance from Keeping Children Safe in Education and the IWF.

The internet filtering categories are monitored and reviewed at least annually through the e-safety committee and modified as appropriate. This committee involves the DSL, other appropriate members of senior staff, the e-safety coordinator, teaching staff, governors, and young people. Filtering categories are dynamically updated by the Sophos filtering system. A joint effort will be made to keep young people safe online with advice and support given to parents/carers should they need it (including when they are at home).

Vulnerable groups

We recognise that all young people can be at risk, however, we acknowledge that some groups are more vulnerable. This can include: experience of abuse within their family; living with domestic violence; young people in care; young people who go missing; young people with additional needs (SEN and/or disabilities); young people who identify, or are perceived as, LGBTQ+ and/or have other protected characteristics under the Equalities Equality Act 2010.

Whilst research tells us girls are more frequently identified as being abused by their peers and, girls are more likely to experience unwanted sexual touching in school, this is not confined to girls. Boys are less likely to report intimate relationship abuse and may display other behaviour such as antisocial behaviour. Boys report high levels of victimisation in areas where they are affected by gangs. We recognise that both boys and girls experience child-on-child abuse, but they do so in gendered ways.

Identifying child-on-child abuse

All staff must be aware of indicators, which may signal that young people are at risk from, or are involved with serious violent crime. These may include:



- unwillingness to come to school
- easily distressed
- a change in friendships or relationships with older individuals or groups
- a significant decline in attainment/progress
- a decline in behaviour
- signs of self-harm
- a significant change in wellbeing
- a change in uniform, clothing or appearance
- signs of assault or unexplained injuries
- unexplained gifts or new possessions could also indicate that young people have been approached by, or are involved with, individuals associated with criminal networks or gangs.

Prevention

At John Kyrle High School we actively seek to raise awareness of and prevent all forms of child-on-child abuse by:

- educating all governors, senior leadership team, staff and volunteers, young people and parents/carers about this issue. This includes whole-school training on the nature, prevalence and effect of child-on-child abuse, and how to prevent, identify and respond to it. This includes:
 - contextual safeguarding
 - the identification and classification of specific behaviours; and
 - the importance of taking seriously all forms of child-on-child abuse (no matter how low-level they may appear) and ensuring that no form of child-on-child abuse is ever dismissed as 'banter' or 'part of growing up'.
- educating young people about the nature and prevalence of child-on-child abuse via our RESPECT curriculum (at JKHS this is called our Happy, Healthy, Successful (RESPECT) curriculum) and the wider curriculum, including life in modern Britain
- young people are frequently told what to do if they witness or experience such abuse, the effect that it can have on those who experience it and the possible reasons for it, including vulnerability of those who inflict such abuse
- all students are regularly informed about the school's approach to such issues through the RESPECT curriculum, through the Relationship and Sex Education programme in class and as part of a whole-school approach to foster healthy and respectful relationships between young people
- engaging parents/carers on this issue by:
 - talking about it with parents/carers
 - asking parents/carers what they perceive to be the risks facing their child and how they would like to see JKHS address those risks
 - involving parents/carers in reviewing of school policies
 - encouraging parents/carers to hold the school to account on this issue
- ensuring that all child-on-child abuse issues are fed back to the DSL/DDSL so that they can spot and address any concerning trends and identify young people who may be in need of additional support
- challenging the attitudes that underlie such abuse (both inside and outside the classroom and beyond the school gates)



- working with the governors, senior leadership team, all staff and volunteers, young people and parents/carers to address equality issues, to promote positive values, and to encourage a culture of tolerance and respect amongst all members of the school community
- fostering an environment that is inclusive, safe and free from harassment and discrimination and gives young people an open forum to talk things through freely, knowing that any concern will be taken seriously and dealt with swiftly and appropriately
- fostering an environment in which our young people feel able to share their concerns openly, in a non-judgemental environment, and have them listened to. At John Kyrle High School we ensure young people know they can talk to staff. This could be a form tutor, a teacher, head of year, pastoral support officer, senior team mentor, support staff or external agencies who visit the school
- ensuring, where possible, physical contact between young people is kept at a minimum and does not become over familiar
- involving young people in the positive ethos of our school where all young people understand the boundaries of behaviour before it becomes abusive.

Context

Child-on-child abuse takes place on a spectrum. Understanding where a young person's behaviour falls on a spectrum is essential to being able to respond appropriately to it. It is essential that responses to incidents are proportionate and contextual.

In our policy we recognise the importance of distinguishing between problematic and abusive sexual behaviour (harmful sexual behaviour HSB).

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

Normal	Inappropriate	Problematic	Abusive	Violent
<ul style="list-style-type: none"> • Developmentally expected • Socially acceptable • Consensual, mutual, reciprocal • Shared decision making 	<ul style="list-style-type: none"> • Single instances of inappropriate sexual behaviour • Socially acceptable behaviour within peer group • Context for behaviour may be inappropriate 	<ul style="list-style-type: none"> • Problematic and concerning behaviours • Developmentally unusual and socially unexpected • No overt elements of victimisation • Consent issues may be unclear 	<ul style="list-style-type: none"> • Victimising intent or outcome • Includes misuse of power • Coercion and force to ensure victim compliance • Intrusive • Informed consent lacking, or not 	<ul style="list-style-type: none"> • Physically violent sexual abuse • Highly intrusive • Instrumental violence which is physiologically and/or sexually arousing to the perpetrator • Sadism



	<ul style="list-style-type: none"> • Generally consensual and reciprocal 	<ul style="list-style-type: none"> • May lack reciprocity or equal power • May include levels of compulsivity 	<ul style="list-style-type: none"> able to be freely given by victim • May include elements of expressive violence 	
--	---	---	--	--

Determining the level of incidents

While determining the level of incidents is not always clear-cut, we use this as a guide. In addition to this we consider the following behaviours:

- chronological and developmental ages of everyone involved
- difference in their power or authority in relation to age, ethnicity, gender, physical, emotional or intellectual vulnerability
- all alleged physical and verbal aspects of the behaviour and incident
- whether the behaviour involved inappropriate sexual knowledge or motivation
- what was the degree of physical aggression, intimidation, threatening behaviour or bribery
- the effect on the victim
- any attempts to ensure the behaviour and incident is kept a secret
- the young person's motivation or reason for the behaviour, if they admit that it occurred
- whether this was a one-off incident, or longer in duration

An example of this is the consensual sharing of an image between 16 year olds might be inappropriate but would sit on the continuum as 'inappropriate', however, if these images were shared wider without consent this could be deemed as 'problematic and abusive'.

When should schools seek support?

Cases of child-on-child abuse are often complex, involve multiple young people, and consent may be unclear. This is especially difficult when young people may be victims but may also involve the harm of others. In some instances it may be most appropriate, for us to respond internally. However, in other instances, cases may require a referral to the police and/or social care.

We understand that this is not always clear. As such we refer to the flow chart (see Appendix 2) and consider the following when deciding if an incident requires a referral.

Cases that may be best responded to within John Kyrle High School sit between 'normal/healthy' and the 'inappropriate' section on Hackett's continuum.

- single instances of inappropriate sexual behaviour
- socially acceptable behaviour within peer group
- context for behaviour may be inappropriate
- generally consensual and reciprocal

Incidents where a referral to police/social care is always required are defined under Hackett as 'violent and abusive'.

- victimising intent or outcome
- includes misuse of power
- coercion and force to ensure compliance



- informed consent lacking or not able to be freely given
- may include elements of expressive violence
- physically sexual abuse
- highly intrusive
- instrumental violence which is psychologically and/or sexually arousing to the young person responsible for the behaviour
- sadism

Cases of child-on-child abuse are not always clear-cut and there are many grey areas. These grey areas fall under the inappropriate/problematic section of the continuum. The Education Multi-Agency Safeguarding Hub (MASH) team and the Education Safeguarding Lead are available via phone and email to offer support to John Kyrle High School staff in order to ensure the appropriate safety plans/referrals/support is in place for the victim and young person alleged to have caused harm.

- problematic and concerning behaviour
- developmentally unusual and socially unexpected
- no overt elements of victimisation
- consent issues maybe unclear
- may lack reciprocity or equal power
- may include levels of compulsivity

When dealing with harmful sexual behaviour to assess where the alleged behaviour falls on a spectrum and to decide how to respond. This could include, for example, whether it:

- is socially acceptable
- involves a single incident or has occurred over a period of time
- is socially acceptable within the peer group
- is problematic and concerning
- involves any overt elements of victimisation or discrimination e.g. related to race, gender sexual orientation, physical, emotional, or intellectual vulnerability
- involves an element of coercion or pre-planning
- involves a power imbalance between the young person/people allegedly responsible for the behaviour
- involves a misuse of power

Response to child-on-child abuse

The DSL or DDSL will take a leading role using their professional judgement and are supported by other agencies such as social care or the police, as required. All responses to child-on-child abuse will be informed by the flow charts, continuum and by liaising with MASH and the Education Safeguarding Lead.

It is important to deal with a situation of child-on-child abuse immediately and sensitively. It is necessary to gather the information as soon as possible to ascertain what has happened and if any other young people are aware or involved. It is equally important to deal with it sensitively and think about the language used and the impact of that language on both the young people and the parents/carers when they become involved. Avoid language that creates a 'blame' culture and leaves a young person labelled. An example is, instead of calling a young person a perpetrator we may instead say 'young person alleged to have caused harm'.

Staff at John Kyrle High School will talk to the young people in a calm and consistent manner. Staff will not be prejudiced, judgemental, dismissive or irresponsible in dealing with such sensitive matters. Young people can speak to another member of staff should they not feel they have been treated in this manner.



The immediate response to a report

John Kyrle High School staff will take all reports seriously and will reassure the victim that they will be supported. All staff understand the next steps once a young person has reported child-on-child abuse and will immediately take the concern to the DSL/DDSL to make them aware. Staff will not promise confidentiality as the concern will need to be shared further (for example, with the police or social care). Staff will, however, only share the report with those people who are necessary to progress it. A written report will be made as soon after the discussion as possible, recording the facts as presented by the young people. These may be used as part of an enquiry/investigation if the case is escalated later. The needs of the victim and the young person alleged to have caused harm will be assessed. Where the report includes an online element, John Kyrle High School staff will follow advice on searching, screening and confiscation. Staff will not view or forward images unless unavoidable and only if another member of staff (preferably the DSL/DDSL) is present. The DSL/DDSL will be informed as soon as possible and consider a referral to the police and social care when using the flow charts (see Appendix 13). The DSL/DDSL will complete a safety plan whereby sexual violence has occurred and will be shared with MASH.

When recording behaviour it is essential that:

- it is recorded as soon as possible, as you can quickly forget or confuse detail – please ensure it is signed by yourself and the young person
- you are clear, explicit and non-avoidant, and avoid vague statements or euphemisms
- proper names for body parts are used but record exactly any language or vocabulary used by the young person, use the young person's words exact words in quotation marks
- you note where and when the incident happened and whether anyone else was present
- you ensure the young person is reassured, feels safe and is being looked after by another staff member

Gather the facts

When making young people aware of an allegation it is essential that before you speak to them any further, you offer them the option to have parents/carers or a person they trust. You should make them aware that parents/carers will be informed even if they wish to progress without parents/carers present. (Should the police/social care advise John Kyrle High School staff not to inform the parents/carers then this will be duly noted with reasons for not doing so). Speak to all the young people involved separately in order to gain a statement of facts from them. Use consistent language and open questions for each account. Ask the young people to tell you what happened. Use open questions, 'where, when, why, who'. (What happened? Who observed the incident? What was seen? What was heard? Did anyone intervene?). Do not interrogate or ask leading questions.

Decide on your next course of action

If John Kyrle High School staff believe any young person to be at risk of significant harm, they will report this to the DSL or the DDSL immediately; they will follow the school's child protection/safeguarding policy.

If MASH and the police intend to pursue this further, they may ask to interview the young people in school or they may ask for parents/carers to come to school to be spoken to. It is important to be prepared for every situation and the potential time it may take.

Informing parents/carers

The best way to inform parents/carers is face to face (where possible). Although this may be time consuming, the nature of the incident and the type of harm/abuse a young person may be suffering can cause fear and anxiety to parents/carers whether their young person is the young person who has been harmed or harmed another.



In all circumstances where the risk of harm to the young person is evident then the school should encourage the young person to share the information with their parent/carer (they may be scared to tell parents/carers that they are being harmed in any way). Should the police/social care advise John Kyrle High School staff not to inform the parents/carers then this will be duly noted with reasons for not doing so.

Manage internally

In some cases of sexual harassment, for example, one-off incidents, it may be appropriate to handle the incident internally, perhaps through utilising the behaviour policy and by providing pastoral support. This decision is considered alongside advice from MASH and is always based on the principle that sexual violence and sexual harassment is never acceptable and will not be tolerated. All decisions, and discussions around making these decisions will be recorded and stored by the DSL/DDSL in the young person's safeguarding file.

It is important to ensure that details of sanctions for the young person alleged to have caused harm are not shared with any other persons other than those providing care for them. This is to maintain confidentiality and privacy for the young person involved.

In line with above, we may decide that the young person involved does not require statutory interventions but may benefit from Early Help. Early Help means providing support as soon as a problem emerges, at any point in a young person's life. Providing Early Help is more effective in promoting the welfare of young people than reacting later. Early Help can be particularly useful to address non-violent harmful behaviour and may prevent escalation of sexual violence. All staff are trained to identify young people who may benefit from Early Help. It is important for young people and their families to receive the right help at the right time. Staff will discuss Early Help requirements with the DSL/DDSL in the first instance.

Where a young person has been harmed, is at risk or harm, or is in immediate danger, we will make a referral to MASH following locally agreed protocols.

Where statutory assessments are appropriate, the DSL/DDSL will be working alongside, and cooperating with, the relevant lead social worker. Collaborative working will help ensure the best possible package of coordinated support is implemented for the victim and, where appropriate, the young person alleged to have caused harm and any other young people that require support.

Safety plan

Where there has been a report of child-on-child abuse that sits under the abusive and violent sections on the flow chart, the DSL/DDSL will make an immediate risk and needs' assessment (safety plan). Where there has been a report of sexual harassment, a safety plan must be completed and submitted to MASH. The safety plan should consider:

- the victim, especially their protection and support;
- the young person alleged to have caused harm; and
- all the other young people at John Kyrle High School and especially any actions that are appropriate to protect them.

Safety plans will be recorded and kept under review. The DSL/DDSL will ensure they are engaging with MASH where appropriate.

Reporting to the police



DSL/DDSL's have a responsibility to report all alleged crimes to the police. The DSL/DDSL also follow local processes for safeguarding referrals.

Where a report of rape, assault by penetration or sexual assault is made, the starting point is this will be passed onto the police as a matter of urgency.

Where a report has been made to police, John Kyrle High School will consult the police and agree what information can be disclosed to staff and others, the young person alleged to have caused harm and their parents/carers. They will also discuss the best way to protect the victim and their anonymity. Where there is a criminal investigation, we will work closely with the relevant agencies to support all young people involved (especially potential witnesses). Where required, advice from the police will be sought in order to help us.

Whilst protecting young people and/or taking any disciplinary measures against the young person alleged to have caused harm, we will work closely with the police (and other agencies as required), to ensure any actions John Kyrle High School take do not jeopardise the police investigation.

Separation

If the young people involved are in the same class, John Kyrle High School will need to consider carefully whether to separate them while the concerns are being investigated. In situations of alleged rape and assault by penetration, the statutory guidance is clear that the young person alleged to have caused harm should always be removed from classes they share with the victim.

John Kyrle High School will consider how best to keep the victim and young person alleged to have caused harm a reasonable distance apart while they are on the same premises, as well as on transport to and from school, where appropriate. MASH will also advise accordingly.

John Kyrle High School will consider how long these measures should be in place, especially if any police investigation is inconclusive. Lack of conviction is not the same as the allegation being unfounded. John Kyrle High School will continue to provide support to the victim and the young person alleged to have caused harm for as long as necessary. Therefore, any separation arrangements must also be continued with for as long as is necessary to make sure young people are safe.

There are different factors which must be considered prior to the separation of young people occurring. These factors are the allegation itself, the context of the allegation, the wishes and feelings of the victim(s), and the threshold the allegation meets.

As part of the consideration as to whether or not the young people are separated in school, safety mapping is recommended so that the victim can clearly identify where they feel safest in school and any areas they do not feel safe. This will also allow John Kyrle High School to map out areas each young person can frequent without concern or worry that the other will be there. These actions are in the best interests of both young people and should not be perceived to be a judgement on the guilt of the young person alleged to have caused harm.

It is essential that the alleged victim is able to express their wishes and feelings in respect of the action John Kyrle High School takes, in some circumstances the alleged victim may state that they do wish for separation to occur but rather that a seating plan is implemented. This is again considered alongside the context, the allegation itself and the threshold that is met.



If multiple young people are involved then John Kyrle High School will complete peer mapping and consult with the alleged victim(s) regarding safety mapping both within school and outside of school.

The end of the criminal process

If a young person is convicted or receives a caution for a sexual offence, John Kyrle High School will update its safety plan and ensure relevant protections are in place for all young people. We will consider any suitable action following our behaviour policy. If the young person alleged to have caused harm remains in John Kyrle High School we will be very clear as to our expectations regarding the young person alleged to have caused harm now they have been convicted or cautioned. This could include expectations regarding their behaviour and any restrictions we think are reasonable and proportionate about the young person alleged to have caused harm's timetable.

Any conviction (even with legal anonymity reporting restrictions) is potentially going to generate interest among other young people in John Kyrle High School. We will ensure all young people involved are protected, especially from any bullying or harassment.

Where cases are classified as "no further action" (NFA'd) by the police or Crown Prosecution Service, or where this is not a guilty verdict, we will continue to offer support to the victim and the young person alleged to have caused harm for as long as is necessary. A not-guilty verdict or a decision not to progress with their case will likely be traumatic for the victim. The fact that an allegation cannot be substantiated does not necessarily mean that it was unfounded. We will continue to support all parties in this instance.

It is also important to note that by law every young person has the right to an education and therefore in instances where allegations have been withdrawn, NFA'd, unfounded or unsubstantiated young people may be placed back into lessons together with a seating plan and safety mapping in place. This is decided on a case-by-case basis and with consideration to the wishes and feelings of the victim.

Support to victims and those instigating harm

Support for young people affected by sexual assault

What support they require depends on the individual young person. It may be that they wish to seek counselling or one-to-one support via a mentor. It may also be that they feel able to deal with the incident(s) on their own or with support of family and friends; in which case it is necessary that the young person continues to be monitored and offered support should they require it in the future. Within school, young people will be offered a named member of staff they can talk to as well as pastoral support. Pastoral support could include increased vigilance, a mentor or someone to talk to.

Other interventions that could be considered may be through the continued curriculum of RSE as well as our RESPECT curriculum.

If the young person needs further support it may be that a safety plan can be put in place for them whilst in school so that they have someone named that they can talk to, support strategies for managing future issues and identified services to offer additional support.

Support for victims of sexual assault is available from a variety of agencies (see Appendix 4).



John Kyrle High School will support the victim of sexual assault to remain in school but if they are unable to do so we will enable them to continue their education elsewhere. This decision will be made at the request of the young person and their family or via a recommendation from another agency. If they are moved, we will ensure the new school is aware of the ongoing support they may need. The DSL/DDSL will support this move.

Where a criminal investigation into rape or assault by penetration leads to a conviction or caution, we may take suitable action, if we have not already done so in line with the school's behaviour policy. In all but the most exceptional of circumstances, the rape or assault is likely to constitute a serious breach of discipline and lead to the view that allowing the young person alleged to have caused harm to remain at John Kyrle High School would seriously harm the education or welfare of the victim (and potentially other young people at John Kyrle High School).

Where a criminal investigation into sexual assault leads to a conviction or caution, we may, if we have not already done so, consider any suitable sanctions using our behaviour policy, including the consideration of permanent exclusion.

Where the young person alleged to have caused harm is going to remain at John Kyrle High School, the principle would be to continue keeping the victim and the young person alleged to have caused harm in separate classes and use safety mapping to consider the most appropriate way to manage potential contact on school premises and transport. The nature of the conviction or caution and wishes of the victim will be especially important in determining how to proceed in such cases.

Reports of sexual assault and sexual harassment will, in some cases, not lead to a report to the police (for a variety of reasons). In some cases, rape, assault by penetration, sexual assault or sexual harassment are reported to the police and the case is not progressed or are reported to the police and ultimately result in a not-guilty verdict. None of this means the offence did not happen or that the victim did not tell the truth. The process will have affected both victim and young person alleged to have caused harm. Appropriate support will be provided to both as required and consideration given to sharing classes and potential contact as required on a case-by-case basis.

All of the above will be considered with the needs and the wishes of the victim at the heart of the process (supported by parents/carers as required). Any arrangements will be kept under review.

For the young person who has displayed harmful behaviour

It is important to find out why the young person has behaved in such a way. It may be that the young person is experiencing their own difficulties and may even have been harmed themselves in a similar way. In such cases support such as one-to-one mentoring or counselling may also be necessary.

Particular support from identified services may be necessary through an Early Help referral and the young person may require additional support from parents/carers (see Appendix 4).

Once the support required to meet the individual needs of the young person is in place it is important that the young person receives a consequence for their behaviour in line with the school's behaviour policy. In the cases of sexually harmful behaviour it may be a requirement for the young person to engage in one-to-one work with a particular service or agency (if a crime has been committed this may be through the police or youth offending service). If there is any form of criminal investigation ongoing it may be that this young person



or parents/carers do not want to be educated on site until the investigation has concluded. In which case, the young person will need to be provided with appropriate support.

It may be that the behaviour the young person has displayed may continue to pose a risk to others, in which case an individual risk assessment may be required. This must be completed via a multi-agency response (via a referral to MASH) to ensure that the needs of the young person and the risks towards others are measured by all of those agencies involved including the young person and their parents/cares. This may mean additional supervision of the young person or protective strategies if the young person feels at risk of engaging in further inappropriate or harmful behaviour.

John Kyrle High School may also choose a consequence such as internal exclusion or exclusion for a period of time to allow the young person to reflect on their behaviour.

After care

It is important that following the incident the young people involved continue to feel supported and receive help even if they have stated that they are managing the incident. Sometimes the feelings of remorse, regret or unhappiness may occur at a much later stage than the incident. It is important to ensure the young people do not engage in any further harmful behaviour either towards someone else or to themselves as a way of coping (e.g. self-harm). For this reason, regular reviews with the young people following the incident(s) are imperative.

Multi-agency working

John Kyrle High School actively engages with its local partners in relation to child-on-child abuse, and works closely with Herefordshire and Gloucestershire Council's children social care, and/or other relevant agencies, to include the local police, PCSO and health professionals.

The relationship John Kyrle High School has built with these partners are essential to ensuring that we are able:

- to prevent, identify early and appropriately handle cases of child-on-child abuse
- to develop a good awareness and understanding of the different referral pathways that operate in its local area, as well as the preventative and support services which exist
- to ensure that our young people can access the range of services and support they need quickly
- to support and help inform our local community's response to child-on-child abuse
- to increase our awareness and understanding of any concerning trends and emerging risks in our local area to enable us to take preventative action to minimise the risk of these being experienced by our young people.

John Kyrle High School actively refers concerns/allegations of child-on-child abuse where necessary to Herefordshire and Gloucestershire Council's children's social care, and/or other relevant agencies.

Young people out of county but attending John Kyrle high School will be reported to their home authority social care team.

In cases involving young people who are subject to risk, harm and abuse and who have looked-after status, the young person's social worker must be informed and a coordinated approach to address any incidents or concerns will be put in place.



The local PCSO meets with the DSL once a month as part of a multi-agency approach. Contextual safeguarding within the local community is discussed and acted upon. The headteacher is actively involved in meeting with young people in order to assess any risks identified and to listen to and act upon their concerns

Child sexual exploitation (CSE) and Child Criminal Exploitation (CCE)

Under the Keeping Children Safe in Education guidance update, and in line with local safeguarding training, all staff are trained in spotting signs of any young person who may be/is being sexually exploited. Staff are required to be vigilant in recognising signs of any young person being/or potentially being sexually exploited or criminally exploited. Both CSE and CCE are forms of abuse and both occur where an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a young person into taking part in sexual or criminal activity. This can be in exchange for something the victim needs or wants, and/or for financial advantage or increased status of the perpetrator. CSE is a form of child sexual abuse and may include physical contact including assault by penetration, masturbation, kissing, rubbing and touching outside clothing. It could include involving young people in the production of sexual images, forcing them to look at or watch sexual activities and encouraging them to behave in sexually inappropriate ways. Some young people are also groomed in preparation for abuse and often do not realise they are being exploited.

Power imbalance can be due to a range of factors including gender, sexual identity, cognitive ability, physical strength and status. Abuse can be perpetrated by individuals or groups, males or females, young people or adults. It can involve force, enticement, compliance and may, or may not, be accompanied by violence or threats of violence. Specific forms of CCE can include young people being forced or manipulated into transporting drugs or money through county lines, working in cannabis factories, shoplifting or pickpocketing, vehicle crime or threatening/committing serious violence. Criminal exploitation can also lead to families being threatened with violence as well as young people being coerced into carrying weapons.

Exploitation can be physical or take place online. Indicators of child sexual exploitation and child criminal exploitation may include:

- going missing for periods of time or regularly returning home late
- regularly missing school
- being disruptive in class
- appearing with unexplained gifts or possessions that can't be accounted for
- having additional monies
- have older boyfriends/girlfriends
- associated with other gang people involved in exploitation
- experiencing health problems that may indicate a sexually transmitted infection
- having mood swings and changes in temperament/emotional wellbeing
- using drugs and/or alcohol
- displaying inappropriate sexualised behaviour, such as over-familiarity with strangers, dressing in a sexualised manner or sending sexualised images by mobile phone
- signs of unexplained physical harm, such as bruising and cigarette burns

It is important to note that both males and females are at risk of CSE and CCE and where concerns are identified, advice will be sought from the Multi Agency Safeguarding Hub and intelligence shared with West Mercia Police.

Serious violence/gang related violence



All staff are aware of indicators which may signal that a young person is at risk of or are involved with serious violent crime. Such behaviours can be associated with factors outside of school and can occur between young people outside of the school environment.

Indicators of serious violent crime can include:

- increased absence from school and/or fixed term/permanent exclusions from school
- a change in friendships or relationships with older individuals or groups
- a significant decline in academic performance
- signs of self-harm or a significant change in wellbeing
- signs of assault or unexplained injuries.

Unexpected gifts or new possessions could also indicate that a young person could have been approached by, or are involved with individuals associated with criminal networks or gangs and may be at risk of criminal exploitation.

Males and females are at risk from, or can be involved with serious violent crime, however, being male increases the likelihood of such involvement. Young people who have experienced child maltreatment and have been involved in offending such as theft or robbery are also at higher risk.

Visit [Advice to schools and colleges on gangs and youth violence - GOV.UK \(www.gov.uk\)](http://www.gov.uk/government/guidance/advice-to-schools-and-colleges-on-gangs-and-youth-violence) for more detailed guidance, and [Criminal exploitation of children and vulnerable adults: county lines - GOV.UK \(www.gov.uk\)](http://www.gov.uk/government/guidance/criminal-exploitation-of-children-and-vulnerable-adults-county-lines)

We will minimise the risk of our students being involved in serious violence by:

- developing skills and knowledge to resolve conflict as part of the curriculum and to help young people to resist being involved with violence
- early identification of young people who may need additional support due to gang-related activity
- challenging aggressive behaviour in ways that prevent the reoccurrence of such behaviour
- understanding the risks for specific groups and target individuals
- managing transitions between educational establishments
- work with local partners to prevent anti-social behaviour or crime and identify young people in need of help in their local community (the DSL meets with the PCSO on a regular basis)

Where there are concerns surrounding a young person who may be, or is at risk of becoming, involved in gang-related activity, the child exploitation team will be made aware. If a young person is at risk of significant harm due to gang-related activity, a referral will be made to the Multi Agency Safeguarding Hub.

Upskirting

The Voyeurism (Offences) Act 2019 is an act which amends the Sexual Offences Act 2003 to make upskirting a specific offence of voyeurism.

For the purpose of the act, upskirting is defined as creating images of, or operating equipment to view, genitals, buttocks or underwear beneath clothing where they would not normally be visible, for the purpose of sexual gratification or to cause humiliation, alarm or distress.

Upskirting is a criminal offence and could criminalise a young person who records an image under another young person's clothing (without that person's consent or a reasonable belief in their consent). Anyone of any gender can be a victim.

Any person found taking part in such an act of child-on-child abuse will be reported to the appropriate authorities.

County Lines

County Lines is a very serious issue where criminal gangs/networks set up a drug-dealing operation in a place outside their usual operating area. Gangs will move their drug-dealing from big cities (e.g. London, Manchester, Liverpool etc.) to smaller towns in order to make more money. This can have a really big effect on the community who live there and brings with it serious criminal behaviour.

Exploitation is an integral part of county lines with young people exploited to move, store and sell drugs and money.

Signs to look out for that can suggest that someone you know might be involved in County-Lines activity:

- are they always going missing from school or their home?
- are they travelling alone to places far away from home?
- have they been found in accommodation such as a hotel room?
- do they suddenly have lots of money/lots of new clothes/new mobile phones?
- do they owe money
- are they receiving many more calls or texts than usual?
- are they refusing to hand over their mobile phone when requested?
- are they carrying or selling drugs?

Young people are often groomed and forced into relationships with gang members and are made to perform sexual acts as well as acting as drug runners. Intimidation, coercion, violence and weapons are often used by offenders to ensure compliance of victims.

Further signs to look out for include:

- are they carrying weapons or know people that have access to weapons?
- are they in relationship with or hanging out with someone/people that are older and controlling?
- do they have unexplained injuries or are they a victim of serious violence?
- do they seem very reserved or seem like they have something to hide?
- do they seem scared?
- are they self-harming?

Gangs recruit and use young people to move drugs and money for them. Young people as young as 12 years old and up to 17 years old are recruited, often using social media. They are exploited and forced to carry drugs between locations, usually on trains or coaches. They are also forced to sell drugs to local users. Locations can include schools, children's homes and within the local neighbourhood.

What to do if you are concerned

If you think that young person may be at risk of County Lines exploitation you must report this to the DSL, DDSL or a member of senior team who will follow local safeguarding guidance and share this information with local authority social care services. If you believe a young person is in immediate risk of harm, you must contact the police on 999.

Modern Day Slavery

Modern day slavery encompasses the recruitment, movement and harbouring of young people through the use of force, coercion, abuse of vulnerability, deception or other means for the purpose of exploitation.



Such exploitation could include:

- sexual exploitation
- forced labour
- organ harvesting
- slavery/domestic servitude
- forced begging
- organised theft
- illegal drugs
- benefit fraud
- forced marriage
- illegal adoption
- criminal exploitation

The above broad categories are also linked to human trafficking which includes the unlawful act of transporting or coercing young people in order to benefit from their work or service, typically in the form of forced labour or sexual exploitation.

Should any staff member suspect a young person or their family is at risk of, or experiencing human trafficking or modern day slavery, they must report it to the DSL/DDSL at once.

Young people and the court system

Young people are sometimes required to give evidence in criminal courts. Arrangements for supporting young victims or witnesses vary in different parts of the country. The police will advise young people and their parents/carers about the best person to talk to. When young people are witnesses in court we must make sure they are well supported. We want young people to be able to play their part in bringing offenders to justice without thinking that they are the ones on trial.

There are times when information sharing will take place so that better decisions in cases involving young people can be made.

Trans, gender variant and intersex young people

John Kyrle High School fosters an environment that is inclusive, safe and free from harassment and discrimination for all members of the school community, young people and adults, regardless of sex, sexual orientation, gender identity, gender expression and/or sex characteristics.

Leaders promote the learning of human diversity that is inclusive of trans, gender variant and intersex young people, thus promoting social awareness, acceptance and respect.

Leaders ensure a climate that is physically, emotionally and intellectually safe for all young people to further their successful learning environment and wellbeing, including that of trans, gender variant and intersex young people.

Controlling behaviour

Controlling behaviour is a range of acts designed to make a young person subordinate and/or dependent by isolating them from sources of support, exploiting their resources and capabilities for personal gain, depriving them of the means needed for independence, resistance and escape and regulating their everyday behaviour.

Coercive behaviour

Coercive behaviour is an act or a pattern of acts of assault, threats, humiliation and intimidation or other abuse that is used to harm, punish, or frighten a young person.

Domestic abuse and young people

The changes to the definition of domestic abuse raise awareness that young people can also be victims and perpetrators of domestic violence and abuse within their own intimate relationships. This is referred to as 'teenage relationship abuse'. Behaviours can be physical, emotional, economic, coercive and controlling. Where there are concerns about the safety or welfare of any young person, the DSL/DDSL must be contacted immediately.

The impact of domestic abuse on young people by family members can have a serious, long-lasting emotional and psychological impact on young people. In some cases, a young person may blame themselves for the abuse. The police inform the DSL/DDSL at John Kyrle High School when they have been called to an incident of domestic abuse and we work in partnership with Herefordshire Council and West Mercia police to identify and provide appropriate support to young people who have experienced domestic abuse. This scheme is called Operation Encompass.

Possible signs include:

- anxiety and depression
- difficulty sleeping
- physical symptoms such as tummy ache
- bed wetting
- aggression towards others
- withdrawal from others
- a lowered sense of self-worth
- truancy
- misuse of alcohol or drugs
- self-harm

NSPCC, Refuge and Safe Lives are agencies who work with young people and their families. National Domestic Abuse helpline: 0808 200 0247 (24 hours a day).

Young people with family members in prison

Having a parent/family member in prison can have an impact on a young person's mental health, behaviour and educational prospects. The emotional trauma that may occur and the practical difficulties of a disrupted family life can be compounded by the social stigma that young people could face as a result of having a parent/family member in prison. Young people of incarcerated parents may experience financial hardship as well as adverse childhood experiences including witnessing violence and exposure to drug and alcohol abuse. They can also be at risk of isolation and poor mental health.

At John Kyrle High School we understand the difficulties and distress associated with a parent/family member going to prison and we do our best to help mitigate negative consequences for our young people. [Prisoners' Families Helpline \(prisonersfamilies.org\)](https://www.prisonersfamilies.org/) Tel: 0808 808 2003

Positive mental health/young people requiring mental health support



In addition to promoting positive mental health, we aim to recognise and respond to mental ill health, by developing and implementing practical, relevant and effective procedures we can promote a safe and stable environment for young people affected both directly and indirectly by mental ill health. Staff are well placed to observe young people on a daily basis and identify behaviour that may suggest a young person is at risk of developing a mental health problem.

All staff are aware that mental health problems can, in some cases, be an indicator that a young person has suffered, or is at risk of suffering, abuse, neglect or exploitation. Staff are also aware that traumatic adverse childhood experiences can have a lasting impact on health, behaviour and education.

Any member of staff who is concerned about the mental health or wellbeing of a young person should speak to the DSL in the first instance. If there is a fear that the young person is in danger of immediate harm, this should be followed with immediate effect with a referral to the DSL, DDSL or a member of the senior team. If the young person presents a medical emergency then the normal procedures for medical emergencies should be followed, including alerting the first aid staff and contacting the emergency services if necessary.

Some mental health issues could also become a child protection/safeguarding matter in which case further advice would be sought from a range of external agencies.

Signposting

Staff at John Kyrle High School are able to access a range of advice to help them identify young people in need of extra mental health support, which includes working with external agencies. Such agencies include:

- CLD counselling
- Teens In Crisis counselling
- Strong Young Minds
- 2gether NHS Foundation
- School Nursing services

We also have a mental health student forum, student wellbeing ambassadors as well as staff wellbeing ambassadors. Some staff are trained mental health first aiders and more staff will receive training in due course.

Early indicators

Staff may become aware of early indicators which indicate a young person is experiencing mental ill health or emotional wellbeing concerns. These signs must always be taken seriously and staff observing any of these warning signs must communicate their concerns with the DSL/DDSL.

Possible signs include:

- physical signs of harm that are repeated or appear non-accidental
- changes in eating/sleeping habits
- increased isolation from friends or family, becoming socially withdrawn
- changes in activity and mood
- lowering of academic achievement
- talking or joking about self-harm or suicide
- abusing drugs or alcohol
- expressing feelings of failure, uselessness or loss of hope
- changes in clothing e.g. long sleeves in warm weather
- secretive behaviour



- skipping PE or getting changed secretly
- lateness to, or absence from, school
- repeated physical pain or nausea with no evident cause
- an increase in lateness or absenteeism

Parents/carers are often very welcoming of support and information from the school about supporting their son/daughter's emotional and mental health. In order to support parent/carers we ensure that all parents/carers are aware of who to talk to if they have concerns about their own son/daughter.

Abuse linked to a belief in spirit possession

Staff are made aware of potential indicators in identifying child abuse or neglect linked to a belief in spirit possession.

The following points can assist in understanding the issues and actions to safeguard young people from abuse or neglect linked to a belief in spirit possession:

- child abuse is never acceptable in any community, in any culture, in any religion, under any circumstances. This includes abuse that might arise through a belief in spirit possession or other spiritual, cultural or religious beliefs
- standard child safeguarding procedures apply and must always be followed in all cases where abuse or neglect is suspected, including those that may be related to a belief in spirit possession
- child abuse linked to a belief in spirit possession sometimes stems from a young person being used as a scapegoat. Whilst specific beliefs, practices, terms or forms of abuse may exist, the underlying reasons for the abuse are often similar to other contexts in which young people become at risk of poor outcomes due to factors such as family stress, deprivation, domestic violence, substance abuse and/or mental health problems. In addition, young people who are different in some way, perhaps because they have a disability, an illness, learning needs, or are exceptionally bright, might be targeted in this kind of abuse. In some cases, there will be no obvious difference and the young person will have been targeted because they will have been perceived to be 'spiritually' different.

The abuse usually occurs in the household where the young person lives. It may also occur in a place of worship where alleged 'diagnosis' and 'exorcism' may take place.

The most common forms of abuse linked to a belief in spirit possession include:

- **Physical abuse:** in the form of beating, shaking, burning, cutting, stabbing, semi- strangulating, tying up the young person, or rubbing chilli peppers or other substances on the young person's genitals or eyes, or placing chilli peppers or other substances in the young person's mouth.
- **Emotional/psychological abuse:** in the form of isolation, for example, not allowing a young person to eat or share a room with family members or threatening to abandon them, or telling a young person they are evil or possessed. The young person may also accept the abuse if they are coerced into believing they are possessed.
- **Neglect:** in the form of failure to ensure appropriate medical care, supervision, regular school attendance, good hygiene, warm and clean home environment and nourishment.
- **Sexual abuse:** young people abused in this way may be particularly vulnerable to sexual exploitation, perhaps because they feel powerless and worthless and feel they will not be believed if they tell someone about the abuse.



In working to identify such child abuse or neglect it is important to remember every young person is different. Some young people may display a combination of indicators of abuse whilst others will attempt to conceal them. In addition to the factors above, there are a range of common features across identified cases. These indicators of abuse, which may also be common features in other kinds of abuse, include:

- a young person's body showing signs or marks, such as bruises or burns, from physical abuse
- a young person becoming noticeably confused, withdrawn, disorientated or isolated and appearing alone amongst other young people
- deterioration of a young person's personal care – for example through a loss of weight, being hungry, turning up to school without food or lunch money, stealing food, or being unkempt with dirty clothes and even faeces smeared on to them
- lack of concern or close bond between the young person and his or her parent/carer
- a young person's attendance at school becoming irregular or the young person being taken out of school altogether without another school place having been organised, or a deterioration in a young person's performance at school
- a young person reporting that they are or have been accused of being 'evil', and/or that they are having the 'devil beaten out of them'.

Forced marriage

Forcing a person into a marriage is a crime. A forced marriage is one entered into without the full and free consent of one or both parties and where violence, threats or any other form of coercion is used to cause a young person to enter into a marriage. Threats can be physical or emotional and psychological. A lack of full and free consent can be where a young person does not or cannot consent (if they have learning disabilities, for example). Nevertheless, some communities use religion and culture as a way to coerce a young person into marriage. John Kyrle High School can play an important role in safeguarding young people from forced marriage.

It is a crime to take a young person overseas to force them to marry (whether or not the forced marriage takes place). It is also a crime to marry a young person who lacks the mental capacity to consent to the marriage (whether they are pressured or not).

As well as speaking to the DSL/DDSL, staff can contact the Forced Marriage Unit if they need advice or information. Tel: 0207 008 0151 or email: fm@fco.gov.uk.

'Honour-based' Abuse

'Honour-based' Abuse (HBA) is a form of domestic abuse, which is perpetrated in the name of so called 'honour'. The 'honour' code which it refers to is set at the discretion of male relatives, and women who do not abide by the 'rules' are then punished for bringing shame on the family.

'Honour-based' Abuse is a violent crime. It might be considered against young people who:

- become involved with a boyfriend/girlfriend from a different culture/religion
- want to get out of an arranged marriage or forced marriage
- wear clothes or take part in activities that might not be considered traditional with a particular culture

All staff need to be alert to the possibility of a young person being at risk of HBA or already having suffered from HBA. If staff have a concern regarding a young person, they must speak to the DSL/DDSL.

Female Genital Mutilation (FGM)

Under the Keeping Children Safe in Education update guidance, and in line with local safeguarding training, all staff are trained in spotting signs of any young person who is at risk of female genital mutilation.

FGM comprises of all procedures involving partial or total removal of the external female genitalia or other injury to the female genital organs. It is illegal in the UK and a form of child abuse. It is also illegal to take a British national or permanent resident abroad for FGM, or help someone trying to do this.

Staff are required to be vigilant in recognising signs that a young person may have been subject to female genital mutilation, indicators may include:

- having difficulty walking, sitting or standing
- spending longer than normal in the bathroom or toilet
- displaying unusual behaviour after an absence from school
- be particularly reluctant to undergo normal medical examinations
- asking for help, but may not be explicit about the problem due to embarrassment or fear.

Some indicators of a young person at immediate risk of female genital mutilation include conversations about:

- being taken 'home' to visit family
- a special occasion to 'become a woman'
- an older female relative visiting the UK
- asking an adult for help
- running away from home or missing school.

All staff are aware, that from 31st October 2015 the FGM mandatory reporting duty became a legal duty within the FGM Act 2003, where regulated health and social care professionals and teachers in England and Wales are required to make a report to the police where, in the course of their professional duties, they either:

- are informed by a girl under 18 that an act of FGM has been carried out on her; or
- observe physical signs which appear to show that an act of FGM has been carried out on a girl under 18 and they have no reason to believe that the act was necessary for the girl's physical or mental health or for purposes connected with labour or birth.

For the purposes of the duty, the relevant age is the girl's age at the time of the **disclosure/identification** of FGM (i.e. it does not apply where a woman aged 18 or over discloses she had FGM when she was under 18).

Should anybody have concerns regarding FGM, or if a disclosure has been made, they must personally report it to the police on 101, and then inform the DSL/DDSL. They must also inform the FGM helpline on 0800 028 3550.

Preventing Radicalisation/extremism

Young people are vulnerable to extremist ideology and radicalisation. Protecting young people from this risk is part of our school's safeguarding approach.

- Extremism is an opposition to our fundamental values including democracy, the rule of law, individual liberty and respect and tolerance of different faiths and beliefs
- Radicalisation is the process by which a young person supports terrorism and extremist ideologies associated with terrorist groups
- Terrorism is an action that endangers or causes serious violence to a young person/people. The use of threat is for the purpose of actioning a political, religious or ideological case

Indicators may include:

- influence such as family and friends
- social media or the internet



- changes in behaviour

Young people and staff have the right to speak freely and voice their opinions, however, free speech that is designed to manipulate the vulnerable or leads to violence and harm of others goes against the moral principles in which freedom of speech is valued.

The Prevent Duty

As set out in the non-statutory advice for schools and childcare providers in 'The Prevent Duty Guidance: England and Wales' 2023, John Kyrle High School follows a policy (in-line with the Child Protection procedure) of reporting incidences that pertain to the potential of a young person being given over to extremist views or ideologies. The school's safeguarding principles apply to keeping young people safe from the risk of extremism, radicalisation and terrorism by staff being alert to changes in a young person's behaviour.

The school aims and helps to build young people's resilience to extremism, radicalisation and terrorism through the promotion of fundamental British Values and associated areas across the curriculum.

There are different views about whether or not there are 'tell-tale' signs of what a young person is being exposed to or seeking information from extremists or being radicalised. The Home Office guidelines, encourage those working with young people to follow a simple process:

- **Notice** – has a young person's behaviour, talk or actions changed?
- **Check** – if you think it has, check it out with someone else who knows them.
- **Report** – if there is evidence of an issue or concern, report it to the DSL/DDSL who will take appropriate steps.

Staff must never offer secrecy if a young person discloses something relating to their vulnerability to being drawn into extremist action; staff should listen and avoid leading questions. They should write down the facts as soon as possible and report any concerns to the DSL/DDSL. Should a referral be made to the Prevent team then it may be possible to support young people via the CHANNEL support programme. A referral to the Multi Agency Safeguarding Hub will also be made when a young person is at risk of significant harm in relation to radicalisation or involvement in extremism.

- The Prevent steering group Chair is Cath Knowles
- DS Phil Colley is the Force's lead
- Chair of the Panel on the council is Ewen Archibald

All staff receive online training in regards to Prevent.

Multi-agency working

John Kyrle High School has a pivotal role to play in multi-agency safeguarding arrangements. Governors ensure that the school contributes to multi-agency working in line with the statutory guidelines Working Together to Safeguard Children 2023. Staff work with social care, the police, health services and other agencies to promote the welfare of young people and protect them from harm.

Staff co-operate with any child protection enquiries conducted by social care and the school ensures there is representation at inter-agency meetings such as team around the family meetings, initial and review child protection conferences, and core group meetings. If a staff member is unable to attend, a written report will be sent. The report will, wherever possible, be shared with parents and/or carers at least 24 hours prior to the meeting.

Staff are keen to contribute to ensure any support put in place leads to improvements for the young person and has impacted positively on their welfare/safety.

Safeguarding partners

The local authority, a clinical commissioning for an area within the local authority and the chief of police for a police area within the local authority will work with relevant agencies to safeguard and promote the welfare of local children, including identifying and responding to their needs.

Information sharing

Information sharing helps to ensure young people receive the right services at the right time. Fears about sharing information cannot be allowed to stand in the way of the need to safeguard and promote the welfare of children at risk of abuse and neglect. The DfE document on information sharing can be viewed at [Information sharing advice for safeguarding practitioners - GOV.UK \(www.gov.uk\)](http://www.gov.uk)

School staff are proactive in sharing information as early as possible to help identify, assess and respond to risks or concerns about the safety and welfare of young people. This includes allowing staff to share information without consent where there is good reason to do so and where the sharing of information will enhance the safeguarding of a young person of a young person in a timely manner. It cannot reasonably be expected that a staff member will gain consent, if to gain consent would place a young person at risk.

Where a young person leaves the school, any information of a safeguarding nature is transferred to the new school or college as soon as possible. Safeguarding files are sent by secure transfer separately from the main file and a confirmation of receipt is obtained. If a young person is removed from the school roll in order to become home educated, the school will ensure any safeguarding information is shared with the Elective Home Education team.

Contact Details

The Designated Safeguarding Lead (DSL) for the school is:

- Mr Kristian Phillips – 01989 760386 or kristianphillips@jkhs.org.uk

The Deputy Safeguarding Lead (DDSL) for the school is:

- Mrs Georgina Lewis– 01989 764358 or g.lewis@jkhs.org.uk

The Prevent lead for the school is:

- Mr Kristian Phillips – 01989 764386 or kristianphillips@jkhs.org.uk

The e-safety coordinator for the school is:

- Mr Kristian Phillips - 01989 764358 or kristianphillips@jkhs.org.uk

The LAC (looked after young people) lead for the school is:

- Mr Kristian Phillips - 01989 764358 or kristianphillips@jkhs.org.uk

The designated lead for young people with a social worker is:

- Mr Kristian Phillips– 01989 760391 or kristianphillips@jkhs.org.uk

The mental health/well-being lead for the school is:

- TBC



The virtual school headteacher (looked after young people) is:

- Joanna Chick – 01432 260579 or VirtualSchool@herefordshire.gov.uk

The LADO (Local Authority Designated Officer) is:

- Terry Pilliner – 01432 261739 or LADO@herefordshire.gcsx.gov.uk

Herefordshire Safeguarding Child Board: Multi-Agency Safeguarding Hub (MASH) (Children's Social Care)

- 01432 260800 or Emergency Out of Hours – 01905 768020 or <http://hscb.herefordshire.gov.uk>

Early Help Hub

- 01432 260261

Gloucestershire Safeguarding: Front Door

- 01452 426565 (Option 1)

The Prevent Co-ordinator for Herefordshire Council is:

- Ewen Archibald – 01432 261970 or ewen.archibald@herefordshire.gov.uk

NSPCC Helpline:

- 0800 028 0285 or help@nspcc.org.uk

Child Line:

- 0800 1111

National FGM Helpline:

- 0800 028 3550

Police:

- 101. Ring 999 if a child is at immediate risk.

Mental health and well-being for school staff

1. John Kyrle High School look after staff, so that they can do their best work. Because when staff do their best work, young people feel safe, supported and can achieve more.

Resources to ensure that school leaders support staff mental health and wellbeing:

2. Education Support Partnership

The Education Support Partnership is the UK's only charity dedicated to improving the health and wellbeing of the entire education workforce.

There are many stresses on those who work in education – a challenging young person, low mood, stress and depression, personal financial worries and many more. The Education Support Partnership runs a free and confidential 24-hour helpline for education staff. No issue is too big or too small.

Education Support Partnership Helpline 08000 562 561

Website: www.educationsupportpartnership.org.uk

Other services include; email support and live chat, information and advice, and a confidential grants service to help with financial worries.

3. Stress test <http://bewellteachwell.org.uk/self-evaluation>

The Education Support Partnership website contains many resources, including an individual assessment designed to give an indication of the kinds of stress and wellbeing issues that may affect a person. The stress test is intended to help people reflect on their own experience of stress and pressure, and to find ways of improving wellbeing at work and home. There are three sections to complete and you will get an instant result for each section.

IMPORTANT - Note that this is not a clinical tool and if it indicates that there are symptoms or concerns about your physical or mental health, you should always consult with your GP.

- 4.** At school it is important that leaders and managers maintain the balance and ensure that both young people and staff feel supported. We recognise staff are affected by a huge range of everyday issues including family illness, stress or financial problems. Leaders would encourage staff to discuss any thoughts or worries they may have.

View the '10 Keys to Happier Living' poster from Action for Happiness.

This policy will be reviewed at least annually with the relevant staff and agencies. It is a 'live' document that changes and evolves through consultation and reference to real cases both within school and the local area. This policy refers to the procedures of the HSCP For professionals – Herefordshire Safeguarding (herefordsafeguardingboards.org.uk)

Policy reviewed:	
Revision made:	Updated with changes in line with KCSIE
Reviewed by:	DSL
Review date:	
Policy approved by:	



Appendix 1 – Definitions and indicators of abuse

Neglect

Neglect is the persistent failure to meet a young person's basic physical and/or psychological needs, likely to result in the serious impairment of the 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:

- adequate food, clothing and shelter (including exclusion from home or abandonment)
- protect a young person 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 young person's basic emotional needs.

The following may be indicators of neglect (this is not designed to be used as a checklist):

- constant hunger
- stealing, scavenging and/or hoarding food
- frequent tiredness or listlessness
- frequently dirty or unkempt
- often poorly or inappropriately clad for the weather
- poor school attendance or often late for school
- poor concentration
- affection or attention-seeking behaviour
- illnesses or injuries that are left untreated



- failure to achieve development milestones, for example growth, weight
- failure to develop intellectually or socially
- responsibility for activity that is not age appropriate such as cooking, ironing, caring for siblings
- the young person is regularly not collected or received from school; or
- the child is left at home alone or with an inappropriate carer

Physical Abuse

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

The following may be indicators of physical abuse (this is not designed to be used as a checklist):

- multiple bruises in clusters or of uniform shape
- bruises that carry an imprint, such as a hand or a belt
- bite marks
- round burn marks
- multiple burn marks and burns on unusual areas of the body such as the back, shoulders or buttocks
- an injury that is not consistent with the account given
- changing or different accounts of how an injury occurred
- bald patches
- symptoms of drug or alcohol intoxication or poisoning
- unaccountable covering of limbs, even in hot weather
- fear of going home or parents/cares being contacted
- fear of medical help
- fear of changing for PE
- inexplicable fear of adults or over-compliance
- violence or aggression towards others including bullying; or
- isolation from peers

Sexual abuse

Sexual abuse involves forcing or enticing a young person to take part in sexual activities, not necessarily involving violence, whether or not the young person 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 young people in looking at, or in the production of, sexual images, watching sexual activities, encouraging young people to behave in sexually inappropriate ways, or grooming a young person 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 young people.

The following may be indicators of sexual abuse (this list is not designed to be used as a checklist):

- sexually explicit play or behaviour or age-inappropriate knowledge
- anal or vaginal discharge, soreness or scratching
- reluctance to go home
- inability to concentrate, tiredness
- refusal to communicate
- thrush, persistent complaints of stomach disorders or pains
- eating disorders, for example anorexia nervosa and bulimia
- attention-seeking behaviour, self-mutilation, substance abuse



- aggressive behaviour including sexual harassment or molestation
- unusual compliance
- regressive behaviour, enuresis, soiling
- frequent or open masturbation, touching others inappropriately
- depression, withdrawal, isolation from peer group
- reluctance to undress for PE or swimming; or
- bruises or scratches in the genital area

Sexual exploitation

Child sexual exploitation occurs when a young person receives “something” (for example food, accommodation, drugs, alcohol, cigarettes, affection, gifts, money) as a result of the young person performing sexual activities, or another person performing sexual activities on the young person.

The presence of any significant indicator for sexual exploitation should trigger a referral to children’s social care. The significant indicators are:

- having a relationship of concern with a controlling adult or young person (this may involve physical and/or emotional abuse and/or gang activity)
- entering and/or leaving vehicles driven by unknown adults
- possessing unexplained amounts of money, expensive clothes or other items
- frequenting areas known for risky activities
- being groomed or abused via the internet and mobile technology; and
- unexplained contact with hotels, taxi companies or fast-food outlets

The intelligence reporting form on the HSCP website will be used to share information with police and children’s social care that raises a concern around CSE.

Emotional abuse

Emotional abuse is the persistent emotional maltreatment of a young person such as to cause severe and persistent adverse effects on the young person’s emotional development. It may involve conveying to young people 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 young person 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 young people. These may include interactions that beyond the young person’s developmental capability, as well as overprotection and limitation of exploration and learning, or preventing the young person participating in normal social interaction. It may also involve seeing or hearing the ill-treatment of another person. It may involve serious bullying (including cyber-bullying), causing young people frequently to feel frightened or in danger, or the exploitation or corruption of young people. Some level of emotional abuse is involved in all types of maltreatment.

The following may be indicators of emotional abuse (this is not designed to be used as a checklist):

- the young person consistently describes him/herself in very negative ways – as stupid, naughty, hopeless, ugly
- over-reaction to mistakes
- delayed physical, mental or emotional development
- sudden speech or sensory disorders
- inappropriate emotional responses, fantasies
- behaviours such as rocking, banging head, regression, tics and twitches
- self-harming, drug or solvent abuse



- fear of parents/carers being contacted
- running away
- compulsive stealing
- eating disorders – anorexia nervosa or bulimia; or
- soiling, smearing faeces, enuresis

N.B. some situations where young people stop communication suddenly (known as “traumatic mutism”) can indicate maltreatment.

Responses from parents/carers

Research and experience indicates that the following responses from parents/carers may suggest a cause for concern across all four categories:

- delay in seeking treatment that is obviously needed
- unawareness or denial of any injury, pain or loss of function (for example a fractured limb)
- incompatible explanations offered, several different explanations or the young person is said to have acted in a way that is inappropriate to his/her age and development
- reluctance to give information or failure to mention other known relevant injuries
- frequent presentation of minor injuries
- a persistently negative attitude toward the young person
- unrealistic expectations or constant complaints about the young person
- alcohol misuse or other drug/substance misuse
- parents/cares request removal of the young person from home; or
- violence between adults in the household

Sexual Harassment

This can be defined as ‘unwanted conduct of a sexual nature’ that can occur online and offline. In the context of this guidance this means in the context of child-on-child sexual harassment. Sexual harassment is likely to: violate a young person’s dignity; and/or make them feel intimidated; degraded or humiliated and/or create a hostile, offensive or sexualised environment.

It can include:

- sexual comments, such as: telling sexual stories; making lewd comments; making sexual remarks about clothes and appearance and calling someone sexualised names.
- sexual “jokes” or taunting/banter

Youth Produced Sexual Imagery

This is when someone shares sexual, naked or semi-naked images or videos of themselves or others or sends sexually explicit messages. They can be sent using mobiles, tablets, smartphones, laptops – any device that allows you to share media and messages. This can also be known as youth produced sexual imagery.

The UK Council for Internet Safety (UKCIS) Education Group has published ‘Advice for Schools and Colleges on responding to sexting incidents – <https://www.gov.uk/government/publications/sharing-nudes-and-semi-nudes-advice-for-education-settings-working-with-children-and-young-people>

Upskirting

This typically involves take a picture under a person’s clothing without them knowing, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or

alarm. It is now a criminal offence and may constitute sexual harassment. Cases of 'upskirting' have a mandatory requirement for being reported.

Rape

A person (A) commits an offence of rape if; he intentionally penetrates the vagina, anus or mouth of another person (B) with his penis, B does not consent to the penetration and A does not reasonably believe that B consents.

Assault by penetration

A person (A) commits an offence if: he/she intentionally penetrates the vagina or anus of another person (B) with a part of his/her body or anything else, the penetration is sexual, B does not consent to the penetration and A does not reasonably believe that B consents.

Sexual assault

A person (A) commits an offence of sexual assault if: he/she intentionally touches another person (B), the touching is sexual, B does not consent to the touching and A does not reasonably believe that B consents.

Consent

Consent is about having the freedom and capacity to choose. Consent to sexual activity may be given to one sort of activity but not another e.g. to vaginal but not anal sex or penetration with conditions such as wearing a condom. Consent can be withdrawn at any time during sexual activity and each time activity occurs. Someone consents to vaginal, anal or oral penetration only if he/she agrees by choice to that penetration and has the freedom and capacity to make that choice.

It is important to know that:

- a child under the age of 13 can never consent to any sexual activity
- the age of consent is 16
- sexual intercourse without consent is rape

It is also important to differentiate between consensual sexual activity between young people of a similar age and that involves any power imbalance, coercion or exploitation. Due to their additional training, the DSL/DDSL must be involved and leading the school's response. If in any doubt, they should seek expert advice.

It is important that John Kyrle High School considers sexual harassment in broad terms. Sexual harassment (as set out above) creates an atmosphere that, if not challenged, can normalise inappropriate behaviours and provide an environment that may lead to harmful sexual behaviour.

Harmful Sexual Behaviour (HSB)

Children's sexual behaviour exists on a wide continuum, from normal and developmentally expected to inappropriate, problematic, abusive and violent. Problematic, abusive and violent sexual behaviour is developmentally inappropriate and may cause developmental damage. A useful umbrella term is "harmful sexual behaviour". The term has been widely adopted in child protection and is used in this advice. Harmful sexual behaviour can occur online and/or offline and can also occur simultaneously between the two. Harmful sexual behaviour should be considered in a child protection context.

Useful guidance can be found in:

NSPCC's and Research in Practice's Harmful Sexual Behaviour Framework:



<https://www.nspcc.org.uk/search/?query=harmful%20sexual%20behaviour%20resources%20>

The Brook Sexual Behaviours Traffic Light Tool can also be very helpful in identifying sexual behaviours by children (Appendix 2).

Professionals must attend a group Traffic Light Tool group training session or complete the online course to be able to use the tool safely and, therefore, the tool cannot be shared with staff who have not completed training.

<https://www.brook.org.uk/training/wider-professional-training/sexual-behaviours-traffic-light-tool/>

Initiation/hazing

Hazing or initiation ceremonies refers to the practice of rituals, challenges, and other activities involving harassment, abuse or humiliation used as a way of initiating a person into a group. Hazing is seen in many different types of social groups, including gangs, sports teams and school groups. The initiation rituals can range from relatively low-level pranks, to protracted patterns of behaviour that rise to the level of abuse or criminal misconduct. Hazing may include physical or psychological abuse. It may also include nudity or sexual assault.

Contextual safeguarding

All staff, but especially the DSL/DDSL should be considering the context within which incidents and/or behaviours occur. This is known as contextual safeguarding, which simply means assessments of young people should consider whether wider environmental factors are present in a young person's life that are a threat to their safety and/or welfare.

Legislation, guidance and Law

Keeping Children Safe in Education [Keeping children safe in education - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/616276/Keeping-children-safe-in-education-2019.pdf)

Human Rights Act 1998 <https://www.equalityhumanrights.com/en/human-rights/human-rights-act>

Equalities Equality Act 2010 <https://www.gov.uk/guidance/equality-act-2010-guidance>

West Midlands Procedures for Child-on-Child abuse <https://westmidlands.procedures.org.uk/pkoso/regional-safeguarding-guidance/children-who-abuse-others>



Appendix 2 – Dealing with a disclosure of abuse

When a young person tells me about abuse he/she has suffered, what must I remember?

- stay calm
- do not communicate shock, anger or embarrassment
- reassure the young person
- tell him/her you are pleased that he/she is speaking to you
- never enter into a pact of secrecy with the young person
- assure him/her that you will try to help but let the young person know that you will have to tell other people in order to do this – state who this will be and why
- tell him/her that you believe them
- young people very rarely lie about abuse; but he/she may have tried to tell others and not been heard or believed
- tell the young person that it is not his/her fault
- encourage the young person to talk but do not ask “leading questions” or press for information
- listen and remember
- check that you have understood correctly what the young person is trying to tell you
- praise the young person for telling you
- communicate that he/she has a right to be safe and protected
- do not tell the young person that what he/she experienced is dirty, naughty or bad
- it is inappropriate to make any comments about the alleged offender
- be aware that the young person may retract what he/she has told you – it is essential to record all you have heard
- at the end of the conversation, tell the young person again who you are going to tell and why that person or those people need to know
- as soon as you can afterwards, make a detailed record of the conversation using the young person's own language – include any questions you may have asked
- do not add any opinions or interpretations

N.B. it is not education staff's role to seek disclosures. Their role is to observe that something may be wrong, ask about it, listen, be available and try to make time to talk.

Immediately afterwards

You must not deal with this yourself. Clear indications or disclosure of abuse must be reported to children's social care without delay, by the headteacher or the DSL/DDSL.

Young people making a disclosure may do so with difficulty, having chosen carefully to whom they will speak. Listening to and supporting a young person who has been abused can be traumatic for the adults involved. Support for you will be available from your DSL, DDSL or headteacher.



Appendix 3 – Allegations about a member of staff, governor or volunteer

Inappropriate behaviour by staff/volunteers could take the following forms:

- **Physical** – for example the intentional use of force as punishment, slapping, use of objects to hit with, throwing objects or inappropriate physical handling
- **Emotional** – for example intimidation, belittling, scapegoating, sarcasm, lack of respect for young people's rights, and attitudes that discriminate on the grounds of race, gender, disability or sexuality, excessive or aggressive shouting
- **Sexual** – for example sexualised behaviour towards peers, sexual harassment, sexual communication including via social networking, email, text, grooming behaviour, sexual assault and rape
- **Neglect** – for example failing to act to protect a young person or people, failing to seek medical attention or failure to meet a young person's basic needs
- **May pose a risk** – behaviours that may take place outside of the workplace that present a transferable risk in their professional role with young people. For example, alleged perpetrator of domestic abuse, offences demonstrating a sexual interest in young people, abuse or neglect of their own young people or behaviours that are incompatible with a professional role working with children

If a young person makes an allegation or raises a concern about a member of staff, governor, visitor or volunteer the headteacher must be informed immediately. If the allegation or concern fall within the following criteria the LADO will be contacted at the earliest opportunity and within one working day:

- behaved in a way that has harmed a young person or may have harmed a young person
- possibly committed a criminal offence against or related to a young person; or
- behaved in a way that indicates he/she may pose a risk of harm to young people

The headteacher will not carry out the investigation him/herself or interview young people.

If a young person makes an allegation of physical abuse against an adult that works with young people and there are visible bruises, marks or injuries or if a young person makes an allegation of sexual abuse against an adult that works with young people, child protection procedures will be followed and a referral made to the Multi-Agency Safeguarding Hub (MASH). The LADO will also be informed.

The headteacher must exercise, and be accountable for, their professional judgement on the action to be taken as follows:

- if the actions of the member of staff are felt likely to fall within the scope of the interagency allegation management procedures 2, the headteacher will notify the LADO. The LADO will liaise with the headteacher and advise about action to be taken which will be in accordance with the interagency procedures for managing allegations
- if the headteacher is uncertain whether the concern or allegation falls within the scope of the allegation management procedures a consultation with the LADO will take place and the advice provided will be acted upon. This consultation and the advice offered will be recorded and held on file
- where an allegation has been made against the headteacher, the chair of governors takes on the role of liaising with the LADO in determining the appropriate way forward. For details of this specific procedure see the section on 'Allegations against Staff and Volunteers' in the procedures of the HSCP.



Appendix 4 – Indicators of vulnerability to radicalisation

Radicalisation refers to the process by which a person comes to support terrorism and forms of extremism leading to terrorism.

Extremism is defined by the Government in the Prevent Strategy as vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs. We also include in our definition of extremism calls for the death of members of our armed forces, whether in this country or overseas.

New definition of extremism 2024

Extremism is the promotion or advancement of an ideology [footnote 3] based on violence, hatred or intolerance [footnote 4], that aims to:

negate or destroy the fundamental rights and freedoms [footnote 5] of others; or
undermine, overturn or replace the UK's system of liberal parliamentary democracy [footnote 6] and democratic rights [footnote 7]; or
intentionally create a permissive environment for others to achieve the results in (1) or (2).

The types of behaviour below are indicative of the kind of promotion or advancement which may be relevant to the definition, and are an important guide to its application. The further context below is also an essential part of the definition.

Extremism is defined by the Crown Prosecution Service as the demonstration of unacceptable behaviour by using any means or medium to express views which:

- encourage, justify or glorify terrorist violence in furtherance of particular beliefs
- seek to provoke others to terrorist acts
- encourage other serious criminal activity or seek to provoke others to serious criminal acts; or
- foster hatred which might lead to inter-community violence in the UK

There is no such thing as a “typical extremist”: those which become involved in extremist actions come from a range of backgrounds and experiences. Most individuals, even those who hold radical views, do not become involved in violent extremist activity.

Young people may become susceptible to radicalisation through a range of social, personal and environmental factors. It is known that violent extremists exploit vulnerabilities in individuals to drive a wedge between them and their families and communities. It is vital that schools staff are able to recognise those vulnerabilities.

Indicators vulnerability include:

- identity crisis – the child is distanced from their cultural/religious heritage and experiences discomfort about their place in society
- personal crisis – the young person may be experiencing family tensions; a sense of isolation; and low self-esteem; they may have disassociated from their existing friendship group and become involved with a new and different group of friends; they may be searching for answers to questions about identity, faith and belonging



- personal circumstances – migration; local community tensions; and events affecting the young person's country or region of origin may contribute to a sense of grievance that is triggered by personal experience of racism or discrimination or aspects of Government policy
- unmet aspirations – the young person may have perceptions of injustice; a feeling of failure; rejecting or civic life
- experiences of criminality – which may include involvement with criminal groups, imprisonment, and poor resettlement/reintegration
- special educational need – young people may experience difficulties with social interaction, empathy with others, understanding the consequences of their actions and awareness of the motivation of others

However, this list is not exhaustive, nor does it mean that all young people experiencing the above are at risk of radicalisation for the purposes of violent extremism.

More critical risk factors could include:

- being in contact with extremist recruiters
- accessing violent extremist websites, especially those with a social networking element
- possessing or accessing violent extremist literature
- using extremist narratives and a global ideology to explain personal disadvantage
- justifying the use of violence to solve societal issues
- joining or seeking to join extremist organisations
- significant changes to appearance and/or behaviour
- experiencing a high level of social isolation resulting in issues of identity crisis and/or personal crisis

MUU ideology (Mixed, Unclear, Unstable) is a category within the Prevent system, introduced in 2017/2018 and designed to distinguish from those cases in which an individual's ideology is obvious, well-embedded and appears to be the primary factor drawing them towards TACT offences. It describes what appears to be an increasingly common phenomenon where individuals do not have a well-defined or well-understood ideological motivation. These individuals often seem drawn towards acts of extremism, extremist or terrorist groups or causes, or terrorist violence, as a means of providing them with a 'solution' to other problems in their lives. They commonly present with multiple and complex vulnerabilities.

Mixed: individuals who show interest in several (sometimes disparate) ideologies simultaneously. For example, a joint interest in right-wing extremism and involuntary celibate ("incel") content or Islamist extremism and white supremacy.

Unstable: individuals who initially appear to adhere solely to one ideology but then switch or transition to another.

Unclear: individuals whose ideological influences are less coherent and not easily identifiable. This can include individuals motivated by a hatred of a 'perceived other' without relating to prominent, well-known forms of extremism. This includes but is not limited to those who appear fixated with mass violence (such as school shootings) and incels, whose intolerance is predominately directed at women.

Individuals referred for MUU display a variety of characteristics, including: an interest in multiple extremist ideologies in parallel (Islamic extremism and white supremacy); switching from one ideology to another over



time; targeting a 'perceived other' of some kind without specifically identifying with a particular cause; obsession with massacre or mass violence without a particular target group; and vulnerability to being drawn into terrorism out of a desire for belonging or elevated social state.



Appendix 5 – Female Genital Mutilation

Female genital mutilation (FGM) is a procedure where the female genitals are deliberately cut, injured or changed, but where there's no medical reason for this to be done. It is also known as "female circumcision" or "cutting", and by other terms such as sunna, gudniin, halalys, tahur, megrez and khitan, among others.

FGM is usually carried out on young girls between infancy and the age of 15, most commonly before puberty starts. It is illegal in the UK and is a form of child abuse. It is very painful and can seriously harm the health of women and girls. It can also cause long-term problems with sex, childbirth and mental health.

Effects of FGM

There are no health benefits to FGM and it can cause serious harm, including:

- constant pain
- pain and/or difficulty having sex
- repeated infections, which can lead to infertility
- bleeding, cysts and abscesses
- problems passing urine or incontinence
- depression, flashbacks and self-harm
- problems during labour and childbirth, which can be life-threatening for mother and baby
- some girls die from blood loss or infection as a direct result of the procedure

Why FGM is carried out?

FGM is carried out for various cultural, religious and social reasons within families and communities in the mistaken belief that it will benefit the girl in some way, for example, as a preparation for marriage or to preserve her virginity.

However, there are no acceptable reasons that justify FGM. It is harmful practice that is not required by any religion and there are no religious texts that say it should be done. There are no health benefits of FGM. FGM usually happens to girls whose mothers, grandmothers or extended female family members have had FGM themselves or if their father comes from a community where it is carried out.

Where is FGM is carried out?

Girls are sometimes taken abroad for FGM, but they may not be aware that this is the reason for their travel. Girls are more at risk of FGM being carried out during the summer holidays as this allows more time for them to "heal" before they return to school.

Communities that perform FGM are found in many parts of Africa, the Middle East and Asia. Girls who were born in the UK or are resident here but whose families originate from an FGM practising community are at greater risk of FGM. Communities in particular risk of FGM in the UK originate from:

- | | |
|---------------|----------------|
| • Egypt | • Gambia |
| • Ethiopia | • Indonesia |
| • Ivory Coast | • Kenya |
| • Yemen | • Sudan |
| • Somalia | • Sierra Leone |
| • Nigeria | • Mali |
| • Malaysia | • Liberia |
| • Eritrea | |



The law and FGM

FGM is illegal in the UK. It is an offence to:

- perform FGM (including taking a young person abroad for FGM)
- help a girl perform FGM on herself in or outside the UK
- help anyone perform FGM in the UK
- help anyone perform FGM outside the UK on a UK national or resident
- fail to protect a girl for whom you are responsible from FGM

Anyone who performs FGM can face up to 14 years in prison. Anyone found guilty of failing to protect a girl from FGM can face up to seven years in prison.

Female Genital Mutilation Act 2003 (section 74 of the Serious Crime Act 2015) places a statutory duty upon teachers (along with social workers and healthcare professionals) to report to the police where they discover (either through disclosure by the victim or visual evidence) that FGM appears to have been carried out on a girl under 18.

Possible signs and indicators of FGM

A girl or woman who has had FGM may:

- have difficulty walking, sitting or standing
- spend longer than normal in the bathroom or toilet
- have unusual behaviour after an absence from school
- be particularly reluctant to undergo normal medical examinations
- ask for help, but may not be explicit about the problem due to embarrassment or fear

These signs MAY indicate a girl is at risk of FGM:

- parents/carers requesting additional periods of leave around school holiday times
- if the girl comes from a country with a high prevalence of FGM
- mother and siblings have undergone FGM
- young person may indicate that they are going for a special event

Further information can be obtained for FGM guidance.



Appendix 6 – Safeguarding in specific circumstances: Youth produced sexual imagery

Youth produced sexual imagery is the sending or posting of sexually suggestive images, including nude or semi-nude photographs via mobile devices or the internet by under 18s.

This includes:

- a person under 18 creating a sexual image of themselves and sharing it with another person under 18
- a person under 18 sharing an image of another person under 18 with another person under 18 or an adult
- a person under 18 in possession of sexual imagery created by another person under 18

It does not include:

- a person under 18 sharing adult pornography
- a person under 18 sharing sexual texts without sexual imagery
- adults sharing sexual imagery of under 18s (this is child sexual abuse and must always be reported to the police)

The law

“Making, possessing, and distributing any imagery of someone under 18 which is indecent is illegal. This includes imagery of yourself if you are under 18.”

Indecent is not definitively defined in law, but images are likely to be considered if indecent if they depict:

- a naked young person
- a topless girl
- an image which displays genitals
- sex acts including masturbation
- indecent images may also include overtly sexual images of young people in their underwear

These laws were not created to criminalise young people but to protect them. Although sharing sexual images of themselves is illegal and risky, it is often the result of curiosity and exploration. We believe young people need education, support and safeguarding not criminalisation.

The National Police Chief’s Council has made clear that incidents of youth produced sexual imagery should be treated primarily as a safeguarding issue. However, the police may need to be involved in cases to ensure that there is thorough investigation including collection of evidence. If a young person has shared imagery consensually, such as when in a romantic relationship or as a joke, and there is no intended malice it is usually appropriate for the school to manage the incident directly. In contrast, any incidents with aggravating factors, for example a young person sharing someone else’s imagery without consent and with malicious intent, should generally be referred to the police and/or children’s social care.

If you have any doubts about whether to involve other agencies, you should make a referral to the police.

Assessing the risks

The circumstances of incidents can vary widely. If at the initial review stage a decision has been made not to refer to police and/or children’s social care, the DSL/DDSL should conduct a further review (including an interview with the young people involved) to establish the facts and assess the risks. When assessing the risks the following should be considered:

- why was the imagery shared?
- was the young person coerced or put under pressure to produce the imagery?
- who has shared the imagery?
- where has the imagery been shared?
- was it shared and received with the knowledge of the young person in the imagery?
- are there any adults involved in the sharing of the imagery?
- what is the impact on the young people involved?
- do the young people involved have additional vulnerabilities?
- does the young person understand consent?
- has the young person taken part in this kind of activity before?

Informing parents/carers

Parents/carers must be informed and involved in the process at an early stage unless informing the parent/carer will put the young person at risk of harm. Any decision not to inform the parents/carers would generally be made in conjunction with other services such as children's social care and/or the police, who would take the lead in deciding when the parents/carers should be informed.

The DSL/DDSL may work with the young people involved to decide on the best approach for informing parents/carers. In some cases the DSL/DDSL may work to support the young person to inform their parents/carers themselves.

Searching devices, viewing and deleting the imagery

Viewing the imagery

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

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

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

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

- never copy, print or share the imagery; this is illegal
- discuss the decision with the headteacher
- ensure viewing is undertaken by the DSL/DDSL or another member of the safeguarding team with delegated authority from the headteacher
- ensure viewing takes place with another member of staff present in the room, ideally the headteacher or a member of the senior leadership team
- this staff member does not need view the images
- wherever possible ensure viewing takes place on school premises, ideally in the headteacher or a member of the senior leadership team's office
- wherever possible ensure that images are viewed by a staff member of the same sex as the young person in the imagery



- record the viewing of the imagery in the school's safeguarding records including who was present, why the image was viewed and any subsequent actions and ensure the safeguarding recording procedures for the school are followed

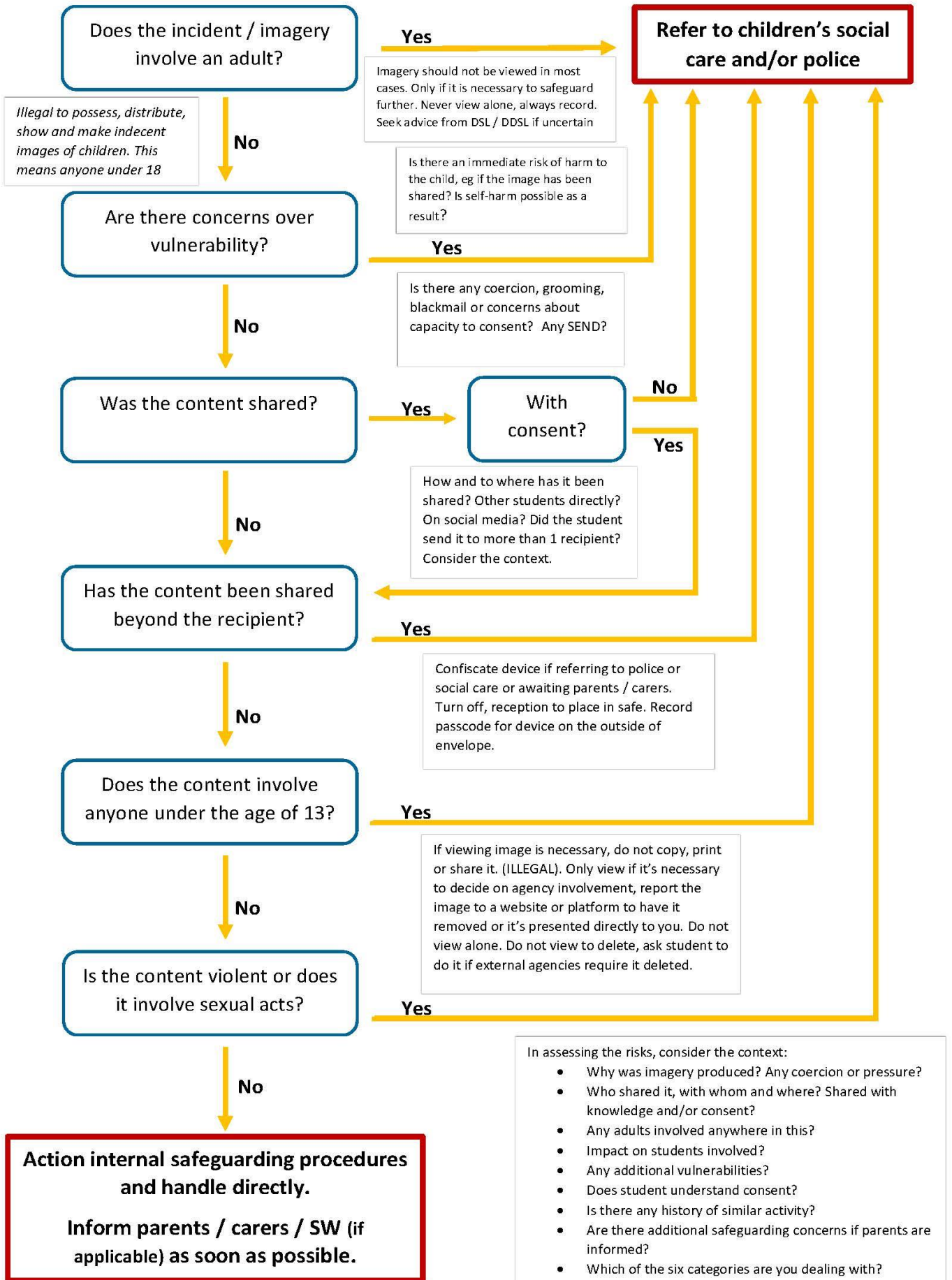
The Education Act 2011 amended the power in the Education Act 1996 to provide that when an electronic device, such as a mobile phone, has been seized, a teacher who has been formally authorised by the headteacher can examine data or files, and delete these, where there is good reason to do so. This power applies to all schools and there is no need to have parental consent to search through a young person's mobile phone.

If during a search a teacher finds material which concerns them and they reasonably suspect the material has been, or could be, used to cause harm or commit an offence, they can decide whether they should delete the material or retain it as evidence of a criminal offence or a breach of school discipline. They can also decide whether the material is of such seriousness that the police need to be involved.

Further details on searching, deleting and confiscating devices can be found in the DfE Searching, Screening and Confiscation advice (note this advice is for schools only).



Appendix 6.1 – Youth Produced Sexual Imagery Flowchart



Appendix 7 – Safeguarding in specific circumstances: Gang involvement

There are particular risk factors and triggers that young people experience in their lives that can lead to them becoming involved in gangs. Many of these risk factors are similar to involvement in other harmful activities such as youth offending or violent extremism.

Risk indicators may include:

- becoming withdrawn from family
- sudden loss of interest in school – decline in attendance or academic achievement
- starting to use new or unknown slang words
- holding unexplained money or possessions
- staying out unusually late without reason
- sudden change in appearance – dressing in a particular style or ‘uniform’
- dropping out of positive activities
- new nickname
- unexplained physical injuries
- graffiti style tags on possessions, school books, walls
- constantly talking about another young person who seems to have a lot of influence over them
- broken off with old friends and hanging around with a new group
- increased use of social networking sites
- starting to adopt codes of group behaviour e.g. ways of talking and hand signs
- expressing aggressive or intimidating views towards other groups of young people some of whom may have been friends in the past
- being scared when entering certain areas
- being concerned by the presence of unknown youths in their neighbourhood

This is not an exhaustive list and should be used as a guide, amended as appropriate in light of local knowledge of the risk factors in a particular area.



Appendix 8 – Safeguarding in specific circumstances: Child Sexual Exploitation

Child sexual exploitation takes different forms – from a seemingly ‘consensual’ relationship where sex is exchanged for attention, affection, accommodation or gifts, to serious organised crime and child trafficking. Child sexual exploitation involves differing degrees of abusive activities, including coercion, intimidation or enticement, unwanted pressure from peers to have sex, sexual bullying (including cyber-bullying), and grooming for sexual activity. There is increasing concern about the role of technology in sexual abuse, including via social networking and other internet sites and mobile phones. The key issue in relation to child sexual exploitation is the imbalance of power within the ‘relationship’. The perpetrator always has power over the victim, increasing the dependence of the victim as the exploitative relationship develops.

Many young people are groomed into sexually exploitative relationships but forms of entry exist. Some young people are engaged in informal economies that incorporate the exchange of sex for rewards such as drugs, alcohol, money or gifts. Others exchange sex for accommodation or money as a result of homelessness and experiences of poverty. Some young people have been bullied and threatened into sexual activities by peers or gangs which is then used against them as a form of extortion and to keep them compliant.

The key indicators of child sexual exploitation include:

- health
 - physical symptoms (bruising suggestive of either physical or sexual assault)
 - chronic fatigue
 - recurring or multiple sexually transmitted infections
 - pregnancy and/or seeking an abortion
 - evidence of drug, alcohol or other substance misuse
 - sexually risky behaviour
- education
 - truancy/disengagement with education or considerable change in performance at school
- emotional and behavioural issues
 - volatile behaviour exhibiting extreme array of mood swings or use of abusive language
 - involvement in petty crime such as shoplifting, stealing etc.
 - secretive behaviour
 - entering or leaving vehicles driven by unknown adults
 - reports of being seen in places known to be used for sexual exploitation, including public toilets known for cottaging or adult venues (pubs and clubs)
- identity
 - low self-image, low self-esteem, self-harming behaviour, e.g. cutting, overdosing, eating disorder, promiscuity
- relationships
 - hostility in relationships with staff, family members as appropriate and significant others
 - physical aggression
 - placement breakdown
 - reports from reliable sources (e.g. family members or other professionals) suggesting the likelihood of involvement in sexual exploitation
 - detachment from age-appropriate activities



- associating with other young people who are known to be sexually exploited
 - known to be sexually active
 - sexual relationships with a significantly older person, or young person who is suspected of being abusive
 - unexplained relationships with older adults
 - possible inappropriate use of the internet and forming relationships, particularly with adults, via the internet
 - phone calls, text messages or letters from unknown adults
 - adults or older youths loitering outside the home
 - persistently missing, staying out overnight or returning late with no plausible explanation
 - returning after having been missing, looking well cared for in spite of having no known home base
 - missing for long periods, with no known home base
 - going missing and being found in areas where they have no known links
 - please note whilst the focus is on older men as perpetrators, younger men and women may also be involved and staff should be aware of this possibility
- social presentation
 - change in appearance
 - going out dressed in clothing unusual for them (inappropriate for age, borrowing clothing from older young people)
- family and environmental factors
 - history of physical, sexual, and/or emotional abuse; neglect; domestic violence; parental difficulties
- housing
 - patterns of previous street homelessness
 - having keys to premises other than those known about
- income
 - possession of large amounts of money with no plausible explanation
 - acquisition of expensive clothes, mobile phones or other possessions without plausible explanation
 - accounts of social activities with no plausible explanation of the source of necessary funding

This list is not exhaustive.

Modern slavery and the national referral mechanism

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.

Further information on the signs that someone may be a victim of modern slavery, the support available to victims and how to refer them to the NRM is available in the Modern Slavery Statutory Guidance. [Modern slavery: how to identify and support victims - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/616222/Modern_Slavery_Statutory_Guidance.pdf)



Appendix 9 – Operation Encompass

Operation Encompass operates in all police forces across England. The process helps to support schools in providing emotional and practice to help young people. Where police attend an incident of domestic abuse, whereby young people live within the household, a notification will be sent to the young person's school the following day to notify the school of the incident. The information provided to the school ensures that the school have up-to-date information for young people who have experienced a domestic abuse incident within the home. Schools can use this information to provide further wellbeing support internally. Should the school feel the information is provided to them provides additional concern to existing concerns or worries, the school as per the local safeguarding procedures must make a referral into the Multi-Agency Safeguarding Hub. Operation Encompass does not replace statutory safeguarding procedures.

National Domestic Abuse Helpline Refuge runs the National Domestic Abuse Helpline, which can be called free of charge and in confidence, 24 hours a day on 0808 200 0247. Its website provides guidance and support for potential victims, as well as those who are worried about friends and loved ones. It also has a form through which a safe time from the team for a call can be booked. Additional advice on identifying young people who are affected by domestic abuse and how they can be helped is available at:

- NSPCC – UK domestic abuse Signs Symptoms Effects
- Refuge what is domestic violence/effects of domestic violence on children
- Safelives; domestic abuse and young people
- Domestic abuse specialist sources for support
- Home: Operation Encompass



Appendix 10 – Information sharing advice for practitioners providing safeguarding services to children, young people and parents/carers July 2018

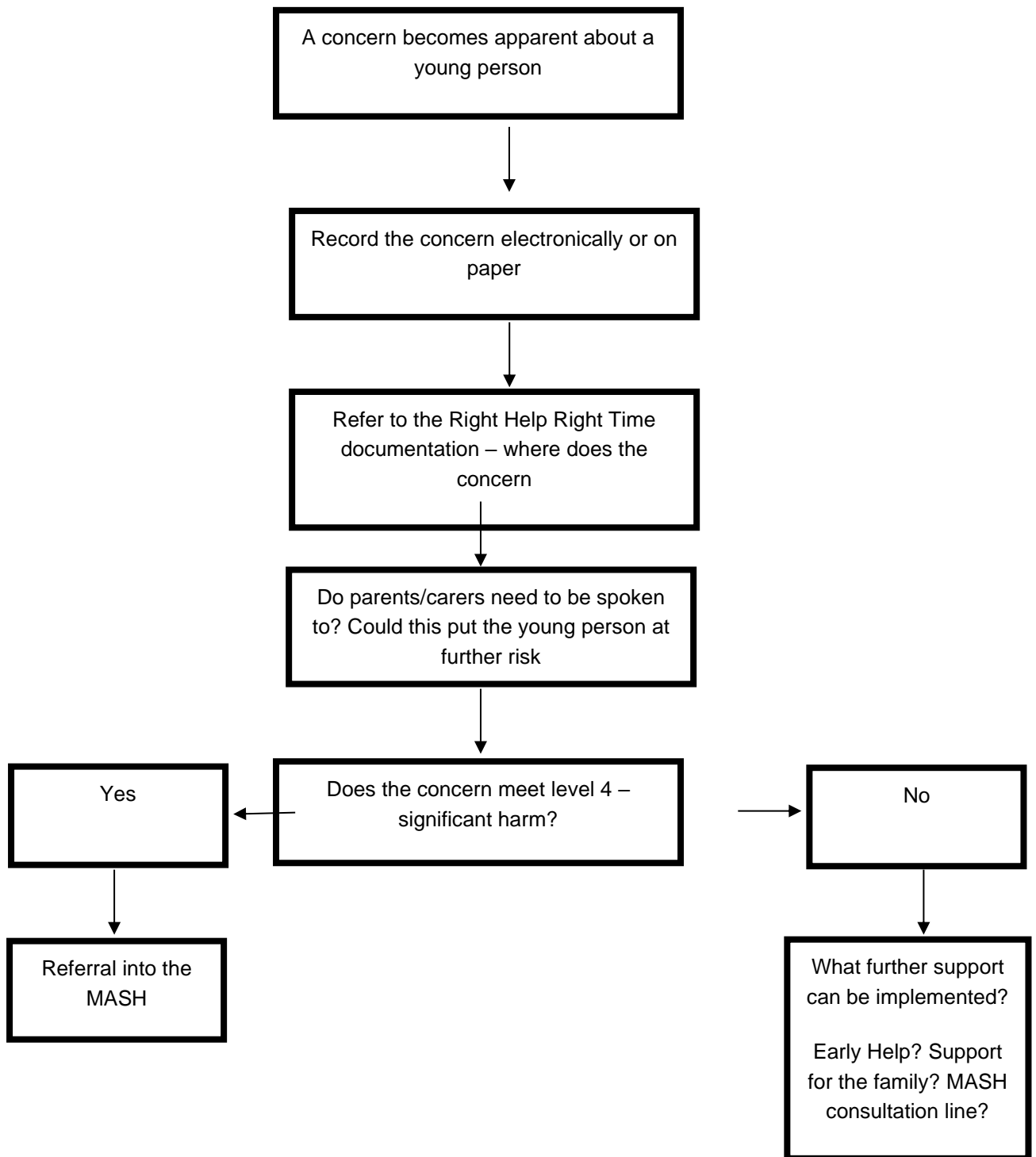
This HM Government advice is non-statutory and has been produced to support practitioners in the decisions they take to share information, which reduces risk of harm to young people and promotes their wellbeing.

This guidance does not deal with policies for bulk or pre-agreed sharing of personal information between IT systems or organisations other than to explain their role in effective information governance.

This guidance has been updated to reflect the General Data Protection Regulation (GDPR) and Data Protection Act 2018, and it supersedes the HM Government Information sharing guidance for practitioners and managers published in March 2018. The information sharing advice for practitioners providing safeguarding services to children, young people, parents and carers 2018 is listed for further guidance.



Appendix 11 – Model Setting Concern Process 2022



Appendix 12 – Brook Traffic Light

Note: Professionals must attend a group Traffic Light Tool group training session or complete the online course to be able to use the tool safely and, therefore, the tool cannot be shared with staff who have not completed training.

Behaviours: age 9 to 13

ALL green, amber and red behaviours require some form of attention and response, it is the level of intervention that varies.

<p>What is a green behaviour? Green behaviours reflect safe and healthy sexual development. They are displayed between young people of similar age or developmental ability and reflective of natural curiosity, experimentation, consensual activities and positive choices.</p> <p>What you can do? Green behaviours provide opportunities to give feedback and additional information.</p> <p>Green behaviours 9-13</p> <ul style="list-style-type: none"> solitary masturbation use of sexual language including swear and slang words having girl/boyfriends who are of the same, opposite or any gender interest in popular culture, e.g. fashion, music, media, online games, chatting online need for privacy consensual kissing, hugging, holding hands with peers 	<p>What is an amber behaviour? Amber behaviours have the potential to be outside of safe and healthy behaviour. They may be of potential concern due to age, or developmental differences. A potential concern due to activity type, frequency, duration or context in which they occur.</p> <p>What can you do? Amber behaviours signal the need to take notice and gather information to assess the appropriate action.</p> <p>Amber behaviours 9-13</p> <ul style="list-style-type: none"> uncharacteristic and risk-related behaviour e.g. sudden and/or provocative changes in dress, withdrawal from friends, mixing with new or older people, having more or less money than usual, going missing verbal, physical or cyber/virtual sexual bullying involving sexual aggression LGBTQ+ targeted bullying exhibitionism e.g. flashing or mooning giving out contact details online viewing pornographic material worrying about being pregnant or having STIs 	<p>What is a red behaviour? Red behaviours are outside of safe and healthy behaviour. They may be excessive, secretive, compulsive, coercive, degrading or threatening and involving significant age, developmental or power differences. They may pose a concern due to the activity, type, frequency, duration or context in which they occur.</p> <p>What can you do? Red behaviours indicate a need for immediate intervention and action.</p> <p>Red behaviours 9-13</p> <ul style="list-style-type: none"> exposing genitals or masturbating in public distributing naked or sexually provocative images of self or others sexually explicit talk with younger children sexual harassment arranging to meet with an online acquaintance in secret genital injury to self or others forcing other young people of similar age, younger or less able to take part in sexual activities sexual activity e.g. oral sex or intercourse presence of a STI evidence of pregnancy
--	---	--



Behaviours: age 13 to 17

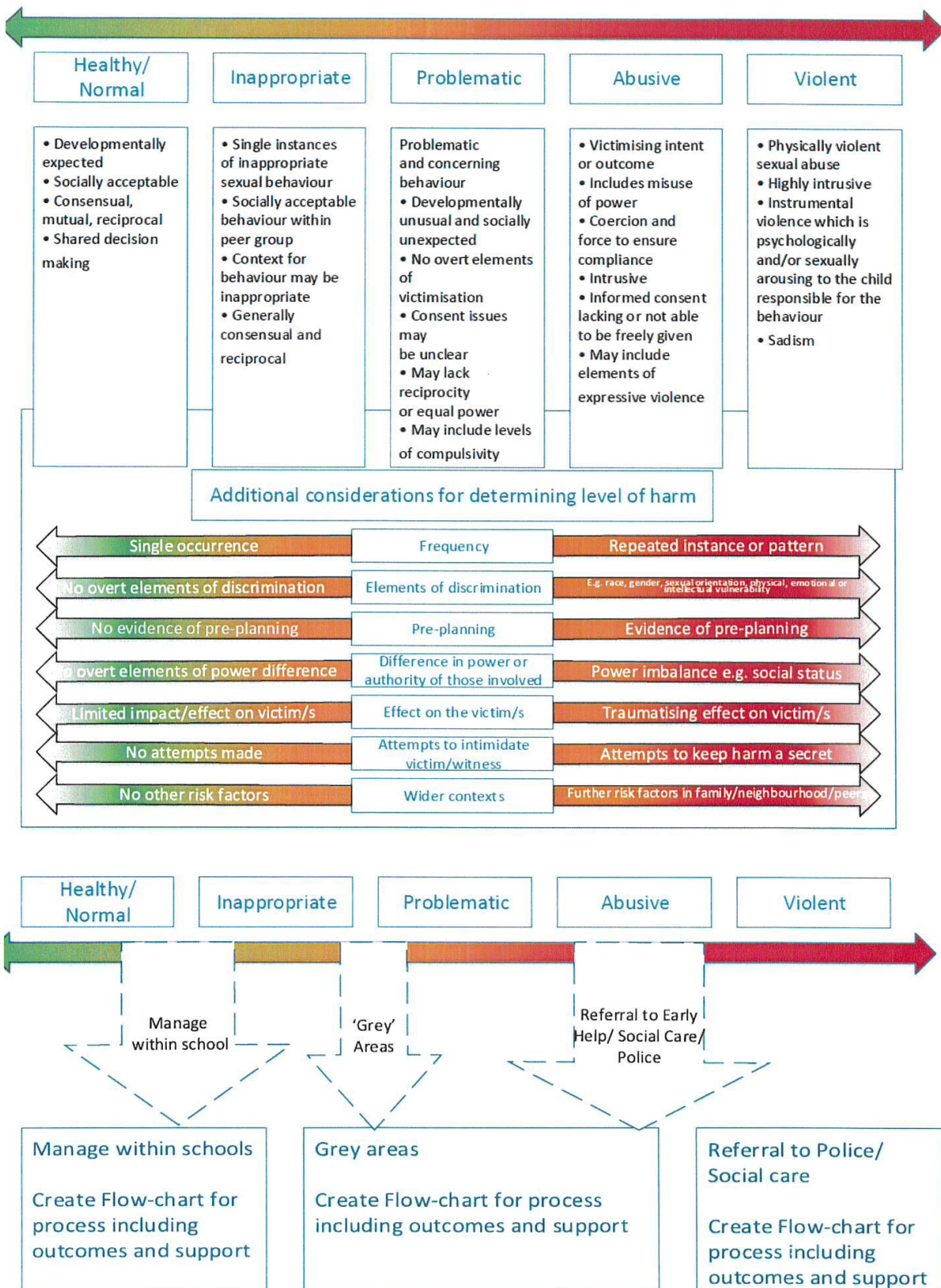
ALL green, amber and red behaviours require some form of attention and response, it is the level of intervention that varies.

<p>What is a green behaviour? Green behaviours reflect safe and healthy sexual development. They are displayed between young people of similar age or developmental ability and reflective of natural curiosity, experimentation, consensual activities and positive choices.</p> <p>What you can do? Green behaviours provide opportunities to give feedback and additional information.</p> <p>Green behaviours 13-17</p> <ul style="list-style-type: none"> • solitary masturbation • sexually explicit conversations with peers • obscenities and jokes within the current cultural norm • interest in erotica/pornography • use of internet/e-media to chat online • having sexual or non-sexual relationships • sexual activity including hugging, kissing, holding hands • consenting oral and/or penetrative sex with others of the same or opposite gender who are of similar age and developmental ability • choosing not to be sexually active 	<p>What is an amber behaviour? Amber behaviours have the potential to be outside of safe and healthy behaviour. They may be of potential concern due to age, or developmental differences. A potential concern due to activity type, frequency, duration or context in which they occur.</p> <p>What can you do? Amber behaviours signal the need to take notice and gather information to assess the appropriate action.</p> <p>Amber behaviours 13-17</p> <ul style="list-style-type: none"> • accessing exploitative or violent pornography • uncharacteristic and risk-related behaviour, e.g. sudden and/or provocative changes in dress • withdrawal from friends, mixing with new or older people, having more or less money than usual, going missing • concern about body image • taking and sending naked or sexually provocative images of self or others • single occurrence of peeping, exposing, mooning or obscene gestures • giving out contact details online • joining adult-only social networking sites and giving false personal information 	<p>What is a red behaviour? Red behaviours are outside of safe and healthy behaviour. They may be excessive, secretive, compulsive, coercive, degrading or threatening and involving significant age, developmental or power differences. They may pose a concern due to the activity, type, frequency, duration or context in which they occur.</p> <p>What can you do? Red behaviours indicate a need for immediate intervention and action.</p> <p>Red behaviours 13-17</p> <ul style="list-style-type: none"> • exposing genitals or masturbating in public • preoccupation with sex, which interferes with daily function • sexual degradation/humiliation of self or others • attempting/forcing others to expose genitals • sexually aggressive/exploitative behaviour • sexually explicit talk with younger people • sexual harassment • non-consensual sexual activity • use of/acceptance of power and control in sexual relationships • genital injury to self or others • sexual contact with others where this is a big difference in age or ability
---	--	---



	<ul style="list-style-type: none"> • arranging a face-to-face meeting with an online contact alone 	<ul style="list-style-type: none"> • sexual activity with someone in authority and in a position of trust • sexual activity with family members
--	---	---

Appendix 13 – Referral Pathways



Appendix 14 – Concerns that do not meet the harm threshold (low-level concerns about staff)

The section is based on Keeping Children Safe in Education (KCSIE) 2025 Part Four: Allegations made against, or concerns raised in relation to teachers, including supply teachers, other staff, volunteers and contractors, Section 2: Concerns that do not meet the harm threshold. This section applies to all concerns (including allegations) about members of staff, including supply teachers, volunteers and contractors, which do not meet the harm threshold set out in KCSIE Part Four, Section 1.

Concerns may arise through, for example:

- Suspicion
- Complaint
- Disclosure(s) made by a young person, LA/carer or other adult within or outside the school
- Pre-employment vetting checks

We recognise the importance of responding to, and dealing with, any concerns in a timely manner to safeguard the welfare of young people.

Traffic light system for identifying the spectrum of behaviour in staff

Allegations that may meet the harms threshold – covered in KCSIE Part Four Section 1:

Allegation

Behaviour which indicates that an adult who works with children 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 they 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.

Allegations/concerns that do not meet the harms threshold – covered in KCSIE Part Four Section 2 – and referred to in this guidance as ‘low-level concerns’:

Low-Level Concern

Does not mean that it is insignificant, it means that the adult’s behaviour towards a child does not meet the threshold set out above. A low-level concern is any concern – no matter how small, and even if no more than causing a sense of unease or a ‘nagging doubt’ – that an adult may have acted in a way that:

- is inconsistent with an organisation’s staff code of conduct, including inappropriate conduct outside of work, and
- does not meet the allegation threshold, or is otherwise not serious enough to consider a referral to the LADO - but may merit consulting with and seeking advice from the LADO, and on a no-names basis if necessary.

Appropriate conduct:

Appropriate Conduct

Behaviour which is entirely consistent with the organisation’s staff code of conduct, and the law.



Definition of low-level concerns

The term 'low-level' concern is any concern – no matter how small – that an adult working in or on behalf of the school may have acted in a way that:

- is inconsistent with the staff code of conduct, including inappropriate conduct outside of work, **and**
- does not meet the allegations threshold or is otherwise not considered serious enough to consider a referral to the designated officer at the local authority.

Examples of such behaviour could include, but are not limited to:

- being overly friendly with young people
- having favourites
- taking photographs of young people on their mobile phone
- engaging with a young person on a one-to-one basis in a secluded area or behind a closed door
- using inappropriate sexualised, intimidating or offensive language

Sharing low-level concerns

We recognise the importance of creating a culture of openness, trust and transparency to encourage all staff to share low-level concerns so that they can be addressed appropriately.

All low-level concerns will be ultimately received by the headteacher to ensure that we identify and record properly any potential patterns of behaviour, where upheld. (Any issues concerning the headteacher will be received by the chair of governors).

We will create this culture by:

- ensuring staff are clear about what appropriate behaviour is, and are confident in distinguishing expected and appropriate behaviour from concerning, problematic or inappropriate behaviour, in themselves and others
- empowering staff to share any low-level concerns in line with the Whistleblowing Policy
- empowering staff to self-refer where appropriate
- addressing unprofessional behaviour and supporting the individual to correct it at an early stage
- providing a responsive, sensitive and proportionate handling of such concerns when they are raised
- helping to identify any weakness in the school's safeguarding system

Responding to low-level concerns

If the concern is raised via a third party, the headteacher (or the chair of governors in the case of concerns about the headteacher) will collect evidence where necessary by speaking:

- directly to the person who raised the concern, unless it has been raised anonymously
- to the individual involved and any witnesses

The headteacher (or chair of governors) will use the information collected to categorise the type of behaviour and determine any further action, if any, in line with the school's Code of Conduct Policy.

Record keeping

All low-level concerns will be recorded in writing. In addition to details of the concern raised, records will include the context in which the concern arose, any action taken and the rationale for decisions and actions taken.

Records will be:

- kept confidential, held securely and comply with the Data Protection Act 2018 and UK GDPR
- reviewed so that potential patterns of concerning, problematic or inappropriate behaviour can be identified. Where a pattern of such behaviour is identified, we will decide on a course of action, either through our disciplinary procedures or, where a pattern of behaviour moves from a concern to meeting the harms threshold as described in KCSIE Part Four, Section 1, we will refer it to the designated officer and the local authority
- retained at least until the individual leaves employment at the school

Where a low-level concern relates to a supply teacher or contractor, we will notify the individual's employer, so any potential patterns of inappropriate behaviour can be identified.

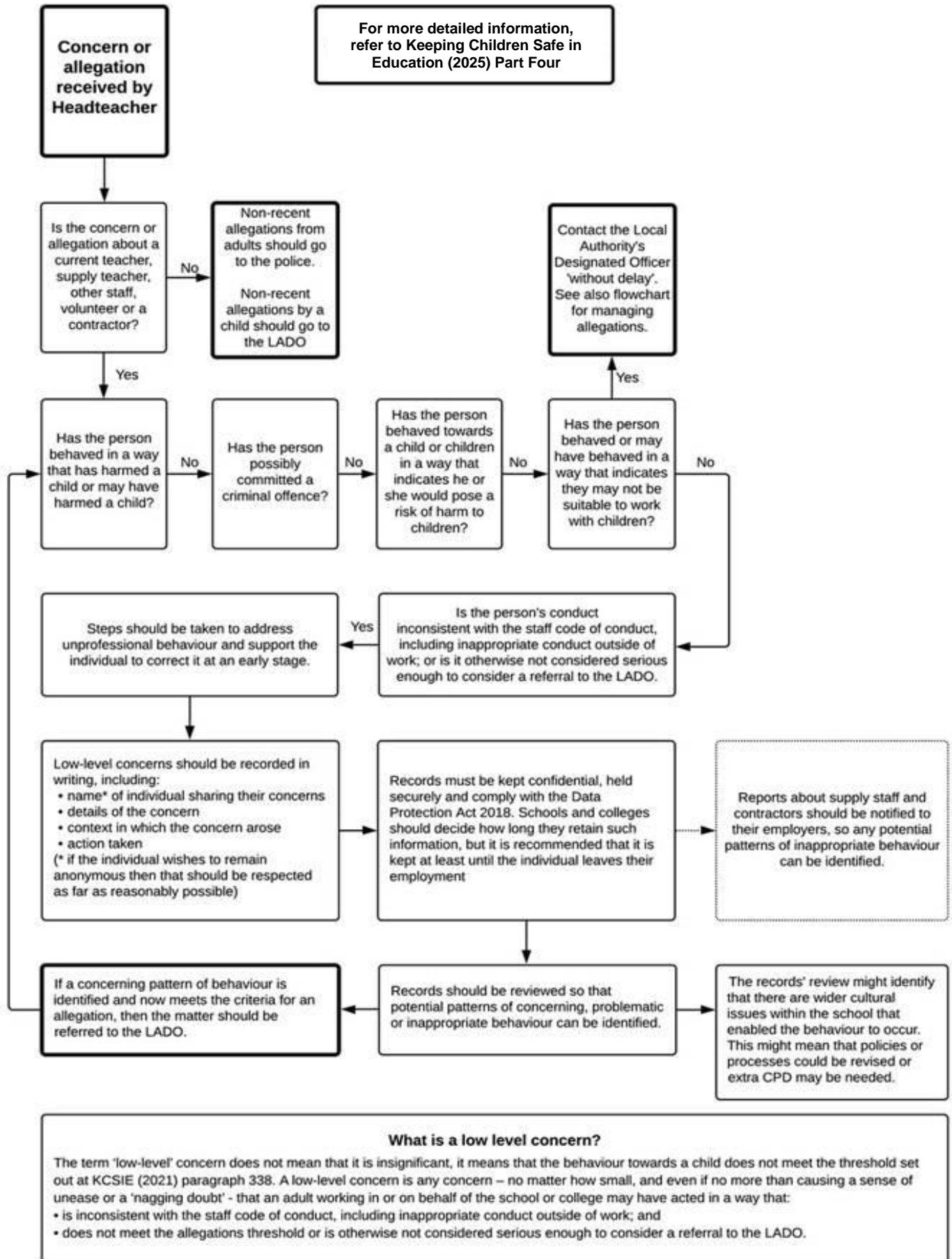
References

We will not include low-level concerns in references unless:

- the concern (or group of concerns) has met the threshold for referral to the designated officer at the local authority and is found to be substantiated; and/or
- the concern (or group of concerns) relates to issues which would ordinarily be included in a reference, such as misconduct or poor performance

This appendix should be read in conjunction with the most recent version of Keeping Children Safe in Education, the Code of Conduct Policy and the Whistleblowing Policy.





What is a low level concern?

The term 'low-level' concern does not mean that it is insignificant, it means that the behaviour towards a child does not meet the threshold set out at KCSIE (2021) paragraph 338. A low-level concern is any concern – no matter how small, and even if no more than causing a sense of unease or a 'nagging doubt' - that an adult working in or on behalf of the school or college may have acted in a way that:

- is inconsistent with the staff code of conduct, including inappropriate conduct outside of work; and
- does not meet the allegations threshold or is otherwise not considered serious enough to consider a referral to the LADO.

