

# RIVERSIDE SCHOOL



## **Safeguarding Policy** **(Including information on Safer** **Recruitment, Allegations Against Staff and** **Low-Level Concerns)**

APPROVED BY GOVERNORS

RESPONSIBLE PERSON – HEADTEACHER

September 2025

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## Statement of Intent

Riverside School is committed to safeguarding and promoting the physical, mental and emotional welfare of every pupil, both inside and outside of the school's premises. We implement a whole-school preventative approach to managing safeguarding concerns in a timely fashion, ensuring that the wellbeing of pupils is at the forefront of all action taken.

This policy sets out a clear and consistent framework for delivering this promise, in line with safeguarding legislation and statutory guidance. It will be achieved by:

- Ensuring that members of the Governing Board, the Headteacher and all staff are trained and understand their responsibilities under safeguarding legislation and statutory guidance, are alert to the signs of child abuse, and know to refer concerns to the DSL.
- Teaching pupils how to keep safe, including online, and recognise behaviour that is unacceptable.
- Identifying and making provision for any pupil that has been subject to, or is at risk of, abuse, neglect or exploitation.
- Creating a culture of safer recruitment by adopting procedures that help deter, reject or identify people who might pose a risk to children.
- Ensuring that Governors, staff and volunteers are only appointed when all the appropriate checks have been satisfactorily completed.

The Designated Safeguarding Lead is Helen Bushell Movahedi. Safeguarding leads are Clare Collett, Charlotte Downs, Amy Price, Daniella Costanza, Clare Marseglia, Lauren Mullen, Laura Stevens, Lucy Godley and Emily Morris. Child Protection matters will be dealt with in accordance with arrangements set out in Appendix B.

For the Light House Club LA extended services provision, the named DSL is the Lead for club. The Riverside School DSL and Safeguarding Leads will support as necessary. Light House Club works takes due note of school policies and procedures.

The named Governor for safeguarding is George Christian.

Bromley LADO is Gemma Taylor, 020 8461 7775 or 07850 921 631.

Bromley MASH can be contacted on 020 8461 7373/ 7279/ 7026. Out of hours 030 0303 8671.

Channel Helpline: 020 7340 7264.

## Acronyms

This policy contains a number of acronyms used in the Education sector. These acronyms are listed below alongside their descriptions.

Acronym	Long Form	Description
CCE	Child Criminal Exploitation	A form of abuse where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into taking part in criminal activity in exchange for something the victim needs or wants, for the financial advantage or other advantage of the perpetrator or facilitator, and/ or through violence or the threat of violence.
CSCS	Children's Social Care Services	The branch of the local authority that deals with children's social care.
CSE	Child Sexual Exploitation	A form of sexual abuse where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into sexual activity in exchange for something the victim needs or wants, for the financial advantage, increased status or other advantage of the perpetrator or facilitator, and/ or through violence or the threat of violence.
DBS	Disclosure and Barring Service	The service that performs the statutory check of criminal records for anyone working or volunteering in a school.
DfE	Department for Education	The national government body with responsibility for children's services, policy and education, including early years, schools, higher and further education policy, apprenticeships and wider skills in England.
DPO	Data Protection Officer	The appointed person in school with responsibility for overseeing data protection strategy and implementation to ensure compliance with the UK GDPR and Data Protection Act.
DSL	Designated Safeguarding Lead	A member of the senior leadership team who has lead responsibility for safeguarding and child protection throughout the school.
EEA	European Economic Area	The Member States of the European Union (EU) and three countries of the European Free Trade Association (EFTA) (Iceland, Lichtenstein and Norway; excluding Switzerland).
EHCP	Education, Health, Care Plan	A funded intervention plan which coordinates the educational, health and care needs for pupils who have significant needs that impact on their learning and access to education. The plan identifies any additional support needs or interventions and the intended impact they will have for the pupil.
ESFA	Education and Skills Funding Agency	An agency sponsored by the Department for Education with accountability for funding education and skills training for children, young people and adults.
FGM	Female Genital Mutilation	All procedures involving the partial or total removal of the external female genitalia or other injury to the female genital organs. FGM is illegal in the UK and a form of child abuse with long-lasting harmful consequences.
	UK General Data	Legislative provision designed to strengthen the safety and

UK GDPR	Protection Regulation	security of all data held within an organisation and ensure that procedures relating to personal data are fair and consistent.
HBA	'Honour-based' Abuse	So-called 'honour-based' abuse involves crimes that have been committed to defend the honour of the family and/ or community.
HMCTS	HM Courts and Tribunals Service	HM Courts and Tribunals Service is responsible for the administration of criminal, civil and family courts and tribunals in England and Wales. HMCTS is an executive agency, sponsored by the Ministry of Justice.
IICSA	Independent Inquiry into Child Sexual Abuse	The Independent Inquiry into Child Sexual Abuse is analysing case files from the Disclosure and Barring Service to learn more about the behaviours of perpetrators who have sexually abused children in institutions, and to understand institutional responses to these behaviours.
KCSiE	Keeping Children Safe in Education	Statutory guidance setting out schools and colleges' duties to safeguard and promote the welfare of children.
LA	Local Authority	A local government agency responsible for the provision of a range of services in a specified local area, including education.
LAC/ CLA	Looked-After Children	Children who have been placed in local authority care or where children's services have looked after children for more than a period of 24 hours.
LGBTQ+	Lesbian, Gay, Bisexual, Transgender & Queer +	Term relating to a community of people, protected by the Equality Act 2010, who identify as lesbian, gay, bisexual or transgender, or other protected sexual or gender identities.
NPCC	The National Police Chiefs' Council	The National Police Chiefs' Council is a national coordination body for law enforcement in the United Kingdom and the representative body for British Police Chief Officers.
PLAC/PCLA	Previously Looked-After Children	Children who were previously in local authority care or were looked after by children's services for more than a period of 24 hours. CLA are also known as care leavers.
PSHE	Personal, Social and Health Education	A non-statutory subject in which pupils learn about themselves, other people, rights, responsibilities and relationships.
RSHE	Relationships, Sex and Health Education	A compulsory subject from Year 7 for all pupils. Includes the teaching of sexual health, reproduction and sexuality, as well as promoting positive relationships.
SCR	Single Central Record	A statutory secure record of recruitment and identity checks for all permanent and temporary staff, proprietors, contractors, external coaches and instructors and volunteers who attend the school in a non-visitor capacity.
SENCO	Special Educational Needs Coordinator	A statutory role within all schools maintaining oversight and coordinating the implementation of the school's special educational needs policy and provision of education to pupils with special educational needs.
SLT	Senior Leadership Team	Staff members who have been delegated leadership responsibilities in a school.

TRA	Teaching Regulation Agency	An executive agency of the DfE with responsibility for the regulation of the teaching profession.
VSH	Virtual School Head	Virtual School heads are in charge of promoting the educational achievement of all the children looked after by the local authority they work for, and all children who currently have, or previously had, a social worker.
SL	Safeguarding Lead	Safeguarding Leads within the school setting who support the Designated Safeguarding Lead.

## Definitions

For the purposes of this policy, “**safeguarding and protecting the welfare of children**” is defined as:

- Protecting pupils from maltreatment.
- Preventing the impairment of pupils’ mental and physical health or development.
- Ensuring that pupils grow up in circumstances consistent with the provision of safe and effective care.
- Taking action to enable all pupils to have the best outcomes.

The revised definition includes statements which highlight the new emphasis on early intervention, protection from harm (both online and offline) and prompting the best outcomes for children, including; Providing help and support to meet the needs of children as soon as problems emerge.

**Child protection** refers to actions/interventions undertaken to prevent children suffering, or being likely to suffer, significant harm.

For the purposes of this policy “**consent**” is defined as having the freedom and capacity to choose to engage in sexual activity. Consent may be given to one sort of sexual activity but not another, and can be withdrawn at any time during sexual activity and each time activity occurs. A person only consents to a sexual activity if they agree by choice to that activity, and has the freedom and capacity to make that choice. Children under the age of 13 can never consent to any sexual activity. The age of consent is 16.

For the purposes of this policy “**sexual violence**” refers to the following offences as defined under the Sexual Offences Act 2003:

- **Rape:** A person (A) commits an offence of rape if they intentionally penetrate the vagina, anus or mouth of another person (B) with their penis, B does not consent to the penetration, and A does not reasonably believe that B consents.
- **Assault by penetration:** A person (A) commits an offence of assault by penetration if the intentionally penetrate the vagina or anus of another person (B) with a part of their body or anything else, the penetration is sexual, B does not consent to the penetration, and A does not reasonably believe that B consents.
- **Sexual assault:** A person (A) commits an offence of sexual assault if they

intentionally touch another person (B), the touching is sexual, B does not consent to the touching, and A does not reasonably believe that B consents.

- **Causing someone to engage in sexual activity without consent:** A person (A) commits an offence if they intentionally cause another person to (B) to engage in an activity, the activity is sexual, B does not consent to engaging in the activity, and A does not reasonably believe that B consents. This could include forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party.

For the purposes of this policy, **“sexual harassment”** refers to unwanted conduct of a sexual nature that occurs online or offline, inside or outside of school. Sexual harassment is likely to violate a pupil’s dignity, make them feel intimidated, degraded or humiliated and create a hostile, offensive, or sexualised environment. If left unchallenged, sexual harassment can create an atmosphere that normalises inappropriate behaviour and may lead to sexual violence.

Sexual harassment can include, but is not limited to:

- Sexual comments, such as sexual stories, lewd comments, sexual remarks about clothes and appearance, and sexualised name-calling.
- Sexual “jokes” “banter” and taunting.
- Physical behaviour, such as deliberately brushing against someone, interfering with someone’s clothes, and displaying images of a sexual nature.
- Online sexual harassment, which may be standalone or part of a wider pattern of sexual harassment and/ or sexual violence. This includes:
  - The consensual and non-consensual sharing of nude and semi-nude images and/ or videos.
  - Sharing unwanted explicit content.
  - Upskirting.
  - Sexualised online bullying.
  - Unwanted sexual comments and messages, including on social media.
  - Sexual exploitation, coercion and threats.

For the purposes of this policy, **“upskirting”** refers to the act, as identified in the Voyeurism (Offences) Act 2019, of taking a picture or video under another person’s clothing, without their knowledge or consent. with the intention of viewing that person’s genitals or buttocks, with or without clothing, to obtain sexual gratification, or cause the victim humiliation, distress or alarm. Upskirting is a criminal offence. Anyone, including pupils and staff, of any gender can be a victim of upskirting.

For the purposes of this policy, the **“consensual and non-consensual sharing of nude and semi-nude images and/ or videos”**, also known as youth produced sexual imagery, colloquially known as **“sexting”**, is defined as the sharing of sexually explicit content, including indecent imagery, videos or live streams. For the purposes of this policy, **“indecent imagery”** is defined as an image which meets one or more of the following criteria:

- Nude or semi-nude sexual posing;
- A child touching themselves/others in a sexual way;
- Any sexual activity involving a child;
- A child being sexually hurt;
- Sexual activity that involves animals

For the purposes of this policy, “**we will use alleged perpetrator(s) or perpetrator(s)**”. However, we will think about the terms we use, especially when in discussion with pupils.

The following three safeguarding partners are identified in Keeping Children Safe in Education (and defined in the Children Act 2004, as amended by chapter 2 of the Children and Social Work Act 2017). They will make arrangements to work together to safeguard and promote the welfare of local children, including identifying and responding to their needs.

- The local authority (LA).
- Integrated care boards (previously known as clinical commissioning groups) for an area within the LA.
- The Chief Officer of Police in the LA area.

## **Barriers**

Some children have an increased risk of abuse, both online and offline, and additional barriers can exist for some children with respect to recognising or disclosing it. We are committed to anti-discriminatory practice and recognise children’s diverse circumstances. We ensure that all children have the same protection, regardless of any barriers they may face.

We give special consideration to children who:

- Have special educational needs and/ or disabilities (SEND) or health conditions ([see section 11](#));
- Are young carers;
- May experience discrimination due to their race, ethnicity, religion, gender identification or sexuality;
- Have English as an additional language;
- Are known to be living in difficult situations – for example, temporary accommodation or where there are issues such as substance abuse or domestic violence;
- Are at risk of FGM, sexual exploitation, forced marriage or radicalisation;
- Are asylum seekers;
- Are at risk due to either their own or a family member’s mental health needs;
- Are looked after or previously looked after ([see section 11](#));
- Are missing or absent from education for prolonged periods and/ or repeat occasions; and

- Whose parents/ carers have expressed an intention to remove them from school to be home educated.

## **1. Legal Framework**

This policy has due regard to all relevant legislation and statutory guidance including, but not limited to, the following legislation:

- Children Act 1989;
- Children Act 2004 (amendment);
- Education Act 2002;
- Childcare Act 2006;
- Safeguarding Vulnerable Groups Act 2006;
- The Education (School Teachers' Appraisal) (England) Regulations 2012 (as amended);
- Sexual Offences Act 2003;
- Female Genital Mutilation Act 2003 (as inserted by the Serious Crime Act 2015);
- Apprenticeships, Children and Learning Act 2009;
- Equality Act 2010;
- Counter-Terrorism and Security Act 2015;
- The UK General Data Protection Regulation (UK GDPR);
- Data Protection Act 2018;
- The Childcare (Disqualification) and Childcare (Early Years Provision Free of Charge) (Extended Entitlement) (Amendment) Regulations 2018;
- Voyeurism (Offences) Act 2019;
- Domestic Abuse Act 2021;
- Serious Crime Act 2015, Section 74, of which notes Section 5B(11) of the Female Genital Mutilation Act 2003;
- The Rehabilitation of Offenders Act 1974;
- Safeguarding Vulnerable Groups Act 2006; and
- The Human Rights Act 1998.

## **Statutory Guidance**

- DfE (2023) 'The Prevent Duty Guidance';
- DfE (2023) 'Working Together to Safeguard Children';
- DfE (2018) 'Disqualification under the Childcare Act 2006';
- DfE (2022) 'Keeping Children Safe in Education 2025';
- HM Government (2020) 'Multi-agency statutory guidance on female genital mutilation';
- HM Government (2021) 'Channel Duty Guidance: Protecting people vulnerable to being drawn into terrorism';
- Home Office and Foreign, Commonwealth and Development Office (2022) 'Multi-agency statutory guidance for dealing with forced marriage' and 'Multi-agency practice guidelines: Handling cases of forced marriage';

- The School Staffing (England) Regulations 2009;
- The Public Sector Equality Duty (PSED); and
- Early Years Foundation Stage (EYFS) Statutory Framework 2014.

### **Non-Statutory Guidance**

- DfE (2015) 'What to do if you're worried a child is being abused';
- DfE (2017) 'Child sexual exploitation';
- DfE (2018) 'Information sharing';
- DfE (2020) 'Sharing nudes and semi-nudes: advice for education settings working with children and young people';
- DfE (2021) 'Teachers' Standards';
- DfE (2022) 'Recruit teachers from overseas'; and
- Department of Health and Social Care (2022) 'Virginity testing and hymenoplasty: multi-agency guidance'.

## **2. Roles and Responsibilities**

All staff, Governors and volunteers have a responsibility to:

- Consider, at all times, what is in the best interests of the pupil. Remember the Culture of Safeguarding and continue to embed this.
- Maintain an attitude of 'it could happen here' where safeguarding is concerned.
- Provide a safe environment in which pupils can learn.
- Be prepared to identify pupils who may benefit from early help.
- Be aware of the school's systems which support safeguarding, including policies, procedures, information and training provided.
- Be aware of the role and identity of the DSL and SLs.
- Undertake safeguarding training, including online safety training, during their induction – this will be regularly updated.
- Read and understand child protection and safeguarding (including online safety) updates, as required, and undertake training at least annually.
- Be aware of the local early help process and understand their role in it.
- Be aware of, and understand, the process for making referrals to Social Care, as well as for making statutory assessments under the Children Act 1989 and their role in these assessments.
- Make a referral to Social Care and/ or the Police immediately, if at any point there is a risk of immediate serious harm to a child.
- Support social workers in making decisions about individual children, in collaboration with the DSL.
- Be aware of and understand the procedure to follow in the event that a child confides/ discloses they are being abused, exploited or neglected.
- Be aware that a pupil 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. For example, children may feel embarrassed, humiliated or being threatened. This could be due to their susceptibility, disability and/ or

sexual orientation or language barriers. This should not prevent staff from having a professional curiosity and speaking to the DSL/SLs if they have concerns about a child. It is also important that staff determine how best to build trusted relationships with children and young people which facilitate communication.

- Maintain appropriate levels of confidentiality when dealing with individual cases.
- Reassure victims that they are being taken seriously, that they will be supported and that they will be kept safe.
- Speak to the DSL/SLs if they are unsure about how to handle safeguarding matters.
- Be aware of safeguarding issues that can put pupils at risk of harm.
- Be aware of behaviours that could potentially be a sign that a pupil may be at risk of harm.

Staff will:

- Read and understand Part 1 or Annex B (depending on their role in school) of the Department for Education's statutory safeguarding guidance, [Keeping Children Safe in Education](#), and review this guidance at least annually.
- Sign a declaration/ virtually confirm at the beginning of each academic year to say that they have reviewed the guidance.

Teachers, including the Headteacher, have a responsibility to:

- Safeguard pupils' wellbeing and maintain public trust in the teaching profession as part of their professional duties, as outlined in the 'Teachers' Standards'.

The Governing Board has a duty to:

- Take strategic leadership responsibility for the school's safeguarding arrangements.
- Ensure that the school complies with its duties under the above child protection and safeguarding legislation.
- Guarantee that the policies, procedures and training opportunities in the school are effective and comply with the law at all times.
- Guarantee that the school contributes to multi-agency working in line with the statutory guidance 'Working Together to Safeguard Children'.
- Confirm that the school's safeguarding arrangements take into account the procedures and practices of the LA as part of the inter-agency safeguarding procedures.
- Understand the local criteria for action and the local protocol for assessment, and ensure these are reflected in the school's policies and procedures.
- Comply with its obligations under section 14B of the Children Act 2004 to supply the local safeguarding arrangements with information to fulfil its functions.
- Ensure that staff working directly with children read at least Part 1 of KCSiE.
- Ensure that staff who do not work directly with children read Annex B or Part 1 of KCSiE.

- Ensure that the mechanisms are in place to assist staff to understand and discharge their role and responsibilities in regard to safeguarding children.
- Ensure a senior board level lead takes leadership responsibility for safeguarding arrangements.
- Appoint a member of staff from the SLT to the role of DSL as an explicit part of the role-holder's job description.
- Appoint one or more SLs to provide support to the DSL, and ensure that they are trained to the same standard as the DSL and that the role is in their job descriptions.
- Facilitate a whole-school approach to safeguarding; this includes ensuring that safeguarding and child protection are at the forefront and underpin all relevant aspects of process and policy development.
- Where there is a safeguarding concern, ensure the child's wishes and feelings are taken into account when determining what action to take and what services to provide.
- Ensure systems are in place to allow children to confidently report abuse, knowing that their concerns will be treated seriously, and they can safely express their views and give feedback; these systems will be well-promoted, easily understood, and easily accessible.
- Ensure that staff have due regard to relevant data protection principles that allow them to share and withhold personal information.
- Ensure that a member of the Governing Board is nominated to liaise with the LA and/ or partner agencies on issues of child protection and in the event of allegations of abuse made against the Headteacher or another Governor.
- Guarantee that there are effective and appropriate policies and procedures in place.
- Ensure all relevant persons are aware of the school's local safeguarding arrangements, including the Governing Board itself, the SLT and DSL.
- Make sure that pupils are taught about safeguarding, including protection against dangers online (including when they are online at home), through teaching and learning opportunities, as part of providing a broad and balanced curriculum.
- Adhere to statutory responsibilities by conducting pre-employment checks on staff who work with children, taking proportionate decisions on whether to ask for any checks beyond what is required.
- Ensure that staff are appropriately trained to support pupils to be themselves at school, e.g., if they are LGBTQ+.
- Ensure the school has clear systems and processes in place for identifying possible mental health problems in pupils, including clear routes to escalate concerns and clear referral and accountability systems.
- Guarantee that volunteers are appropriately supervised.
- Make sure that at least one person on any appointment panel has undertaken safer recruitment training.
- Ensure that all staff receive safeguarding and child protection training updates, e.g., emails, as required, but at least annually.
- Ensure that all Governors receive appropriate safeguarding and child protection training upon their induction and that this training is updated regularly.

- Certify that there are procedures in place to handle allegations against all staff, including supply staff, volunteers and contractors.
- Confirm that there are procedures in place to make a referral to the LADO, and/or DBS and the Teaching Regulation Agency (TRA), where appropriate, if a person in regulated activity has been dismissed or removed due to safeguarding concerns or would have been had they not resigned.
- Guarantee that there are procedures in place to handle pupils' allegations against other pupils.
- Ensure that appropriate disciplinary procedures are in place, as well as policies pertaining to the behaviour of pupils and staff.
- Ensure that procedures are in place to eliminate unlawful discrimination, harassment and victimisation, including those in relation to child-on-child abuse.
- Guarantee that there are systems in place for pupils to express their views and give feedback.
- Establish an early help procedure and ensure all staff understand the procedure and their role in it.
- Appoint a designated teacher to promote the educational achievement of CLA and ensure that this person has undergone appropriate training.
- Ensure that the designated teacher works with the VSH to discuss how the pupil premium funding can be used to support CLA.
- Introduce mechanisms to assist staff in understanding and discharging their roles and responsibilities.
- Make sure that staff members have the skills, knowledge and understanding necessary to keep CLA pupils safe, particularly with regard to the pupil's legal status, contact details and care arrangements.
- Put in place appropriate safeguarding responses for pupils who go missing from school, particularly on repeat occasions, to help identify any risk of abuse, neglect or exploitation, and prevent the risk of their disappearance in future.
- Ensure that all members of the Governing Board have been subject to an Enhanced DBS Check.
- Create a culture where staff are confident to challenge senior leaders over any safeguarding concerns.
- Be aware of their obligations under the Human Rights Act 1998, the Equality Act 2010 (including the Public Sector Equality Duty), Data Protection Act 2018, the UK GDPR and the local multi-agency safeguarding arrangements.

The Headteacher has a duty to:

- Ensure that the policies and procedures adopted by the Governing Board, particularly concerning referrals of cases of suspected abuse and neglect, are followed by staff.
- Provide staff with the appropriate policies and information upon induction.
- Ensure Early Years staffing ratios are met.
- Ensure Early Years Foundation Stage is assigned to a key person.

The DSL has a duty to:

- Take lead responsibility for safeguarding and child protection, including online safety.
- Provide advice and support to other staff on child welfare, safeguarding and child protection matters.
- Take part in strategy discussions and inter-agency meetings, and/ or support other staff to do so.
- Contribute to the assessment of children and/or support other staff to do so.
- During term time, be available during school hours for staff to discuss any safeguarding concerns. N.B. Individual schools, working with the DSL, define what “available” means and whether, in exceptional circumstances, availability via phone, video call or other media is an acceptable substitution for in person availability.
- Arrange, alongside the school, adequate and appropriate cover for any activities outside of school hours or terms.
- Refer cases:
  - To Social where abuse and neglect are suspected, and support staff who make referrals to Social Care.
  - To the Channel Programme where radicalisation concerns arise, and support staff who make referrals to the Channel Programme.
  - To the LADO and /or DBS where a person is dismissed or has left due to harm, or risk of harm, to a child.
  - To the Police where a crime may have been committed, in line with the National Police Chiefs’ Council (NPCC) guidance.
- Act as a source of support, advice and expertise for all staff.
- Act as a point of contact with the safeguarding partners.
- Liaise with the Headteacher to inform them of issues, especially regarding ongoing enquiries under section 47 of the Children Act 1989 and Police investigations.
- Liaise with the SLs to ensure effective safeguarding outcomes
- Liaise with the case manager and the LA designated officers (LADOs) for child protection concerns in cases concerning staff.
- Liaise with staff on matters of safety, safeguarding and welfare, including online and digital safety.
- Oversee the safe use of technology, mobile phones and cameras, both school and personal when accessing school systems etc.
- Liaise with staff when deciding whether to make a referral by liaising with relevant agencies so that children’s needs are considered holistically.
- Liaise with the senior mental health lead and, where available, the mental health support team, where safeguarding concerns are linked to mental health.
- Promote supportive engagement with parents/ carers in safeguarding and promoting the welfare of children, including where families may be facing challenging circumstances.
- Work with the Headteacher and relevant strategic leads, taking lead responsibility for promoting educational outcomes by knowing the welfare, safeguarding and child protection issues that children in need are experiencing, or have experienced, and identifying the impact that these issues might be having on their

attendance, engagement and achievement at school. This includes:

- Ensuring that the school knows which pupils have or had a social worker.
  - Understanding the academic progress and attainment of these pupils.
  - Maintaining a culture of high aspirations for these pupils.
  - Supporting teachers to provide additional academic support or reasonable adjustments to help these pupils reach their potential.
  - Helping to promote educational outcomes by sharing the information about the welfare, safeguarding and child protection issues these pupils are experiencing with teachers and the SLT.
- Ensure that child protection files are kept up-to-date and only accessed by those who need to do so.
  - Ensure that a pupil's child protection file is transferred as soon as possible, and within five days, when transferring to a new school, and consider any additional information that should be shared.
  - Ensure each member of staff has access to and understands the school's Safeguarding Policy and procedures – this will be discussed during the staff induction process.
  - Work with the Governing Board to ensure the school's Safeguarding Policy is reviewed annually, and the procedures are updated and reviewed regularly.
  - Ensure the school's Safeguarding Policy is available publicly, and parents/ carers are aware that the school may make referrals for suspected cases of abuse or neglect, as well as the role the school plays in these referrals.
  - Link with safeguarding partner arrangements to make sure that staff are aware of the training opportunities available and the latest local policies on safeguarding.
  - Undergo training, and update this training at least every two years.
  - Obtain access to resources and attend any relevant or refresher training courses.
  - Encourage a culture of listening to children and taking account of their wishes and feelings; this includes understanding the difficulties pupils may have in approaching staff about their circumstances and considering how to build trusted relationships that facilitate communication.
  - Support and advise staff and help them feel confident on welfare, safeguarding and child protection matters: specifically, to ensure that staff are supported during the referrals processes; and to support staff to consider how safeguarding welfare and educational outcomes are linked, including to inform the provision of academic and pastoral support.
  - Understand the importance of information sharing, including within school, with other schools, and with the safeguarding partners, other agencies, organisations and practitioners.
  - Understand relevant data protection legislation and regulations, especially the Data Protection Act 2018 and the UK GDPR.
  - Keep detailed, accurate, secure written records of concerns and referrals, and understand the purpose of this record-keeping. Discuss the local response to sexual violence and sexual harassment with Police and local authority children's social care colleagues to prepare the school's policies.
  - Be confident that they know what local specialist support is available to support all children involved (including victims and alleged perpetrators) in sexual violence

and sexual harassment, and be confident as to how to access this support.

- Be aware that children must have an 'appropriate adult' to support and help them in the case of a Police investigation or search.
- Refer suspected cases, as appropriate, to the relevant body (local authority children's social care, Channel Programme, Disclosure and Barring Service, and/or Police), and support staff who make such referrals directly.

The designated teacher has a responsibility for promoting the educational achievement of CLA and PLAC, and for children who have left care through adoption, special guardianship or child arrangement orders or who were adopted from state care outside England and Wales.

### **3. Multi-Agency Working**

The school contributes to multi-agency working as part of its statutory duty. The school is aware of and will follow the local safeguarding arrangements.

The school will be fully engaged, involved, and included in local safeguarding arrangements. Once the school is named as a relevant agency by local safeguarding partners, it will follow its statutory duty to cooperate with the published arrangements in the same way as other relevant agencies. The school will act in accordance with the safeguarding arrangements.

The school will work with Social Care, the police, Health Services and other services to protect the welfare of its pupils, through the early help process and by contributing to multi-agency plans to provide additional support.

Where a need for early help is identified, the school will allow access for Social Care from the host LA and, where appropriate, a placing LA. This will allow for that LA to conduct (or consider whether to conduct) a section 17 or 47 assessment.

The school also recognises the particular importance of inter-agency working in identifying and preventing CSE.

### **Information Sharing**

The school recognises the importance of proactive information sharing between professionals and local agencies in order to effectively meet pupils' needs and identify any need for early help.

Considering the above, staff will be aware that whilst the UK GDPR and the Data Protection Act 2018 place a duty on schools to process personal information fairly and lawfully, they also allow for information to be stored and shared for safeguarding purposes – data protection regulations do not act as a barrier to sharing information where failure to do so would result in the pupil being placed at risk of harm.

Staff members will ensure that fear of sharing information does not stand in the way of their responsibility to promote the welfare and safety of pupils. If staff members are in doubt about sharing information, they will speak to the DSL or SLs.

#### **4. Early Help**

Early help means providing support as soon as a problem emerges, at any point in a child's life. Any pupil may benefit from early help, but in particular, staff will be alert to the potential need for early help for pupils who:

- Have mental health needs;
- Are young carers;
- Show signs of being drawn into anti-social or criminal behaviour, including gang involvement and association with organised crime groups or country lines.
- Are frequently missing or going missing from care or from home.
- Are at risk of modern slavery, trafficking, or sexual or criminal exploitation.
- Are at risk of being radicalised or exploited.
- Have family members in prison, or are affected by parental offending.
- Are in a family circumstance presenting challenges for them, such as drug and alcohol misuse, adult mental health problems, or domestic abuse.
- Misuse drugs or alcohol.
- Have returned home to their family from care.
- Are at risk of HBA, such as FGM or forced marriage.
- Are privately fostered.
- Are persistently absent from education, including persistent absences for part of the school day.
- Show early signs of abuse and/ or neglect in other ways.

The DSL will take the lead where early help is appropriate. This includes liaising with other agencies and setting up an inter-agency assessment as appropriate. The local early help process will be followed as required.

Staff may be required to support other agencies and professionals in an early help assessment, in some cases acting as the lead practitioner. Any such cases will be kept under constant review and consideration given to a referral to Social Care for assessment for statutory services if the pupil's situation is not improving or is worsening.

#### **5. Abuse and Neglect**

For the purposes of this policy, "**abuse**" is defined as a form of maltreatment of a child which involves inflicting harm or failing to act to prevent harm. Harm can include ill treatment that is not physical as well as the impact of witnessing the ill treatment of others – this can be particularly relevant, for example, in relation to the impact on children of all forms of domestic abuse. Children may be abused in a family, institutional or community setting by those known to them or by others, e.g., via the internet. Abuse can

take place wholly online, or technology may be used to facilitate offline abuse. Children may be abused by one or multiple adults or other children.

For the purposes of this policy, “**physical abuse**” is defined as a form of abuse which may involve actions such as hitting, shaking, throwing, poisoning, burning or scalding, drowning suffocating, or otherwise causing physical harm to a child. Physical abuse can also be caused when a parent/ carer fabricates the symptoms of, or deliberately induces, illness in a child.

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

For the purposes of this policy, “**sexual abuse**” is defined as abuse that involves forcing or enticing a child to take part in sexual activities, not necessarily involving violence, and regardless of whether the child is aware of what is happening. This may involve physical contact, including assault by penetration, or non-penetrative acts, such as masturbation, kissing, rubbing, and touching outside of clothing. It may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse. Sexual abuse can be perpetrated by people of any gender and age.

For the purposes of this policy, “**neglect**” is defined as the persistent failure to meet a child’s basic physical and/ or psychological needs, likely to result in serious impairment of a child’s health or development. This may involve a parent or carer failing to provide a child with adequate food, clothing or shelter (including exclusion from home or abandonment), failing to protect a child from physical or emotional harm or danger, failing to ensure adequate supervision (including through the use of inappropriate caregivers), or failing to ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child’s basic emotional needs.

All staff will be aware of the indicators of abuse and neglect and understand that children can be at risk of harm inside and outside of the school, inside and outside of home and online. All staff will be aware that abuse, neglect and other safeguarding issues are rarely

standalone events that can be given a specific label, and multiple issues often overlap one another; therefore, staff will be vigilant and always raise concerns with the DSL. All staff, especially the DSL and SLs, will 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. This includes being aware that pupils can be at risk of abuse or exploitation in situations outside their families (extra-familial harms). All staff will be aware of the appropriate action to take following a pupil being identified as at potential risk of abuse and, in all cases, will speak to the DSL if they are unsure.

All staff will be aware that technology is a significant component in many safeguarding and wellbeing issues, including online abuse, cyberbullying and the sharing of indecent images.

## **6. Specific Safeguarding Issues**

There are certain specific safeguarding issues that can put children at risk of harm – staff will be aware of these issues.

Appendix A of this policy sets out details of specific safeguarding issues that pupils may experience and outlines specific actions that would be taken in relation to individual issues.

## **7. Child-on-Child Abuse**

For the purposes of this policy, “**child-on-child abuse**” is defined as abuse between children.

The school has a zero-tolerance approach to abuse, including child-on-child abuse, as confirmed in the Safeguarding Policy’s [Statement of Intent](#).

All staff will be aware that child-on-child abuse can occur between pupils of any age and gender, both inside and outside of school, as well as online. All staff will be aware of the indicators of child-on-child abuse, how to identify it, and how to respond to reports. All staff will also recognise that even if no cases have been reported, this is not an indicator that child-on-child abuse is not occurring. All staff will speak to the DSL/SLs if they have any concerns about child-on-child abuse.

All staff will understand the importance of challenging inappropriate behaviour between peers, and will not tolerate abuse as “banter” or “part of growing up”. This can lead to a culture of unacceptable behaviour and an unsafe environment.

Child-on-child abuse can be manifested in many different ways, including:

- Bullying, including cyberbullying and prejudice-based or discriminatory bullying.
- Abuse in intimate personal relationships between peers – sometimes known as ‘teenage relationship abuse’.

- Physical abuse – this may include an online element which facilitates, threatens and/ or encourages physical abuse.
- Sexual violence – this may include an online element which facilitates, threatens and/ or encourages sexual violence.
- Sexual harassment, including online sexual harassment, which may be standalone or part of a broader pattern of abuse.
- Causing someone to engage in sexual activity without consent.
- The consensual and non-consensual sharing of nude and semi-nude images and/ or videos.
- Upskirting.
- Initiation and hazing-type violence and rituals, which can include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group, and may also include an online element.

All staff will be clear as to the school's policy and procedures regarding child-on-child abuse and the role they have to play in preventing it and responding where they believe a child may be at risk from it.

Pupils will be made aware of how to raise concerns or make a report and how any reports will be handled. This includes the process for reporting concerns about friends or peers. Pupils will also be reassured that they will be taken seriously, be supported, and kept safe.

The school's procedures for managing allegations of child-on-child abuse are including in staff training, further explanation can be seen in the school's Anti-Bullying Policy and Exclusion Policy where relevant.

## **8. Online Safety and Personal Electronic Devices**

The school will adhere to the E-Safety Policy and the Safe Use of AI Policy at all times.

As part of a broad and balanced curriculum, all pupils will be made aware of online risks and taught how to stay safe online.

Through training, all staff members will be made aware of:

- Pupil attitudes and behaviours which may indicate they are at risk of potential harm online.
- The procedure to follow when they have a concern regarding a pupil's online activity.

The school will ensure that suitable filtering systems are in place on ICT equipment to prevent children accessing inappropriate material, in accordance with Cyber-Security. The school will, however, ensure that the use of filtering and monitoring systems does not cause "over blocking", which lead to unreasonable restrictions as to what pupils may

be taught online.

KCSiE states the following: 'Governing bodies and proprietors should consider the number of and age range of their children, those who are potentially at greater risk of harm and how often they access the IT system along with the proportionality of costs versus safeguarding risks.'

Furthermore, KCSiE relates to the filtering and monitoring standards which set out that schools and colleges should:

- Identify and assign roles and responsibilities to manage filtering and monitoring systems;
- Review filtering and monitoring provision at least annually;
- Block harmful and inappropriate content without unreasonably impacting teaching and learning; and
- Have effective monitoring strategies in place that meet their safeguarding needs.

Further information can be found in [Filtering and Monitoring Standards for Schools and Colleges](#).

Staff are aware of the filtering and systems in place and will know how to escalate concerns where they are identified.

Further information regarding the school's approach to online safety can be found in the E-Safety Policy and the Safe Use of AI Policy.

### **Communicating with Parents/ Carers**

As part of the usual communication with parents/ carers the school will reinforce the importance of pupils being safe online and inform parents/ carers that they will find it helpful to understand what systems the school uses to filter and monitor online use.

The school will also make it clear to parents/ carers what their children are being asked to do online for school.

### **Reviewing Online Safety**

The school will carry out an annual review of its approach to online safety, supported by an annual risk assessment that considers and reflects the risks faced by pupils. Approach to online safety is based on addressing the following categories of risk:

- Content – being exposed to illegal, inappropriate or harmful content, such as pornography, fake news, racism, misogyny, self-harm, suicide, antisemitism, radicalisation and extremism;
- Contact – being subjected to harmful online interaction with other users, such as peer-to-peer pressure, commercial advertising and adults posing as children or

young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes;

- Conduct – personal online behaviour that increases the likelihood of, or causes, harm, such as making sending and receiving explicit images (e.g., consensual and non-consensual sharing of nudes and semi-nudes and/ or pornography), sharing other explicit images and online bullying; and
- Commerce – risks such as online gambling, inappropriate advertising, phishing and/ or financial scams.

## **Personal Electronic Devices**

The use of personal electronic devices, including mobile phones and cameras, by staff and pupils is closely monitored by the school in accordance with the Staff Acceptable Usage Policy. The school have developed a separate policy for the use of smart watches, mobile phones with cameras and high-tech communications devices.

Any staff accessing work emails or the online school system on personal devices should be aware that appropriate filtering and monitoring systems should be in place.

Photographs and videos of pupils will be carefully planned before any activity with particular regard to consent and adhering to the school's Data Protection Policy. The DPO will oversee the planning of any events where photographs and videos will be taken.

Where photographs and videos will involve pupils who are CLA, or pupils for whom there are security concerns, the Headteacher will liaise with the DSL to determine the steps involved. The DSL will, in known cases of pupils who are CLA or other relevant security liaise with the pupils' social workers, carers or other appropriate professionals to assess the needs and risks associated with the pupils.

Staff will report any concerns about pupils' or other staff members' use of personal electronic devices to the DSL or their site SL, following the appropriate procedures.

## **Upskirting**

Under the Voyeurism (Offences) Act 2019, it is an offence to operate equipment for the purpose of upskirting. "**Operating equipment**" includes enabling, or securing, activation by another person without that person's knowledge e.g., a motion-activated camera.

Upskirting will not be tolerated by the school. Any incidents of upskirting will be reported to the DSL, who will then decide on the next steps to take, which may include Police involvement.

## **9. Consensual and Non-Consensual Sharing of Indecent Images and Videos**

The school will ensure that staff are aware to treat the consensual and non-consensual sharing of nude and semi-nude images and/ or videos (also known as sexting or youth

produced sexual images) as a safeguarding concern. Staff will not view the image, if they have viewed this by accident, report this to the DSL. Staff do not place blame or shame; they reassure the pupil that this will be passed to the DSL.

Staff will receive appropriate training regarding child sexual development and will understand the difference between sexual behaviour that is considered normal and expected for the age of the pupil, and sexual behaviour that is inappropriate and harmful. Staff will receive appropriate training around how to deal with instances of sharing nudes and semi-nudes in the school community, including understanding motivations, assessing risks posed to pupils depicted in the images, and how and when to report instances of this behaviour.

Staff will be aware that creating, possessing and distributing indecent imagery of children is a criminal offence, regardless of whether the imagery is created, possessed and distributed by the individual depicted; however, staff will ensure that pupils are not unnecessarily criminalised. The DSL may refer to the Brook Traffic Light Tool or other such useful and appropriate resources for further guidance.

Where a member of staff becomes aware of an incidence of sharing nudes and/ or semi-nudes, they will refer this to the DSL as soon as possible.

A suggested approach based on [guidance](#) from the UK Council for Internet Safety for all staff and for DSLs and Senior Leaders.

## **10. Context of Safeguarding Incidents**

At Riverside School we take into account contextual safeguarding and liaise with our colleagues within social care and appropriate agencies accordingly to help safeguard pupils. Contextual safeguarding is an approach to understanding and responding to young people's experiences of significant harm beyond their families. It recognises that the different relationships that young people form in their neighbourhoods, schools and online can feature violence and abuse. Families can have little influence over these contexts, and young people's experiences of extra-familial abuse can undermine the home adult-child relationship. Contextual safeguarding therefore expands the objectives of child protection systems in recognition that young people are susceptible to abuse in a range of social contexts (Contextual Safeguarding Network, 2017). At Riverside we understand the importance of knowing our local community and keeping abreast of any safeguarding factors which may impact upon the wellbeing of our pupils and their families.

## **11. Pupils Potentially at Greater Risk of Harm**

The school recognises that some groups of pupils can face additional safeguarding challenges, and understands that further barriers may exist when determining abuse and neglect in these groups of pupils. Additional considerations for managing safeguarding concerns and incidents amongst these groups are outlined below.

## **Pupils working with social workers**

Pupils may need social workers due to safeguarding welfare or medical needs. These needs can leave pupils susceptible to further harm and educational disadvantage.

As a matter of routine, the DSL will hold and use information from the LA including whether a pupil has a social worker in order to make decisions in the best interests of the pupil's safety, welfare, and educational outcomes.

Where a pupil has the support of a social worker, this will support to inform decisions about safeguarding e.g., responding to an unauthorised absence, and promoting welfare e.g., considering the provision pastoral or academic support.

## **Home educated children**

Families may choose elective home education (EHE) for their children. In some cases, EHE can mean that children are less visible to the services needed to safeguard and support them.

In line with the Education (Pupil Registration) (England) Regulations 2006, the school will inform the LA of all deletions from the admissions register when a pupil is taken off roll.

Where a parent/ carer has expressed their intention to remove a pupil from school for EHE, the school, in collaboration with the LA and other key professionals, will coordinate a meeting with the parent/ carer, where possible, before the final decision has been made, particularly where the pupil has SEND, is susceptible, and/ or has a social worker.

IN KCSiE, where parents or carers are considering removing their child from school to educate them at home, it states that "where a child has an EHCP, the local authority will need to review the plan whilst working closely with parents/ carers".

## **CLA and PLAC**

Children most commonly become looked after because of abuse and/ or neglect. Because of this, they can be at potentially greater risk in relation to safeguarding. PCLA, also known as care leavers, can also remain susceptible after leaving care.

The Governing Board will ensure that staff have the skills, knowledge and understanding to keep CLA and PCLA safe. This includes ensuring that the appropriate staff have the information they need, such as:

- Looked after legal status i.e., whether they are looked after under voluntary arrangements with consent of parents/ carers, or on an interim or full care order.
- Contact arrangements with parents or those with parental responsibility.
- Care arrangements and the levels of authority delegated to the carer by the

authority looking after the pupil.

The DSL will be provided with the necessary details of pupils' social workers and the VSH, and, for PCLA, personal advisers.

Further details of safeguarding procedures from CLA and PCLA are outlined in the school's Children Looked After Policy. Statutory guidance can be found at [Designated Teacher for Looked After and Previously Looked After Children](#).

## **Pupils with SEND**

Riverside School is a school for pupils with complex needs and we recognise our pupils can face additional safeguarding challenges, and understand that further barriers exist when determining abuse and neglect in this group of pupils. Pupils with SEND and/or complex health conditions are three times more likely to be abused than their peers.

When managing safeguarding in relation to pupils with SEND, staff will be aware of the following:

- Certain indicators of abuse such as behaviour, mood and injury may relate to the pupil's disability without further exploration. It should, however, never be assumed that a pupil's indicators relate only to their disability.
- Pupils with SEND can be disproportionately impacted by issues such as bullying, without outwardly showing any signs.
- Communication barriers may exist, as well as difficulties in overcoming these barriers.

Schools should take positive action, where it can be shown that it is proportionate, to deal with particular disadvantages affecting pupils with protected characteristics in order to meet their specific need. For example, considering taking positive action to support girls if there was evidence they were being disproportionately subjected to sexual violence or sexual harassment. There is also a duty to make reasonable adjustments for pupils with disabilities.

When reporting concerns or making referrals for pupils with SEND, the above will always be taken into consideration. When managing a safeguarding issue relating to a pupil with SEND, the DSL will liaise with the other members of the school's leadership team, as well as the pupil's family where appropriate, to ensure that the pupil's needs are met effectively.

## **LGBTQ+ pupils**

The fact that a pupil may be LGBTQ+ is not in itself an inherent risk factor for harm; however, staff will be aware that LGBTQ+ pupils can be targeted by other individuals. Staff will also be aware that, in some cases, a pupil who is perceived by others to be LGBTQ+ (whether they are or not) can be just as susceptible as pupils who identify as LGBTQ+.

Staff will also be aware that the risk to these pupils can be compounded when they do not have a trusted adult with whom they can speak openly. Staff will endeavour to reduce the additional barriers faced by these pupils and provide a safe space for them to speak out and share any concerns they have.

### **Pupils requiring mental health support**

All staff will be made aware that mental health problems can, in some cases, be an indicator that a pupil has suffered, or is at risk of suffering, abuse, neglect or exploitation.

## **12. Use of the School Premises for Non-School Activities**

Where the Governing Board hires or rents out school facilities or the school premises to organisations or individuals e.g., for providers to run community or extracurricular activities such as extended services, it will ensure that appropriate arrangements are in place to keep pupils safe.

Where the Governing Board provides the activities under the direct supervision or management of school staff, child protection arrangements will apply. Where activities are provided separately by another body, this may not be the case; therefore, the Governing Board will seek assurance that the body concerned has appropriate safeguarding and child protection policies and procedures in place, including inspecting these as needed. The Governing Board will also ensure that there are arrangements in place to liaise with the school on these matters where appropriate. The Governing Board will ensure safeguarding requirements are included in any transfer of control agreement, i.e., a lease or hire agreement, as a condition of use and occupation of the premises, and specify that failure to comply with this would lead to termination of the agreement.

### **Extracurricular activities and clubs**

External bodies that host extracurricular activities and clubs at the school, e.g., charities or companies, will work in collaboration with the school to effectively safeguard pupils and adhere to local safeguarding arrangements.

Staff and volunteers running extracurricular activities and clubs are aware of their safeguarding responsibilities and promote the welfare of pupils. Paid and volunteer staff understand how they should respond to child protection concerns and how to make a referral to Social Care or the Police, if necessary.

KCSIE provides clarity around safeguarding arrangements that schools should expect providers (hirers) to have in place in accordance with the [guidance on keeping children safe in out-of-school settings](#). Further information can be found in the updated guidance.

All national governing bodies of sport that receive funding from either Sport England or UK Sport must aim to meet the Standards for Safeguarding and Protecting Children in

Sport.

If a school receives an allegation relating to an incident where an individual or organisation was using the school premises for running an activity, the school will follow school safeguarding policies and procedures, including informing the LADO if appropriate.

### **13. Work Experience**

When a pupil is sent on work experience, the school will ensure that the provider has appropriate safeguarding in place.

### **14. Private Fostering**

Private fostering occurs when a child under the age of 16 (under 18, if considered disabled) is provided with care and accommodation by a person who is not a parent, person with parental responsibility for them or a relative in their own home. A child is not privately fostered if the person caring for and accommodating them has done so for less than 28 days and does not intend to do so for longer. Such arrangements may come to the attention of school staff through the normal course of their interaction, and promotion of learning activities, with children. Riverside School will then notify the local authority to allow the local authority to check the arrangement is suitable and safe for the child.

### **15. Concerns About Pupils**

If a member of staff has any concern about a pupil's welfare, or a pupil has reported a safeguarding concern in relation to themselves or a peer, they will act on them immediately by speaking to the DSL or safeguarding leads.

Staff will be aware that pupils may not feel ready or know how to tell someone that they are being abused, exploited or neglected, and/ or they may not recognise their experiences as harmful. Staff will be aware that this must not prevent them from having professional curiosity and speaking to the DSL and/or safeguarding leads, if they have concern about a pupil.

All staff members are aware of the procedure for reporting concerns and understand their responsibilities in relation to confidentiality and information sharing, as outlined in the [communication and confidentiality section](#) of this policy.

When there is a concern about a pupil, staff are expected to complete concerns logs within a timely manner and discuss with the DSL. Full factual information needs to be recorded. Riverside School uses the "My Concern" programme to record all safeguarding concerns. Once a concerns log is submitted this will be sent directly to the DSL. A paperwork system will still be in place additionally. All completed written concerns log, to be sealed in a confidential envelope and handed to DSL. If DSL is not available to be

handed to and discussed with another member of the senior leadership team a per arrangements outlined in Appendix B.

If a child discloses a safeguarding issue to you, you should:

- Listen to and believe them. Allow them time to talk freely and do not ask leading questions;
- Stay calm and do not show that you are shocked or upset;
- Tell the child they have done the right thing in telling you. Do not tell them they should have told you sooner;
- Explain what will happen next and that you will have to pass this information on. Do not promise to keep it a secret;
- Write up your conversation as soon as possible in the child's own words. Stick to the facts, and do not put your own judgment on it; and
- Sign and date the write-up and pass it on in a timely manner.

The DSL will address the concern. If the DSL passes the concern to the LA, the LA will then make a decision regarding what action is required within one working day of the referral being made, and will notify the referrer. The DSL (and referrer) are required to monitor a referral if they do not receive information from the LA regarding what action is necessary for the pupil. If the situation does not improve after a referral, the DSL will ask for reconsideration to ensure that their concerns have been addressed and that the situation improves for the pupil.

If early help is appropriate, the case will be kept under constant review. If the pupil's situation does not improve, a referral will be considered. All concerns, discussions and decisions made, as well as the reasons for making those decisions, will be recorded in writing by the DSL and kept securely in location.

If a pupil is in immediate danger, a referral will be made to CSCS and/ or the Police immediately.

Where there are safeguarding concerns, the school will ensure that the pupil's wishes are always taken into account, and that there are systems available for pupils to provide feedback and express their views. When responding to safeguarding concerns, staff members will act calmly and supportively, ensuring that the pupil feels like they are being listened to and believed.

An inter-agency assessment will be undertaken where a child and their family could benefit from coordinated support from more than one agency. These assessments will identify what help the child and family require in preventing needs escalating to a point where intervention would be needed.

## **16. Managing Referrals**

All staff members, in particular the DSL, will be aware of the LA's arrangements in place

for managing referrals. The DSL will provide staff members with clarity and support where needed. When making a referral to Social Care or other external agencies, information will be shared in line with confidentiality requirements and will only be shared where necessary and/or appropriate to do so.

The DSL will work alongside external agencies, maintaining continuous liaison, including multi-agency liaison where appropriate, in order to ensure the wellbeing of the pupils involved. The DSL will work closely with the Police to ensure the school does not jeopardise any criminal proceedings, and to obtain help and support as necessary.

Where a pupil has been harmed or is in immediate danger or at risk of harm, the referrer will be notified of the action that will be taken within one working day of a referral being made. Where this information is not forthcoming, the referrer will contact the assigned social worker for more information.

The school will not wait for the start or outcome of an investigation before protecting the victim and other pupils: this applies to criminal investigations as well as those made by Social Care. If Social Care decide that a statutory investigation is not appropriate, the school will consider referring the incident again if it is believed that the pupil is at risk of harm. Where Social Care decides that a statutory investigation is not appropriate and the school agrees with this decision, the school will consider the use of other support mechanisms, such as early help and pastoral support.

At all stages of the reporting and referral process, where appropriate the pupil will be informed of the decisions made, actions taken and reasons for doing so. Discussions of concerns with families will take place where this would not put the pupil or others at potential risk of harm. The school will work closely with families to ensure that the pupils, as well as their family, understand the arrangements in place such as in-school interventions. They will ensure that at all times the pupil feels effectively supported, and that they know where additional support can be accessed.

## **17. Concerns About School Safeguarding Practices**

Any concerns regarding the safeguarding practices at the school will be raised with the SLT, and the necessary whistleblowing procedures will be followed, as outlined in the Raising Concerns (Whistleblowing) Policy. If a staff member feels unable to raise an issue with the SLT, they should access other whistleblowing channels such as the NSPCC Whistleblowing helpline (0800 028 0285).

## **18. Safeguarding Concerns and Allegations of Abuse Against Staff**

All allegations against staff, supply staff, volunteers and contractors will be managed in line with the School's Allegations of Abuse Against Staff Policy, a copy of which is provided to staff. The school will ensure all allegations against staff, including those who are not employees of the school, are dealt with appropriately and that the school liaises with the

relevant parties.

When managing allegations against staff, the school will recognise the distinction between allegations that meet the harms threshold and allegations that do not, also known as “low-level concerns”, as defined in the Allegations of Abuse Against Staff Policy. Allegations that meet the harms threshold include instances where staff have:

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

Low-level concerns will be handled in line with the school’s Low-Level Concerns Policy.

## **19. Communication and Confidentiality**

All child protection and safeguarding concerns will be treated in the strictest of confidence in accordance with school data protection policies. Sharing safeguarding information appropriately overrides data protection and fears of this should not stand in the way of sharing information.

The Data Protection Act 2018 (DPA) and UK GDPR do not prevent or limit the sharing of information for the purposes of keeping children safe. If staff need to share ‘special category personal data’, the DPA contains ‘safeguarding of children and individuals at risk’ as a processing condition that allows practitioners to share information without consent. If it is possible to gain consent, it cannot reasonably be expected that a practitioner gains consent. The same holds true if the act of gaining consent would place a pupil at risk.

If a victim asks the school not to tell anyone about the sexual violence or sexual harassment there is no definitive answer. Even if a victim does not give consent to sharing information, staff may still legally share information if there’s another legal basis under the UK GDPR that applies. The DSL will have to balance the victim’s wishes against their duty of care to protect the victim and other pupils.

Where there is an allegation or incident of sexual abuse or sexual violence, the school will consult its policy and agree on what information will be disclosed to staff and others, in particular the alleged perpetrator and their parents/ carers. Where a report of sexual violence or sexual harassment is progressing through the criminal justice system, the school will do all it can to protect the anonymity of the pupils involved in the case.

Concerns will only be reported to those necessary for its progression and reports will only be shared amongst staff members and with external agencies on a need-to-know basis. During the disclosure of a concern by a pupil, staff members will not promise the pupil confidentiality and will ensure that they are aware, where appropriate, of what

information will be shared, with whom and why.

Where it is in the public interest, and protects pupils from harm, information can be lawfully shared without the victim's consent e.g., if doing so would assist the prevention, detection or prosecution of a serious crime. Before doing so, the DSL will weigh the victim's wishes against their duty to protect the victim and others. Where a referral is made against the victim's wishes, it is done so carefully with the reasons for the referral explained to the victim and specialist support offered.

Depending on the nature of a concern, the DSL will discuss the concern with the families of the pupils involved. Discussions with families will not take place where they could potentially put a pupil at risk of harm. Discussion with the victim's families will relate to the arrangements being put in place to safeguard the victim, with the aim of understanding their wishes in terms of support arrangements and the progression of the report. Discussion with the alleged perpetrator's (if they are a child at the school) family will have regards to the arrangements that will impact their child, such as moving classes, with the reasons behind decisions being explained and the available support discussed. External agencies will be invited to these discussions where necessary.

Where confidentiality or anonymity has been breached, the school will implement the appropriate disciplinary procedures as necessary and will analyse how damage can be minimised and future breaches be prevented.

Where a pupil is leaving the school, the DSL will consider whether it is appropriate to share any information with the pupil's new provider, in addition to the child protection file, that will allow the new provider to support the pupil and arrange appropriate support for their arrival.

The Government's [information sharing advice for safeguarding practitioners](#) includes seven 'golden rules' for sharing information and will support staff who have to make decisions about sharing information.

## **20. Safer Recruitment**

The school's full policy and procedures for safer recruitment are outlined in the Safer Recruitment Policy.

An Enhanced DBS Check with barred list information will be undertaken for all staff members engaged in regulated activity. A person will be considered to be in 'regulated activity' if, as a result of their work, they:

- Are responsible on a daily basis for the care or supervision of children;
- Regularly work in the school at times when children are on the premises; or
- Regularly come into contact with children under 18 years of age.

The DfE's [DBS Workforce Guides](#) will be consulted when determining whether a position

fits the child workforce criteria.

The Governing Board will conduct the appropriate pre-employment checks for all prospective employees, including internal candidates who have lived or worked outside the UK.

The appropriate DBS and suitability checks will also be carried out for appropriate staff including, but not limited to, Governors, volunteers and contractors.

As per KCSiE, schools should inform shortlisted candidates that online searches may be done as part of due diligence checks and that copies of documents used to verify the successful candidate's identity, right to work and required qualifications should be kept on their personnel file.

### **Staff suitability**

All centres providing care for pupils under the age of eight must ensure that staff and volunteers working in these settings are not disqualified from doing so under the Childcare (Disqualification) and Childcare (Early Years Provision Free of Charge) (Extended Entitlement) (Amendment) Regulations 2018. A person may be disqualified if:

- They have certain orders or other restrictions placed upon them; or
- They have committed certain offences.

All staff members are required to sign the Staff Disqualification Declaration Form confirming that they are not disqualified from working in a schooling environment. A disqualified person will not be permitted to continue working at the school, unless they apply for and are granted a waiver from Ofsted. The school will provide support with this process.

### **Ongoing suitability**

Following appointment, consideration will be given to staff and volunteers' ongoing suitability – to prevent the opportunity for harm to children or placing children at risk.

If you have concerns about a member of staff (including a supply teacher, volunteer or contractor), or an allegation is made about a member of staff (including a supply teacher, volunteer or contractor) posing a risk of harm to children, speak to the Headteacher-Steve Solomons, Deputy Heads Amy Price and Charlotte Downs or DSL Helen Bushell Movahedi at the first available opportunity. If the concern/ allegations are about the Headteacher, refer to the Chair of Governors George Christian, Deputy Heads Amy Price and Charlotte Downs or DSL Helen Bushell Movahedi.

### **Referral to the DBS**

The school will consult with LADO and follow advice to refer to the DBS anyone who has

harmed a child or who poses a risk of harm to a child, or if there is reason to believe the member of staff has committed an offence and has been removed from working in regulated activity. The duty will also apply in circumstances where an individual is deployed to another of work that is not in regulated activity, or they are suspended.

## **21. Single Central Record**

The school keeps an SCR which records all staff, including agency and third-party supply staff, and teacher trainees on salaried routes, who work at the school.

The following information is recorded on the SCR:

- An identity check;
- A Barred List check;
- An Enhanced DBS check;
- A prohibition from teaching check;
- A check of professional qualifications, where required;
- A check to determine the individual's right to work in the UK;
- Additional checks for those who have lived or worked outside of the UK;
- Whether the employee's position involves relevant activity, i.e., regularly caring for, training, supervising or being solely in charge of persons aged under 18.

For agency and third-party supply staff, the school will also record whether written confirmation from the employment business supplying the member of staff has been received which indicates that all necessary checks have been conducted (i.e., all the same checks the school would perform on any individual working in the school or who will be providing education on the school's behalf, including through online delivery) and the date that confirmation was received.

If any checks have been conducted for volunteers, this will also be recorded on the SCR. If risk assessments are conducted to assess whether a volunteer should be subject to an enhanced DBS check, the risk assessment will be recorded.

Written confirmation, through letters of assurance, that supply agencies and other companies have completed all relevant checks will also be included.

The school is free to record any other information it deems relevant.

The details of an individual will be removed from the SCR once they are no longer working at the school.

## **22. Training**

Staff members will undergo safeguarding and child protection training at induction, which will be updated on at least an annual basis.

Induction training will cover:

- Safeguarding Policy;
- Staff Code of Conduct;
- Part 1 of 'Keeping Children Safe in Education; (KCSiE) (and Annex A, if appropriate);
- Appropriate child protection and safeguarding training, including online safety training; and
- Information about the role and identity of the DSL and Safeguarding Leads;

All staff members will also receive regular safeguarding and child protection updates as required, but at least annually. Training will cover, at a minimum:

- Safeguarding duties;
- Areas of abuse and red flags;
- Legislation and guidance;
- Issues surrounding sexual violence and sexual harassment;
- Contextual safeguarding;
- How to keep CLA and PCLA safe; and
- Updated online safety training.

Staff will receive opportunities to contribute towards and inform the safeguarding arrangements in the school.

The DSL and Safeguarding Leads will undergo child protection and safeguarding training upon appointment and at least every two years thereafter. The DSL and Safeguarding Leads will also obtain access to resources and attend any relevant or refresher training courses, ensuring they keep up-to-date with any developments relevant to their role. This will include training to understand:

- The assessment process for providing early help and statutory intervention, including any local criteria for action and Social Care referral arrangements.
- How LAs conduct child protection case conferences and child protection review conferences to enable the DSL to attend and effectively contribute to proceedings when required.
- The importance of providing information and support to Social Care.
- The lasting impact that adversity and trauma can have.
- How to be alert to the specific needs of children in need, pupils with SEND and/ or relevant health conditions, and young carers.
- The importance of internal and external information sharing.
- The Prevent duty.
- Risks associated with online safety, including the additional risks faced online by pupils with SEND.

### **23. Monitoring and Review**

This policy is reviewed at least annually by the DSL and Headteacher and is approved by the Governing Board. It is also updated as required to ensure it is up-to-date with legislative changes and safeguarding issues as they emerge and evolve, including any lessons learned.

Any changes made to this policy will be communicated to all members of staff by the DSL. All staff are required to familiarise themselves with all processes and procedures outlined in this policy as part of their induction process.

## Appendix A – Specific Safeguarding Issues

This appendix sets out details of specific safeguarding issues that pupils may experience, and outlines specific actions that would be taken in relation to these issues.

The issues covered are:

1. [Domestic Abuse](#)
2. [Homelessness](#)
3. [Children Missing from Education & Children Absent from Education](#)
4. [Child Abduction and Community Safety Incidents](#)
5. [Child Criminal Exploitation \(CCE\)](#)
6. [Cyber-Crime](#)
7. [Child Sexual Exploitation](#)
8. [Modern Slavery](#)
9. [Female Genital Mutilation](#)
10. [Virginity Testing and Hymenoplasty](#)
11. [Forced Marriage](#)
12. [Radicalisation](#)
13. [Pupils with Family Members in Prison](#)
14. [Pupils Required to Give Evidence in Court](#)
15. [Mental Health](#)
16. [Serious Violence](#)

### 1. Domestic Abuse

For the purposes of this policy, and in line with the Domestic Abuse Act 2021, “**domestic abuse**” is defined as abusive behaviour of a person towards another person (including conduct directed as someone else, e.g., the person’s child) where both persons involved are aged 16 or over and are personally connected. “**Abusive behaviour**” includes physical or sexual abuse, violent or threatening behaviour, controlling or coercive behaviour, economic abuse, psychological or emotional abuse, or another form of abuse.

“**Personally connected**” includes people who:

- Are, have been, or have agreed to be married to each other.
- Are, have been, or have agreed to be in a civil partnership with each other.
- Are or have been in an intimate personal relationship with each other.
- Ever have or have had a parental relationship towards the same child.
- Are relatives.

The school will recognise the impact of domestic abuse on children, as victims in their own right, if they see, hear or experience the effects of domestic abuse. All staff will be aware of the signs of domestic abuse and will follow the appropriate safeguarding procedures where any concerns arise.

## **2. Homelessness**

The DSL and SLs will be aware of the contact details and referral routes into the Local Housing Authority so that concerns over homelessness can be raised as early as possible.

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

- Household debt;
- Rent arrears;
- Cost of living crisis;
- Domestic abuse;
- Anti-social behaviour; and
- Any mention of a family moving home because “they have to”.

Referrals to the Local Housing Authority do not replace referrals to Social Care where a child is being harmed or is at risk of harm. For 16–17-year-olds, homelessness may not be family-based and referrals to Social Care will be made as necessary where concerns are raised.

## **3. Children Missing from Education & Children Absent from Education**

The term ‘children missing from education’ is different from ‘children absent from education’. Supporting children who are absent from education helps prevent the risk of them becoming a child missing from education in the future.

If a child is missing from education they are not on a roll. A child absent from education is a child who is not attending or has a poor attendance record. They are children who are absent from education for prolonged periods and/ or on repeated occasions. This could be a safeguarding concern.

A child absent from school is a potential indicator of abuse or neglect and, as such, these children are increasingly at risk of being victims of harm, exploitation or radicalisation. Staff will monitor children who are absent from the school, particularly those absent on repeat occasions, and will report them to the DSL. The school will inform the LA of any pupil who fails to attend regularly, or who has been absent without the school or LA’s permission/awareness for a continuous period of 10 school days or more.

The updated guidance on school attendance [Working together to improve school attendance](#) now includes information on how schools should work with local authorities’ children’s services where a pupil’s school absence indicates a safeguarding concern.

### **Admissions Register**

Pupils are placed on the admissions register at the beginning of the first day that is agreed by the school, or when the school has been notified that the pupil will first be attending. The school will notify the LA within five days once a pupil’s name is added to the admissions register.

The school will ensure that the admissions register is kept up to date and accurate at all times, and will inform families when any changes occur. Two emergency contacts will be held for each pupil where possible. Staff will monitor pupils who do not attend the school on the agreed date and will notify the LA at the earliest opportunity.

If a family notifies the school that their child will live at a different address, the school will record the following information on the admissions register:

- The full name of the parent/ carer with whom the child will be living;
- The new address; and
- The date from which the pupil will live at the address.

If a family notifies the school that their child will be attending a different school, or that they are already registered at a different school, the following information will be recorded on the admissions register:

- The name of the new school; and
- The date from which the pupil first attended, or is due to attend, the new school.

Where a pupil moves to a new school, the school will use a secure internet system to securely transfer pupils' data.

To ensure accurate data is collected to allow effective safeguarding, the school will inform the LA of any pupil who is going to be deleted from the admissions register, in accordance with the Education (Pupil Registration) (England) Regulations 2006 (as amended), where they:

- have been taken out of the school by their parents/ carers, and are being educated outside of the national education system, e.g., home education;
- have ceased to attend the school, and no longer live within a reasonable distance of the premises;
- have been certified by the school's medical officer as unlikely to be in a fit state of health to attend, before ceasing to be of compulsory school age, and their parent has not indicated the intention of the pupil continuing to attend school after ceasing to be of compulsory school age;
- have been in custody for a period of more than four months due to a final court order and the school does not reasonably believe they will be returning to the school at the end of the period; or
- have been permanently excluded.

The school will also remove a pupil from the admissions register where the school and LA have been unable to establish the pupil's whereabouts after making reasonable enquiries into their attendance.

If the school is going to remove a pupil from the admissions register, they will inform the

LA of the following:

- The full name of the pupil;
- The full name and address of any parent/ carer with whom the pupil lives;
- At least one telephone number of the parent/ carer with whom the pupil lives;
- The full name and address of the parent/ carer with whom the pupil is going to live, and the date that the pupil will live there from;
- The name of the pupil's new school and the date they have/ will attend from; and
- The grounds for removal from the admissions register under regulation 8 of the Education (Pupil Registration) (England) Regulations 2006 (as amended).

The school will work with the LA to establish methods of making returns for pupils back into the school. The school will highlight to the LA where they have been unable to obtain necessary information from parents, e.g., where an address is unknown. The school will also highlight any other necessary contextual information, including safeguarding concerns.

#### **4. Child Abduction and Community Safety Incidents**

For the purposes of this policy "**child abduction**" is defined as the unauthorised removal or retention of a child from a parent or anyone with legal responsibility for the child. Child abduction can be committed by parents and other relatives, other people known to the victim, or strangers.

All staff will be alert to community safety incidents taking place in the vicinity of the school that may raise concerns regarding child abduction, e.g., people loitering nearby or unknown adults conversing with pupils.

Pupils will be provided with practical advice and lessons to ensure they can keep themselves safe outdoors.

#### **5. Child Criminal Exploitation (CEE)**

For the purposes of this policy "**Child criminal exploitation**" is defined as a form of abuse where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into taking part in criminal activity, for any of the following reasons:

- In exchange for something the victim needs or wants.
- For the financial or other advantage of the perpetrator or facilitator.
- Through violence or threat of violence.

Specific forms of CCE can include:

- Being forced or manipulated into transporting drugs or money through county lines;

- Working in cannabis factories;
- Shoplifting or pickpocketing;
- Committing vehicle crime; or
- Committing, or threatening to commit, serious violence to others.

The school will recognise that pupils involved in CCE are victims themselves, regardless of whether they have committed crimes, and even if the criminal activity appears consensual. The school will also recognise that pupils of any gender is at risk of CCE.

School staff will be aware of the indicators that a pupil is the victim of CCE, including:

- Appearing with unexplained gifts, money or new possessions.
- Associating with other children involved in exploitation.
- Suffering from changes in emotional wellbeing.
- Misusing drugs or alcohol.
- Going missing for periods of time, or regularly coming home late.
- Regularly missing school or education, or not taking part.

## County Lines

For the purposes of this policy, “**county lines**” refers to gangs and organised criminal networks exploiting children to move, store or sell drugs and money into one or more areas, locally and/ or across the UK.

As well as the general indicators for CCE, school staff will be aware of the specific indicators that a pupil may be involved in county lines, including:

- Going missing and subsequently being found in areas away from their home.
- Having been the victim or perpetrator of serious violence, e.g., knife crime.
- Receiving requests for drugs via a phone line.
- Moving drugs.
- Handing over and collecting money for drugs.
- Being exposed to techniques such as ‘plugging’, where drugs are concealed internally to avoid detection.
- Being found in accommodation they have no connection with, or a hotel room where there is drug related activity.
- Owing a ‘debt bond’ to their exploiters.
- Having their bank account used to facilitate drug dealing.

Staff will be made aware of pupils with missing episodes who may have been trafficked for the purpose of transporting drugs. Staff members who suspect a pupil may be susceptible to, or involved in, county lines activity will immediately report all concerns to the DSL and or a Safeguarding Lead.

The DSL will consider if a referral needs to be made to the National Referral Mechanism on a case-by-case basis, and will consider involving local services and providers who offer

support to victims of county lines exploitation.

## 6. Cyber-Crime

For the purposes of this policy, “**cyber-crime**” is defined as criminal activity committed using computers and/ or the internet. This includes ‘cyber-enabled’ crimes, i.e., crimes that can happen offline but are enabled at scale and at speed online, and ‘cyber-dependent’ crimes, i.e., crimes that can be committed only by using a computer. Crimes could include:

- Unauthorised access to computers, known as ‘hacking’;
- Denial of Service attacks, known as ‘booting’; or
- Making, supplying or obtaining malicious software, or ‘malware’, e.g., viruses, spyware, ransomware, botnets and remote action trojans with the intent to commit further offence.

All staff will be aware of the signs of cyber-crime and will follow the appropriate safeguarding procedures when concerns arise. This may include the DSL referring pupils to the National Crime Agency’s Cyber Choices programme.

## 7. Child Sexual Exploitation

For the purposes of this policy, “**child sexual exploitation**” is defined as a form of sexual abuse where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into sexual activity, for any of the following reasons:

- In exchange for something the victim needs or wants;
- For the financial advantage, increased status or other advantage of the perpetrator or facilitator; or
- Through violence or the threat of violence.

The school recognises that CSE can occur over time or be a one-off occurrence, and it may happen without the pupil’s immediate knowledge, e.g., through others shoring videos or images of them on social media. The school recognises that CSE can affect any pupil who has been coerced into engaging in sexual activities, even if the activity appears consensual; this includes pupils aged 16 and above who can legally consent to sexual activity. The school will also recognise that pupils may not realise they are being exploited, e.g., they believe they are in a genuine romantic relationship.

School staff will be aware of the key indicators that a pupil is the victim of CSE, including:

- Appearing with unexplained gifts, money or new possessions;
- Associating with other children involved in exploitation;
- Suffering from changes in emotional wellbeing;
- Misusing drugs and alcohol;
- Going missing for periods of time or regularly coming home late;

- Regularly missing school or education, or not taking part;
- Having older partners;
- Suffering from sexually transmitted infections;
- Displaying sexual behaviours beyond expected sexual development; and
- Becoming pregnant.

Where CSE or the risk of it is suspected, staff will discuss the case with the DSL. If after discussion a concern remains, local safeguarding procedures will be triggered, including referral to the LA. The LA and all other necessary authorities will then handle the matter to conclusion. The school will cooperate as needed.

## 8. Modern Slavery

For the purposes of this policy, “**modern slavery**” encompasses human trafficking and slavery, servitude, and forced or compulsory labour. This can include CCE, CSE and other forms of exploitation.

All staff will be aware of and alert to the signs that a pupil may be the victim of modern slavery. Staff will also be aware of the support available to victims of modern slavery and how to refer pupils to the National Referral Mechanism.

## 9. Female Genital Mutilation

For the purposes of this policy, “**female genital mutilation**” is defined as all procedures involving the partial or total removal of the external female genitalia or other injury to the female genital organs.

Keeping Children Safe in Education explains that FGM comprises “all procedures involving partial or total removal of the external female genitalia, or other injury to the female genital organs”. FGM is illegal in the UK and is a form of child abuse with long-lasting, harmful consequences. It is also known as ‘female genital cutting’, ‘circumcision’ or ‘initiation’.

All staff will be alert to the possibility of a pupil being at risk of FGM, or already having suffered FGM. If staff are worried about someone who is at risk of FGM or who has been a victim of FGM, they are required to share this information with Social Care and/ or the Police, this will be supported by the DSL or a Safeguarding Lead. The school’s procedures relating to managing cases of FGM and protecting pupils will reflect multi-agency working arrangements.

As outlined in Section 5B of the Female Genital Mutilation Act 2003 (as inserted by section 74 of the Serious Crime Act 2015), teachers are **legally required** to report to the Police any discovery, whether through disclosure by the victim or visual evidence, of FGM on a pupil under the age of 18. Teachers failing to report such cases may face disciplinary action. Teachers will not examine pupils, and so it is rare that they will see any visual evidence, but they must personally report to the police where an act of FGM appears to

have been carried out. They should also consider and discuss any such case with the DSL and involve Social Care as appropriate. **N.B.**, this does not apply to any suspected or at-risk cases, nor if the individual is over the age of 18. In such cases, local safeguarding procedures will be followed.

All staff will be aware of the indicators that pupils may be at risk of FGM. While some individual indicators may not suggest risk, the presence of two or more indicators could signal a risk to the pupil. It is important to note that the pupil may not yet be aware of the practice or that it may be conducted on them, so staff will be sensitive when broaching the subject.

Indicators that a pupil may be at heightened risk of undergoing FGM include:

- The socio-economic position of the family, and their integration into UK society.
- The pupil coming from a community known to adopt FGM.
- Any girl with a mother or sister who has been subjected to FGM.
- Any girl withdrawn from PHSE.

Indicators that FGM may take place soon include:

- When a female family elder is visiting from a country of origin.
- A girl confiding that she is to have a 'special procedure' or a ceremony to 'become a woman'
- A girl requesting help from her teacher if she is aware or suspects that she is at immediate risk.
- A girl, or her family member, talking about a long holiday to her country of origin or another country where FGM is prevalent.

All staff will be vigilant to the signs that FGM has already taken place so that help can be offered, enquiries made to protect others, and criminal investigations can begin. Indicators that FGM may have already taken place include the pupil:

- having difficulty walking, sitting or standing;
- spending longer than normal in the bathroom or toilet;
- spending long periods of time away from a classroom during the day with bladder or menstrual problems;
- having prolonged or repeated absences from school, followed by withdrawal or depression;
- being reluctant to undergo normal medical examinations; and
- asking for help, but not being explicit about the problem due to embarrassment or fear.

FGM is included in the definition of so called "**honour-based abuse (HBA)**", which involves crimes that have been committed to defend the honour of the family and/ or community. All forms of HBA are forms of abuse and will be treated and escalated as such. Staff will be alert to the signs of HBA, including concerns that a child is at risk of

HBA, or has already suffered from HBA, and will consult with the DSL, who will activate local safeguarding procedures if concerns arise.

## **10. VirginitY Testing and Hymenoplasty**

Under the Health and Care Act 2022, it is illegal to carry out, offer or aid and abet virginitY testing or hymenoplasty in any part on the UK. It is also illegal for UK nationals and residents to do these things outside of the UK.

**VirginitY testing** – Also known as hymen testing, '2-finger or vaginal examination, this is defined as any examination (with or without contact) of the female genitalia intended to establish if vaginal intercourse has taken place. This is irrespective of whether consent has been given. Vaginal examination has no established scientific merit or clinical indication.

**Hymenoplasty** – A procedure which can involve a number of different techniques, but typically involving stitching or surgery, undertaken to reconstruct a hymen with the intent that the person bleeds the next time they have vaginal intercourse. Hymenoplasty is different to procedures that may be performed for clinical reasons, e.g., surgery to address discomfort or menstrual complications.

VirginitY testing and hymenoplasty are forms of violence against women and girls and are part of the cycle of HBA. They can be precursors to child or forced marriage and other forms of familial and/ or community coercive behaviours, including physical and emotional control. Victims are pressurised into undergoing these procedures, often by family members or the intended husbands' family to fulfil the requirement that a woman remains 'pure' before marriage. Those who 'fail' to meet this requirement are likely to suffer further abuse, including emotional and physical abuse, disownment and even honour killings.

The procedures are degrading and intrusive, and can result in extreme psychological trauma, provoking conditions such as anxiety, depression and PTSD, as well as physical harm and medical complications. Staff will be alert to the possible presence of stress, anxiety and other psychological or behavioural signs, and mental health support should be made available where appropriate.

Victims face barriers in coming forward, e.g., they may not know that the abuse was abnormal or wrong at the time, and may feel shameful, having been taught that speaking out against family and/ or the community is wrong, or being scared about the repercussions of speaking out. The school will educate pupils about the harms of these practices and dispel myths, e.g., the belief that virginitY determines the worth of a woman, and establish an environment where pupils feel safe enough to make a disclosure.

Pupils aged 13 and older are considered to be most at risk, but it can affect those as young as 8, and anyone with female genitalia can be a victim regardless of age, gender identity,

ethnicity, sexuality, religion, disability or socio-economic status. All staff will be aware of the following indicators that a pupil is at risk of or has been subjected to a virginity test and/ or hymenoplasty:

- A pupil is known to have requested either procedure or asks for help;
- Family members disclose that the pupil has already undergone the practices;
- Pain and discomfort after the procedures e.g., difficulty walking or sitting for a long period of time when this was not previously a problem;
- Concern from family members that the pupil is in a relationship, or plans for them to be married;
- A close relative has been threatened with either procedure, or has already been subjected to one;
- A pupil has already experienced or is at risk of other forms of HBA;
- A pupil is already known to social services in relation to other safeguarding issues;
- A pupil discloses other concerns that could be an indication of abuse, e.g., they may state that they do not feel safe at home, that family members will not let them out the house and/ or that family members are controlling;
- A pupil displays signs of trauma and an increase in emotional and psychological needs, e.g., withdrawal, anxiety, depression, or significant change in behaviour;
- A pupil appears fearful of their family or a particular family member;
- Unexplained absence from school, potentially to go abroad; or
- Changes in behaviour, e.g., deterioration in schoolwork, attendance or attainment

The above list is not exhaustive, but if any of these indicators are identified, staff members will immediately raise concerns with the DSL. An assessment of the risk they face will be undertaken. If there is believed to be immediate danger, the Police will be contacted without delay.

The school will not involve families and community members in cases involving virginity testing and hymenoplasty, including trying to mediate with the family or using a community member as an interpreter, as this may increase the risk of harm to the pupil, including expediting arrangements for the procedure.

## **11. Forced Marriage**

Forced marriage is a marriage where one or both spouses do not consent to the marriage but are coerced into it. Force can be physical, psychological, financial, sexual or emotional. A lack of full and free consent can be where a person does not consent or where they cannot consent, e.g., due to some form of SEND. Where an individual lacks the capacity to consent to marriage, coercion is not required for a marriage to be forced.

Since February 2023, it has also been considered a crime to carry out any conduct whose purpose is to cause a child to marry before their eighteenth 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.

All staff will be alert to the indicators that a pupil is at risk of or has undergone forced marriage, including, but not limited to, the pupil:

- being absent from school – particularly where this is persistent;
- requesting extended leave of absence and failing to return from visits to country of origin;
- being fearful of forthcoming school holidays;
- being subjected to surveillance by siblings or cousins at school;
- demonstrating a decline in behaviour, engagement, performance, exam results or punctuality;
- being withdrawn from school by their parents;
- being removed from a day centre when they have a physical or learning disability;
- not being allowed to attend extracurricular activities;
- suddenly announcing that they are engaged to a stranger, e.g., to friends or on social media;
- having a family history of forced marriage, e.g., their older siblings have been forced to marry;
- being prevented from going on to further or higher education;
- showing signs of mental health disorders and behaviours, e.g., depression, self-harm, anorexia; or
- displaying a sudden decline in their educational performance, aspirations or motivation.

Staff who have any concerns regarding a pupil who may have undergone, is currently undergoing, or is at risk of forced marriage will speak to the DSL or Safeguarding Leads and local safeguarding procedures will be followed – this could include referral to Social Care, the Police or the Forced Marriage Unit. The DS or Safeguarding Lead will ensure the pupil is spoken to privately about these concerns, and further action will be taken as appropriate. Pupils will always be listened to and their comments taken seriously.

It will be made clear to staff members that they should not approach the pupil's family or those with influence in the community without the express of the pupil, as this will alert them to the concerns and may place the pupil in further danger.

Advice will be sought from the Forced Marriage Unit following any suspicion of force marriage among pupils.

If a pupil is being forced to marry, or is fearful of being forced to, the school will be especially vigilant for signs of mental health disorders and self-harm. The pupil will be supported by the DSL and Senior Mental Health Lead. Referrals will be made on a case-by-case basis.

Staff members will make themselves aware of how they can support victims of forced marriage in order to respond to the victims needs at an early stage, and will be aware of the practical help they can offer, such as referral to Social Care and national support groups.

Local child safeguarding procedures will be activated following concerns regarding forced marriage – the school will use existing national and local protocols for multi-agency liaison with Police and Social Care.

The school will support any victims to seek help by:

- Making them aware of their rights and choices to seek legal advice and representation.
- Recording injuries and making referrals for medical examination where necessary.
- Providing personal safety advice.
- Developing a safety plan in case they are seen, e.g., by preparing another reason for why the victim is seeking help.

The school will establish where possible whether pupils at risk of forced marriage have a dual nationality or two passports.

The school will aim to create an open environment where pupils feel comfortable and safe to discuss the problems they are facing – this means creating an environment where forced marriage is discussed openly within the curriculum and support and counselling are provided routinely.

The school will take a whole school approach towards educating on forced marriage in the school curriculum and environment – in particular, the school's RSHE curriculum will incorporate teaching about the signs of forced marriage and how to obtain help. Appropriate material and sources of further support will be signposted to pupils. Pupils will be encouraged to access appropriate advice, information and support.

Teachers and other staff members will be educated through CPD about the issues surrounding forced marriage and the signs to look out for.

## **12. Radicalisation**

For the purposes of this policy, "**radicalisation**" refers to the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups.

For the purpose of this policy, "**extremism**" refers to the vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty, and the mutual respect and tolerance of different faiths and beliefs. Extremism also includes calling for the death of members of the armed forces.

For the purposes of this policy, "**terrorism**" refers to an action that endangers or causes serious violence to a person or people, serious damage to property, or seriously interferes with or disrupts an electronic system. The use or threat of these actions must be designed to influence the government or intimidate the public, and be made for the purpose of advancing a political, religious or ideological cause.

Protecting pupils from the risk of radicalisation is part of the school's wider safeguarding duties. The school will actively assess the risk of pupils being radicalised and drawn into extremism and/ or terrorism. Staff will be alert to changes in pupils' behaviour which could indicate that they may need help or protection. Staff will use their professional judgement to identify pupils who may be at risk of radicalisation and act appropriately, which could include contacting the DSL or making a Prevent referral. The school will work with local safeguarding arrangements as appropriate.

The school will ensure that they engage with parents and families, as they are in a key position to spot signs of radicalisation. In doing so, the school will assist and advise family members who raise concerns and provide information for support mechanisms. Any concerns over radicalisation will be discussed with the pupil's parents/ carers, unless the school has reason to believe that the child would be placed at risk as a result.

The DSL will undertake Prevent awareness training to be able to provide advice and support to other staff on how to protect pupils against the risk of radicalisation. The DSL will hold formal training sessions with all members of staff to ensure they are aware of the risk indicators and their duties regarding preventing radicalisation.

Where there is a concern, the DSL will consider the level of risk and decide which agency to make a referral to. This could include Channel, the government's programme for identifying and supporting individuals at risk of being drawn into terrorism, or the local authority children's social care team. An individual will be required to provide their consent before any support delivered through the Channel programme is provided.

The DfE also has a dedicated telephone helpline, 020 7340 7264, which school staff and Governors can call to raise concerns about extremism with respect to a pupil. You can also email [counter.extremism@education.gov.uk](mailto:counter.extremism@education.gov.uk). Note that this is not to be used in emergency situations.

In an emergency, call 999 or the confidential anti-terrorist hotline on 0800 789 321 if you:

- Think someone is in immediate danger;
- Think someone may be planning to travel to join an extremist group; or
- See or hear something that that may be terrorist-related.

## **The Prevent Duty**

Under section 26 of the Counter-Terrorism and Security Act 2015, all schools are subject to a duty to have "due regard to the need to prevent people from being drawn into terrorism", known as "[The Prevent Duty](#)". The Prevent Duty will form part of the school's wider safeguarding obligations.

The school's procedures for carrying out the Prevent Duty, including how it will engage and implement the Channel programme is outlined in the Prevent Policy.

### **13. Pupils with family members in prison**

Pupils with a family member in prison will be offered pastoral support as necessary. Where appropriate they will receive a copy of '[Are you a young person with a family member in prison?](#)' from Action for Prisoners' Families where appropriate and allowed the opportunity to discuss questions and any concerns.

### **14. Pupils Required to Give Evidence in Court**

Pupils required to give evidence in criminal courts, either for crimes committed against them or crimes they have witnessed, will be offered appropriate pastoral support.

Pupils aged 5 – 11 will be provided with the booklet '[Going to Court](#)' from HMCTS where appropriate and allowed the opportunity to discuss questions and concerns.

Pupils aged 12 – 17 will be provided with the booklet '[Going to court and being a witness](#)' from HMCTS where appropriate and allowed the opportunity to discuss questions and concerns.

### **15. Mental Health**

All staff will be made 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.

Staff will not attempt to make a diagnosis of mental health problems – the school will ensure this is done by a trained mental health professional. Staff will, however, be encouraged to identify pupils whose behaviour suggests they may be experiencing a mental health problem or may be at risk of developing one. Staff will also be aware of how pupils' experiences can impact on their mental health, behaviour and education.

Staff who have a mental health concern about a pupil that is also a safeguarding concern will act in line with this policy and speak to the DSL or SLs.

The school will access a range of advice to help them identify pupils in need of additional mental health support, including working with external agencies.

### **16. Serious Violence**

Through training, all staff will be made aware of the indicators which may signal a pupil is at risk from, or is involved with, serious violent crime. These indicators include, but are not limited to:

- Increased absence from school;
- A change in friendships;
- Relationships with older individuals or groups;

- A significant decline in academic performance;
- Signs of self-harm;
- A significant change in wellbeing;
- Signs of assault;
- Unexplained injuries; or
- Unexplained gifts or new possessions.

Staff will be made aware of some of the most significant risk factors that could increase a pupil's susceptibility to becoming involved in serious violence. These risk factors include, but are not limited to:

- Being male;
- Having been frequently absent from school;
- Having been permanently excluded from school;
- Having experienced child maltreatment; or
- Having been involved in offending, such as theft or robbery.

Staff members who suspect a pupil may be susceptible to, or involved in, serious violent crime will immediately report their concerns to the DSL.

The school are aware that the Police, Crime, Sentencing and Courts Act introduced a new duty in 2023 on a range of specified authorities, such as the Police, to share data and information, and put plans in place to prevent and reduce serious violence within their local communities. Schools are under a separate duty to cooperate with core duty holders, such as the Police, when asked – the school will ensure arrangements are in place to do so.

## Appendix B – Designated Safeguarding Lead

Helen Bushell Movahedi- Assistant  
Headteacher (DSL)

### Safeguarding Leads:

Amy Price – Deputy Headteacher  
Charlotte Downs - Deputy Headteacher  
Clare Collett- Assistant Headteacher Secondary Riverside Orpington  
Daniella Costanza-- Assistant Headteacher Primary Riverside Orpington  
Katie Collect- Strutt- Assistant Headteacher Secondary Riverside Orpington  
Emily Morris- Phase leader Riverside Orpington  
Laura Stevens- Phase Leader Riverside Phoenix  
Lauren Mullen - Phase leader Riverside West Wickham  
Lucy Godley- Phase Leader Riverside Orpington

Please speak to the DSL or SL or a senior  
leader (in DSL/SL absence)

Make a concerns log on My Concern

The DSL/SL follow up with you as  
needed.

DSL/SL will follow up on any actions  
needed and will keep you informed as  
appropriate