

# Safeguarding and Child Protection at Nottingham High School

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*THIS POLICY REFERS TO ALL STUDENTS INCLUDING THOSE IN EYFS*

## Safeguarding and Child Protection at Nottingham High School

### Contents

KEY EXTERNAL CONTACT DETAILS .....	5
KEY SCHOOL CONTACT DETAILS.....	7
POLICY STATEMENT .....	8
CONTEXTUAL SAFEGUARDING.....	9
CONCERNS ABOUT A CHILD .....	10
Disclosures by students – Advice to staff .....	12
Actions taken by the DSL .....	14
Early Help .....	16
What staff should do if they have concerns that children are at risk from or involved with serious violent crime.....	19
How should staff respond to an incident of nudes and semi-nudes being shared by students...	19
What staff should do if a child is absent from education .....	20
What staff should do if a child needs a social worker (Children in Need and Child Protection Plans).....	21
What staff should do if a child requires mental health support.....	21
What staff should do if they have safeguarding concerns about another staff member .....	22
What staff should do if they have concerns about safeguarding practices in the School.....	22
What about informing parents? .....	22
ARRANGEMENTS FOR DEALING WITH CHILD ON CHILD ALLEGATIONS (INCLUDING CHILD ON CHILD SEXUAL VIOLENCE AND HARASSMENT).....	23
Dealing with safeguarding concerns or allegations made about staff including supply teachers, volunteers and contractors.....	27
Dealing with safeguarding concerns and allegations about supply teachers and contractors .....	32
Dealing with concerns or allegations that do not meet the harm threshold .....	33
SAFER RECRUITMENT.....	35
MANAGEMENT OF SAFEGUARDING .....	36
TRAINING .....	37
All Staff.....	38
Governors.....	39
DSL(s) .....	40
OVERSIGHT OF SAFEGUARDING, INCLUDING ARRANGEMENTS FOR REVIEWING POLICIES AND PROCEDURES.....	40

## Safeguarding and Child Protection at Nottingham High School

THE SCHOOL'S ARRANGEMENTS TO FULFIL OTHER SAFEGUARDING RESPONSIBILITIES .....	41
Teaching children how to keep safe .....	41
Filtering and monitoring .....	41
Relationships and Sex Education ("RSE") .....	42
Looked after children .....	42
Arrangements for visiting speakers .....	43
Arrangements for use of school premises for non-school activities .....	43
EARLY YEARS PROVISION SAFEGUARDING ARRANGEMENTS .....	45
Disqualification from working in childcare .....	45
Use of mobile phones and cameras .....	45
DSL for the EYFS .....	46
APPENDIX 1 SIGNS AND TYPES OF ABUSE .....	47
APPENDIX 2 CHILD ON CHILD ABUSE POLICY .....	61
Understanding child-on-child abuse .....	62
What is child-on-child abuse? .....	62
When does behaviour become problematic or abusive? .....	63
Other behaviour .....	64
How can a child who is being abused by another child/children be identified? .....	65
Are some children particularly vulnerable to abusing or being abused by another child/children? .....	65
A whole school approach .....	66
School environment .....	66
Engaging parents .....	66
Ethos .....	67
Multi-agency working .....	67
Responding to concerns or allegations of child-on-child abuse .....	68
General principles .....	68
What should you do if you suspect either that a child may be at risk of or experiencing abuse by their peer(s), or that a child may be at risk of abusing or may be abusing their peer(s)? .....	69
How will the School respond to concerns or allegations of child-on-child abuse? .....	69
Safety plans .....	71
Information sharing, data protection and record keeping .....	72
Disciplinary action .....	72

## Safeguarding and Child Protection at Nottingham High School

## Safeguarding and Child Protection at Nottingham High School

### KEY EXTERNAL CONTACT DETAILS

#### Nottingham City

<b>Claire Maclean</b>	Schools and Education Safeguarding Coordinator	Claire.maclean@nottinghamcity.gov.uk 0115 8764749
<b>Debbie Mawson</b>	LADO Business Support	<a href="mailto:lado@nottinghamcity.gov.uk">lado@nottinghamcity.gov.uk</a> 0115 8765714
<b>Caroline Hose</b>	LADO	<a href="mailto:caroline.hose@nottinghamcity.gov.uk">caroline.hose@nottinghamcity.gov.uk</a>
<b>If no contact with any of the contacts above</b>	Nottingham City Safeguarding Children Partnership	<a href="mailto:safeguarding.partnerships@nottinghamcity.gov.uk">safeguarding.partnerships@nottinghamcity.gov.uk</a> 0115 8764762

- Children and families direct (Duty Team) – 0115 8764800
- Emergency duty team out of hours – 0115 8765600
- Advanced DSL - we liaise with the Advanced DSL network via Claire Maclean

#### Nottinghamshire

- Nottinghamshire Safeguarding Board - 0115 977 3935
- <https://www.nottinghamshire.gov.uk/nscp>
- MASH Duty Team – 0300 500 8090 ([mash.safeguarding@secure.nottscg.gov.uk](mailto:mash.safeguarding@secure.nottscg.gov.uk))
- MASH Consultation Line - 0115 977 4247
- Eva Callaghan – Designated Officer referrals - 0115 8041272
- Hazel McKibbin, Temp Service Manager – 0115 9773921

#### Derbyshire

- Call Derbyshire – 01629 533190 then ask for Children's Services and Safeguarding.
- Starting point – professional advice – request for support form
- Designated Officer – Miles Dent – 01629 531940

#### Derby City

- First contact team - 01332 641172

<b>Support and Advice about Extremism</b>	<p><b>Police</b></p> <p>Contact Nottinghamshire Police Prevent Team. Tel: 101 ext. 800 2962/2963 EMAIL: <a href="mailto:prevent@nottinghamshire.pnn.police.uk">prevent@nottinghamshire.pnn.police.uk</a></p> <p>EMERGENCY: 999 NON-EMERGENCY NUMBER: 101</p>
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## Safeguarding and Child Protection at Nottingham High School

	<p><b>Local Authority Prevent team:</b>  EMAIL: <a href="mailto:Prevent@nottinghamcity.gov.uk">Prevent@nottinghamcity.gov.uk</a>  TEL: Amy Goulden, Prevent Coordinator  07818458778</p> <p><b>Department for Education</b>  NON-EMERGENCY NUMBER: 020 7340 7264  EMAIL: <a href="mailto:counter.extremism@education.gov.uk">counter.extremism@education.gov.uk</a></p>
<b>NSPCC Whistleblowing Advice Line</b>	<p>ADDRESS: Weston House  42 Curtain Road  London  EC2A 3NH  TEL: 0800 028 0285  EMAIL: <a href="mailto:help@nspcc.org.uk">help@nspcc.org.uk</a></p>
<b>NSPCC Report Abuse in Education Advice Line</b>	<p>TEL: 0800 136 663  EMAIL: <a href="mailto:help@nspcc.org.uk">help@nspcc.org.uk</a></p>
<b>Disclosure and Barring Service</b>	<p>ADDRESS: DBS customer services  PO Box 3961  Royal Wootton Bassett  SN4 4HF  TEL: 03000 200 190  EMAIL: customerservices@dbb.gov.uk</p>
<b>Teaching Regulation Agency</b>	<p>ADDRESS: Teacher Misconduct  Ground Floor South  Cheylesmore House  5 Quinton Road  Coventry CV1 2WT  TEL: 0207 593 5393  EMAIL: <a href="mailto:misconduct.teacher@education.gov.uk">misconduct.teacher@education.gov.uk</a></p>
<b>OFSTED Safeguarding Children</b>	<p>TEL: 0300 123 4666 (Monday to Friday from 8am to 5pm)  EMAIL: <a href="mailto:CIE@ofsted.gov.uk">CIE@ofsted.gov.uk</a></p>
<b>Independent Schools Inspectorate</b>	<p>TEL: 0207 6000 100  EMAIL: <a href="mailto:concerns@isi.net">concerns@isi.net</a></p>

## Safeguarding and Child Protection at Nottingham High School

### KEY SCHOOL CONTACT DETAILS

<b>Governors</b>	<p><b>Chair of Governors</b> Mr Steve Banks TEL: 0115 978 6056 EMAIL: <a href="mailto:Chairman@nottinghamhigh.co.uk">Chairman@nottinghamhigh.co.uk</a></p> <p><b>Nominated Safeguarding Governor</b> Dr Gail Walton (Senior School) Dr Sharmini Krishanand (Infant &amp; Junior School) TEL: 0115 978 6056 EMAIL: <a href="mailto:walton.g@nottinghamhigh.co.uk">walton.g@nottinghamhigh.co.uk</a> <a href="mailto:krishanand.s@nottinghamhigh.co.uk">krishanand.s@nottinghamhigh.co.uk</a></p>
<b>Designated Safeguarding Lead ("DSL") and Deputy Designed Safeguarding Lead ("DDSL")</b>	<p><b>Main DSL for the Senior School</b> Lisa Gritti TEL: 0115 978 6056/0115 845 2204/07787 568368 EMAIL: <a href="mailto:gritti.l@nottinghamhigh.co.uk">gritti.l@nottinghamhigh.co.uk</a></p> <p><b>Main DSL for the Infant &amp; Junior School inc EYFS</b> Clare Bruce TEL: 0115 845 2214/0115 978 6056 EMAIL: <a href="mailto:bruce.ca@nottinghamhigh.co.uk">bruce.ca@nottinghamhigh.co.uk</a></p> <p><b>Deputy DSL for the Senior School</b> Michaela Smith TEL: 0115 978 6056/0115 845 2202 EMAIL: <a href="mailto:smith.ml@nottinghamhigh.co.uk">smith.ml@nottinghamhigh.co.uk</a></p> <p><b>Deputy DSL for the Infant &amp; Junior School inc EYFS</b>  Christian Cordy TEL: 0115 845 2214/0115 978 6056 EMAIL: <a href="mailto:cordy.c@nottinghamhigh.co.uk">cordy.c@nottinghamhigh.co.uk</a></p>
<b>External lettings safeguarding support</b>	<a href="mailto:dsl@nottinghamhigh.co.uk">dsl@nottinghamhigh.co.uk</a>

## Safeguarding and Child Protection at Nottingham High School

<b>Designated Teacher for Looked After Children</b>	Lisa Gritti (Senior School)/ Clare Bruce (Infant & Junior School) TEL: 0115 978 6056 EMAIL: <a href="mailto:gritti.l@nottinghamhigh.co.uk">gritti.l@nottinghamhigh.co.uk</a> <a href="mailto:bruce.ca@nottinghamhigh.co.uk">bruce.ca@nottinghamhigh.co.uk</a>
<b>Head</b>	Kevin Fear TEL: 0115 845 2203/0115 978 6056 EMAIL: <a href="mailto:hm@nottinghamhigh.co.uk">hm@nottinghamhigh.co.uk</a>

### POLICY STATEMENT

This policy applies to Nottingham High School and Nottingham High Infant & Junior School which includes the EYFS setting. This policy is reviewed and updated annually (as a minimum) and is available on the School website.

This policy has regard to the following guidance and advice:

- *Keeping Children Safe in Education* (September 2023) ("KCSIE")
  - *KCSIE incorporates the additional statutory guidance Disqualification under the Childcare Act 2006* (September 2018)
  - *KCSIE also provides links to various toolkits and additional advice and support*
- *Working Together to Safeguard Children* (December 2023) ("WT")
  - *WT refers to the non-statutory advice: Information sharing* (July 2018)
- *Prevent Duty Guidance: for England and Wales* (April 2021) ("Prevent"). *Prevent* is supplemented by non-statutory advice and a briefing note:
  - *The Prevent duty: Departmental advice for schools and childminders* (June 2015)
  - *The use of social media for on-line radicalisation* (July 2015)
- *Relationships education, relationships, and sex education (RSE) and health education* (September 2021).
- *Behaviour in schools* (September 2022)
- *Working together to improve school attendance* (May 2022)
- *Keeping children safe in out of school settings* (April 2022)
- *Digital and technology standards in schools and colleges* (March 2023)
- *The Charity Commission guidance Safeguarding and protecting people for charities and trustees* (June 2022)



## Safeguarding and Child Protection at Nottingham High School

This policy also takes into account the procedures and practice of Nottingham City as part of the inter-agency safeguarding procedures set up by the Nottingham City Safeguarding Children Partnership (NCSCP).

### CONTEXTUAL SAFEGUARDING

This policy:

(a) encapsulates a Contextual Safeguarding approach, which is about changing the way that professionals approach child protection when risks occur outside of the family, thereby requiring all those within a Local Safeguarding Partnership to consider how they work alongside, rather than just refer into, children's social care, to create safe spaces in which children thrive.

(b) adopts a whole-school community Contextual Safeguarding approach, which means:

- being aware of and seeking to understand the impact that these wider social contexts may be having on the School's students,
- creating a safe culture in the School by, for example, implementing policies and procedures that address child-on-child abuse and harmful attitudes; promoting healthy relationships and attitudes to gender/ sexuality; hotspot mapping to identify risky areas in the School; training on potential bias and stereotyped assumptions,
- being alert to and monitoring changes in students' behaviour and/or attendance, and
- contributing to local child protection agendas by, for example, challenging poor threshold decisions and referring concerns about contexts to relevant local agencies.

Safeguarding incidents and/or behaviours can be associated with factors outside the School and can occur between children outside School. All staff, but especially the DSL and any deputies, should consider the context within which such incidents and/or behaviours occur. The School will as part of the wider assessment of children, consider whether environmental factors are present in a child's life that are a threat to their safety and/or welfare. The School will share as much information with Children's Social Care as possible as part of the referral process to enable consideration of all the available evidence and the full context of any abuse.

## Safeguarding and Child Protection at Nottingham High School

### CONCERNS ABOUT A CHILD

The School has a duty to consider at all times the best interests of the student and take action to enable all students to achieve the best outcomes. Safeguarding and promoting the welfare of children is everyone's responsibility. The School adopts a committed and 'whole school' approach to safeguarding, ensuring safeguarding and child protection are at the forefront and underpin all relevant aspects of process and policy development.

Parents are encouraged to raise any concerns directly with the School, if necessary, using this safeguarding policy for concerns about the safety and/or welfare of children. Parents may contact the ISI directly if they wish.

The School has arrangements for listening to children and providing early help. Early help means providing support as soon as a problem emerges at any point in a child's life. Where a child would benefit from co-ordinated early help, an early help inter-agency assessment should be arranged. Chapter three of Working Together to Safeguard Children provides detailed guidance on the early help process.

Definitions of safeguarding and types and signs of abuse

Safeguarding and promoting the welfare of children is defined as protecting children from maltreatment; preventing impairment of children's mental and physical health or development; ensuring that children grow up in circumstances consistent with the provision of safe and effective care; and taking action to enable all children to have the best outcomes.

Abuse is 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. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others (e.g. via the internet). Abuse can take place wholly online, or technology may be used to facilitate offline abuse. They may be abused by an adult or adults or by another child or children. Abuse can be:

- physical abuse;
- emotional abuse;
- sexual abuse; and/or
- neglect.

Staff are referred to Appendix 1 of this policy for further detail of the types of abuse and possible signs of abuse, as well as further information regarding specific safeguarding issues such as child criminal and/or sexual exploitation.

## Safeguarding and Child Protection at Nottingham High School

### PROCEDURES FOR DEALING WITH CONCERNS ABOUT A CHILD

If staff suspect or hear any allegation or complaint of abuse, exploitation, or neglect from a child or any third party, they must act immediately and follow the relevant procedure below. Staff should not assume that somebody else will act and share information that might be critical in keeping children safe.

Our aim is complete the following reporting and referral process within 24 hours of the initial concern being raised.

- Where a member of staff has a concern that a child may be suffering or at risk of suffering significant harm, the [Safeguarding Concern Report Form](#) should be used if possible [digital via SharePoint]. The member of staff must ensure that any child protection concerns are discussed immediately with the DSL (before the form is completed if necessary), no later than 13:00 during morning School, or immediately at 16:00 during afternoon School. If the Report Form is not accessible, staff should not hesitate to visit, call or email the DSL and the DSL will ensure the concern is immediately acknowledged and explored.
- On receipt of a concern, the DSL must determine whether there are grounds to share the information with other agencies/ professionals. We understand that information sharing is vital in identifying and tackling all forms of abuse and neglect, and in promoting children's welfare, including their educational outcomes. We understand we have clear powers to share, hold and use information for these purposes. This may involve contact with LSP Duty Team, possible for anonymous advice if necessary. The member of staff involved in the disclosure can also make contact with the outside agencies but must inform the DSL if they have done so. An accurate record of the conversation must be kept on record.
- Staff should not assume a colleague or other professional will act and share information that might be critical in keeping children safe.

All child protection concerns are shared in accordance with the City and County procedures.

#### **Important note about confidentiality**

**Students who have a problem may wish to speak to a member of staff as a person whom they trust. It is important that the member of staff sets the boundaries firmly at the outset of such a conversation, making it clear that no one can offer absolute confidentiality. Whilst the wishes of the child may be taken into account, their wishes may be overridden where the member of staff in question believes it is in the child's best interest.**

**A student who insists on confidentiality should be referred to an external source, such as ChildLine.** If the student is only prepared to speak if absolute confidentiality is guaranteed, the member of staff should terminate the conversation at that point.

## Safeguarding and Child Protection at Nottingham High School

The adult must, nevertheless, provide the DSL with a written account of what has transpired as a matter of urgency.

### Disclosures by students – Advice to staff

**If a student decides to speak to you about the fact that either they, or a student known to them, is being abused or has concerns about abuse,** our initial response is incredibly important.

All staff should:

- listen carefully
- avoid asking leading questions
- reassure the individual that the allegation/complaint will be taken seriously and that they will be supported and kept safe
- ensure that the individual is not made to feel ashamed for making the report or given the impression that they are creating a problem by making the report
- not guarantee absolute confidentiality (as this may ultimately not be in the best interests of the child) and explain that the information needs to be passed to the appropriate person who will ensure that the correct action is taken
- be aware that the individual may not feel ready or know how to tell someone that they are being abused, exploited or neglected, and/or may not recognise their experiences as harmful. Staff should exercise professional curiosity and speak to the DSL if they have concerns
- determine how best to build trusted relationships with children and young people which facilitate communication}

All concerns, discussions, and decisions (together with reasons) made under these procedures should be recorded in writing. This will help if/when responding to any complaint about the way a case has been handled. The record should include a clear and comprehensive summary of the concern, details of how the concern was followed up and resolved and a note of any action taken, the decision reached and the outcome. The record should include the date, time and place of the conversation and detail of what was said and done by whom and in whose presence and signed by the person making it. The information should be kept confidential and stored securely, ensuring that the file is only accessible to those who need to see it, and is shared in accordance with the guidance set out in Parts one and two of *KCSIE*. Where the allegation relates to harmful sexual behaviours, if possible, the disclosure should be managed with two members of staff present (preferably one of them being the DSL or their deputy).

Where there is a safeguarding concern, the School will ensure the student's wishes and feelings are taken into account when determining what action to take and what services to

## Safeguarding and Child Protection at Nottingham High School

provide. This is particularly important in the context of harmful behaviours, such as sexual harassment and sexual violence. The School manages this by ensuring that there are systems in place, that are well promoted, easily understood and easily accessible for children to confidently report abuse, knowing their concerns will be treated seriously, and knowing they can safely express their views and give feedback. The School operates its processes with the best interests of the student/s at their heart.

### You should:

- react professionally, and remember that you are not carrying out an investigation. If possible, manage reports with two members of staff present, (preferably one of them being the designated safeguarding lead or a deputy). However, this might not always be possible;
- **take what they say seriously and calmly, without becoming emotionally involved;**
- allow them to tell their own story without interruption or prompting;
- recognising that an initial disclosure to a trusted adult may only be the first incident reported, rather than representative of a singular incident and that trauma can impact memory and so children may not be able to recall all details or timeline of abuse;
- keep in mind that certain children may face additional barriers to telling someone because of their vulnerability, disability, sex, ethnicity and/or sexual orientation;
- listen carefully to the child, reflecting back, using the child's language, being non-judgmental, being clear about boundaries and how the report will be progressed, not asking leading questions and only prompting the child where necessary with open questions – where, when, what, etc. It is important to note that whilst leading questions should be avoided, staff can ask children if they have been harmed and what the nature of that harm was; Keep any questioning brief and gentle;
- **make it clear that you cannot offer unconditional confidentiality, see next point. If necessary, refer to the policy for students on child abuse and related matters;**
- **explain that any adult member of staff is obliged to inform the DSL if child protection or safeguarding issues are involved in order that specialist help can be arranged.**
- **encourage them to speak directly to the DSL;**
- **explain that only those who have a professional “need to know” will be told, and, if appropriate, measures will be set up to protect them from retaliation and further abuse;**
- reassure them that they were right to tell, and that they are not to blame for having been bullied or abused;
- never be judgemental, for example avoid saying “It’ll be all right”;
- make a written record of what has been said (afterwards if necessary). Use the student's own words as far as possible, considering the best way to make a record of the report. Best practice is to wait until the end of the report and immediately write up a thorough summary. This
- allows the staff member to devote their full attention to the child and to listen to what they are saying. It may be appropriate to make notes during the report (especially if a second member of staff is present). However, if making notes, staff should be

## Safeguarding and Child Protection at Nottingham High School

conscious of the need to remain engaged with the child and not appear distracted by the note taking. Either way, it is essential a written record is made;

- only recording the facts as the child presents them. The notes should not reflect the personal opinion of the note taker. Notes of such reports could become part of a statutory assessment by children's social care and/or part of a criminal investigation;
- inform the DSL/DDSL or the Headmaster as soon as possible if the designated safeguarding lead (or deputy) is not involved in the initial report. Staff must also acknowledge that they too can refer the disclosure to the correct outside agency using the details at the end of this document.
- inform the Headmaster immediately in cases where abuse from a member of staff is alleged, or if the incident happened inside the school, or on a school trip; and,
- where there are evident signs of physical injury, that may (or may not) be the result of abuse or bullying, medical help should be summoned, or the student should be taken to the Medical Room. No examination should be made of any part of the child's body not normally visible.

The DSL will use the Nottingham City Child Protection Referral procedures in deciding how to proceed and will contact the appropriate welfare agency within 24 hours of the initial disclosure where appropriate.

### Actions taken by the DSL

Subject to the paramount safety and welfare of the student, the Designated Safeguarding Lead will:

- consider the procedures published by Nottingham Safeguarding Children Partnership and covered in their specific training for the role;
- consider the nature and seriousness of the suspicion or disclosure. A disclosure involving a serious criminal offence will always be referred to the Designated Officer or the Police without further investigation within the school;
- consult with the Designated Officer or other appropriate professionals on a confidential basis. This can be done without identifying the family if the Designated Safeguarding Lead deems it appropriate. However, as soon as sufficient concern exists that a child may be at risk of significant harm, a referral direct to children's social care services will be made without delay and certainly within 24 hours. If the initial referral is made by telephone, the Designated Safeguarding Lead will confirm the referral by completing the MARF to children's social services promptly. If no response or acknowledgement is received within three working days, the Designated Safeguarding Lead will contact the Designated Officer;
- in addition, if the situation of the child does not improve following the referral the DSL or staff member making the referral will press for re-consideration, to help the situation improve;
- whilst the Designated Safeguarding Lead, alongside the Governors, will always consider the wishes of the student who has disclosed and the wishes of his/her parents, consent is not required for a referral to social services where there are concerns about a child's safety. If the Designated Safeguarding Lead is concerned that disclosing information to parents would put a child at risk, s/he will take further advice from the relevant professionals;
- have regard for confidentiality, so far as applicable;



## Safeguarding and Child Protection at Nottingham High School

- consider the lawful rights and interests of the school community as a whole, including its employees and its insurers;
- determine if there is a pattern of behaviour which may lead to welfare concerns as a result of a period of monitoring of behaviour by the Designated Safeguarding Lead in response to concerns raised;
- the Designated Safeguarding Lead will keep the Headmaster informed, if an allegation relates to an adult. If the Headmaster is not available or is the subject of the allegation, then the Designated Safeguarding Lead will report the allegation to the Spokesman (Chair of Governors); and,
- the Designated Safeguarding Lead will report any referrals to the Nominated Governor for Child Protection.
- the Designated Safeguarding Lead will ensure records are kept as per Paragraph 68 (KCSIE 2023)
  - All concerns, discussions and decisions made, and the reasons for those decisions, should be recorded in writing. Information should be kept confidential and stored securely. It is good practice to keep concerns and referrals in a separate child protection file for each child.
  - Records should include:
    - a clear and comprehensive summary of the concern;
    - details of how the concern was followed up and resolved;
    - a note of any action taken, decisions reached and the outcome.

The guidance, *Information Sharing: Advice for Practitioners Providing Safeguarding Services to Children, Young People, Parents and Carers* supports staff who have to make decisions about sharing information. The governing body recognises the importance of information sharing between practitioners and local agencies, including ensuring arrangements for sharing information within the School and with local authority children's social care, the safeguarding partners and other organisations, agencies, and practitioners as required. Fears regarding sharing information under the Data Protection Act 2018 and the UK GDPR should not be allowed to stand in the way of the need to safeguard and promote the welfare and protect the safety of children, and neither the DPA 2018 or the UK GDPR prevent the sharing of information for the purposes of keeping children safe. If in doubt about what information can and should be shared, staff should speak to the Designated Safeguarding Lead ("DSL").

The governing body will ensure that staff understand the relevant data protection principles which allow them to share (and withhold) personal information, including:

- being confident of the processing conditions which allow them to store and share information for safeguarding purposes, including information, which is sensitive and personal and should be treated as 'special category personal data'
- understanding that 'safeguarding of children and individuals at risk' is a processing condition that allows the sharing of special category personal data, including without

## Safeguarding and Child Protection at Nottingham High School

consent where there is good reason to do so. For example, information may be shared without consent where: it is not possible to gain consent; it cannot be reasonably expected to gain consent; and, gaining consent would place a child at risk

- not providing students' personal data where the serious harm test is met.

### Early Help

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

- Is disabled or has certain health conditions and has specific additional needs
- Has special educational needs (whether or not they have a statutory education, health, and care plan)
- Has a mental health need
- Is a young carer
- Is showing signs of being drawn in to anti-social or criminal behaviour, including gang involvement and association with organised crime groups or county lines
- Is frequently missing/goes missing from care or from home
- Is misusing drugs or alcohol themselves
- Is at risk of modern slavery, trafficking, or sexual or criminal exploitation
- Is in a family circumstance presenting challenges for the child, such as substance abuse, adult mental health problems or domestic abuse
- Has returned home to their family from care
- Is showing early signs of abuse and/or neglect
- Is at risk of being radicalised or exploited
- Has a family member in prison, or is affected by parental offending
- Is experiencing, or is at risk of experiencing family ostracism
- Is at risk of 'honour'-based abuse such as Female Genital Mutilation or Forced Marriage
- Is a privately fostered child
- Is absent from education, particularly on repeat occasions and/or prolonged periods including persistent absences for part of the school day

Early help means providing support as soon as a problem emerges at any point in a child's life, from the foundation years through to the teenage years. A lead practitioner should undertake the assessment, provide help to the child and family, act as an advocate on their behalf and co-ordinate the delivery of support services. A GP, family support worker, school nurse, teacher, health visitor and/or special educational needs co-ordinator could undertake the lead practitioner role. Decisions about who should be the lead practitioner should be taken on a case-by-case basis and should be informed by the child and their family.



## Safeguarding and Child Protection at Nottingham High School

For an early help assessment to be effective:

- it should be undertaken with the agreement of the child and their parents or carers, involving the child and family as well as all the practitioners who are working with them. It should take account of the child's wishes and feelings wherever possible, their age, family circumstances and the wider community context in which they are living;
- practitioners should be able to discuss concerns they may have about a child and family with a social worker in the local authority. Local authority children's social care should set out the process for how this will happen;
- in cases where agreement to an early help assessment cannot be obtained, practitioners should consider how the needs of the child might be met. However, practitioners should still inform individuals that their data will be recorded and shared and the purpose explained to them. If at any time it is considered that the child may be a child in need, as defined in the Children Act 1989, or that the child has suffered significant harm or is likely to do so, a referral should be made immediately to local authority children's social care. This referral can be made by any practitioner.

In the first instance, staff who consider that a student may benefit from early help should discuss this with the School's DSL or Deputy DSL. The DSL or DDSL will consider the appropriate action to take in accordance with the Nottingham City Threshold of Needs document <http://www.nottinghamchildrenspartnership.co.uk/media/3374269/nottingham-city-threshold-of-needs.pdf>. The DSL or DDSL will support staff in liaising with external agencies and professionals in an inter-agency assessment, as appropriate. If early help is appropriate, the matter will be kept under review and consideration given to a referral to children's social care if the student's situation does not appear to be improving.

What staff should do if they have concerns about a child

If staff (including governors, supply staff, agency staff and volunteers) have any concerns about a child (as opposed to a child being in immediate danger), they should, where possible, speak with the School's DSL to agree a course of action, although staff can make a direct referral to children's social care. As set out above, staff should not assume that somebody else will take action and share information that might be critical in keeping children safe; they should maintain an attitude of "it could happen here". If anyone other than the DSL makes a referral, they should inform the DSL as soon as possible that a referral has been made. If a child's situation does not appear to be improving, the DSL should press children's social care for reconsideration. Staff should challenge any inaction and follow this up with the DSL and children's social care as appropriate. All concerns, discussions and decisions made and the reasons for those decisions should be recorded in writing.

What staff should do if a child is in danger or at risk of harm

If staff (including governors, supply staff, agency staff and volunteers) believe that a child is in immediate danger or at risk of harm, they should make an immediate referral to children's social care and/or the police. Anyone can make a referral. Any such referral must be made

## Safeguarding and Child Protection at Nottingham High School

immediately and in any event within 24 hours (one working day) of staff being aware of the risk. Parental consent is not needed for referrals to statutory agencies such as the police and children's social care. If anyone other than the DSL makes a referral, they should inform the DSL as soon as possible that a referral has been made. The local authority social worker should acknowledge receipt to the referrer within 24 hours and make a decision about the next steps and type of response required. Staff should challenge any inaction and follow this up with the DSL and children's social care as appropriate. All concerns, discussions and decisions made and the reasons for those decisions should be recorded in writing.

The School's Local Safeguarding Children Executive is the Nottingham City Safeguarding Children Partnership. A full copy of their local procedures can be found here <https://www.nottinghamcity.gov.uk/ncscp>.

The Staff Code of Conduct gives further guidance on a variety of safeguarding matters, such as one-to-one teaching and communication with students.

What staff should do if a child is seen as at risk of radicalisation

Staff should follow the School's normal referral processes when there are concerns about children who may be at risk of being drawn into terrorism, as set out above. This may include a Prevent referral or referral to children's social care depending on the level of risk. Contact with the School's Designated Safeguarding Lead should be made without delay. The Designated Safeguarding Lead and other senior staff will discuss these concerns and will consider seeking external advice and guidance where necessary and appropriate. The DSL, or other staff with the support of the DSL, will refer young people on to the Channel programme under the local Prevent Duty strategy in conjunction with the local Prevent Police officer. However, if staff have concerns that there is an immediate/significant risk of a child being drawn into terrorism, they can call Nottinghamshire Police Prevent Team. Tel: 101 ext. 800 2962/2963 [prevent@nottinghamshire.pnn.police.uk](mailto:prevent@nottinghamshire.pnn.police.uk).

The School, in recognition that students may be at risk of being drawn into terrorism or other forms of extremism, carries out appropriate risk assessments (following consultation with local partners, such as the police) of the potential risk in the local area. Such risk assessments are discussed with the Head, DSL, relevant DDSLs and governors responsible for safeguarding to ensure the School's safeguarding arrangements are sufficiently robust to help prevent and protect children from being drawn into terrorism and are regularly revised.

What staff should do if they discover an act of Female Genital Mutilation ("FGM")

Staff must report to the police cases where they discover that an act of FGM appears to have been carried out. Unless the member of staff has a good reason not to, they should still consider and discuss any such case with DSL and involve children's social care as appropriate. Staff are referred to Appendix 1 of this policy for the procedure to be followed where they suspect that a student may be at risk of FGM.

## Safeguarding and Child Protection at Nottingham High School

What staff should do if they have concerns that children are at risk from or involved with serious violent crime

All staff should be aware of indicators which may signal that children are at risk from or are involved with serious violent crime. These may include increased absence from School, a change in friendships or relationships with older individuals or groups, a significant decline in performance, signs of self-harm or a significant change in wellbeing, signs of assault or unexplained injuries.

If staff have any concerns about a child (as opposed to a child being in immediate danger), they should, where possible, speak with the School's DSL to agree a course of action, although staff can make a direct referral to children's social care.

How should staff respond to an incident of nudes and semi-nudes being shared by students

All members of staff in an education setting have a duty to recognise and refer any incidents involving nudes and semi-nudes and will be equipped with the necessary safeguarding training and support to enable them to recognise concerns.

For this purpose, 'sharing nudes/semi-nudes' means the sending or posting of nude or semi-nude images, videos, or live streams by children under the age of 18 online. This could be via social media (including Snapchat), gaming platforms, chat apps (including WhatsApp and iMessage) or forums. It could also involve sharing between devices via services like Apple's AirDrop which works offline. The sharing of nudes and semi-nudes may happen publicly online, in 1:1 messaging or via group chats and/or via closed social media accounts. The images, videos or live streams may include more than one child.

Any direct disclosure by a child will be taken seriously and staff will ensure the child is feeling comfortable and will only ask appropriate and sensitive questions, in order to minimise further distress or trauma to them.

If staff are notified or become aware of an incident of nudes or semi-nudes being shared by a student or of a student, they should refer the incident to the DSL as soon as possible.

The DSL will follow the DDMSC / UKIS guidance "*Sharing nudes and semi-nudes: advice for education settings working with children and young people*" (December 2020) when responding to a report of sharing nudes and/or semi-nudes. This will include:

- Holding an initial review meeting with appropriate staff. This may include the staff member(s) who heard the disclosure and the safeguarding or leadership team who deal with safeguarding concerns.

## Safeguarding and Child Protection at Nottingham High School

- Carrying out interviews with the children involved (if appropriate).
- Informing parents and carers at an early stage and keep them involved in the process in order to best support the student unless there is good reason to believe that involving them would put the child at risk of harm. Any decision not to inform them should 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 they should be informed.
- Carrying out a risk assessment to determine whether there is a concern that a child has been harmed or is at risk of immediate harm at any point in the process
- If not, the incident can be handled in school in accordance with the "sharing nudes" guidance and the School's Child Protection and Behaviour policies.
- If it is determined that there is a risk of harm, the DSL must make a referral to children's social care and/or the police immediately.

All incidents relating to nudes and semi-nudes being shared need to be recorded, whether they have been referred externally or not. Schools must record the reason for not reporting incidents externally and ensure it is signed off by the Head. Records will be kept in line with statutory requirements set out in *KCSIE* and local safeguarding procedures. No copies of imagery will be taken or retained.

This guidance does not apply to the sharing of images of children under 18 by an adult over 18 as this constitutes child sexual abuse. In the event that staff become aware of such an incident, they should notify the DSL immediately, who should always inform the police as a matter of urgency.

### What staff should do if a child is absent from education

Children who are absent from education particularly on repeat occasions and/or for prolonged periods, and children missing education can act as a vital warning sign to a range of safeguarding issues, including neglect and child sexual and/or criminal exploitation, particularly county lines. It is important that the School's response to persistently absent students and children missing education supports identifying such abuse, and in the case of absent students, helps prevent the risk of them becoming a child missing education in the future. The School's procedures for unauthorised absence and for dealing with children who go missing from education are found in the *Missing Pupil and Children who are absent from education Policy incl EYFS*. Further detail can also be found at Appendix 1 of this policy.

Where reasonably possible, the School will hold more than one emergency contact number for each student to provide the School with additional options to make contact with a responsible adult particularly when a child missing from education is also identified as a welfare and/or safeguarding concern.

## Safeguarding and Child Protection at Nottingham High School

The School will report to Nottingham City a student who fails to attend school regularly or has been absent from school without the School's permission for a continuous period of 10 school days or more.

When working with local authority children's services where school absence indicates safeguarding concerns the School will have regard to the non-statutory DfE guidance '*Working together to improve school attendance*'.

### What staff should do if a child needs a social worker (Children in Need and Child Protection Plans)

Children may need a social worker due to safeguarding or welfare needs. Children may need this help due to abuse, neglect and complex family circumstances. A child'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.

Local authorities should share the fact a child has a social worker, and the DSL should hold and use this information so that decisions can be made in the best interests of the child's safety, welfare, and educational outcomes. This should be considered as a matter of routine.

Where children need a social worker, this should inform decisions about safeguarding (for example, responding to unauthorised absence or missing education where there are known safeguarding risks) and about promoting welfare (for example, considering the provision of pastoral and/or academic support, alongside action by statutory services).

### What staff should do if a child requires mental health support

The School has an important role to play in supporting the mental health and wellbeing of its students. Mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation. The School aims to prevent health problems by promoting resilience as part of a whole school approach to social and emotional wellbeing of our students.

Staff can access a range of advice to help them identify children in need of extra mental health support, this includes working with external agencies. More information can be found in the DfE *Mental Health and Behaviour in Schools* guidance. The UK Health Security Agency has produced a range of resources to support school teachers to promote positive health, wellbeing, and resilience among young people.

## Safeguarding and Child Protection at Nottingham High School

### What staff should do if they have safeguarding concerns about another staff member

If staff have safeguarding concerns about another staff member (including supply staff, agency staff, volunteers and contractors), then this should be referred to the Head. Where there are concerns about the Head, this should be referred to the Chair of Governors. In the event of allegations of abuse being made against the Head, staff are referred to the procedures below regarding managing allegations of abuse against staff (including supply staff, agency staff, volunteers, and contractors) and refer the matter directly to the designated officer(s) at Nottingham City.

### What staff should do if they have concerns about safeguarding practices in the School

The School aims to ensure there is a culture of safety and raising concerns and an attitude of 'it could happen here'. Where staff have concerns about poor or unsafe practices and potential failures in the School's safeguarding systems, these should be raised in accordance with the School's whistleblowing procedures which can be found in the *Whistleblowing Policy* which can be found in SharePoint. There will be no disciplinary action taken against a member of staff for making such a report provided that it is done in good faith.

If staff and volunteers feel unable to raise an issue with the School or feel that their genuine concerns are not being addressed, they may use other whistleblowing channels, such as the NSPCC whistleblowing advice line. Contact details for the NSPCC helpline can be found on the Key Contacts page at the start of this policy.

### What about informing parents?

Parents play an important role in protecting their children from abuse and will normally be kept informed, as appropriate, of any action to be taken under these procedures. However, there may be circumstances when the DSL or Headmaster will need to consult the Designated Officer, children's services and/or the Police before discussing details with parents e.g. where the concern relates to the student's home life or the Police are involved in the matter.

When an external agency is involved in speaking with children, and where possible and practical, the School will establish whether the external agency believe that parents should be contacted prior to a child being interviewed, contacted afterwards or not contacted at all. In this scenario, the responsibility for informing parents of the involvement of an external agency will, where possible and practical, be clearly established, for example by asking the external agency directly whether the School can contact the parents and what information can be provided.



## Safeguarding and Child Protection at Nottingham High School

In relation to Channel referrals, the DSL will consider seeking the consent of the student (or their parent/guardian) when determining what information can be shared. Whether or not consent is sought will be dependent on the circumstances of the case but may relate to issues such as the health of the individual, law enforcement or protection of the public.

### ARRANGEMENTS FOR DEALING WITH CHILD ON CHILD ALLEGATIONS (INCLUDING CHILD ON CHILD SEXUAL VIOLENCE AND HARASSMENT)

Child on child abuse is abuse by one or more children against another child. It can be standalone or as part of wider abuse and can happen both inside and outside of school, and online. It can manifest itself in many ways and can include abuse within intimate partner relationships, bullying (including cyber bullying, prejudice-based and discriminatory bullying), abuse within intimate partner relationships between children, physical abuse (such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm), initiation/hazing type violence and rituals, upskirting, sexting, consensual and non-consensual sharing of nudes and/or semi-nudes, sexual assault, gender-based issues, sexual behaviours including child on child sexual violence and sexual harassment, causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party. It can also occur through a group of children sexually assaulting or sexually harassing a single child or group of children.

These arrangements apply to all reports and concerns of child on child abuse, whether they have happened in school or outside of it, and/or online. Abuse that occurs online or outside of school should not be downplayed and should be treated equally seriously.

Staff will address inappropriate behaviour (even if it appears to be relatively innocuous) to help prevent problematic, abusive and/or violent behaviour in the future. The School takes a zero-tolerance approach and abusive comments and interactions should never be passed off or dismissed as "banter" or "part of growing up". Nor will harmful sexual behaviours, including sexual comments, remarks or jokes and online sexual harassment, be dismissed as the same or "just having a laugh" or "boys being boys". Staff will also challenge physical behaviours (that are potentially criminal in nature), such as grabbing bottoms, breasts and genitalia, pulling down trousers, flicking bras and lifting up skirts. Dismissing or tolerating such behaviours risks normalising them.

The School acknowledges that even if there have been no reported cases of child on child abuse in relation to students within the School, such abuse may still be taking place and is simply not being reported. The School will ensure that children are aware of how they can report abuse, and that they are aware of the procedures that the School will follow once a

## Safeguarding and Child Protection at Nottingham High School

report has been made. These procedures will be well promoted and in a format that is easily accessible and easily understood by children.

The School recognises that a child is likely to disclose an allegation to someone they trust: this could be any member of staff. By making such a disclosure the student is likely to feel that the member of staff is in a position of trust. The School also recognises that children may not find it easy to tell staff about their abuse verbally and that instead they may show signs or act in ways they hope adults will notice and react to. It is also recognised that an incident may come to a member of staff's attention through a report of a friend, or by overhearing conversations. It is therefore important that all staff are clear on the School's policy and procedures with regards to child on child abuse, and can recognise the indicators and signs of child on child abuse and know how to identify it and how to respond to reports.

The School recognises that a first disclosure to a trusted adult may only be the first incident reported. It is not necessarily representative of a singular incident. Staff will take all reports of abuse seriously regardless of how long it has taken for the child to come forward. Staff will act immediately and will support the victim when they raise a concern.

The School recognises that children with special educational needs and disabilities (SEND) or certain health conditions are three times more likely to be abused by their peers and other children, can face additional safeguarding challenges and may be more prone to child-on-child group isolation or bullying (including prejudice-based bullying) than other children. The School will consider extra pastoral support for those children via their Tutor, Senior Tutor, Learning Support Coordinator, Head of Year, Assistant Head (Individuals) and/or Deputy Head (Individuals) as appropriate. The School also recognises that certain children may face additional barriers to reporting an incident of abuse because of their vulnerability, disability, sex, ethnicity and/or sexual orientation.

The School's Child on Child Abuse Policy can be found in Appendix 2.

Where an issue of student behaviour or bullying gives 'reasonable cause to suspect that a child is suffering, or is likely to suffer, harm', staff should follow the procedures below rather than the School's Anti-Bullying and Behaviour policies:

A student against whom an allegation of abuse has been made may be suspended from the School during the investigation. The School will take advice from the Nottingham City Safeguarding Children Partnership on the investigation of such allegations and will take all appropriate action to ensure the safety and welfare of all students involved including the alleged victim and perpetrator(s). If it is necessary for a student to be interviewed by the police in relation to allegations of abuse, the School will ensure that, subject to the advice of the Nottingham City Safeguarding Children Partnership, parents are informed as soon as possible and that the students involved are supported during the interview by an appropriate adult and



## Safeguarding and Child Protection at Nottingham High School

until the investigation is completed. Confidentiality will be an important consideration for the School and advice will be sought as necessary from the Nottingham City Safeguarding Children Partnership.

The victim may ask the School not to tell anyone about the sexual violence or sexual harassment. Advice should be sought from the DSL or DDSL who should consider: parents or carers should normally be informed unless doing so would put the victim at greater risk; the basic safeguarding principal that if a child is at risk of harm, is in immediate danger, or has been harmed, a referral should be made to local authority children's social care; and whether a crime has been committed. Ultimately, the DSL or DDSL will balance the victim's wishes against their duty to protect the victim and other children.

Police may be informed of any harmful sexual behaviours which are potentially criminal in nature, such as grabbing bottoms, breasts and genitalia. Rape, assault by penetration and sexual assaults will be passed to the police. Where a report has been made to the police, the School will consult the police and agree what information can be disclosed to staff and others, in particular, the alleged perpetrator(s) and their parents or carers. If the DSL decides to make a referral to children's social care and/or a report to the police against a victim's wishes, the reasons should be explained to the student and appropriate specialist support offered. The DSL may also decide that the children involved may benefit from early help, and may make the necessary referral in accordance with the child's Local Authority referral process, depending on where they live. The DSL may also take advice from Nottingham City Safeguarding Children Partnership.

The sending of an indecent image can be illegal. A person under 18 is committing an offence if they send an indecent image of themselves and someone passing this on is also distributing an indecent image of a child. The School seeks to protect children from sexting and the significant impact it can have. Behaviours linked to issues such as consensual and non-consensual sharing of nudes and semi-nude images and/or videos can be signs that children are at risk.

Advice for students and parents is available at:

[www.thinkuknow.co.uk](http://www.thinkuknow.co.uk)

<https://www.childline.org.uk/explore/online-safety/pages/sexting.aspx>

The School will follow the DDMSC / UKIS guidance "Sharing nudes and semi-nudes: advice for education settings working with children and young people" (December 2020) when responding to an allegation that nudes and/or semi-nudes have been shared.

In the event of disclosures about child on child abuse, all children involved (both victim(s) and perpetrator(s)) will be treated as being at risk, and safeguarding procedures in accordance with this policy will be followed. Victims will be supported by the DSL, DDSL, Tutor, Senior

## Safeguarding and Child Protection at Nottingham High School

Tutor and/or Head of Year as appropriate and support from external agencies will be sought, as appropriate.

When there has been a report of sexual violence, the DSL will make an immediate risk and needs assessment. Where there has been a report of sexual harassment, the need for a risk assessment should be considered on a case-by-case basis. The risk and needs assessment should consider:

- the victim;
- whether there may have been other victims;
- the alleged perpetrator(s); and
- all the other children (and, if appropriate, staff) at the School especially any actions that are appropriate to protect them from the alleged perpetrator(s), or from future harms.

Risk assessments will be recorded (written or electronic) and kept under review. In relation to a report of sexual violence or sexual harassment, the DSL (and indeed all staff) will reassure any victim that they are being taken seriously and that they will be supported and kept safe. The victim will never be made to feel ashamed for making a report nor will they be given the impression that they are creating a problem by reporting sexual violence or sexual harassment; nor would a victim ever be made to feel ashamed for making a report or have their experience minimised. The School will explain to the child in a way that avoids alarming or distressing them that the law is in place to protect children rather than to criminalise them. The School will consider the age and the developmental stage of the victim, the nature of the allegations and the potential risk of further abuse. The School acknowledges that, by the very nature of sexual violence and sexual harassment, a power imbalance is likely to have been created between the victim and alleged perpetrator(s). The DSL will consider the risks posed to students and put adequate measures in place to protect them and keep them safe and to ensure their educational attainment is not adversely affected as far as is possible. This may include careful consideration of the proximity of the victim and alleged perpetrator and considerations regarding shared classes, sharing School premises (including during any before or after school-based activities), and School transport. The School will also consider the risks posed to the victim from other health needs, including physical, mental and sexual health problems, as well as unwanted pregnancy which may arise as a result of the incident, and will consider recommending additional support.

The School will consider intra familial harms and whether any support for siblings is necessary following an incident.

The School will keep a written record of all concerns, discussions and decisions made.

The School will reflect on reported concerns, including the decisions made and actions taken, in order to identify any patterns of concerning, problematic or inappropriate behaviour which

## Safeguarding and Child Protection at Nottingham High School

may indicate an unacceptable culture, or any weaknesses in the School's safeguarding system which may require additional training or amendments to relevant policies. Where a pattern is identified the School will decide on an appropriate course of action.

In the event that a report is proven to be false, unsubstantiated, unfounded or malicious, the DSL will consider whether the child and/or the person who has made the allegation is in need of help or may have been abused by someone else and this is a cry for help. In such circumstances, a referral to children's social care may be appropriate. If a report is shown to be deliberately invented or malicious, the Head will consider whether any disciplinary action is appropriate against the individual who made it in accordance with the School's behaviour policies.

### Dealing with safeguarding concerns or allegations made about staff including supply teachers, volunteers and contractors

The School's procedures for managing allegations against staff (including supply staff, volunteers and contractors) who are currently working in the School whether in a paid or unpaid capacity follows DfE statutory guidance and Nottingham City Safeguarding Children Partnership] and applies when staff (including volunteers) have (or are alleged to have):

- 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 indicated that they may pose a risk of harm if they were to work regularly or closely with children; and/or
- Behaved or may have behaved in a way that indicates they may not be suitable to work with children, including behaviour that may have happened outside of school.

In this section reference to 'allegations' also covers concerns. Allegations that do not meet the above harm test should be dealt with using the School's procedure for handling low level concerns set out below.

Allegations against a teacher who is no longer teaching should be referred to the police. Historical (non-recent) allegations of abuse should be referred to the police and also the LADO. Non-recent allegations made by a child will be reported to the LADO in line with the local authority's procedures for dealing with non-recent allegations. The LADO will coordinate with children social care and the police.

If an allegation is made against anyone working with children in the School, before contacting the LADO, the School will conduct a basic enquiry in line with local procedures to establish the facts in order to determine whether there appears to be any foundation to the allegation.

## Safeguarding and Child Protection at Nottingham High School

The School should not undertake their own investigation of the allegation(s) without prior consultation with the LADO or, in the most serious cases, the police, so as not to jeopardise statutory investigations. In borderline cases, the School may discuss informally with the LADO on a no-names basis.

When dealing with an allegation about a staff member the School will apply common sense and judgment, deal with allegations quickly, fairly and consistently and will support the person subject to the allegation.

1. Concerns including allegations which appear to meet the above reporting criteria are to be reported straight away to the 'case manager' who is the Head, who may then delegate the role to the DSL. If an allegation is reported to the DSL, the DSL will keep the Head informed. Where the Head or DSL is absent or is the subject of the allegation or concern, reports should be made to the Chair of Governors or school proprietor. Where the Head or DSL is the subject of the allegation or concern, the Head or DSL must not be informed of the allegation prior to contact with the Chair of Governors and LADO. However, staff may consider discussing any concerns with the DSL and make any referral via them.
2. The case manager should immediately discuss the allegation with the LADO and consider the nature, content and context of the allegation and agree a course of action including any involvement of the police. Where the case manager deems there to be an immediate risk to children or there is evidence of a possible criminal offence, or it is an emergency situation, the case manager should contact children's social care and as appropriate the police immediately. All discussions should be recorded in writing, and any communication with both the individual and the parents of the child(ren) agreed. The LADO should be informed within one working day of all allegations that come to the School's attention and appear to meet the criteria or that are made directly to the police and/or children's social care. The DSL is responsible for ensuring the child is not at risk.
3. Where the case manager is concerned about the welfare of other children in the community, or the member of staff's family, they will discuss these concerns with the LADO and make a risk assessment of the situation. It may be necessary for the LADO to make a referral to children's social care.
4. When to inform the individual, who is the subject of the allegation, will be considered on a case by case basis and with guidance from the LADO, and if appropriate, the police and/or children's social care. Subject to any objection, the case manager will ensure that the individual who is subject of the allegation is informed as soon as possible and given an explanation of the likely course or action. The case manager will

## Safeguarding and Child Protection at Nottingham High School

appoint a named representative to keep the individual informed of the progress of the case and will consider what other support is appropriate for the individual.

5. The case manager should give careful consideration as to whether the circumstances of the case warrant suspension from contact with children at the School or whether alternative arrangements should be put in place until the allegation is resolved. The following alternative arrangements should be considered by the case manager before suspending a member of staff:
  - redeployment within the School so that the individual does not have direct contact with the child or children concerned;
  - providing an assistant to be present when the individual has contact with children;
  - redeploying to alternative work in the School so the individual does not have unsupervised access to children;
  - moving the child or children to classes where they will not come into contact with the member of staff, but this decision should only be made if it is in the best interest of the child or children concerned and takes accounts of their views. It should be made making it clear that this is not a punishment and parents have been consulted; or,
  - temporarily redeploying the member of staff to another role in a different location, for example to an alternative school where available.

These alternatives allow time for an informed decision regarding the suspension, this will, however, depend upon the nature of the allegation.

Suspension should not be an automatic response when an allegation is reported. It should be considered only in cases where there is cause to suspect a child or other children at the School is/are at risk of harm, or the case is so serious that it might be grounds for dismissal. The case manager will give due weight to the views of the LADO, *WT* and *KCS/E* when making a decision about suspension (including with respect to considering alternatives). Where the individual is suspended, the case manager will confirm the decision within one working day, and will ensure they know who their point of contact is in the School and shall provide them with their contact details. The case manager will also record the rationale and justification for the suspension, including what alternatives were considered and why they were rejected.

6. Where further enquiries are required to enable a decision about how to proceed, the LADO and case manager should discuss how and by whom the investigation will be undertaken. The LADO will provide advice and guidance to the School to ensure that an appropriate investigation is carried out. In straightforward cases, the investigation should usually be undertaken by a senior member of staff at the School. Where there

## Safeguarding and Child Protection at Nottingham High School

is lack of resource, or the nature or complexity of the allegation requires it, an independent investigator may be appointed to undertake the investigation.

7. The case manager will ensure that parents are informed as soon as possible and kept informed about progress of the case, subject to any advice from children's social care or the police. Parents and others will be made aware that there are restrictions on publishing information which may lead to the identification of the teacher subject to the allegation.
8. The case manager will monitor the progress of cases to ensure they are dealt with as quickly as possible in a thorough and fair process. The outcome of the investigation of an allegation will record whether it is substantiated (sufficient evidence to prove it), unsubstantiated (insufficient evidence either to prove or disprove it), false (sufficient evidence to disprove it), malicious (sufficient evidence to disprove it and that there has been a deliberate act to deceive or cause harm to the person subject of the allegation) or unfounded (to reflect cases where there is no evidence or proper basis which supports the allegation being made).
9. Reviews are conducted at fortnightly or monthly intervals, depending on the complexity of the case. The first review will take place no later than four weeks after the initial assessment and subsequent review dates will be set at the review meeting.
10. The case manager will discuss with the LADO whether a referral to the Disclosure and Barring Service or Teaching Regulation Agency should be made where an allegation is substantiated and the person is dismissed or the School ceases to use their services, or the person resigns or otherwise ceases to provide their services. The School has a legal obligation to report promptly to the Disclosure and Barring Service any person (whether employed, contracted, a volunteer or a student) who has harmed, or poses a risk of harm, to a child, or if there is reason to believe the member of staff has committed one of a number of listed offences, and who has been removed from working (paid or unpaid) in regulated activity, or would have been removed had they not left. Further, or in the alternative, if an investigation leads to the dismissal or resignation prior to dismissal of a member of teaching staff specifically, the School must consider making a referral to the Teaching Regulation Agency and a prohibition order may be appropriate (because that teacher has displayed unacceptable professional conduct, conduct that may bring the profession into disrepute or a conviction at any time for a relevant offence).
11. On conclusion of the case, the case manager should review the circumstances of the case with the LADO to determine whether there are any improvements to be made to the School's safeguarding procedures or practices to help prevent similar events in the future. Learning lessons where the allegation is concluded to be either, unfounded,



## Safeguarding and Child Protection at Nottingham High School

false, malicious or unsubstantiated, the case manager (and if they have been involved, the LADO) should consider the facts and determine whether any lessons can be learned and if improvements can be made.

Where an individual is removed from regulated activity, or would have been removed had the individual not left, including when they are suspended, redeployed to work that is not regulated activity, are dismissed, or have resigned, and the individual has engaged in relevant conduct in relation to children and/or adults, and/or satisfied the harm test in relation to children and/or vulnerable adults, and/or been cautioned or convicted of a relevant (automatic barring either with or without the right to make representations) offence, the School will make a referral to the DBS.

The School has a duty of care to its staff, and whilst the welfare of a child is paramount, the School must offer appropriate welfare support to the adult subject to the investigation and potentially their family. The School will also make every reasonable effort to maintain confidentiality and guard against unwanted publicity whilst an allegation is being investigated or considered. Information will also not ordinarily be shared with other staff or with children or parents who are not directly involved in the investigation.

Where initial discussions lead to no further action, the case manager and the LADO should record the decision and justification for it and agree on what information should be put in writing to the individual concerned, and by whom.

Allegations found to be malicious or false will be removed from the individual's personnel records unless the individual gives consent for retention of the information. In all other circumstances a written record will be made of the decision and retained on the individual's personnel file in accordance with *KCSIE* and a copy will only be provided to the individual concerned. The information to be kept on file includes a clear and comprehensive summary of the allegation, details of how the allegation was followed up and resolved, a note of any action taken, decisions reached and the outcomes, and a declaration on whether the information will be referred to in any future reference. Schools have an obligation to preserve records which contain information about allegations of sexual abuse for the duration of the inquiry in accordance with the guidelines of the Independent Inquiry into Child Sexual Abuse ("IICSA"). All other records should be retained until the accused has reached pension age, or for a period of 10 years from the date of the allegation, whichever is longer.

Allegations proven to be false, unsubstantiated, unfounded or malicious will not be included in employer references. If an allegation is shown to be deliberately invented or malicious, the DSL should consider whether the child and/or the person who has made the allegation is in need of help or may have been abused by someone else and this is a cry for help. In such circumstances, a referral to children's social care may be appropriate. If a report is shown to be deliberately invented or malicious, the Head will consider whether any disciplinary action

## Safeguarding and Child Protection at Nottingham High School

is appropriate against a student who made it in accordance with the School's behaviour policies; or whether the police should be asked to consider if action might be appropriate against the person responsible even if they are not a student.

In all cases where there are concerns or allegations of abuse, the School will make a serious incident report to the Charity Commission whenever the Commission's guidelines deem it appropriate to do so.

### Dealing with safeguarding concerns and allegations about supply teachers and contractors

The School's procedures for managing allegations against staff above also apply to staff not directly employed by the School, for example, supply teachers provided by an employment agency or business ('the agency'). The School will usually take the lead but agencies should be fully involved (because they have their own policies and procedures) and co-operate with any enquiries from the LADO, police and/or children's social care.

In no circumstances will the School decide to cease to use a supply teacher due to safeguarding concerns, without finding out the facts and liaising with the LADO to determine a suitable outcome. The School will discuss with the agency (or agencies where the supply teacher is working across a number of schools) whether it is appropriate to suspend the supply teacher, or redeploy them to another part of the school, whilst they carry out their investigation.

The School will advise supply teachers being investigated to contact their trade union representative if they have one, or a colleague for support. The allegations management meeting which is often arranged by the LADO should address issues such as information sharing, to ensure that any previous concerns or allegations known to the agency are taken into account by the School during the investigation.

When using an agency, the School should inform the agency of its process for managing allegations but also take account of the agency's policies and their duty to refer to the DBS as personnel suppliers. This should include inviting the agency's human resource manager or equivalent to meetings and keeping them up to date with information about its policies.

Where the agency dismisses or ceases to use the services of a teacher because of serious misconduct, or might have dismissed them or ceased to use their services had they not left the School first, the School must consider whether to refer the case to the Secretary of State (via the Teaching Regulation Agency).



## Safeguarding and Child Protection at Nottingham High School

### Dealing with safeguarding concerns and allegations about organisations or individuals using school premises

The School may receive an allegation or concern relating to an incident that happened when an individual or organisation was using the school premises for the purposes of running activities for children and/or vulnerable adults (for example community groups, sports associations, or service providers that run extra-curricular activities). As with any safeguarding allegation, the School will follow their safeguarding policy and procedures, including informing the LADO.

When services or activities at the School are provided under the direct supervision or management of school staff, this Policy will apply in relation to any safeguarding concerns or allegations. Where services or activities are not under the direct supervision or management of the School, the School will seek assurance that any individual or organisation has appropriate safeguarding and child protection policies and procedures in place (and the School will inspect these as needed); and ensure that there are arrangements in place for the provider to liaise with the School on these matters where appropriate.

The School has arrangements in place for the use of school premises for non-school activities including the availability of the DSL or DDSL and how they can be contacted.

### Dealing with concerns or allegations that do not meet the harm threshold

A low-level concern is any concern 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 LADO.

A 'low-level' concern does not mean that it is insignificant. A concern may be a low-level concern, no matter how small, even if it does no more than give a sense of unease or a 'nagging doubt'. Such behaviour can exist on a wide spectrum, from the inadvertent or thoughtless, or behaviour that may look to be inappropriate, but might not be in specific circumstances, through to that which is ultimately intended to enable abuse (for example, grooming-type behaviours).

The School takes all concerns about safeguarding seriously and recognises that addressing even low-level concerns is important to create and embed a culture of openness, trust and

## Safeguarding and Child Protection at Nottingham High School

transparency in which the School's values and expected behaviour of its staff are constantly lived, monitored and reinforced by all staff.

The School has a Low-Level Concerns section in the Staff Code of Conduct which enables all staff to share concerns – no matter how small – about their own or another member of staff's behaviour.

The School's Staff Code of Conduct can be found on the [School website](#). The aim of the Staff Code of Conduct is to provide clear guidance about the standards of appropriate behaviour and actions of its staff so as to not place students or staff at risk of harm or of allegation of harm to a student. All staff are expected to comply with the standards contained within this code of conduct at all times.

The procedure for sharing confidentially any such concerns is set out in the Staff Code of Conduct. The Head is the ultimate decision-maker in respect of all low-level concerns.

Staff must share all concerns with the Head without delay so that it can be recorded and dealt with appropriately, sensitively, and proportionately and in a timely manner. Where a low-level concern is raised about the Head, it should be referred to the Chair of Governors.

Staff are also encouraged to self-refer in the event that they have found themselves in a situation which may be misinterpreted, might appear compromising to others, and/or on reflection they believe they have behaved in a way that may be considered to fall below the expected professional standard. All concerns will be handled sensitively and will be dealt with appropriately and proportionately.

If a concern is raised by a third party, the Head will collect as much evidence as possible by speaking to the person who has raised the concern (if known), to the individual involved and any witnesses. The concern will be recorded in accordance with this policy, in the usual way.

The School will address unprofessional behaviour at an early stage and will support the individual to correct it.

All low-level concerns will be recorded in writing. The record will include details of the concern, the context within which the concern arose, and details of the action taken. The name of the reporting individual should also be included, unless they have asked to remain anonymous, which will be respected as far as reasonably possible. The records will be kept confidential, will be held securely and in compliance with the Data Protection Act 2018 and the UK GDPR at all times. The information will be retained for 7 years after the individual has left employment. Low-level concerns will not be included in references unless they relate to issues which would normally be disclosed, for example, misconduct or poor performance.

## Safeguarding and Child Protection at Nottingham High School

The School will also reflect on reported concerns in order to identify any patterns of concerning, problematic or inappropriate behaviour which may indicate an unacceptable culture, or any weaknesses in the School's safeguarding system which may require additional training or modified policies. Where a pattern is identified, the School will decide on a course of action, either through its disciplinary procedures, or, where the pattern moved from a concern to meeting the harms threshold, it will follow the above procedure and refer the matter to the LADO.

Where a low-level concern relates to a person employed by a supply agency or a contractor, the individual's employer will be notified about the concern, so that any potential patterns of inappropriate behaviour can be identified.

If the School is in any doubt as to whether a low-level concern in fact meets the harm threshold, the Head will consult with the LADO and take a more collaborative decision-making approach.

### SAFER RECRUITMENT

The School is committed to safer recruitment processes to create a culture that safeguards and promotes the welfare of children in the School whilst deterring and preventing people who are unsuitable to work with children from applying or securing employment, or volunteering opportunities, within the School.

Members of the teaching and non-teaching staff at the School including part-time staff, temporary and supply staff, and visiting staff, such as musicians and sports coaches are subject to the necessary statutory child protection checks before starting work, for example, right to work checks, additional overseas checks (if necessary), verifying identity, taking up references, checking work history and confirming medical fitness for the role. For most appointments, an enhanced DBS check with 'barred list' information will be appropriate. A DBS certificate will be obtained from the candidate before or as soon as practicable after appointment. Alternatively, if the applicant has subscribed to it and gives permission, the School may undertake an online update check through the DBS Update Service.

Full details of the School's safer recruitment procedures for checking the suitability of staff, Governors and volunteers to work with children and young people is set out in the Recruitment Selection and Disclosures Policy and Procedure.

The School's protocols for ensuring that any visiting speakers, whether invited by staff or students themselves, are suitable and appropriately supervised is set out in Visitors, Contractors and Visiting Speakers procedure, which can be accessed via SharePoint or Human Resources (HR@nottinghamhigh.co.uk).

## Safeguarding and Child Protection at Nottingham High School

Further information about the School's procedures for managing contractors attending the School site can be accessed by contacting John Willis, Estates Manager at [willis.j@nottinghamhigh.co.uk](mailto:willis.j@nottinghamhigh.co.uk).

### MANAGEMENT OF SAFEGUARDING

The Senior School's DSL is Lisa Gritti, and the Infant & Junior School's DSL is Clare Bruce, both of whom are members of the School Management Team.

Michaela Smith is the Senior School DDSL and Christian Cordy is the Infant & Junior School DDSL and the people to whom reports should be made in the absence of the DSL. This ensures there is the required cover for the role at all times.

The DSL and DDSL's contact details can be found on the Key Contacts page at the start of this policy.

The DSL's role is to take lead responsibility for safeguarding and child protection matters in the School. The DSL's responsibility is to maintain an overview of safeguarding within the School, to open channels of communication with local statutory agencies, refer incidents to third parties (including the local authority children's services, the DBS, Channel and the police) where appropriate, to support staff in carrying out their safeguarding duties and to monitor the effectiveness of the School's policies and procedures in practice. The DSL works with the governors to review and update the School's safeguarding policy.

Where a student leaves the School, including for in-year transfers, the DSL will also ensure their child protection file is transferred to the new school (separately from the main student file) as soon as possible and within 5 days for an in-year transfer or within the first 5 days of the start of a new term. The DSL will ensure secure transit and obtain confirmation of receipt. In addition to the child protection file, the DSL should also consider if it would be appropriate to share any additional information with the new school in advance of a child leaving to help them put in place the right support to safeguard this child and to help the child thrive in the school.

The DSL regularly reviews the School's and their own practices and concerns about welfare and safeguarding matters. This includes the personal and professional duty of all staff to report welfare and safeguarding concerns to the DSL, or in the absence of action, directly to local children's services.

During term time, the DSL and/or a DDSL will always be available during school hours for staff in the School to discuss any safeguarding concerns. If a DSL or DDSL is not available in person, they can be contacted via email or telephone as per the numbers at the start of this policy. For out of hours/out of term activities, the School's arrangements include;

## Safeguarding and Child Protection at Nottingham High School

- contact details of DSL/DDSLs being provided at the start of this policy
- an additional out of hours/out of term email address [info@nottinghamhigh.co.uk](mailto:info@nottinghamhigh.co.uk) that is checked regularly
- a rota of DSL/DDSLs to respond to safeguarding concerns out of hours/out of term time.

The DSL or DDSL should liaise with other agencies in line with *WT*. “*NPCC - When to call the police*” can assist the DSL or DDSL understand when they should consider calling the police and what to expect when they do. If the School has questions about any police investigation, it will ask the police. The DSL or DDSL will also be responsible for liaising with key pastoral staff, including the School Counsellor and, where available, local mental health support e.g. CAMHS, where safeguarding concerns are linked to mental health. The DSL and DDSL should be confident as to what local specialist support is available to support all children involved in sexual violence and sexual harassment and be confident as to how to access this support when required.

Whilst the Head should ensure that the policies and procedures adopted, particularly those concerning referrals of cases of suspected abuse and neglect, are understood and followed by all staff, and the Governors are ultimately responsible for ensuring staff are competent, supported and regularly reviewed in relation to safeguarding, the ultimate lead responsibility for safeguarding and child protection remains with the DSL and this responsibility should not be delegated.

Full details of the DSL’s role can be found at Annex C of *KCSIE*.

### TRAINING

Induction and training are in line with advice from Nottingham City Safeguarding Children Partnership. In addition to induction safeguarding training, every member of staff, including part-time, temporary, visiting and contract staff working in School, receives basic training on their responsibilities at least annually in being alert to the signs of abuse and bullying, online safety and on the procedures for recording and referring any concerns to the DSL or the Headmaster, including managing a report of child on child sexual violence and harassment.

All staff attend full refresher training at least every three years in line with LSP recommendations (due September 2024). In line with Nottingham City Council procedure, this is in the form of a revision of the ‘Introduction Course’. Child Protection training is also available to all Governors and volunteers and refresher training is offered to them every three years. All staff receive regular updates to training through INSET Days, staff briefings and emailed information and this occurs at least once a year in line with recommendations in *KCSIE*. All training records are kept securely. Staff have been given guidance regarding online safety of staff and students during remote learning.

## Safeguarding and Child Protection at Nottingham High School

All staff are trained both on induction and annually via an online training tool that requires them to read and understand this policy and Part 1 of KCSIE (2023). Staff are tested on their understanding of the policy and guidance electronically and their responses are recorded centrally by the training tool.

Staff are also briefed, on induction and annually, on our behaviour policy, missing child policy, online safety policy and anti-bullying policies, the acceptable use of technology at NHS, and the protocols for mobile technology and cameras in the EYFS. They are directed to the whistleblowing policy in the employment handbook and reminded about appropriate staff and student relationships. The Online Safety Policy includes guidance on the importance of ICT in students' lives and the need to be alert to students' use of 3G/4G/5G access to networks via their device. Many children have unlimited and unrestricted access to the internet via mobile phone networks. This access means some children, whilst at school, sexually harass other children via their mobile and smart technology, share indecent images: consensually and non-consensually (often via large chat groups), and view and share pornography and other harmful content. Our PSHE curriculum supports the education of online safety of our students.

Training in child protection is an important part of the induction process and is given to all staff as soon as possible. This includes appropriate training on preventing extremism and radicalisation, child sexual exploitation and female genital mutilation, alongside other categories of abuse, to enable staff to identify students at risk. Staff are aware of the importance of early help and their role in the process. A DSL or DDSL will normally take the lead on early help cases.

All new staff and volunteers should be confident about:

- their personal responsibilities
- the School's policies and procedures
- how to support and respond to a child who tells of abuse
- recording and reporting concerns.

### All Staff

All new staff will be provided with induction training that includes<sup>156</sup>:

- the child protection and safeguarding policy (including the policy and procedures to deal with child on child abuse);
- the role and identity of the DSL(s) and any DDSLs
- the behaviour management policy (including measures to prevent bullying, including cyberbullying, prejudice-based and discriminatory bullying);
- the Staff Code of Conduct including the School's whistleblowing procedure and the acceptable use of technologies policy, staff/student relationships and communications including the use of social media



## Safeguarding and Child Protection at Nottingham High School

- the safeguarding response to children who are absent from education, particularly on repeat occasions and/or prolonged periods or children missing education;
- the online safety policy, including an understanding of the expectations, applicable roles and responsibilities in relation to filtering and monitoring.
- a copy of Part one of *KCSIE* at least
- School leaders and staff who work directly with children will also be required to read Annex B of *KCSIE* (and Part Five of *KCSIE*).

Copies of the above documents are provided to all staff during induction.

All staff are also required to:

- Read at least Part one of *KCSIE* and confirm that they have done so. Each time Part one of *KCSIE* is updated by the Department for Education, staff will be updated on the changes via our online training platform.
- Understand key information contained in Part one of *KCSIE*. The School will ensure staff understanding by face-to-face training, where appropriate, and the use of questions on the online training platform.
- Receive training in safeguarding and child protection regularly, in line with advice from the Nottingham City Safeguarding Children Partnership. Training will include online safety and harmful sexual behaviours (including child on child sexual violence and harassment). It will also include Prevent awareness training to equip staff to raise concerns appropriately by ensuring all staff have the knowledge and confidence to identify children at risk of being drawn into terrorism; are able to challenge extremist ideas; and know how to refer children and young people for further help.
- Undertake regular informal updates, at least annually, to provide them with relevant skills and knowledge to safeguard children effectively, including online. The School provides these via, for example, emails, e-bulletins, and staff briefings and staff meetings.

### Governors

The governing body will ensure that all governors receive appropriate safeguarding and child protection (including online) training at induction. This training should equip them with the knowledge to provide strategic challenge to test and assure themselves that the safeguarding policies and procedures in place in the School are effective and support the delivery of a robust whole school approach to safeguarding. Their training should be regularly updated.

The governing body are aware of their obligations under the Human Rights Act 1998 (HRA), the Equality Act 2010, and their local multi-agency safeguarding arrangements. Under the Human Rights Act 1998, it is unlawful for the School to act in a way that is incompatible with the European Convention on Human Rights (ECHR) Convention. Being subjected to

## Safeguarding and Child Protection at Nottingham High School

harassment, violence and or abuse, including that of a sexual nature, may breach conventions set out in the European Convention on Human Rights (ECHR) Convention. The Equality Act 2010 includes that the School;

- must not lawfully discriminate against students because of their protected characteristics;
- must consider how they are supporting students with protected characteristics;
- must take positive actions, where proportionate, to deal with the disadvantages these students face;
- be conscious that students with protected characteristics may be at more risk of harm and integrate this into its safeguarding procedures and policies.

### DSL(s)

The DSL receives updated child protection training at least every two years to provide them with the knowledge and skills required to carry out the role. This includes local inter-agency working protocols, participation in child protection case conferences, supporting children in need, identifying children at risk of radicalisation, record keeping and promoting a culture of listening to children, training in the Nottingham City Safeguarding Children Partnership's approach to *Prevent* duties [and harmful sexual behaviours]. Further details of the required training content for the DSL are set out in Annex C of *KCSIE*.

In addition to their formal training, the DSL's knowledge and skills are updated at least annually to keep up with any developments relevant to their role. In particular, the School will support the DSL in developing their knowledge and skills to understand the views of children including to encourage a culture of listening to children and taking account of their wishes, as well as having an awareness of the difficulties children may face in approaching staff with a disclosure.

The DDSL is trained to the same level as the DSL.

## OVERSIGHT OF SAFEGUARDING, INCLUDING ARRANGEMENTS FOR REVIEWING POLICIES AND PROCEDURES

Dr Gail Walton and Dr Sharmini Krishinand are the board-level leads designated to take a lead in relation to responsibility for the safeguarding arrangements in the School. They are members of the governing body.

The School considers its obligation to review safeguarding practices a matter of its everyday concerns. A review of the School's safeguarding and child protection policy, and related policies, take place at least annually at Governors' Meetings, including an update and review of the effectiveness of procedures and their implementation, including lessons learnt. The School draws on the expertise of staff, including the DSL(s), in shaping the School's safeguarding arrangements and policies.



## Safeguarding and Child Protection at Nottingham High School

The School's safeguarding policies and procedures should be transparent, clear, and easy to understand for staff, students, students, parents, and carers.

If there has been a substantiated allegation against a member of staff, the School will work with the LADO to determine whether there are any improvements to be made to the School's procedures or practice to help prevent similar events in the future.

### THE SCHOOL'S ARRANGEMENTS TO FULFIL OTHER SAFEGUARDING RESPONSIBILITIES

#### Teaching children how to keep safe

The governing body ensures that all students are taught about safeguarding, including online safety, through the curriculum and PSHE to help children to adjust their behaviours, both inside and outside of School, in order to reduce risks and build resilience, including to radicalisation. This includes teaching students about the safe use of electronic equipment and the internet and the risks posed by adults or young people, who use the internet and social media to bully, groom, abuse or radicalise other people, especially children, young people and vulnerable adults. The School recognises that a "one size fits all" approach may not be appropriate for all children, and a more personalised or contextualised approach for more vulnerable children, victims of abuse and some SEND children might be needed.

Internet safety (including when children are online at home) is an integral part of the School's ICT curriculum and also embedded in PSHE and Relationships Education and Relationships and Sex Education ("RSE").

#### Filtering and monitoring

The School has appropriate filters and monitoring systems in place to safeguard children from potentially harmful and inappropriate material online when using the School's IT system. The School's systems include Smoothwall.

Such systems aim to reduce the risk of children being exposed to illegal, inappropriate or harmful materials online (content risk); reduce the risk of children being subjected to harmful online interaction with others including commercial advertising and grooming (contact risk); restrict access to online risks such as online gambling, phishing or financial scams (commerce risk); and help manage online behaviour that can increase a child's likelihood of, or causes, harm for example making, sending and receiving explicit images.

The School recognises however that children have unlimited and unrestricted access to the internet via mobile phone networks (i.e. 3G, 4G and 5G) which means that children may

## Safeguarding and Child Protection at Nottingham High School

consensually and/or non-consensually share indecent images, sexually harass their peers via mobile and smart technology, and view and share pornography and other harmful content whilst at school undetected.

The School ensures compliance with the DfE's 'filtering and monitoring standards for schools' by;

- Identifying and assigning roles and responsibilities to manage filtering and monitoring systems.
- Reviewing the filtering and monitoring provision at least annually.
- Blocking harmful and inappropriate content without unreasonably impacting teaching and learning.
- Having effective monitoring strategies in place that meet our safeguarding needs.

Further detail of the School's policy and procedures in relation to online safety can be found in the School's Online Safety Policy which also includes detail on the School's filtering and monitoring arrangements to ensure that children are safe from harmful and inappropriate content, including terrorist and extremist material when accessing the through the School's systems.

The School will liaise with parents to reinforce the importance of children being safe online and the systems the School uses to filter and monitor online use. Parents and carers will be made aware of what their children are being asked to do online when undertaking remote learning, including the sites they will asked to access and who from the School their child is going to be interacting with online.

### Relationships and Sex Education ("RSE")

RSE is compulsory from September 2020 although the School has flexibility to decide how it discharges its duties within the first year of compulsory teaching. The School understands that preventative education is most effective in the context of a whole-school approach that prepares children for life in modern Britain and creates a culture of zero tolerance for sexism, misogyny/misandry, homophobia, biphobic, and sexual violence/harassment.

The School will have regard to the DfE's statutory guidance *Relationships Education, Relationships and Sex Education (RSE) and Health Education* when making arrangements for and teaching RSE.

Relationships education and RSE will form part of the School's PSHE programme.

### Looked after children

## Safeguarding and Child Protection at Nottingham High School

The governing body ensures that staff have the skills, knowledge and understanding necessary to keep safe any children on roll who are looked after by a local authority.

Lisa Gritti (Senior School) and Christian Cordy (Infant & Junior School) are the designated members of staff who have responsibility for their welfare and progress. The School ensures that the designated member of staff receives appropriate training in order to carry out their role.

### Arrangements for visiting speakers

The School has clear protocols for ensuring that any visiting speakers are appropriately supervised and suitable. The School's responsibility to students is to ensure that they can critically assess the information they receive as to its value to themselves, and that the information is aligned to the ethos and values of the School and British values.

The School is required to undertake a risk assessment process before agreeing to a Visiting Speaker being allowed to attend the School. This will take into account any vetting requirements considered appropriate in the circumstances and may include a DBS check if relevant.

Visiting speakers will be expected to understand that, where appropriate, their session should actively promote the British values of democracy, the rule of law, individual liberty and mutual respect and tolerance of those with different faiths and beliefs and at no point undermine these. In some cases, the School may request a copy of the Visiting Speaker's presentation and/or footage in advance of the session being provided.

Visiting Speakers, whilst on the School site, will be supervised by a School employee. On attending the School, visiting speakers will be required to sign in at Visitor Reception using our electronic system. The School shall also keep a formal register of visiting speakers retained in line with its Data Protection Policy.

### Arrangements for use of school premises for non-school activities

When services or activities at the School are provided under the direct supervision or management of school staff, this Policy will apply in relation to any safeguarding concerns or allegations.

Where services or activities are not under the direct supervision or management of the School, the School will seek assurance that any individual or organisation has appropriate safeguarding and child protection policies and procedures in place (and the School will inspect these as needed); and ensure that there are arrangements in place for the provider to liaise

## Safeguarding and Child Protection at Nottingham High School

with the School on these matters where appropriate. This applies regardless of whether or not the children who attend any of these services or activities are children on the school roll.

The School will ensure that the DSL or DDSL can be contacted and/or is available at all times the school premises is in use, whether that activity is a school or non-school activity and regardless as to whether the children attending are on the school roll.

The DSL can be contacted via [dsl@nottinghamhigh.co.uk](mailto:dsl@nottinghamhigh.co.uk). In an emergency, the police should be contacted.

A robust risk assessment is completed before a lease is commenced and safeguarding procedures and policies scrutinised by the School. A new lease is issued and risk assessment complete annually following any statutory and non-statutory guidance updates.

The School will ensure that safeguarding requirements are included in any agreement for use of the school premises (such as a lease or hire agreement) as a condition of use and occupation of the premises and that failure to do so by the provider to comply with this will lead to termination of the agreement.

When considering the safeguarding arrangements any providers have in place the School will have regard to the DfE's non statutory guidance '*Keeping children safe in out-of-school settings*' (April 2022).

## Safeguarding and Child Protection at Nottingham High School

### EARLY YEARS PROVISION SAFEGUARDING ARRANGEMENTS

#### Disqualification from working in childcare

Where staff work in, or are involved in the management of, the School's early years or provision of care of students under the age of eight, the School will take steps to check whether those staff are disqualified under the Childcare Act 2006. These checks will be undertaken pre-appointment. This forms part of the School's safer recruitment practices, further details of which can be found in the School's Recruitment Selection and Disclosures Policy and Procedure

The School records all checks of staff employed to work in or manage relevant childcare on the Single Central Register. This includes the date disqualification checks were completed.

Where a member of staff is found to be disqualified or if there is doubt over that issue then, pending resolution, the School will remove them from the work from which they are or may be disqualified. Suspension or dismissal will not be an automatic response; the School will consider if there is scope in principle to redeploy them with other age groups or in other work from which they are not disqualified, subject to assessing the risks and taking advice from the LADO when appropriate.

#### Use of mobile phones and cameras

Personal mobile phones and personal cameras with imaging and sharing capability may not be used within the EYFS setting. Staff, parents and visitors are required not to have their mobile phones or personal cameras out for use within the setting. There is signage within the setting to state this.

During working hours, personal mobile phones and cameras must be kept out of the reach of children and parents, in a secure area accessible only to staff. All staff are made aware of their duty to follow this procedure. If, in the School context, a member of staff takes a photo on a personal mobile phone, this must be uploaded to social media and deleted from the personal mobile as soon as possible.

In a medical emergency (for example a child experiencing a seizure), a mobile phone may be used to call an ambulance and take advice from medical professionals where needed.

Visitors to the setting, including parents, are requested not to have their mobile phones accessible or in use in the EYFS setting.

## Safeguarding and Child Protection at Nottingham High School

School issued iPads are used within the EYFS classrooms to take photographs and videos of the children to capture their learning and provide a learning journey for parents. These iPads remain on school premises and the photographs used are for this purpose.

With the permission of the Head, parents are welcome to take images of their own children at award ceremonies, concerts/shows, Friends functions and sporting events. In all such cases, express permission will be signalled to those attending. Without this permission, photography of any kind is prohibited.

If parents choose to photograph their child at such an event, they should show consideration and courtesy to other audience members and ensure that they do not hamper their enjoyment of the event, or distract the students who are participating in the event.

Therefore, whilst parents may not use cameras and phones around the site on a daily basis, at public events such devices are permitted with permission from the Head.

### DSL for the EYFS

The practitioner designated to take lead responsibility for safeguarding children in the early years settings is Clare Bruce.

## Safeguarding and Child Protection at Nottingham High School

### APPENDIX 1 SIGNS AND TYPES OF ABUSE

All School staff should be aware that abuse, neglect, and safeguarding issues are rarely standalone events and cannot be covered by one definition or one label alone. In most cases, multiple issues will overlap with one another therefore staff should always be vigilant and always raise any concerns with the DSL or DDSL.

All staff should be aware that safeguarding incidents and/or behaviours can be associated with factors outside the School and/or can occur between children outside of these environments. All staff, but especially the DSL and DDSL, should consider whether children are at risk of abuse or exploitation in situations outside their families. Extra-familial harms take a variety of different forms and children can be vulnerable to multiple harms including (but not limited to) sexual abuse (including harassment and exploitation), domestic abuse in their own intimate relationships (teenage relationship abuse), criminal exploitation, serious youth violence, county lines, and radicalisation.

All staff should be aware that technology is a significant component in many safeguarding and wellbeing issues and should recognise that children are at risk of abuse online as well as face to face. In many cases abuse will take place concurrently online and in daily life. Staff should be aware that children can also abuse other children online, this can take the form of abusive, harassing, and misogynistic/misandrist messages, the non-consensual sharing of indecent images, especially around chat groups, and the sharing of abusive images and pornography, to those who do not want to receive such content.

**In all cases, if staff are unsure, they should always speak to the DSL (or DDSL).**

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

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



## Safeguarding and Child Protection at Nottingham High School

involved in all types of maltreatment of a child, although it may occur alone. **Sexual abuse:** involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing, and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (including via the internet). Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children. Sexual abuse also includes sexual violence and sexual harassment (see below) which can occur between two children of any sex (also known as child on child abuse). This can also occur through a group of children sexually assaulting or sexually harassing a single child or group of children. Sexual violence are sexual offences under the Sexual Offences Act 2003, such as rape, sexual assault, and assault by penetration. Schools should be aware that sexual assault covers a very wide range of behaviour so a single act of kissing someone without consent or touching someone's bottom/breasts/genitalia without consent, can still constitute sexual assault.

**Sexual harassment:** is 'unwanted conduct of a sexual nature' that can occur online and offline and both inside and outside of school. Sexual harassment is likely to violate a child's dignity, and/or make them feel intimidated, degraded, or humiliated and/or create a hostile, offensive or sexualised environment. Sexual harassment 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; physical behaviour, such as deliberately brushing against someone, interfering with someone's clothes; or upskirting, and sharing of unwanted explicit content (for example displaying pictures, photos or drawings of a sexual nature); and online sexual harassment, which might include consensual or non-consensual sharing of sexual images and videos (often referred to as the sharing of nudes/semi-nudes, or sexting – see below); inappropriate sexual comments on social media; exploitation; coercion and threats. Online sexual harassment may be standalone, or part of a wider pattern of sexual harassment and/or sexual violence.

**Sexual violence:** refers to sexual offences under the Sexual Offences Act 2003, including rape, assault by penetration, sexual assault, and/or causing someone to engage in sexual activity without consent. Consent to sexual activity may be given to one sort of sexual activity, but not another, or penetration with conditions, such as wearing a condom. Consent can be withdrawn at any time during sexual activity and each time activity occurs. A child under the age of 13 can never consent to any sexual activity. The age of consent is 16, and sexual intercourse without consent is rape.

**Child-on-child sexual violence and/or harassment:** Sexual violence and sexual harassment (as defined above) can occur between two children of any age and sex, from

## Safeguarding and Child Protection at Nottingham High School

primary through to secondary stage and into colleges. It can occur through a group of children sexually assaulting or sexually harassing a single child or group of children. It is more likely that girls will be the victims of sexual violence and harassment, and it is more likely that it will be perpetrated by boys. It can however occur between children of any sex. Sexual violence and sexual harassment exist on a continuum and may overlap; they can occur online and face to face (both physically and verbally) and are never acceptable. Children who are victims of sexual violence and/or sexual harassment wherever it happens, will likely find the experience stressful and distressing. This will, in all likelihood, adversely affect their educational attainment and will be exacerbated if the alleged perpetrator(s) attends the same school or college.

**Harmful sexual behaviour:** problematic, abusive and violent sexual behaviour is developmentally inappropriate and may cause developmental damage. A useful umbrella term is “harmful sexual behaviour”. Harmful sexual behaviour can occur online and/or face-to-face and can also occur simultaneously between the two. Sexual behaviour between children can be considered harmful if one of the children is much older, particularly if there is more than two years’ age difference, or if one of the children is pre-pubescent and the other is not. However, a younger child can abuse an older child, particularly if they have power over them, for example, if the older child is disabled or smaller in stature.

**Sharing of nudes and/or semi-nudes:** the sending or posting of nude or semi-nude images, videos, or live streams online by young people under the age of 18. This could be via social media, gaming platforms, chat apps or forums. It could also involve sharing between devices via services like Apple’s AirDrop which works offline. The sharing of nudes and semi-nudes can happen publicly online, in 1:1 messaging or via group chats and closed social media accounts and may include images or footage of more than one child or young person.

Alternative terms used by children and young people may include ‘dick pics’ or ‘pics’ or may be referred to by adults or professionals as ‘youth produced/involved sexual imagery’, ‘indecent imagery’, ‘image based sexual abuse’ or ‘sexting’.

The motivations for taking and sharing nude and semi-nude images, videos and live streams are not always sexually or criminally motivated. Such images may be created and shared consensually by young people who are in relationships, as well as between those who are not in a relationship. It is also possible for a young person in a consensual relationship to be coerced into sharing an image with their partner. Incidents may also occur where:

- children and young people find nudes and semi-nudes online and share them claiming to be from a peer/child
- children and young people digitally manipulate an image of a young person into an existing nude online

## Safeguarding and Child Protection at Nottingham High School

- images created or shared are used to abuse peers/children e.g. by selling images online or obtaining images to share more widely without consent to publicly shame

For this reason, incidents can either be classified as 'aggravated' or 'experimental'. The DDCMS / UKIS guidance "*Sharing nudes and semi-nudes: advice for education settings working with children and young people*" sets out the classification of incidents, and how each should be handled.

**Upskirting:** is a criminal offence and typically involves taking a picture under a person's clothing (not necessarily a skirt) without their permission and/or knowledge, with the intention of viewing their genitals or buttocks (with or without underwear) to obtain sexual gratification, or cause the victim humiliation, distress or alarm. Anyone of any sex can be a victim.

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

**Serious violence:** indicators which may signal that children are at risk from, or are involved with serious violent crime include increased absence from School, a change in friendships or relationships with older individuals or groups, a significant decline in performance, signs of self-harm or a significant change in wellbeing, or signs of assault or unexplained injuries. Unexplained gifts or new possessions could also indicate that children have been approached by, or are involved with, individuals associated with criminal networks or gangs and may be at risk of criminal exploitation. All staff should be aware of the associated risks which increase the likelihood of involvement in serious violence (for example, being male, frequent absence from school or permanently excluded from school, experienced child maltreatment or having been involved in offending) and understand the measures in place to manage these.

**Specific safeguarding issues:** behaviours linked to drug taking, alcohol abuse, truancy and sexting put children in danger. Safeguarding issues can also manifest themselves via child on child abuse, such as abuse within intimate partner relationships, bullying (including cyberbullying), gender-based violence/sexual assaults, sexting and upskirting. Safeguarding issues can also be linked to, for example, children missing education; child sexual exploitation; domestic violence; fabricated or induced illness; faith abuse (including ostracism of families); female genital mutilation; forced marriage; gangs and youth violence; gender-based violence / violence against women and girls; hate; mental health; preventing radicalisation; relationship

## Safeguarding and Child Protection at Nottingham High School

abuse; sexting; consensual and non-consensual sharing of nudes and semi-nudes; and trafficking.

**Child sexual exploitation (CSE):** CSE is a form of child sexual abuse (see above) which occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into sexual activity (a) in exchange for something the victim needs or wants (for example, money, gifts or affection), and/or (b) for the financial advantage or increased status of the perpetrator or facilitator. Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including gender, sexual identity, cognitive ability, physical strength, status, and access to economic or other resources.

The victim may have been sexually exploited even if the sexual activity appears consensual. CSE does not always involve physical contact; it can also occur through the use of technology. CSE can affect any child or young person (male or female) under the age of 18 years (including 16- and 17-year olds who can legally consent to have sex) who has been coerced into engaging in sexual activities. It can include both contact (penetrative and non-penetrative acts) and non-contact sexual activity and may occur without the child or young person's immediate knowledge (e.g. through others copying videos or images they have created and posted on social media). Some children may not realise they are being exploited e.g. they believe they are in a genuine romantic relationship.

CSE can be a one-off occurrence or a series of incidents over time and range from opportunistic to complex organised abuse. It can involve force and/or enticement-based methods of compliance and may, or may not, be accompanied by violence or threats of violence.

The below CCE indicators can also be indicators of CSE, as can:

- children who have older boyfriends or girlfriends, and
- children who suffer from sexually transmitted infections, display sexual behaviours beyond expected sexual development or become pregnant.

The DfE has published guidance on this entitled "*Child sexual exploitation: guide for practitioners*".

CSE may occur alone, or may overlap with CCE, and/or county lines, as well as other forms of abuse.

**Child criminal exploitation (CCE):** CCE is where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child into any criminal activity (a) in exchange for something the victim needs or wants (for example, money, gifts or affection), and/or (b) for the financial or other advantage (such as increased status) of the perpetrator or facilitator and/or (c) through violence or the threat of violence. Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including

## Safeguarding and Child Protection at Nottingham High School

gender, sexual identity, cognitive ability, physical strength, status, and access to economic or other resources. The victim may have been criminally exploited even if the activity appears consensual. CCE does not always involve physical contact; it can also occur through the use of technology.

CCE can include children being forced to work in cannabis factories, being coerced into moving drugs or money across the country (county lines, see below), forced to shoplift or pickpocket. They can also be forced or manipulated into committing vehicle crime or threatening/committing serious violence to others.

Children can become trapped by this type of exploitation as perpetrators can threaten victims (and their families) with violence or entrap and coerce them into debt. They may be coerced into carrying weapons such as knives or begin to carry a knife for a sense of protection from harm from others. Children can be exploited by adult males or females, as individuals or in groups. They may also be exploited by other children, who themselves may be experiencing exploitation – where this is the case, their vulnerability as victims is not always recognised by adults and professionals (especially when they are older children). It is important in these circumstances that the child perpetrator is also recognised as a victim.

Some of the following can be indicators of CCE:

- children who appear with unexplained gifts, money, or new possessions
- children who associate with other children involved in exploitation
- children who suffer from changes in emotional well-being
- children who misuse drugs and alcohol
- children who go missing for periods of time or regularly come home late, and
- children who regularly miss school or education or do not take part in education.

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

CCE may occur alone, or may overlap with CSE, and/or county lines, as well as other forms of abuse.

Children who have been exploited will need additional support to help maintain them in education.

**County lines:** County lines is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs, using dedicated mobile phone lines or other form of “deal line”.

## Safeguarding and Child Protection at Nottingham High School

This activity can happen locally as well as across the UK - no specified distance of travel is required. Children and vulnerable adults exploited to sell drugs and move and store drugs and money. Offenders will often use coercion, intimidation, violence (including sexual violence) and weapons to ensure compliance of victims. Children can be targeted and recruited into county lines in a number of locations including schools (mainstream and special), further and higher educational institutions, student referral units, children's homes and care homes. Children are increasingly being targeted and recruited online using social media. Children can easily become trapped by this type of exploitation as county lines gangs can manufacture drug debts which need to be worked off or threaten serious violence and kidnap towards victims (and their families) if they attempt to leave the county lines network.

A number of the ways of identifying indicators for CSE and CCE as detailed above may be applicable to where children are involved in county lines. Some additional specific indicators that may be present where a child is criminally exploited through involvement in county lines are children who:

- go missing and are subsequently found in areas away from their home;
- that have been the victim or perpetrator of serious violence (e.g. knife crime);
- are involved in receiving requests for drugs via a phone line, moving drugs, handing over and collecting money for drugs;
- are exposed to techniques such as 'plugging', where drugs are concealed internally to avoid detection;
- are found in accommodation that they have no connection with, often called a 'trap house or cuckooing' or hotel room where there is drug activity;
- owe a 'debt bond' to their exploiters;
- have their bank accounts used to facilitate drug dealing.

Further information on the signs of a child's involvement in county lines is available in guidance published by the Home Office.

**Modern Slavery:** Modern slavery encompasses human trafficking and slavery, servitude and forced or compulsory labour. Exploitation can take many forms, including sexual exploitation, forced labour, slavery, servitude, forced criminality and the removal of organs. 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 National Referral Mechanism is available in the statutory guidance "*Modern slavery: how to identify and support victims (May 2022)*".

**Cybercrime:** is criminal activity committed using computers and/or the internet. It is broadly categorised as either 'cyber-enabled' (crimes that can happen off-line but are enabled at scale and at speed on-line) or 'cyber dependent' (crimes that can be committed only by using a computer). Cyber-dependent crimes include:



## Safeguarding and Child Protection at Nottingham High School

- unauthorised access to computers (illegal 'hacking'), for example accessing a school's computer network to look for test paper answers or change grades awarded;
- denial of Service (Dos or DDoS) attacks or 'booting'. These are attempts to make a computer, network, or website unavailable by overwhelming it with internet traffic from multiple sources; and,
- making, supplying, or obtaining malware (malicious software) such as viruses, spyware, ransomware, botnets, and Remote Access Trojans with the intent to commit further offence, including those above.

Children with particular skill and interest in computing and technology may inadvertently or deliberately stray into cyber-dependent crime.

If there are concerns about a child in this area, the DSL (or a deputy), should consider referring into the Cyber Choices programme. This is a nationwide police programme supported by the Home Office and led by the National Crime Agency, working with regional and local policing. It aims to intervene where young people are at risk of committing, or being drawn into, low level cyber-dependent offences and divert them to a more positive use of their skills and interests. Cyber Choices does not currently cover 'cyber-enabled' crime such as fraud, purchasing of illegal drugs on-line and child sexual abuse and exploitation, nor other areas of concern such as on-line bullying or general on-line safety.

Additional advice can be found at: Cyber Choices, 'NPCC- When to call the Police' and National Cyber Security Centre - NCSC.gov.uk.

**Mental health:** all staff should be aware that mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation.

Only appropriately trained professionals should attempt to make a diagnosis of a mental health problem. Staff, however, are well placed to observe children day-to-day and identify those whose behaviour suggests that they may be experiencing a mental health problem or be at risk of developing one.

Where children have suffered abuse and neglect, or potentially traumatic adverse childhood experiences, this can have a lasting impact throughout childhood, adolescence and into adulthood. It is key that staff are aware of how these children's experiences can impact on their mental health, behaviour, attendance and progress at school.

If staff have a mental health concern about a child that is also a safeguarding concern, immediate action should be taken, following this policy, and speaking to the DSL {or DDSL}.

The DfE has published advice and guidance on *Preventing and Tackling Bullying, and Mental Health and Behaviour in Schools*. In addition, Public Health England has produced a range of



## Safeguarding and Child Protection at Nottingham High School

resources to support secondary and senior school teachers to promote positive health, wellbeing and resilience among young people including its guidance *Promoting Children and Young People's Emotional Health and Wellbeing*. Its resources include social media, forming positive relationships, smoking and alcohol.

**So called 'honour based' abuse:** encompasses crimes which have been committed to protect or defend the honour of the family and/or the community, including Female Genital Mutilation (FGM)], forced marriage, and practices such as breast ironing.

Abuse committed in the context of preserving "honour" often involves a wider network of family or community pressure and can include multiple perpetrators. It is important to be aware of this dynamic and additional risk factors when deciding what form of safeguarding action to take.

FGM comprises all procedures involving partial or total removal of the external female genitalia or other injury to the female genital organs. Guidance on the warning signs that FGM may be about to take place, or may have already taken place, can also be found on pages 38-41 of the Multi-agency statutory guidance on FGM. To give an example of indications that a girl has already been subjected to FGM:

- A student may have difficulty walking, sitting, or standing and may even look uncomfortable.
- A student may have frequent urinary, menstrual or stomach problems or spend longer than normal in the bathroom due to difficulties urinating.
- There may be prolonged or repeated absences from School and/or noticeable behaviour changes (e.g. withdrawal or depression) on the student's return.
- A student is reluctant to undergo medical examination.

**If staff have a concern that a student may be at risk of FGM, they should speak to the DSL or DDSL who will (where appropriate) activate local safeguarding procedures, using existing national and local protocols for multi-agency liaison with police and Children's Social Care.**

There is a statutory duty on teachers to personally 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. Anyone found guilty of failing to protect a girl from risk of FGM faces up to 7 years in prison, a fine, or both. Unless the teacher has a good reason not to, they should still consider and discuss any such case with the DSL and involve children's social care as appropriate. If the teacher is unsure whether this reporting duty applies, they should discuss their concerns with the DSL in accordance with this policy. Where a teacher suspects that a student is at risk (i.e. where the teacher does not discover that an act of FGM appears

## Safeguarding and Child Protection at Nottingham High School

to have been carried out, either through disclosure by the victim or visual evidence) or it involves a student over 18, teachers should follow the School's local safeguarding procedures. Further information can be found in the *Multi-agency statutory guidance on female genital mutilation and the FGM resource pack*, particularly section 13.

**Forced marriage:** Forcing a person into a marriage is a crime in England and Wales. 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 person to enter into a marriage.<sup>248</sup> Threats can be physical or emotional and psychological. A lack of full and free consent can be where a person does not consent or where they cannot consent (if they have learning disabilities, for example). Nevertheless, some communities use religion and culture as a way to coerce a person into marriage. Since February 2023 it has also been a crime to carry out any conduct whose purpose is to cause a child to marry before their 18<sup>th</sup> birthday, even if violence, threats or another form of coercion are not used. As with the existing forced marriage law, this applies to non-binding, unofficial 'marriages' as well as legal marriages.

Schools and colleges can play an important role in safeguarding children from forced marriage. There are a range of potential indicators that a child may be at risk of forced marriage, details of which can be found on pages 13-14 of the *Multi-agency guidelines: Handling cases of forced marriage*. Further information on forced marriage is available in guidance published by the Forced Marriage Unit. School staff can also contact the Forced Marriage Unit if they need advice or information: Contact: 020 7008 0151 or email [fm@fco.gov.uk](mailto:fm@fco.gov.uk).

**Radicalisation:** Radicalisation refers to the process by which a person comes to support terrorism and forms of extremism. Extremism is 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. It can also call for the death of members of the armed forces, whether in this country or overseas. Terrorism is an action that endangers or causes serious violence to a person/people; causes serious damage to property; or seriously interferes or disrupts an electronic system. The use or threat must be designed to influence the government or to intimidate the public and is made for the purpose of advancing a political, religious, or ideological cause.

There is no single way of identifying whether a child is likely to be susceptible to an extremist ideology. Background factors combined with specific influences such as family and friends may contribute to a child's vulnerability. Similarly, radicalisation can occur through many different methods (such as social media or the internet) and settings (such as within the home). As with other safeguarding risks, staff should be alert to changes in children's behaviour, which could indicate that they may be in need of help or protection. Staff should use their judgement in identifying children who might be at risk of radicalisation and act proportionately, which may include making a Prevent referral. Designated safeguarding leads and other senior leaders in

## Safeguarding and Child Protection at Nottingham High School

colleges should familiar themselves with the Prevent duty guidance: for further education institutions in England and Wales. Staff should contact the DSL or the DDSL, who should be aware of the local procedures in place, before making a Prevent referral.

In the event of a child leaving, the DSL should consider if it would be appropriate to share any information with the new school or college. For example, information that would allow the new school or college to continue supporting victims of abuse or those who are currently receiving support through the 'Channel' programme and have that support in place for when the child arrives at the new school.

**Special educational needs and/or disabilities (SEND), or students with certain health conditions:** Students with SEND or certain health conditions can face additional safeguarding challenges. These children may not outwardly show signs of abuse and/or may have difficulties in communication about abuse or neglect, or bullying.

These can include:

- assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's condition without further exploration;
- these children being more prone to peer group isolation or bullying (including prejudice-based bullying) than other children;
- the potential for children with SEND or certain health conditions being disproportionately impacted by behaviours such as peer group isolation or bullying (including prejudice-based bullying), without outwardly showing any signs;
- communication barriers and difficulties in managing or reporting these challenges;
- being unable to understand the difference between fact and fiction in online content and then repeating the content/behaviours in School or the consequences of doing so.

Staff will support such students in expressing any concerns they may have and will be particularly vigilant to any signs or indicators of abuse, discussing this with the DSL as appropriate.

**Lesbian, gay, bi or trans ("LGBTQ+"):** The fact that a child may be LGBTQ+ is not in itself an inherent risk factor for harm. However, children who are LGBTQ+ can be targeted by children. In some cases, a student who is perceived by another child/children to be LGBTQ+ (whether they are or not) can be just as vulnerable as children who identify as LGBTQ+. Risks can be compounded where children who are LGBTQ+ lack a trusted adult with whom they can be open. The School endeavours to provide a safe space for LGBTQ+ children to speak out or share their concerns with trusted members of staff.

**Domestic abuse:** The Domestic Abuse Act 2021 received Royal Assent on 29 April 2021. The Act introduces the first ever statutory definition of domestic abuse and recognises the impact of domestic abuse on children, as victims in their own right, if they see, hear, or

## Safeguarding and Child Protection at Nottingham High School

experience the effects of abuse. The statutory definition of domestic abuse, based on the previous cross-government definition, ensures that different types of relationships are captured, including ex-partners and family members. The definition captures a range of different abusive behaviours, including but not limited to, psychological, sexual, physical, emotional, and economic abuse and coercive and controlling behaviour. Both the person who is carrying out the behaviour and the person to whom the behaviour is directed towards must be aged 16 or over and they must be “personally connected” (as defined in section 2 of the 2021 Act).

Types of domestic abuse include intimate partner violence, abuse by family members, teenage relationship abuse and child/adolescent to parent violence and abuse.

Anyone can be a victim of domestic abuse, regardless of gender, age, ethnicity, socio-economic status, sexuality or background and domestic abuse can take place inside or outside of the home. The government will issue statutory guidance to provide further information for those working with domestic abuse victims and perpetrators, including the impact on children.

All children can witness and be adversely affected by domestic abuse in the context of their home life where domestic abuse occurs between family members. Experiencing domestic abuse and/or violence can have a serious, long lasting emotional and psychological impact on children. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result.

Young people can also experience domestic abuse within their own intimate relationships. This form of child on child abuse is sometimes referred to as ‘teenage relationship abuse’. Depending on the age of the young people, this may not be recognised in law under the statutory definition of ‘domestic abuse’ (if one or both parties are under 16). However, as with any child under 18, where there are concerns about safety or welfare, child safeguarding procedures should be followed and both young victims and young perpetrators should be offered support. The Act’s provisions, including the new definition, will be commenced over the coming months.

Domestic Abuse may lead to other safeguarding concerns and should therefore be managed under this policy. School staff can contact Operation Encompass on 0204 513 9990 for advice in respect of children who have experienced domestic abuse.

**Homelessness:** Being homeless, or at risk of homelessness presents a real risk to a child's welfare. The School should be aware of potential indicators of homelessness including household debt, rent arrears, domestic abuse, and anti-social behaviour, as well as a family being asked to leave a property. If staff are made aware or suspect that a student may be at risk of homelessness they should talk to the DSL in the first instance. Whilst referrals to the Local Housing Authority should be progressed as appropriate, and in accordance with local

## Safeguarding and Child Protection at Nottingham High School

procedures, this does not and should not replace a referral to the LADO where a child has been harmed or is at risk of harm, in accordance with this policy.

**Children who are absent from school:** A child being absent from school, particularly repeatedly and/or for prolonged periods, and children missing education is a potential indicator of a range of safeguarding issues including abuse, neglect, sexual abuse, CSE and CCE. It can also be a sign of child criminal exploitation including involvement in county lines. It may indicate mental health problems, risk of substance abuse, risk of travelling to conflict zones, risk of FGM, so-called 'honour'-based abuse or risk of forced marriage. Staff must follow the School's procedures for dealing with children who are absent, particularly persistently or for prolonged periods. The School's procedure for dealing with children who are absent and/or missing can be found in the *Missing Pupil and Children who are absent from education Policy incl EYFS*. All unexplained absences will be followed up in accordance with this policy.

The School shall inform the local authority of any student who is going to be added to or deleted from the School's admission register at non-standard transition points in accordance with the requirements of the Education (Student Registration) (England) Regulations 2006 (as amended). This will assist the local authority to:

- a) fulfil its duty to identify children of compulsory school age who are missing from education; and
- b) follow up with any child who might be in danger of not receiving an education and who might be at risk of abuse, neglect, or radicalisation.

School attendance registers are carefully monitored to identify any trends. The School will inform the local authority and the local authority where the child is normally resident of any student who fails to attend school regularly, or has been absent without the School's permission for a continuous period of 10 school days or more.

Action should be taken in accordance with this policy if any absence of a student from the School gives rise to a concern about their welfare. The School's policy supports identification of abuse and provides preventative measures against the risk of the child going missing in the future. This applies when issues are first emerging as well as where children are already known to the local authority children's social care and need a social worker.

**Child abduction and community safety incidents:** Child abduction is the unauthorised removal or retention of a minor from a parent or anyone with legal responsibility for the child. Child abduction can be committed by parents or other family members; by people known but not related to the victim (such as neighbours, friends, and acquaintances); and by strangers.

## Safeguarding and Child Protection at Nottingham High School

Other community safety incidents in the vicinity of a school can raise concerns amongst children and parents, for example, people loitering nearby or unknown adults engaging children in conversation.

As children get older and are granted more independence (for example, as they start walking to school on their own) it is important they are given practical advice on how to keep themselves safe. Many schools provide outdoor-safety lessons run by teachers or by local police staff.

It is important that lessons focus on building children's confidence and abilities rather than simply warning them about all strangers. Further information is available at: [www.actionagainstabduction.org](http://www.actionagainstabduction.org) and [www.clevernevergoes.org](http://www.clevernevergoes.org).

**Children and the court system:** Children are sometimes required to give evidence in criminal courts, either for crimes committed against them or for crimes they have witnessed. There are two age appropriate guides to support children 5-11 year olds and 12-17 year olds available on the gov.uk website.

The guides explain each step of the process and support and special measures that are available. There are diagrams illustrating the courtroom structure and the use of video links is explained.

Making child arrangements via the family courts following separation can be stressful and entrench conflict in families. This can be stressful for children. The Ministry of Justice has launched an online child arrangements information tool with clear and concise information on the dispute resolution service. The School may refer some parents and carers to this service where appropriate.

**Children with family members in prison:** Approximately 200,000 children in England and Wales have a parent sent to prison each year. These children are at risk of poor outcomes including poverty, stigma, isolation, and poor mental health. The National Information Centre on Children of Offenders (NICCO) provides information designed to support professionals working with offenders and their children, to help mitigate negative consequences for those children.



## Safeguarding and Child Protection at Nottingham High School

### APPENDIX 2 CHILD ON CHILD ABUSE POLICY

The Governors, Senior Management team, and all staff (which term shall apply to all volunteer staff members) at Nottingham High School are committed to the prevention, early identification, and appropriate management of child-on-child abuse (as defined below) both within and beyond the School.

In particular, we:

- believe that in order to protect children, all schools should (a) be aware of the nature and level of risk to which their students are or may be exposed, and put in place a clear and comprehensive strategy which is tailored to their specific safeguarding context; and (b) take a whole-school community Contextual Safeguarding approach to preventing and responding to child-on-child abuse,
- regard the introduction of this policy as a preventative measure. We (a) do not feel it is acceptable merely to take a reactive approach to child-on-child abuse in response to alleged incidents of it; and (b) believe that in order to tackle child-on-child abuse proactively, it is necessary to focus on all four of the following areas: (i) systems and structures; (ii) prevention; (iii) identification; and (iv) response/intervention,
- recognise national and increasing concern about this issue, and wish to implement this policy in order to mitigate harmful attitudes and child-on-child abuse in the school setting, and
- encourage parents to hold us to account on this issue, so that if their child is feeling unsafe as a result of the behaviour of any of another child/children, they should inform the School so that it can ensure that appropriate and prompt action is taken in response.

This policy:

- is the School's overarching policy for any issue that could constitute child-on-child abuse. It relates to, and should be read alongside, the School's Safeguarding and Child Protection policy and any other relevant policies including, but not limited to, bullying, IT Acceptable Use Policy, Data Protection Policy, Missing Pupil and Children who are absent from education Policy incl EYFS and School Behaviour and Discipline policy.
- applies to all Governors, the Senior Management Team, and staff. It is reviewed annually, and updated in the interim, as may be required, to ensure that it continually addresses the risks to which students are or may be exposed.
- recognises that abuse is abuse, and should never be passed off as 'banter', 'just having a laugh', or 'part of growing up',
- is compliant with the statutory guidance on child-on-child abuse as set out in Keeping Children Safe in Education 2023



## Safeguarding and Child Protection at Nottingham High School

- does not use the term ‘victim’ and/or ‘perpetrator’. This is because our School takes a safeguarding approach to all individuals involved in concerns or allegations about child-on-child abuse, including those who are alleged to have been abused, and those who are alleged to have abused children, in addition to any sanctioning work that may also be required for the latter. Research has shown that many children who present with harmful behaviour towards others, in the context of child-on-child abuse, are themselves vulnerable and may have been victimised by peers, parents or adults in the community prior to their abuse of children,
- uses the terms ‘child’ and ‘children’, which is defined for the purposes of this policy as a person aged under 18. We have nonetheless chosen not to restrict our approach to child-on-child abuse under this policy to children but instead to adopt a wider interpretation of our safeguarding responsibilities so that they apply to all students, regardless of age. Although the starting point is that the School’s response to child-on-child abuse should be the same for all students, regardless of age, there may be some different considerations in relation to, for example, a child aged under 10, or a student aged 18 or over in terms of how local agencies and/or partners respond. This, for example, is likely to be different on the part of local authorities, given that their safeguarding duties are limited, in the case of children’s social care – save for a number of specific exceptions – to children and, in the case of adult social care services, to adults with care and support needs.

Similarly, the School’s response to incidents involving the exchange of youth involved sexual imagery will need to differ depending on the age of the students involved. There is also likely to be a more significant criminal justice response in relation to any student responsible for abuse who is aged 18 or over,

- should, if relevant, according to the concern(s) or allegation(s) raised, be read in conjunction with the DfE’s advice on Sexual Violence and Sexual Harassment Between Children in Schools and Colleges (DfE’s Advice) (May 2018), and any other advice and guidance referred to within it, as appropriate, and
- should be read in conjunction with the Local Safeguarding Partnership’s Safeguarding Policy and Procedures, and any relevant Practice Guidance issued by it.

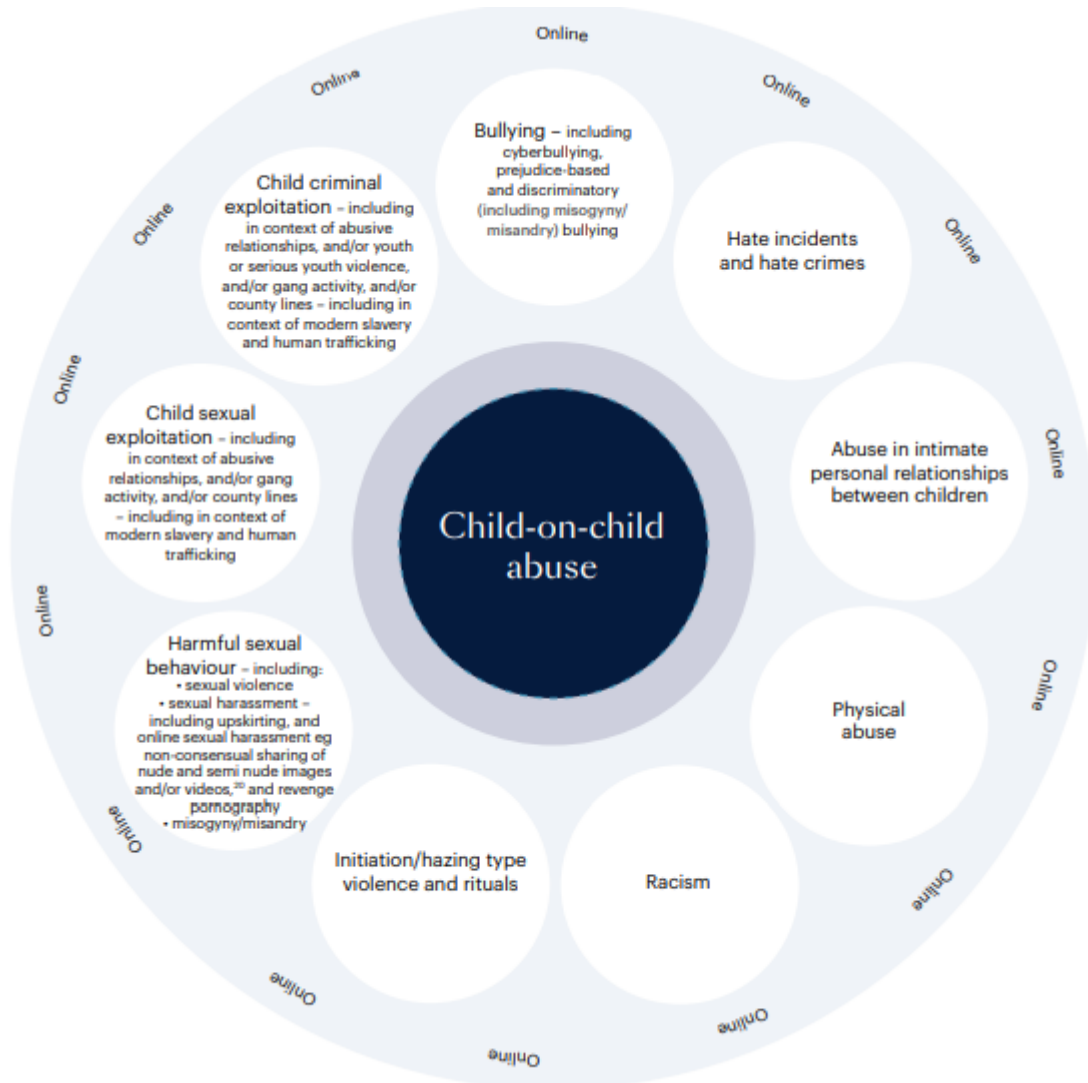
### Understanding child-on-child abuse

#### What is child-on-child abuse?

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

## Safeguarding and Child Protection at Nottingham High School

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



### When does behaviour become problematic or abusive?

All behaviour takes place on a spectrum. Understanding where a child's behaviour falls on a spectrum is essential to being able to respond appropriately to it.

### Sexual behaviours

Simon Hackett has proposed the following continuum model to demonstrate the range of sexual behaviours presented by children, which may be helpful when seeking to understand a student's sexual behaviour and deciding how to respond to it.

## Safeguarding and Child Protection at Nottingham High School

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

Hackett's continuum relates exclusively to sexual behaviours and is not exhaustive. The Brook Sexual Behaviours Traffic Light Tool can help professionals working with children to distinguish between three levels of sexual behaviour – green, amber and red, and to respond according to the level of concern.

### Other behaviour

When dealing with other alleged behaviour which involves reports of, for example, emotional and/or physical abuse, staff can draw on aspects of Hackett's continuum 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,

## Safeguarding and Child Protection at Nottingham High School

- 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 child/ children allegedly responsible for the behaviour and the child/children allegedly the subject of that power, and
- involves a misuse of power.

### How can a child who is being abused by another child/children be identified?

All staff should be alert to the well-being of students and to signs of abuse, and should engage with these signs, as appropriate, to determine whether they are caused by child-on-child abuse. However, staff should be mindful of the fact that the way(s) in which children will disclose or present with behaviour(s) as a result of their experiences will differ.

The School's Senior Management Team should regularly review iSams information and bullying reports which can help to identify any changes in behaviour and/or concerning patterns or trends at an early stage.

### Are some children particularly vulnerable to abusing or being abused by another child/children?

Any child can be vulnerable to child-on-child abuse due to the strength of peer influence during adolescence, and staff should be alert to signs of such abuse amongst all children. Individual and situational factors can increase a child's vulnerability to abuse by another child/children. For example, an image of a child could be shared, following which they could become more vulnerable to child-on-child abuse due to how others now perceive them, regardless of any characteristics which may be inherent in them and/or their family. Peer group dynamics can also play an important role in determining a child's vulnerability to such abuse. For example, children who are more likely to follow others and/or who are socially isolated from their peers may be more vulnerable to child-on-child abuse. Research suggests that:

- child-on-child abuse may affect boys differently from girls, and that this difference may result from societal norms (particularly around power, control and the way in which femininity and masculinity are constructed) rather than biological make-up. Barriers to disclosure will also be different. As a result, schools need to explore the gender dynamics of child-on-child abuse within their settings, and recognise that these will play out differently in single sex, mixed or gender- imbalanced environments,
- children with Special Educational Needs and/or Disabilities (SEND) are three times more likely to be abused than their peers without SEND, and additional barriers can sometimes exist when recognising abuse in children with SEND.

## Safeguarding and Child Protection at Nottingham High School

These can include:

- assumptions that indicators of possible abuse such as behaviour, mood and injury relate to a child's disability without further exploration,
  - the potential for children with SEND to be disproportionately impacted by behaviours such as bullying and harassment, without outwardly showing any signs,
  - communication barriers and difficulties, and
  - overcoming these barriers.
- some children may be more likely to experience child-on-child abuse than others as a result of certain characteristics such as sexual orientation, ethnicity, race or religious beliefs. Their sexuality may also be particularly vulnerable to abuse by another child/children.

### A whole school approach

#### School environment

The School actively seeks to raise awareness of and prevent all forms of child-on-child abuse by:

- educating all Governors, its Senior Management Team, staff, students, and parents about this issue. This includes: training all governors, the Senior Management Team, and staff on the nature, prevalence and effect of child-on-child abuse, and how to prevent, identify, and respond to it. This includes (i) Contextual Safeguarding, (ii) the identification and classification of specific behaviours, including digital behaviours, (iii) 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 horseplay or teasing, and (iv) social media and online safety, including how to encourage children to use social media in a positive, responsible and safe way, and how to enable them to identify and manage abusive behaviour online.
- educating children about the nature and prevalence of child-on-child abuse, positive, responsible and safe use of social media, and the unequivocal facts about consent, via PSHE and the wider curriculum.

### Engaging parents

We are engaging parents on these issues by:

- talking about them with parents, both in groups and one to one,
- asking parents what they perceive to be the risks facing their child and how they would like to see the School address those risks,
- and encouraging parents to hold the School to account on this issue, in part as a result of visibility of this policy.

## Safeguarding and Child Protection at Nottingham High School

### Ethos

- working with Governors, Senior Management Team, and all staff, students and parents to address equality issues, to promote positive values, and to encourage a culture of tolerance and respect amongst all members of the School community,
- creating conditions in which our students can aspire to, and realise, safe and healthy relationships, fostering a whole-school culture:
  - which is founded on the idea that every member of our School community is responsible for building and maintaining safe and positive relationships, and helping to create a safe School environment in which violence and abuse are never acceptable,
  - in which students are able to develop trusting relationships with staff, and in which staff understand, through regular discussion and training, the importance of these relationships in providing students with a sense of belonging, which could otherwise be sought in problematic contexts,
  - in which students feel able to share their concerns openly, in a non-judgmental environment, and have them listened to,
  - which (i) proactively identifies positive qualities in students; (ii) nurtures these qualities; (iii) teaches and encourages students to think about positive hopes for the future; and (vi) supports students in developing small-scale goals that enable realistic ambitions, and
  - which provides supervised activities to students that give them the experience of having their needs met that might otherwise apparently be met in abusive circumstances. These can include experiencing (i) status; (ii) excitement; and (iii) a degree of risk,
- responding to cases of child-on-child abuse promptly and appropriately, and
- ensuring that all child-on-child abuse issues are fed back to the School's DSL/DDSL so that they can spot and address any concerning trends and identify students who may be in need of additional support.

### Multi-agency working

The School actively engages with its Local Safeguarding Partnership in relation to child-on-child abuse, and works closely with, for example, children's social care, the police, and/or other relevant agencies in accordance with the Local Safeguarding Partnership's procedures], and other schools.

The relationships the School has built with these partners are essential to ensuring that the School is able to prevent, identify early, and appropriately handle cases of child-on-child abuse. They help the School to: (a) develop a good awareness and understanding of the different referral pathways that operate in its local area, as well as the preventative and support



## Safeguarding and Child Protection at Nottingham High School

services which exist; (b) ensure that its students are able to access the range of services and support they need quickly; (c) support and help inform the School's local community's response to child-on-child abuse; (d) increase the School's awareness and understanding of any concerning trends and emerging risks in its local area to enable it to take preventative action to minimise the risk of these being experienced by its students.

The School actively refers concerns and allegations of child-on-child abuse where necessary to children's social care, the police and/or other relevant agencies in accordance with the Local Safeguarding Partnership's procedures. This is particularly important because child-on-child abuse can be a complex issue, and even more so where wider safeguarding concerns exist. It is often not appropriate for one single agency (where the alleged incident cannot appropriately be managed internally by the School itself) to try to address the issue alone – it requires effective partnership working.

### Responding to concerns or allegations of child-on-child abuse

#### General principles

It is essential that all concerns and allegations of child-on-child abuse are handled sensitively, appropriately and promptly. The way in which they are responded to can have a significant impact on our School environment. Alongside the advice on managing disclosures in Section 5, any response should:

- include a thorough investigation of the concern(s) or allegation(s), and the wider context in which it/they may have occurred (as appropriate) – depending on the nature and seriousness of the alleged incident(s), it may be appropriate for the police and/or children's social care to carry out this investigation;
- treat all children involved as being at potential risk
  - while the child allegedly responsible for the abuse may pose a significant risk of harm to other children, s/he may also have considerable unmet needs and be at risk of harm themselves. The School should ensure that a safeguarding response is in place for both the child who has allegedly experienced the abuse, and the child who has allegedly been responsible for it, and additional sanctioning work may be required for the latter;
- take into account
  - that the abuse may indicate wider safeguarding concerns for any of the children involved, and consider and address the effect of wider sociocultural contexts – such as the child's/ children's peer group (both within and outside the School); family; the School environment; their experience(s) of crime and victimisation in the local community; and the child/children's online presence. Consider what changes may need to be made to these contexts to address the child/ children's needs and to mitigate risk, and



## Safeguarding and Child Protection at Nottingham High School

- the potential complexity of child-on-child abuse and of children's experiences, and consider the interplay between power, choice and consent. While children may appear to be making choices, if those choices are limited they are not consenting,
- the views of the child/children affected. Unless it is considered unsafe to do so (for example, where a referral needs to be made immediately), the DSL/DDSL should discuss the proposed action with the child/ children and their parents, and obtain consent to any referral before it is made. The School should manage the child/children's expectations about information sharing, and keep them and their parents informed of developments, where appropriate and safe to do so. It is particularly important to take into account the wishes of any child who has allegedly been abused, and to give that child as much control as is reasonably possible over decisions regarding how any investigation will be progressed and how they will be supported.

### What should you do if you suspect either that a child may be at risk of or experiencing abuse by their peer(s), or that a child may be at risk of abusing or may be abusing their peer(s)?

If a member of staff thinks for whatever reason that a child may be at risk of or experiencing abuse by their peer(s), or that a child may be at risk of abusing or may be abusing their peer(s), they should discuss their concern with the DSL/DDSL without delay (in accordance with this Safeguarding and Child Protection policy) so that a course of action can be agreed.

Where a child is suffering, or is likely to suffer from harm, it is important that a referral to children's social care (and, if appropriate, the police) is made immediately.

Anyone can make a referral. Where referrals are not made by the DSL/DDSL, the DSL/DDSL should be informed as soon as possible that a referral has been.

If a child speaks to a member of staff about child-on-child abuse that they have witnessed or are a part of, the member of staff should listen to the child and use open language that demonstrates understanding rather than judgement. For further details please see the procedures set out in the Safeguarding and Child Protection policy.

### How will the School respond to concerns or allegations of child-on-child abuse?

The DSL/DDSL will, if not present at the disclosure, discuss the concern(s) or allegation(s) with the member of staff who has reported it/them and will, where necessary, take any immediate steps to ensure the safety of the child/all children affected.

Where any concern(s) or allegation(s) indicate(s) that indecent images of a child or children may have been shared online, the DSL/DDSL should consider what urgent action can be taken in addition to the actions and referral duties set out in this policy and to seek specialist help in preventing the images spreading further and removing the images from the internet.

The Internet Watch Foundation (IWF), for example, has a trained team that can evaluate and remove illegal images from the internet when the images are reported to them quickly. They

## Safeguarding and Child Protection at Nottingham High School

will also share the image with the National Crime Agency's CEOP Command to facilitate an investigation. Any report to IWF will be made in consultation with the police.

DSLs/DDSLs should always use their professional judgement to: (a) assess the nature and seriousness of the alleged behaviour, and (b) determine whether it is appropriate for the alleged behaviour to be dealt with internally and, if so, whether any external specialist support is required.

In borderline cases the DSL/DDSL may wish to consult with children's social care and/or other relevant agencies in accordance with the Local Safeguarding Partnership's procedures] on a no-names basis (where possible) to determine the most appropriate response.

Where the DSL/DDSL considers or suspects that the alleged behaviour in question might be abusive or violent on a spectrum or where the needs and circumstances of the individual child/children in question might otherwise require it, the DSL/DDSL should contact children's social care and/or the police immediately and, in any event, within 24 hours of the DSL/DDSL becoming aware of the alleged behaviour. There are four likely scenarios for the School to consider when managing any reports of sexual violence or harassment. In all scenarios, the response will be underpinned by the principle that sexual violence and sexual harassment is unacceptable and will not be tolerated. All concerns, discussions, decisions and reasoning will be recorded. The case could be **managed internally** by the School, managed with a multi-agency approach to **provide early help** as per Chapter 3 of Working Together to Safeguard Children, **referred to children's social care** where the child has been harmed, is at risk of harm or is in immediate danger, or **reported to the Police** (generally in parallel with a referral to children's social care). Further guidance on these scenarios can be found below and in Part 5 of KCSIE 2023.

The DSL/DDSL will discuss the concern(s) or allegation(s) with the agency and agree on a course of action, which may include:

A **Manage internally** with help from external specialists where appropriate and possible. Where the alleged behaviour between peers is abusive or violent (as opposed to inappropriate or problematic), scenarios B, C or D should ordinarily apply. However, where support from local agencies is not available, the School may need to handle concerns or allegations internally. In these cases, the School will engage and seek advice from external specialists (either in the private and/or voluntary sector).

B Undertake/contribute to an inter-agency **early help assessment**, with targeted early help services provided to address the assessed needs of the child/children and their family. These services may, for example, include family and parenting programmes, responses to emerging thematic concerns in extra familial contexts, a specialist harmful sexual behaviour team, CAMHS and/or youth offending services.

## Safeguarding and Child Protection at Nottingham High School

**C Refer the child/children to children's social care** for a section 17/47 statutory assessment. Where a child is suffering, or is likely to suffer from harm, it is important that a referral to children's social care (and, if appropriate, a report to the police) is made immediately. This referral will be made to children's social care in the area where the/each child lives. Depending on the safeguarding procedures issued by the Local Safeguarding Partnership in that area, there will normally be an initial review and assessment of the referral, in accordance with that area's assessment framework. As a matter of best practice, if an incident of child-on-child abuse requires referral to and action by children's social care and a strategy meeting is convened, then the School will hold every professional involved in the case accountable for their safeguarding response, including themselves, to both the/each child who has experienced the abuse, and the/each child who was responsible for it, and the contexts to which the abuse was associated.

**D Report alleged criminal behaviour** to the police. Alleged criminal behaviour will ordinarily be reported to the police. However, there are some circumstances where it may not be appropriate to report such behaviour to the police. For example, where the exchange of youth involved sexual imagery does not involve any aggravating factors [see the School's youth involved sexual imagery policy for further information]. All concerns or allegations will be assessed on a case by case basis, and in light of the wider context.

### Safety plans

The School will always carry out a safety plan in respect of:

- any child who is alleged to have behaved in a way that is considered to be abusive or violent,
- any child who has reportedly been abused or affected by the alleged abusive or violent behaviour by another child, or
- any child who may be at risk due to the alleged abusive or violent behaviour by another child as deemed appropriate by the DSL/DDSL. Where it is alleged that a child has behaved in a way that is considered to be inappropriate or problematic (as opposed to abusive or violent), the DSL/DDSL will use their professional judgment – based on the particular concern(s) and/or allegation(s) raised, and the needs and circumstances of the individual child/children in question – to determine whether (as explained above) it would be appropriate to contact children's social care, and to carry out a safety plan.

Careful judgment and consideration are required as to whether alleged behaviour which might be judged to be inappropriate by an adult might actually be harmful to another child. Consultation is recommended with children's social care if there is any doubt about this. Careful consideration should also be given to a range of factors including the context, severity of the alleged behaviour, impact of the alleged behaviour on others, risk to others, and whether there are any patterns of behaviour occurring.

## Safeguarding and Child Protection at Nottingham High School

Where other children have been identified as witnesses to alleged abuse or violence, consideration should also be given by the DSL/DDSL to whether there might be any risks to those children, and whether a safety plan would be appropriate in relation to any risks presenting to them.

### Information sharing, data protection and record keeping

When responding to concern(s) or allegation(s) of child-on-child abuse, the School will:

- always consider carefully, in consultation with children's social care, the police and other relevant agencies (where they are involved), how to share information about the concern(s) or allegation(s) with the student(s) affected, their parents, staff, and other students and individuals,
- record the information that is necessary for the School and other relevant agencies (where they are involved) to respond to the concern(s) or allegation(s) and safeguard everyone involved,
- keep a record of the legal purpose for sharing the information with any third party, including relevant authorities, and ensure that the third party has agreed to handle the information securely and to only use it for the agreed legal purpose, and
- be mindful of and act in accordance with its safeguarding and data protection duties, including those set out in Working Together to Safeguard Children (Dec 2023) and the Government advice on Information Sharing for safeguarding practitioners (updated in July 2018).

### Disciplinary action

The School may wish to consider whether disciplinary action may be appropriate for any child/children involved. However, if there are police proceedings underway, or there could be, it is critical that the School works in partnership with the police and/or children's social care.

Where a matter is not of interest to the police and/ or children's social care, the School may still need to consider what is the most appropriate action to take to ensure positive behaviour management. Disciplinary action may sometimes be appropriate, including to:

- (a) ensure that the child/children take(s) responsibility for and realise(s) the seriousness of their behaviour;
- (b) demonstrate to the child/children and others that child-on-child abuse can never be tolerated; and
- (c) ensure the safety and wellbeing of other children

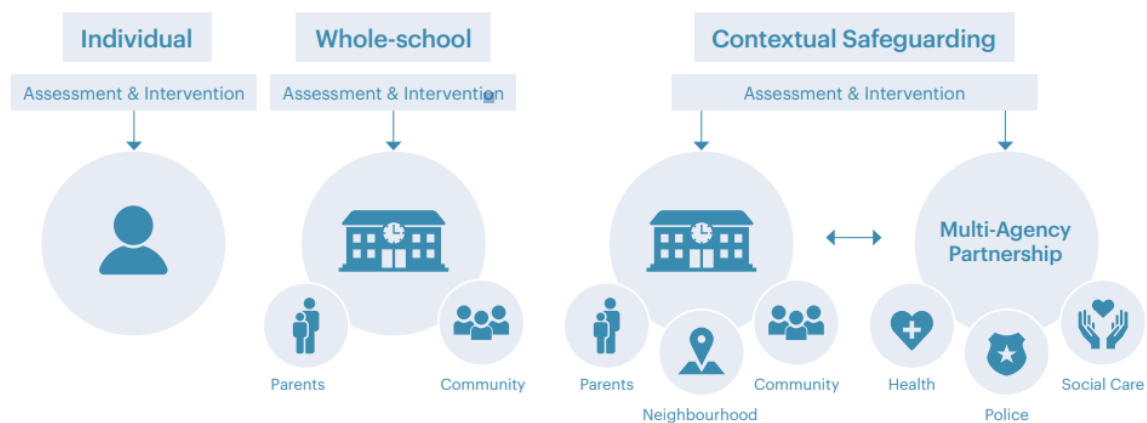
However, these considerations must be balanced against any police investigations, the child's/children's own potential unmet needs, and any action or intervention planned regarding

## Safeguarding and Child Protection at Nottingham High School

safeguarding concerns. Before deciding on appropriate action, the School will always consider its duty to safeguard all children in its care from harm; the underlying reasons for a child's behaviour; any unmet needs, or harm or abuse suffered by the child; the risk that the child may pose to other children; and the severity of the child-on-child abuse and the causes of it.

Disciplinary interventions alone are rarely able to solve issues of child-on-child abuse, and the School will always consider the wider actions that may need to be taken, and any lessons that may need to be learnt going forwards, as set out above and below.

The School's response to concerns or allegations of child-on-child abuse should be part of on-going proactive work by the School to embed best practice and in taking a whole-school community Contextual Safeguarding approach (defined above) to such abuse. As such the School's response can become part of its wider prevention work.



The response could also include the School asking itself a series of questions about the context in which an incident of child-on-child abuse occurred in the School, the local community in which the School is based, and the wider physical and online environment – such as:

- What protective factors and influences exist within the School (such as positive peer influences, examples where child-on-child abuse has been challenged, etc.) and how can the School bolster these?
- How (if at all) did the School's physical environment or the students' routes to and from the School contribute to the abuse, and how can the School address this going forwards, for example by improving the School's safety, security and supervision, or by working with local safeguarding partners to mitigate the risks to students' safety whilst travelling to and from the School?

## Safeguarding and Child Protection at Nottingham High School

- How (if at all) did the online environment contribute to the abuse, and how can the School address this going forwards, for example by strengthening the way in which the School encourages positive and safe use of the internet by students?
- Did wider gender norms, equality issues, and/or societal attitudes contribute to the abuse?
- What was the relationship between the abuse and the cultural norms between staff and students, and how can these be addressed going forward?
- Does the abuse indicate a need for staff training on, for example, underlying attitudes, a particular issue or the handling of particular types of abuse, or to address any victim-blaming narratives from staff?
- How have similar cases been managed in the past and what effect has this had?
- Does the case or any identified trends highlight areas for development in the way in which the School works with children to raise their awareness of and/or prevent child-on-child abuse, including by way of the School's PSHE curriculum and lessons that address underlying attitudes or behaviour such as gender and equalities work, respect, boundaries, consent, children's rights and critical thinking and/or avoiding victim-blaming narratives?
- Are there any lessons to be learnt about the way in which the School engages with parents to address child-on-child abuse issues?
- Are there underlying issues that affect other schools in the area and is there a need for a multi-agency response?
- Does this case highlight a need to work with certain children to build their confidence, and teach them how to identify and manage abusive behaviour?
- Were there opportunities to intervene earlier or differently and/or to address common themes amongst the behaviour of other children in the School?

Answers to these questions can be developed into an action plan that is reviewed on a regular basis by the School's leadership and the DSL/DDSL. The School will, where possible and appropriate, work with the local authority and wider partners to deliver on this plan, possibly as part of a wider Contextual Safeguarding school assessment led by or with input from the local authority.