

Child Protection and Safeguarding Policy

Divad Training

Policy Review

This policy will be reviewed in full on an annual basis.

We follow the procedures outlined in Keeping Children Safe in Education September 2018 and Working Together to Safeguard Children July 2018

Signature

Director: David Joseph Date: 10th October 2018

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1. INTRODUCTION

Shaping Policy

Staff within Divad Training will be shaping policy and considering all of the vulnerability factors that apply to the setting as young people 16 plus are introduced.

Contextual Safeguarding

Safeguarding will be considered in the wider context taking in to account the whole social sphere of the subject concerned.

Safeguarding is defined as protecting children from maltreatment, preventing impairment of health and/or development, ensuring that children grow up in the provision of safe and effective care and optimising children's life chances.

This Child Protection and Safeguarding Policy forms part of a suite of documents and policies which relate to the safeguarding responsibilities of the company.

In particular this policy should be read in conjunction with the Safer Recruitment Policy, Behaviour Policy, Online Safety Policy and Anti Bullying Policy.

Purpose of a Child Protection Policy	To inform staff, parents, volunteers and committee about the company's responsibilities for safeguarding children. To enable everyone to have a clear understanding of how these responsibilities should be carried out.
Enfield's Safeguarding Children Board Child Protection Procedures	The company follows the procedures established by Enfield's Safeguarding Children Board; the London Safeguarding Children Board and the replacement for the Safeguarding Children Board under the Children and Social Work Act 2017 which will comprise of the three local safeguarding partners (Local Authority, Police, Clinical Commissioning Groups and relevant agencies which could include schools) which must be in place by September 2019
Company Staff & Volunteers	All company staff and volunteers are particularly well placed to observe outward signs of abuse, changes in behaviour and failure to develop because they have daily contact with children. All company staff and volunteers will receive annual child protection training, so that they are knowledgeable and aware of their role in the early recognition of the signs and symptoms of abuse or neglect and of the appropriate procedures to follow.
Mission Statement	<ul style="list-style-type: none">• Establish and maintain an environment where children feel secure, are encouraged to talk, and are listened to when they have a worry or concern.• Establish and maintain an environment where company staff and volunteers feel safe, are encouraged to talk and are listened to when they have concerns about the safety and well being of a child.• Ensure children know that there are adults in the company whom they can approach if they are worried.• Ensure that children who have been abused will be supported in line with a child protection plan, where deemed necessary.• Include opportunities in the PSHE curriculum for children to develop the skills they need to recognise and stay safe from abuse including online safety.• Establish a 'Could happen here' culture amongst staff and other members of the Divad Training community.

2. STATUTORY FRAMEWORK

In order to protect children from harm Divad Training will act in accordance with the following legislation and guidance:

Education

The Children Act 1989 & 2004

Education Act 2002

The Education Regulations 2003, 2007, 2011, 2012 & 2014

The Further Education Regulations 2006

The School Staffing Regulations 2009

The Children and Families Act 2014

Working Together to Safeguard Children – A guide to inter-agency working to safeguard and promote the welfare of children (HM Government July 2018)

DfE guidance Keeping Children Safe in Education (September 2018)

Dealing with Allegations of Abuse Against Teachers and Other Staff (DfE 2012)

UK Council for Child Internet Safety

Prevent Duty Guidance in England and Wales

UK Safer Internet Centre – Appropriate Filtering and Monitoring

Police

Police Act 1997

The Sexual Offences Act 2003

Counter Terrorism and Security Act (2015)

Other

Safeguarding Vulnerable Groups Act 2006

Protection of Freedoms Act 2012

Equality Act 2010

The Rehabilitation of Offenders Act 1975

Data Protection Act 2018

HM Government 'Working Together to Safeguard Children' (HM Government 2018) requires the Divad Training to follow the procedures for protecting children from abuse in line with government guidance. Schools and Children's Centres are also expected to ensure that they have appropriate procedures in place for responding to situations in which they believe that a child has been abused or are at risk of abuse - these procedures should also cover circumstances in which a member of staff is accused of, or suspected of, abuse.

DfE guidance Safeguarding Children and Safer Recruitment in Education (2018) places the following responsibilities: -

- Divad Training should be aware of and follow the procedures established by the London Safeguarding Children Board.
- Staff should be alert to signs of abuse and know to whom they should report any concerns or suspicions. Staff should adopt an, 'it could happen here' mentality. (A good source of advice for recognising the signs of abuse is the NSPCC website as recommended in keeping Children safe in Education 2018).
- Divad Training should have procedures (of which all staff are aware) for handling suspected cases of abuse of pupils, including procedures to be followed if a member of staff is accused of abuse, or suspected of abuse
- A Designated Senior Person should have responsibility for co-ordinating action within Divad Training and liaising with other agencies
- Staff with designated responsibility for Child Protection should receive appropriate training every 2 years with annual updates

DfE guidance Keeping Children Safe in Education (2018) also states that “Everyone who comes in to contact with children and their families has a role to play. In order to fulfil this responsibility effectively, all practitioners should make sure their approach is child-centred. This means that they should consider, at all times, what is in the best interests of the child.”

3. THE DESIGNATED SAFEGUARDING LEAD

The role of the Designated Safeguarding Lead within the company’s Senior Leadership Team can not be delegated to others and is explicit in their job description

The safeguarding team consists of the following members of staff who meet regularly to discuss children who have been brought to the attention of the team. These children are monitored closely and referrals are made should they meet the necessary thresholds.

The Designated Safeguarding Lead is:

NAME: Jacqueline AIYELA

The Deputy Designated Safeguarding Lead is:

NAME: Narayan SAH

The Deputy Designated Safeguarding Lead is:

NAME: David JOSEPH

(Photographs of designated staff are displayed in our setting and visitors signposted to these and our safeguarding procedures as and when appropriate or as part of their induction.)

It is the role of the Designated Safeguarding Lead for Child Protection to:

- Ensure that he/she receives refresher training at two yearly intervals to keep his or her knowledge and skills up to date, there should also be updates at least annually.
- Ensure that all staff who work with children undertake appropriate training to equip them to carry out their responsibilities for child protection effectively and that this is kept up to date by refresher training on an annual basis. All staff will also have read Part 1 of the government’s guidance ‘Keeping Children Safe in Education September 2018. All staff who have direct contact with children in addition must read Annex A – All staff will sign a register to show they have read the relevant parts. Staff at induction will also be required to read the relevant parts and sign in addition to the staff code of conduct.
- Ensure that all staff understand the role of the Designated Safeguarding Lead.
- Ensure that newly appointed staff receive a safeguarding induction.
- Ensure that temporary staff and volunteers are made aware of the company’s safeguarding arrangements.
- Ensure that the company operates within the legislative framework and recommended guidance.
- Ensure that all staff and volunteers are aware of the London Safeguarding Children Board.
- Ensure the prevention of people being drawn in to terrorism known as the ‘Prevent Duty’ S26 Counter Terrorism and Security Act 2015– this includes both violent and non-violent extremism which can create an atmosphere conducive to terrorism and can popularise views which terrorists exploit.
- Develop effective working relationships with other agencies and services.
- Decide whether to take further action about specific concerns (e.g. refer to MASH team or Social Care).
- Liaise with social care teams over suspected cases of child abuse.
- Ensure that accurate records relating to individual children are kept separate from the academic file in a secure place and marked 'Strictly Confidential' and that these records are passed securely should the child transfer to a new provision.
- Submit reports to, ensure the company’s attendance at Child Protection Conferences and contribute to decision making and delivery of actions planned to safeguard the child.

- Ensure that the company effectively monitors children about whom there are concerns, including notifying relevant services of the absence of a child who is the subject of a child protection plan.
Provide guidance to parents, children and staff about obtaining suitable support.
- Contributing to an Early Help offer with social care, the police and health services

4. THE COMPANY DIRECTORS

The Company Directors have overall responsibility for ensuring that there are sufficient measures in place to safeguard the children in their establishment. All committee members and directors will now need an Enhanced DBS check.

In particular the Company Directors must ensure:

- Divad Training has an up to date Safeguarding policy and procedures.
- Acceptable use of ICT (incorporating use of mobile phones which in Annex C of Keeping Children Safe in Education 2018 outlines Divad Training's responsibility relating to children using their own mobile phones of 3G or 4G whilst on company courses and social media etc).
- Safer recruitment procedures and having at least one panel member who has been trained in Safer Recruitment
- Appointment of a designated safeguarding lead who is a senior member of the company leadership team
- Relevant child protection training for company staff/volunteers is attended.
- Safe management of allegations.
- Deficiencies or weaknesses in child protection arrangements are remedied without delay.
- Safeguarding policies and procedures are reviewed annually and information provided to the local authority about them and about how the above duties have been discharged.
- Divad Training will utilise the experiences and expertise of their staff when shaping safeguarding policies, with opportunity given for staff to provide their contributions.
- Divad Training will ensure appropriate filters and appropriate online monitoring systems are in place. This includes attention to 'over-blocking' which may lead to unreasonable restrictions to what children can be taught.
- Divad Training should ensure that children are taught about safeguarding, including online, through teaching and learning opportunities, as part of providing a broad and balanced curriculum.

5. COMPANY PROCEDURES

The company has a clear approach to early intervention and, as such, all company staff should identify children who would benefit from 'early help'. If any member of staff is concerned about a child he or she must inform the Designated Safeguarding Lead.

The member of staff must record information regarding the concerns on the same day. The recording must be a clear, precise, factual account of the observations on a specific reporting form.

The Designated Safeguarding Lead will decide whether the concerns should be referred to relevant services. Where necessary a call to the Local Authority's consultation line will be made to seek further advice. If it is decided to make a referral to MASH this will be done with prior discussion with the parents, unless to do so would place the child at further risk of harm.

The Designated Safeguarding Lead will document reasons for decisions relating to child protection and safeguarding

The Designated Safeguarding Lead will follow up all statutory assessments and if information is not forthcoming institute any local escalation procedures (KCSiE 2018 Part 1: 32). All concerns, discussions and decisions made, and the reasons for those decisions, should be recorded in writing (KCSiE Part 1:36)

Attendance and Company Transfer

Attention will be paid to the attendance and development of any child about whom the company has concerns, or who has been identified as being the subject of a child protection/child in need plan (formerly referred to as the Child Protection Register) and a written record will be kept.

If a pupil who is/ or has been the subject of a child protection plan changes company, the Designated Safeguarding Lead will inform the social worker responsible for the case and transfer the appropriate records to the Designated Senior Person at the receiving company, in a secure manner, and separate from the child's academic file.

Intimate Care Procedures

If a child needs the assistance of an adult to change their underwear or remove their underclothes due to wetting themselves or to investigate an injury, it must be done in the presence of another adult. (See also Intimate Care Policy.)

Security Passes

Each member of staff is issued with a security pass in order to gain access to the grounds and company building. Please let a senior member of staff know if you lose your pass in order to prevent inappropriate access.

Visitors

All visitors must sign in and wear a visitors' badge. They must also read and comply with the visitors expectations prior to entry. By signing the visitors' book, visitors are agreeing to comply with each company's guidelines for safeguarding children.

Special Educational Needs & Disability

In line with evidence, children with special educational needs and disabilities are at an increased risk of abuse. There are fewer signs and indicators and more possible explanations. Children with communication difficulties may be especially vulnerable.

Children and young people with special educational needs and disabilities can face additional safeguarding challenges because:

- There may be assumptions that indicators of possible abuse such as behaviour; mood and injury relate to the child's disability without further exploration;
- Children with SEN and disabilities can be disproportionately impacted by things like bullying without outwardly showing any signs; and
- Difficulties may arise in overcoming communication barriers.

At the Divad Training, we identify pupils who might need more support to be kept safe or keep themselves safe by:

- Implementation of behaviour plans
- Professional team meetings involving both the pastoral and SEND teams
- Clear communication through the online reporting system,
- A whole company approach.

6. MOBILE PHONES

As stated in our ICT, Online Safety and Acceptable Use Policies (amongst others), mobile phones and personally-owned devices will not be used in any way during lessons or formal company time (A requirement KCSiE 2018 Annex C policy on use of 3G and 4G during company hours). They should be on silent and kept in a bag/cupboard at all times. Staff phones should be on silent and not used during training.

7. WHEN TO BE CONCERNED

All staff and volunteers should be aware that the main categories of abuse are:

- Physical abuse
- Emotional abuse
- Sexual abuse
- Neglect

All staff and volunteers should be concerned about a child if he/she presents with indicators of possible significant harm – **see Appendix 1 for details.**

Generally, in an abusive relationship the child may:

- Appear frightened of the parent/s or other household members e.g. siblings or others outside of the home
- Act in a way that is inappropriate to her/his age and development (full account needs to be taken of different patterns of development and different ethnic groups)
- Display insufficient sense of 'boundaries', lack stranger awareness
- Appear wary of adults and display 'frozen watchfulness'

8. DEALING WITH A DISCLOSURE

If a child discloses that he or she has been abused in some way, the member of staff / volunteer should use the following strategies or at least have an awareness of the **TED** technique (Tell, Explain, Describe):

- Listen to what is being said without displaying shock or disbelief
- Accept what is being said
- Allow the child to talk freely
- Reassure the child, but not make promises which it might not be possible to keep
- Not promise confidentiality – it might be necessary to refer to Social Care
- Reassure him or her that what has happened is not his or her fault
- Stress that it was the right thing to tell
- Listen, rather than ask direct questions
- Not criticise the alleged perpetrator
- Explain what has to be done next and who has to be told
- Make a written record (see Record Keeping)
- Pass information to the Designated Safeguarding Lead without delay

Support

Dealing with a disclosure from a child, and a child protection case in general, is likely to be a stressful experience. The member of staff/volunteer should, therefore, consider seeking support for him/herself and discuss this with the Designated Safeguarding Lead.

9. CONFIDENTIALITY

Safeguarding children raises issues of confidentiality that must be clearly understood by all staff/volunteers in company.

- All staff in company, both teaching and non-teaching staff, have a responsibility to share relevant information about the protection of children with other professionals, particularly the investigative agencies (Social Care and the Police).
- If a child confides in a member of staff/volunteer and requests that the information is kept secret, it is important that the member of staff/volunteer tell the child in a manner appropriate to the child's age/stage of development that they cannot promise complete confidentiality – instead they must explain that they may need to pass information to other professionals to help keep the child or other children safe.
- Staff/volunteers who receive information about children and their families in the course of their work should share that information only within appropriate professional contexts.

10. RECORD KEEPING

When a child has made a disclosure, the member of staff/volunteer should:

- Make brief notes as soon as possible after the conversation
- Not destroy the original notes in case they are needed by a court
- Record the date, time, place and any noticeable non-verbal behaviour and the words used by the child
- Draw a diagram to indicate the position of any bruising or other injury
- Record statements and observations rather than interpretations or assumptions
- Use the appropriate reporting form

All records need to be given to the Designated Safeguarding Lead promptly. No copies should be retained by the member of staff or volunteer.

11. ALLEGATIONS INVOLVING COMPANY/STAFF/VOLUNTEERS

Whenever it is alleged that a member of staff/volunteer has:

- Behaved in a way that has, or may have harmed a child
- Possibly committed a criminal offence against/related to a child
- Behaved toward a child in a way which indicates s/he would pose a risk of harm to children.

The person receiving the allegation must take it seriously and immediately inform the Managing Director.

If any member of staff/volunteer has reason to suspect that another member of staff/volunteer may have abused a child at the company, or elsewhere, they must immediately inform the Managing Director.

They should also make a written record of the allegation using the informant's words - including time, date and place where the alleged incident took place, what was said and anyone else present. This record should be signed and dated and immediately passed on to the Managing Director.

If the concerns are about the Managing Director, then the Enfield LADO (Local Authority Designated Officer) should be contacted 020 8379 2746. Police CAIT Child Abuse Investigation Team 020 8733 5139

The Managing Director will not investigate the allegation itself, or take written or detailed statements, but he/she will assess whether it is necessary to refer to Children Schools and Families in consultation with the Local Authority Designated Officer (020 8279 2746))

If it is decided that the allegation warrants further action through Child Protection Procedures the Managing Director must immediately make a referral so that the allegation can be investigated in accordance with procedures.

If it is decided that it is not necessary to refer to Children Schools and Families, the Managing Director and Local Authority Designated Officer will consider whether there needs to be an internal investigation.

The Managing Director should, as soon as possible, **following briefing** from the Local Authority Designated Officer inform the subject of the allegation.

If a person, in regulated activity, is dismissed or removed due to a safeguarding concern (or would have been had they not resigned) then a referral must be made to the Disclosure and Barring Service.

Whistleblowing

Where there are concerns about the way that safeguarding is carried out in the company, staff should refer to the Whistleblowing Policy. A whistleblowing disclosure must be about something that affects the general public such as:

- A criminal offence has been committed, is being committed or is likely to be committed
- A legal obligation has been breached
- There has been a miscarriage of justice
- The health and safety of any individual has been endangered
- The environment has been damaged
- Information about any of the above has been concealed.

The NSPCC runs a whistleblowing helpline on behalf of the Home Office, the number is 0808 800 5000.

12. SAFER RECRUITMENT

The company has a robust approach to safer recruitment. We have robust procedures that help to deter, reject and identify people that might abuse children. The Governing Body along with the Managing Director make decisions about the suitability of the prospective employee based on checks and evidence including: DBS checks, barred list checks and prohibition checks together with references and interview information. For all appointments of staff and volunteers engaging in regulated activity, an enhanced DBS certificate, which includes barred list information, will be required. In addition to obtaining a DBS certificate, anyone who is appointed to carry out teaching work will require an additional check to ensure they are not prohibited from teaching.

Regulated activity includes:

Teaching, training, instructing, caring for or supervising children if the person is unsupervised, or providing advice or guidance on well-being, or driving a vehicle only for children.

Work for a limited range of establishments, with the opportunity for contact with children, but not including work done by supervised volunteers.

Relevant personal care, or health care provided by or provided under the supervision of health care provision.

The company keeps a single central record of all staff, trainees and volunteers. The following checks are carried out, recorded and dated – identity, barred list, enhanced DBS certificate, prohibition from teaching, checks on people living or working outside the UK, professional qualifications and right to work in the UK. Prohibition checks must be undertaken for everyone in ‘teaching work’, not just those with QTS. Checks must also be made to the NCTL Teacher Services System for any restrictions imposed by countries in the European Economic Area.

For supply staff, the company obtains vetting confirmation that the agency has carried out the relevant checks. Company must also check that an agency worker presenting at the company is the same person for whom the agency has provided checks for.

Under no circumstances are volunteers, not subject to any checks, allowed to be left unsupervised or allowed to work in regulated activity.

Disqualification by Association

Up until 31st August 2018, schools and providers had a duty to check each member of staff, alongside all members of their household, for disqualification under the Childcare Act 2006. From September, these regulations have been amended and there is now an expectation that all staff make a self-declaration if a member of their household is disqualified. A record of staff covered by the Act and the date in which staff were informed of this change is recorded on the company’s SCR.

13. CHILDREN MISSING FROM EDUCATION

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

The company will inform the LA of any pupil who is going to be deleted from the admission register where they:

- Have been taken out of company by their parents and are being educated outside the company system e.g. home education.
- Have ceased to attend company and no longer live within reasonable distance
- Have been certified by a medical officer as unlikely to be in a fit state of health to attend training before ceasing to be of compulsory school age, and neither they nor their parent has indicated the intention to continue to attend the training after ceasing to be of compulsory school age.

- Are in custody for a period of more than four months due to a final court order and the proprietor does not reasonably believe they will be returning to the training at the end of that period.
- Have been permanently excluded.

14. CHILD SEX EXPLOITATION

Child sex exploitation (CSE) involves exploitative situations, contexts and relationships where young people receive something (e.g. accommodation, drugs, alcohol, gifts, or in some cases simply affection) as a result of engaging in sexual activities. Sexual exploitation involves varying degrees of coercion, intimidation or enticement, including unwanted pressure from peers to have sex, sexual bullying including cyberbullying and grooming. However, it is also important to recognise that some young people who are being sexually exploited do not exhibit any external signs of this abuse. (See Appendix 1 for further signs of Sexual Abuse.)

Staff should be aware of the key indicators of children being sexually exploited which can include:

- Going missing for periods of time or regularly coming home late
- Regularly missing school or education or not taking part in education
- Appearing with unexplained gifts or new possessions
- Associating with other young people involved in exploitation
- Having older boyfriends or girlfriends
- Suffering from sexually transmitted infections
- Mood swings or changes in emotional wellbeing
- Displaying inappropriate sexualised behaviour
- Drug and alcohol misuse.

15. FEMALE GENITAL MUTILATION

If staff have a concern regarding an act of FGM that appears to have been carried out or they suspect there is the potential for FGM to take place there is a statutory duty upon each individual to personally report to the police. (More information regarding this can be obtained from the pastoral team.)

FGM may be likely if there is a visiting female elder, there is talk of a special procedure or celebration to become a woman, or parents wish to take their daughter out of training to visit an 'at risk' country (especially before the summer holidays), or parents wish to withdraw their children from learning about FGM.

Indications that FGM may have already taken place may include:

- Difficulty walking, sitting or standing and may even look uncomfortable
- Spending longer than normal in the bathroom or toilet due to difficulties urinating
- Spending long periods of time away from the classroom during the day with bladder or menstrual problems
- Frequent urinary, menstrual or stomach problems
- Prolonged or repeated absences from training, especially with noticeable behaviour changes on return
- Reluctance to undergo normal medical examinations
- Confiding in a professional without being explicit about the problem due to embarrassment or fear.

16. COUNTER TERRORISM AND SECURITY ACT 2015 (THE PREVENT DUTY)

Preventing radicalisation is part of the company's wider safeguarding duties and should be viewed as similar in nature to protecting children from other forms of harm and abuse. Radicalisation refers to the process by which a person comes to support terrorism and forms of extremism. There is no single way of identifying an individual who is likely to be susceptible to an extremist ideology, but all staff must remain vigilant in monitoring changes in behaviour, language used and possible exposure to inappropriate material on TV, online and/or via social media. (Reference to this can also be found in the company's Online Safety Policy.)

From 1st July 2015 specified authorities, including schools and publicly funded organisations such as Divad Training, are subject to the Prevent Duty. All staff have been issued with copies of this guidance, which also now forms part of the company's induction for new staff (see staff handbook). The statutory Prevent guidance summarises the requirements on schools and colleges in terms of four general themes: risk assessment, working in partnership, staff training and IT policies.

- Schools, colleges and training providers are expected to assess the risk of children being drawn in to terrorism, including support for extremist ideas that are part of terrorist ideology. Staff are aware of the procedures in line with our usual safeguarding protocols.
- There is an expectation that the company's Designated Safeguarding Lead, as well as others with safeguarding responsibilities (where appropriate), undertakes Prevent awareness training in line with other safeguarding training requirements in order to provide advice and support to other members of staff on protecting children from the risk of radicalisation.
- The company's filtering is monitored on a regular basis to ensure that children are safe from terrorist and extremist material when accessing the internet in school. This plays a key part in the school's ongoing approach to online safety.

17. HONOUR BASED VIOLENCE

Honour based violence is a violent crime or incident which may have been committed to protect or defend the honour of the family or community. It is often linked to family members or acquaintances who mistakenly believe someone has brought shame to their family or community by doing something that is not in keeping with the traditional beliefs of their culture. Women and girls are the most common victims of honour based violence however it can also affect men and boys. Crimes of honour do not always include violence. Crimes committed might include:

- **Domestic abuse**
- **Threats of violence**
- **Sexual or psychological abuse**
- **Forced marriage (illegal throughout England and Wales)**
- **Being held against your will or taken somewhere you don't want to go**
- **Assault.**

Incidents of honour based crime are treated very seriously and are dealt with sensitively and confidentially.

18. PEER ON PEER ABUSE (INCLUDING SEXTING)

There is no clear boundary between incidents that should be regarded as abusive and incidents that are more properly dealt with as bullying, sexual experimentation etc. This is a matter of professional judgement.

If one child or young person causes harm to another, this should not necessarily be dealt with as abuse: bullying, fighting and harassment between children are not generally seen as child protection issues. However, it may be appropriate to regard a young person's behaviour as abusive if:

- There is a large difference in power (for example age, size, ability, development) between the young people concerned; or
- The perpetrator has repeatedly tried to harm one or more other children; or
- There are concerns about the intention of the alleged perpetrator.

If the evidence suggests that there was an intention to cause severe harm to the victim, this should be regarded as abusive whether or not severe harm was actually caused.

The Sexually Harmful Behaviour Team in the Youth Offending Service can offer information and guidance to help practitioners distinguish between age appropriate and abusive sexual behaviour.

Whilst professionals refer to the issue as 'sexting' there is no clear definition of 'sexting'. Many professionals consider sexting to be 'sending or posting sexually suggestive images, including nude or semi-nude photographs, via mobiles or over the Internet.' Yet when young people are asked 'What does sexting mean to you?' they are more likely to interpret sexting as 'writing and sharing explicit messages

with people they know'. Similarly, many parents think of sexting as flirty or sexual text messages rather than images.

Creating and sharing sexual photos and videos of under-18s is illegal and therefore causes the greatest complexity for schools and other agencies when responding. It also presents a range of risks which need careful management.

On this basis, the school refers to the phrase 'youth produced sexual imagery' and uses this instead of 'sexting.' This is to ensure clarity about the issues this advice addresses.

'Youth produced sexual imagery' best describes the practice because:

- 'Youth produced' includes young people sharing images that they, or another young person, have created of themselves.
- 'Sexual' is clearer than 'indecent.' A judgement of whether something is 'decent' is both a value judgement and dependent on context.
- 'Imagery' covers both still photos and moving videos (and this is what is meant by reference to imagery throughout the document).

The types of incidents which this advice covers are:

- A person under the age of 18 creates and shares sexual imagery of themselves with a peer under the age of 18
- A person under the age of 18 shares sexual imagery created by another person under the age of 18 with a peer under the age of 18 or an adult
- A person under the age of 18 is in possession of sexual imagery created by another person under the age of 18

Although the production of such imagery will likely take place outside of school and college, these issues often manifest in schools, colleges and organisations working with children and young people. The school will respond swiftly and confidently to ensure that children are safeguarded, supported and educated.

19. CHILD ON CHILD SEXUAL VIOLENCE AND SEXUAL HARASSMENT

Can occur between two children of any age and sex. It can also occur through a group of children sexually assaulting or sexually harassing a single child or group of children.

Sexual Violence

- Rape
- Assault by Penetration
- Sexual Assault

Sexual Harassment

- 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; physical behaviour, such as: deliberately brushing against someone, interfering with someone's clothes (schools and colleges should be considering when any of this crosses a line into sexual violence - it is important to talk to and consider the experience of the victim)
- Displaying pictures, photos or drawings of a sexual nature; and online sexual harassment. This may be standalone, or part of a wider pattern of sexual harassment and/or sexual violence.

It may include:

- Non-consensual sharing of sexual images and videos; sexualised online bullying; unwanted sexual comments and messages, including, on social media; and sexual exploitation; coercion and threats

20. PRIVATE FOSTERING ARRANGEMENTS

A private fostering arrangement is one that is made privately (without the involvement of a Local Authority) for the care of a child under the age of 16 years (under 18 if disabled) by someone other than a parent or close relative, in their own home, with the intention that it should last for 28 days or more.

A close family member is defined as a 'grandparent, brother, sister, uncle or aunt' and includes half-siblings and step-parents; it does not include great-aunts or uncles, great grandparents or cousins.

Parents and private foster carers have a legal duty to inform the relevant local authority at least 6 weeks before the arrangement is due to start; not to do so is a criminal offence.

Whilst most privately fostered children are appropriately supported and looked after, they are a potentially vulnerable group who should be monitored by the local authority, particularly when the child has come from another country. In some cases, privately fostered children are affected by abuse and neglect, or be involved in trafficking, child sexual exploitation or modern-day slavery.

Schools have a mandatory duty to report to the Local Authority where they are aware or suspect that a child is subject to a private fostering arrangement. Divad Training will also undertake to inform the Local Authority. Although schools have a duty to inform the Local Authority, there is no duty for anyone, including the private foster carer or social workers to inform the school. However, it should be clear to the school who has parental responsibility.

Staff should notify the Designated Safeguarding Lead when they become aware of private fostering arrangements. The Designated Safeguarding Lead will speak to the family of the child involved to check that they are aware of their duty to inform the LA. The school itself has a duty to inform the LA of these arrangements.

On admission to the school, we will take steps to verify the relationship of the adults to the child who is being registered, wherever possible.

21. SAFEGUARDING CONCERNS LIST (KCSiE ANNEX A)

- Children and the court system
- Children missing from education
- Children with family members in prison
- Child sexual exploitation
- Child criminal exploitation: county lines
- Domestic abuse
- Homelessness
- So-called 'honour-based' violence
- Preventing radicalisation
- Peer on peer abuse
- Sexual violence and sexual harassment between children in schools and colleges

Additional advice and support – Links on page 86 KCSIE 2018.

APPENDIX 1 - INDICATORS OF POSSIBLE SIGNIFICANT HARM

POSSIBLE SIGNS OF PHYSICAL ABUSE

- Unexplained injuries or burns, particularly if they are recurrent
- Injuries not typical of accidental injury
- Frequent injuries even with apparently reasonable explanations
- Improbable or conflicting explanations for injuries
- Refusal to discuss injuries
- Admission of punishment which appears excessive
- Fear of parents being contacted

- Bald patches
- Withdrawal from physical contact
- Arms and legs kept covered in hot weather
- Fear of returning home
- Fear of medical help / parents not seeking medical help
- Self-destructive tendencies
- Aggression towards others
- Chronic running away
- Frequently absent from school

POSSIBLE SIGNS OF EMOTIONAL ABUSE

- Probably the most difficult type of abuse to recognise. An emotionally abused child is often withdrawn, introverted and depressed.
- Admission of punishment which appears excessive
- Over-reaction to mistakes
- Sudden speech disorders
- Fear of new situations
- Inappropriate emotional responses to painful situations
- Neurotic behaviour (e.g. rocking, hair twisting, thumb sucking)
- Self mutilation
- Fear of parents being contacted
- Extremes of passivity or aggression
- Drug/solvent abuse
- Chronic running away
- Compulsive stealing
- Scavenging for food or clothes
- Continual self depreciation
- Air of detachment – ‘don’t care’ attitude
- Social isolation – does not join in and has few friends
- Desperate attention-seeking behaviour
- Eating problems, including over-eating or lack of appetite
- Depression, withdrawal

POSSIBLE SIGNS OF SEXUAL ABUSE

- Demonstrate sexual knowledge or behaviour inappropriate to age/stage of development, or that is unusually explicit
- Wetting or other regressive behaviours e.g. thumb sucking
- Inexplicable changes in behaviour, such as becoming aggressive or withdrawn
- Stop enjoying previously liked activities
- Be reluctant to undress for PE
- Become fearful of, or refuse to see, certain adults for no apparent reason; show dislike of a particular baby-sitter, relative or other adult
- Draw sexually explicit pictures
- Urinary infections, bleeding or soreness in the genital or anal areas
- Soreness or bleeding in the throat
- Chronic ailments, such as stomach pains or headaches
- Take over the parental role at home; seem old beyond their years
- Develop eating disorders, such as anorexia or bulimia
- Depression, suicidal thoughts
- Poor self-image, self-harm, self-hatred
- Physical discomfort
- Use drugs or drink to excess
- Unexplained pregnancy
- Memory loss
- Frequent running away
- Restricted social activities
- Find excuses not to go home or to a particular place

- Have recurring nightmares/be afraid of the dark
- Be unable to concentrate; seem to be in a world of their own
- Have a 'friend who has a problem' and then tell about the abuse of the friend
- Sudden changes in school work habits, become truant
- Withdrawal, isolation or excessive worrying
- Outbursts of anger or irritability
- Unexplained sums of money
- Act in a sexually inappropriate/harmful or seductive way towards others

POSSIBLE SIGNS OF NEGLECT

- Constant hunger
- Poor personal hygiene
- Inappropriate clothing, clothing in a poor state of repair
- Frequent lateness or non-attendance at school
- Untreated medical problems
- Low self-esteem
- Poor social relationships
- Compulsive stealing
- Constant tiredness
- Emaciation
- Destructive tendencies.
- Neurotic behaviour (e.g. rocking, hair twisting, thumb sucking)
- Chronic running away
- Scavenging for food or clothes

In addition to all the above signs a child may disclose an experience in which he/she may have been harmed, or there may be any other cause to believe that a child may be suffering harm.