Epic Academy
Safeguarding Policy

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Version	Date of review	Author	Note of revisions

Contents

1. Purpose and aims

1.1 Epic Academy is committed to safeguarding and promoting the welfare of all learners. The purpose of its Safeguarding Policy is to ensure every child associated with Epic Academy is safe and protected from harm. This means the Academy will always work to:

- protect children and young people at the Academy from maltreatment;
- prevent the impairment of children's and young people's health or development;
- ensure that children and young people at the Academy grow up in circumstances consistent with the provision of safe and effective care;
- undertake that role so as to enable children and young people at the Academy to have the best outcomes.

1.2 This policy will give clear direction to staff, volunteers, visitors and parents about expected behaviour and the legal responsibility to safeguard and promote the welfare of all children at the Academy.

1.3 The Academy fully recognises the contribution it can make to protect children from harm and aims to support and promote the welfare of all children who are registered learners. The elements of this policy are prevention, protection and support.

1.4 This policy applies to all learners, staff, parents, volunteers and visitors. Prior to implementing this policy, the Leadership Team have considered a range of factors to help identify and focus on the key issues for the Academy, the local community and has reviewed referrals, considered local context and local issues accordingly on order to identify its key priorities.

Epic Academy is part of the SCCU Group and consists of the following services:

2. Our ethos

2.1 The child's welfare is of paramount importance Epic Academy will establish and maintain an ethos where learners feel secure, are encouraged to talk, are listened to and are safe. Children at Epic Academy will be able to talk freely to any member of staff if they are worried or concerned about something.

2.2 Everyone who comes into contact with children and their families has a role to play in safeguarding children. Epic Academy recognises that staff play a particularly important role as they are in a position to identify concerns early and provide help for children to prevent concerns from escalating. All staff are advised to maintain an attitude of 'it could happen here' where safeguarding is concerned. When concerned about the welfare of a child, staff members must always act in the best interests of the child.

2.3 All staff, through training and induction, know how to recognise indicators of concern, how to respond to a disclosure from a child and how to record and report this information. Staff will not agree to make promises to any child and will not keep secrets. The adult will make it clear to the child what they will have to do with any information they have chosen to disclose.

2.4 At all times Epic Academy will work in partnership and endeavour to establish effective working relationships with parents, carers and colleagues from other agencies in line with Working Together to Safeguard Children (February 2019) and work in partnership with local safeguarding procedures.

3. Roles and Responsibilities

3.1 It is the responsibility of every member of staff, volunteer and regular visitor to Epic Academy to ensure that they carry out the requirements of this policy and, at all times, work in a way that will safeguard and promote the welfare of all learners. This includes the responsibility to provide a safe environment in which children can learn.

3.2 SCCU Group SLT are accountable for ensuring the effectiveness of this policy and compliance with it. Although SCCU Group takes collective responsibility to safeguard and promote the welfare of all, there is also a Designated Safeguarding Lead who has day-to-day responsibility for safeguarding within Epic Academy.

3.3 Epic Academy SLT will ensure that:

- the Safeguarding Policy is in place and is reviewed annually, is available publicly via Epic Academy website and has been written in line with Local Authority guidance and the requirements of the local safeguarding partners' policies and procedures;
- the Academy contributes to inter-agency working in line with Working Together to Safeguard Children (February 2019);
- a senior member of staff from the leadership team is designated to take the lead responsibility for safeguarding and child protection and that there is also a Deputy DSL in place who is appropriately trained to deal with any issues in the absence of the Designated Safeguarding Lead (DSL). There will always be cover for this role;
- all staff receive induction in safeguarding on appointment and are provided with a copy of this policy and the staff code of conduct;
- all staff undertake appropriate child protection training that is updated regularly, at least annually;
- appropriate procedures are in place for dealing with allegations against members of staff and volunteers in line with statutory guidance;
- safer recruitment practices are followed in accordance with the requirements of Keeping Children Safe in Education (September 2020);

3.4 The SCCU Group are responsible for:

- identifying a senior member of staff from the leadership team to be the Designated Safeguarding Lead (DSL);
- identifying a member of staff to be the Designated Deputy Safeguarding Lead (DDSL);
- identifying alternative members of staff to act as the Designated Safeguarding Lead (DSL) and/or the Designated Deputy Safeguarding Lead (DDSL) in their absence to ensure there is always cover for these roles;
- ensuring that the policies and procedures are noted by SLT, particularly concerning referrals of cases of suspected abuse and neglect, and are followed by all staff;
- ensuring that all staff and volunteers feel able to raise concerns about poor or unsafe practice and such concerns are addressed sensitively in accordance with agreed whistle-blowing procedures;
- liaising with the Local Authority Designated Officer (LADO) in the event of an allegation of abuse being made against a member of staff.

3.5 The Designated Safeguarding Lead (DSL) is a senior member of staff from the leadership team who takes lead responsibility for safeguarding and child protection within the Academy. The DSL will carry out their role in accordance with the responsibilities outlined in Annex B of Keeping Children Safe in Education (September 2020);

3.6   The DSL will provide advice and support to other staff on child welfare and child protection matters. Any concern for a child's safety or welfare will be recorded in a timely fashion using MyConcern software to securely report and complete concern forms https://www.myconcern.co.uk/

3.7   Throughout the year the Designated Safeguarding Lead and/or the Deputy Designated Safeguarding Lead will always be available for staff to discuss any safeguarding concerns.

3.8   The DSL will attend child protection conferences and core group meetings. Through appropriate training, knowledge and experience they, or other appropriately designated member of staff, will liaise with Children's Services and other agencies where necessary, and make referrals of suspected abuse to them, take part in strategy discussions and other interagency meetings and contribute to the assessment of children. The DSL and safeguarding team are responsible for ensuring that all staff members and volunteers are aware of the policy and the procedure they need to follow. They will ensure that all staff, volunteers and regular visitors have received appropriate child protection information during induction. They will oversee all logs and child protection files are kept confidential and secure on our My Concerns portal.

4. Training and induction

4.1 When new staff join, they will be informed of the safeguarding arrangements in place during their initial induction process. They will be given a copy of the Safeguarding Policy along with the Staff Code of Conduct, Part One of Keeping Children Safe in Education (June 2020); and informed who the Designated Safeguarding Lead (DSL) and Deputy DSL are. All staff are expected to read these key documents (and to answer a short quiz to confirm that they have read Part one) and fully understand their responsibilities. They will also be informed of the recording procedures.

4.2 Every new member of staff or volunteer will receive safeguarding training. This programme will include information relating to signs and symptoms of abuse, how to manage a disclosure from a child, how to record and the remit of the role of the Designated Safeguarding Lead (DSL). The training will also include information about whistle-blowing in respect of concerns about another adult's behaviour and suitability to work with children.

4.3 In addition to the safeguarding induction, Epic Academy will ensure that mechanisms are in place to assist staff to understand and discharge their role and responsibilities as set out in Part one of Keeping Children Safe in Education(June 2020); In order to achieve this, the Academy will ensure that:
- all members of staff will undertake appropriate safeguarding training on an annual basis.
- evaluate the impact of this training;
- all staff members receive regular safeguarding and child protection updates (for example, via email, e-bulletins, staff meetings), as required, but at least annually, to provide them with the relevant skills and knowledge to safeguard children effectively.

4.4 Epic Academy actively encourages all staff to keep up to date with the most recent local and national safeguarding advice and guidance, Annex A of Keeping Children Safe in Education (June 2020) provides links to guidance on specific safeguarding issues such as Child Sexual Exploitation and Female Genital Mutilation. In addition, throughout the Academy year the Academy will brief staff on key issues identified within Keeping Children Safe in Education (September 2020).

Why safeguarding is important. We will ensure that children/young people will receive the right help, at the right time to address risk and prevent issues from escalating. Research and serious case reviews have repeatedly shown the dangers of failing to take effective action, which include:

- Failing to act and refer early signs of abuse and neglect
- Poor record-keeping Failing to listen to the views of the child
- Failing to re-assess concerns when situations do not improve
- Not sharing information, delays in sharing
- Lack of challenge to those who appear not to be taking action

Our policies and procedures aim to address all areas of poor practice and we ensure staff seek advice when unsure.

5. Procedures for managing concerns

5.1 All staff must follow our procedures which are consistent with Working Together to Safeguard Children (February 2019) and Keeping Children Safe in Education (June 2020).

5.2 It is not the responsibility of staff to investigate welfare concerns or determine the truth of any disclosure or allegation. All staff, however, have a duty to recognise concerns and maintain an open mind. Accordingly, all concerns regarding the welfare of learners will be recorded and discussed with the designated senior person with responsibility for child protection (or another senior member of staff in the absence of the designated person) prior to any discussion with parents.

5.3 Reporting

Staff must immediately report:

- any suspicion that a child is injured, marked, or bruised in a way which is not readily attributable to the normal knocks or scrapes received in play;
- any explanation given which appears inconsistent or suspicious;
- any behaviours which give rise to suspicions that a child may have suffered harm (e.g., worrying drawings or play);
- any concerns that a child may be suffering from inadequate care, ill treatment, or emotional maltreatment;
- any concerns that a child is presenting signs or symptoms of abuse or neglect;
- any significant changes in a child's presentation, including non-attendance;
- any hint or disclosure of abuse from any person;
- any concerns regarding person(s) who may pose a risk to children (e.g. living in a household with children present).

Disclosures or information may be received from learners, parents or other members of the public. The Academy recognises that those who disclose such information may do so with difficulty, having chosen carefully to whom they will speak. Accordingly, all staff will handle disclosures with sensitivity. Such information cannot remain confidential and staff will immediately communicate what they have been told to the Designated Safeguarding Lead.

Staff will not investigate but will, wherever possible, elicit enough information to pass on to the Designated Safeguarding Lead in order that s/he can make an informed decision of what to do next.
Staff will:

- listen to and take seriously any disclosure or information that a child may be at risk of harm;
- try to ensure that the person disclosing does not have to speak to another member of Academy staff;
- clarify the information;
- try to keep questions to a minimum and of an 'open' nature e.g. 'Can you tell me what happened?' rather than 'Did x hit you?';
- try not to show signs of shock, horror or surprise;
- not express feelings or judgments regarding any person alleged to have harmed the child;
- explain sensitively to the person that they have a responsibility to refer the information to the senior designated person;
- reassure and support the person as far as possible;
- explain that only those who 'need to know' will be told;
- explain what will happen next and that the person will be involved as appropriate;
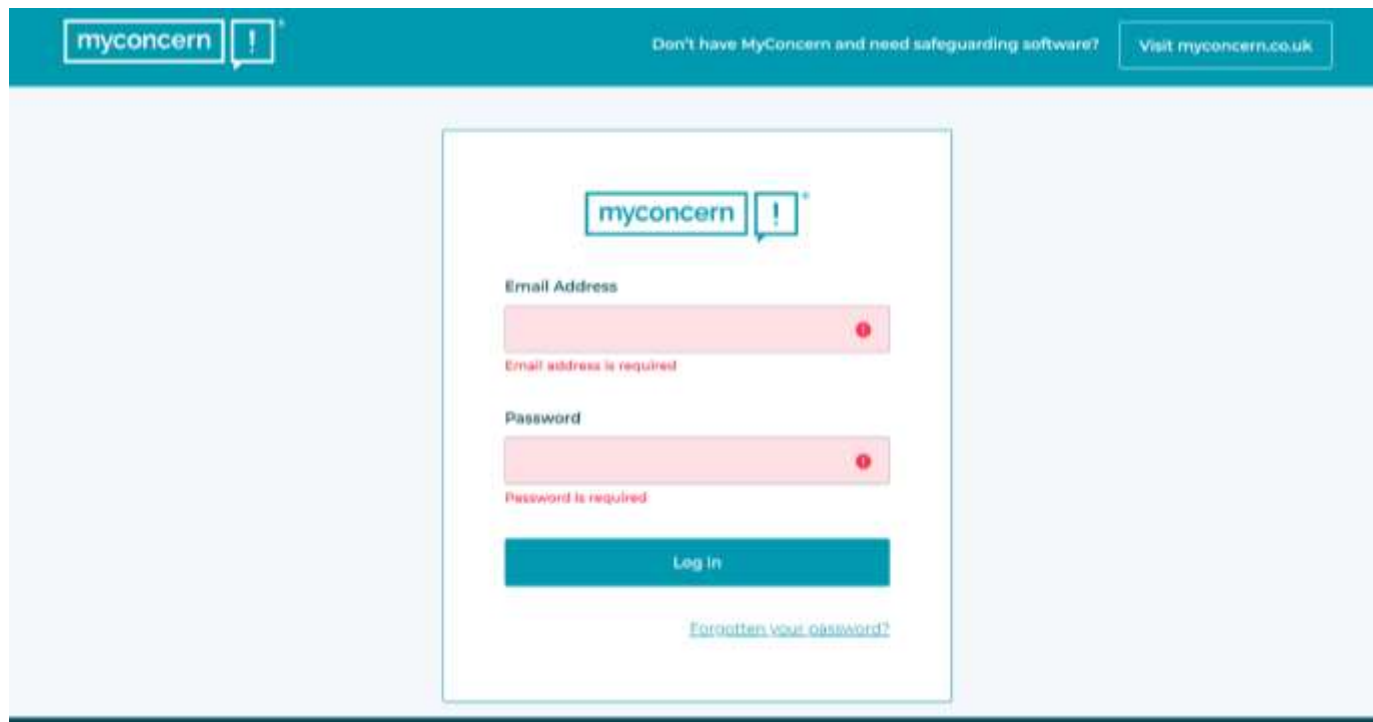- record on My Concerns portal

5.4 Epic Academy adheres to child protection procedures that have been agreed locally through the local safeguarding partners. Where children and families in need of support are identified, the Academy will carry out its responsibilities in accordance with local threshold guidance.

5.5 Every member of staff including volunteers working with children are advised to maintain an attitude of 'it could happen here' where safeguarding is concerned. When concerned about the welfare of a child, staff members should always act in the interests of the child and have a responsibility to act as outlined in this policy.

5.6 All staff are encouraged to report any concerns that they have and not see these as insignificant. On occasions, a referral is justified by a single incident such as an injury or disclosure of abuse. More often however, concerns accumulate over a period and are evidenced by building up a picture of harm over time; this is particularly true in cases of emotional abuse and neglect. In these circumstances, it is crucial that staff record and pass on concerns in accordance with this policy to allow the DSL to build up a picture and access support for the child at the earliest opportunity. A reliance on memory without accurate and contemporaneous records of concern could lead to a failure to protect.

5.7 It is not the responsibility of staff to investigate welfare concerns or determine the truth of any disclosure or allegation. All staff, however, have a duty to recognise concerns and pass the information on in accordance with the procedures outlined in this policy.

5.8 The Designated Safeguarding Lead (DSL) should be used as a first point of contact for concerns and queries regarding any safeguarding concern in the Academy. Any member of staff or visitor to the Academy who receives a disclosure of abuse or suspects that a child is at risk of harm must report it immediately to the DSL or, if unavailable, to the alternative designated person. In the absence of either of the above, the matter should be brought to the attention of the most senior member of staff.

5.9 All concerns about a child or young person should be reported without delay and recorded using the agreed procedures and on paper if appropriate.

Following receipt of any information that raises concern, the DSL will consider what action to take and will seek advice from Children's Services as required. All information and actions taken, including the reasons for any decisions made, will be fully documented. All referrals will be made in line with local Children's Services procedures. If, at any point, there is a risk of immediate serious harm to a child a referral should be made to Children's Services and/or the police immediately.

6. Records and information sharing

6.1 If staff are concerned about the welfare or safety of any child at Epic Academy, they will record their concern on My Concerns system. Any concern can be discussed immediately with a DSL for guidance and next steps. Otherwise, the concern can be raised through MyConcern that will notify a DSL once submitted.

7. Working with parents and carers

7.1 Epic Academy is committed to working in partnership with parents/carers to safeguard and promote the welfare of children and to support them to understand statutory responsibilities in this area.

7.2 Epic Academy is committed to working with parents positively, openly and honestly and will ensure that all parents are treated with respect, dignity and courtesy. The Academy respects parents' rights to privacy and confidentiality and will not share sensitive information unless granted permission, or where it is necessary to do so in order to safeguard a child from harm.

7.3 Epic Academy will seek to share with parents any concerns about their child unless to do so may place a child at increased risk of harm. A lack of parental engagement or agreement regarding the concerns Epic Academy has about a child will not prevent the DSL making a referral to Children's Services in those circumstances where it is appropriate to do so.

8. Safer recruitment

8.1 Epic Academy will ensure that every Manager has completed appropriate safer recruitment training. At all times SCCU Group SLT will ensure that safer recruitment practices are followed in accordance with the requirements of [Keeping Children Safe in Education (September 2020).](#)

8.2 Epic Academy will use the recruitment and selection process to deter and reject unsuitable candidates; it will require evidence of original academic certificates and will not accept testimonials but insist on taking up references prior to interview. The Academy will question the contents of application forms if they are unclear, will undertake Disclosure and Barring Service checks and use any other means of ensuring the most suitable people to work with children are recruited and selected.

8.3 The Quality Manager will maintain a Single Central Register of all safer recruitment checks carried out in line with statutory requirements.

9. Safer working practice

9.1 All adults who come into contact with children have a duty of care to safeguard and promote their welfare. There is a legal duty placed upon Epic Academy to ensure that all adults who work with or on behalf of children are competent, confident and safe to do so.

9.2 All adults working will wear a lanyard at all times.

9.3 All staff will be provided with a copy of Epic Academy's Code of Conduct at induction. They will be expected to know and understand Code of Conduct. There will be occasion when some form of physical contact is inevitable, for example if a child has an accident or is hurt or is in a situation of danger to themselves or others around them.

9.4 Guidance about acceptable conduct and safe practice will be given to all staff and volunteers during induction. These are sensible steps that every adult should take in their daily professional conduct with children. This advice can be found in 'Guidance for Safer Working Practices for Adults who Work with Children and Young People in Education Settings' (April 2020). All staff and volunteers are expected to carry out their work in accordance with this guidance and will be made aware that failure to do so could lead to disciplinary action.

10. Managing allegations against staff and volunteers

Epic Academy aims to provide a safe and supportive environment which secures the wellbeing and very best outcomes for the children; it recognises that sometimes the behaviour of adults may lead to an allegation of abuse being made.

Allegations sometimes arise from a differing understanding of the same event, but when they occur, they are distressing and difficult for all concerned. Epic Academy recognises that many allegations are genuine and there are some adults who deliberately seek to harm or abuse children.

Epic Academy will take all possible steps to safeguard children and to ensure that adults in Epic Academy are safe to work with children; it will always ensure that the procedures outlined in the local procedures and Part 4 of 'Keeping Children Safe in Education', DfE (2020) are adhered to and will seek appropriate advice from the Local Authority Designated Officer (LADO). The LADO can be contacted to request a consultation or to make a referral.

If an allegation is made or information is received about any adult who works in Epic Academy which indicates that they may be unsuitable to work with children, the member of staff receiving the information will inform the DSL, Deputy DSL or the SCCU Group SLT immediately. This includes concerns relating to agency, sub-contractors and volunteers. Should an allegation be made against the Managing Director this should be reported to the DSL or directly to the LADO.

The DSL, Deputy DSL or SCCU Group will seek advice from the LADO within one working day. No member of staff will undertake further investigations before receiving advice from the LADO.

Any member of staff or volunteer who does not feel confident to be able to raise their concerns with the DSL, Deputy DSL or SLT Group should contact the LADO directly. Further NSPCC guidance on whistleblowing is available as is their whistleblowing helpline for staff who do not feel able to raise concerns regarding child protection failures internally. Staff can call: 0800 028 0285 (available from 8:00am to 8:00pm, Monday to Friday) or via e-mail: help@nspcc.org.uk.

The Academy has a legal duty to refer to the Disclosure and Barring Service anyone who has harmed, or poses a risk of harm, to a child, or if there is reason to believe the member of staff has committed one of a number of listed offences, and who has been removed from working (paid or unpaid) in regulated activity, or would have been removed had they not left. The DBS will consider whether to bar the person. If these circumstances arise in relation to a member of staff at the Academy, a referral will be made as soon as possible after the resignation or removal of the individual in accordance with advice from the LADO and/or HR.

11. Statutory framework

This policy has been devised in accordance with the following legislation and guidance:

- [Working Together to Safeguard Children: A guide to inter-agency working to safeguard and promote the welfare of children (February 2019)](#)
- [Keeping Children Safe in Education (September 2020)](#)
- [Guidance for Safer Working Practices for Adults who Work with Children and Young People in Education Settings' (April 2020).](#)
- [What to do if you're worried a child is being abused (March 2015)](#)
- [Information Sharing: Advice for practitioners (July 2018)](#)
- [The Prevent Duty: Departmental advice for schools and childcare providers (April 2019)](#)
- [Mandatory Reporting of Female Genital Mutilation – procedural information (Home Office October January 2020)](#)
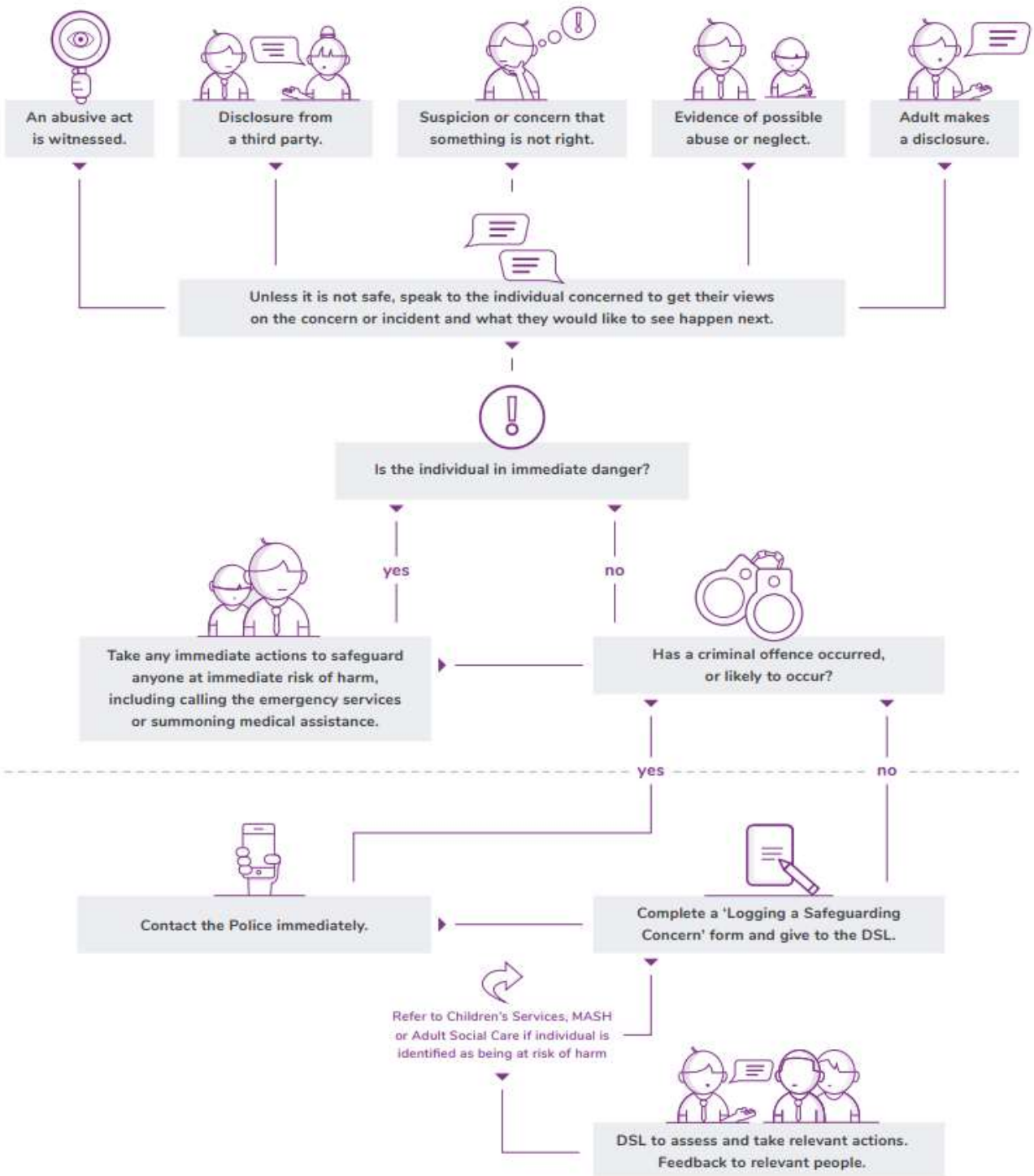- Local safeguarding procedures

12. Definitions:

- As in the Children Acts 1989 and 2004, a **child** is anyone who has not yet reached his/her 18th birthday.
- **Harm** means ill-treatment or impairment of health and development, including, for example, impairment suffered from seeing or hearing the ill-treatment of another.
- **Development** means physical, intellectual, emotional, social or behavioural development; **Health** includes physical and mental health; **Ill-treatment** includes sexual abuse and other forms of ill-treatment which are not physical.
- **Abuse** and **neglect** are forms of maltreatment. Somebody may abuse or neglect a child by inflicting harm or failing to act to prevent harm. Children may be abused in a family or in an institutional or community setting; by those known to them, or, more rarely, by others. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Children may be abused by an adult or adults or by another child or children.
- **Physical abuse** may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm to a child. Physical harm may also be caused when a parent or carer fabricates the symptoms of or deliberately induces illness in a child.
- **Sexual abuse** involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example, rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (including via the internet). Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.
- **Emotional abuse** is the persistent emotional maltreatment of a child such as to cause severe and persistent adverse effects on the child's emotional development. It may involve conveying to children that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond the child's developmental capability, as well as overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including online bullying), causing children frequently to 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, though it may occur alone.
- **Neglect** is the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's physical or mental health or development. Neglect may occur during pregnancy as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to:
  - provide adequate food and clothing, shelter (including exclusion from home or abandonment);
  - protect a child from physical and emotional harm or danger;
  - ensure adequate supervision (including the use of inadequate caretakers);
  - ensure access to appropriate medical care or treatment;
  - it may also include neglect of, or unresponsiveness to, a child's basic emotional needs.
- **Contextual Safeguarding**
  Safeguarding incidents and/or behaviours can be associated with factors outside of the Academy and can occur between children outside the Academy. Staff should be considering the context within such incidents and/or behaviours. This will be done through assessing the wider environmental factors that are present in a child's life that are a threat to their safety and welfare.

13   SCCU Concern Procedures

Safeguarding
Responding to Concern
TARGET TIMESCALE - SAME DAY

An abusive act is witnessed.

Disclosure from a third party.

Suspicion or concern that something is not right.

Evidence of possible abuse or neglect.

Adult makes a disclosure.

Unless it is not safe, speak to the individual concerned to get their views on the concern or incident and what they would like to see happen next.

Is the individual in immediate danger?

yes

no

Take any immediate actions to safeguard anyone at immediate risk of harm, including calling the emergency services or summoning medical assistance.

Has a criminal offence occurred, or likely to occur?

yes

no

Contact the Police immediately.

Complete a 'Logging a Safeguarding Concern' form and give to the DSL.

Refer to Children's Services, MASH or Adult Social Care if individual is identified as being at risk of harm

DSL to assess and take relevant actions. Feedback to relevant people.

14. Safeguarding induction sheet

(For new or supply staff and regular visitors or volunteers)

Epic Academy staff have a statutory duty to safeguard and promote the welfare of children, and at the Academy we take this responsibility seriously.

Any concerns raised can be directed to a staff member or you can seek the names below. A paper version will be recorded in the initial instance and then uploaded onto MyConcerns.

The people you should talk to in Academy are:

Epic Academy Designated Safeguarding Lead (DSL):	G Plant
Location of office:	SCCU Group HQ
Contact details:	gplant@sccu.uk.com
SCCU Group Designated Safeguarding Lead (DSL):	L Morrissey
Location of office:	SCCU Group HQ
Contact details:	lmorrissey@sccu.uk.com
Managing Director:	S Riddell
Contact details:	sriddell@sccu.uk.com
Operations Director:	J Pease
Contact details:	jpease@sccu.uk.com

15. Signs and Symptoms of Child Protection Concerns:

Vulnerability

Alongside the specific safeguarding issues listed below staff should consider children who may be particularly vulnerable to abuse and may require early help: Factors that can increase vulnerabilities can include any children with additional needs including;

- children with special educational needs / disabled children (SEND);
- children facing housing issues such as frequent moves and homelessness;
- those living in families with chaotic lifestyles;
- families with increased stress, parental mental health and/or drug and alcohol dependency;
- those children living elsewhere, with friends, relatives, are in care or are leaving care;
- asylum seekers / refugees;
- those vulnerable to discrimination on the basis of their sexuality, race, religion, ethnicity or disability;
- children at risk from neglect or abuse including specific issues such as FGM, CSE, forced marriage, radicalisation and living in households with domestic abuse;
- children with communication difficulties;
- children without adequate parenting / supervision which could lead to abuse, risk-related behaviour and sexual exploitation.

This this not an exhaustive list but merely an example of vulnerabilities that staff must consider when identifying safeguarding concerns. For more information on specific safeguarding issues please refer to Part 1 and Annex A of Keeping Children Safe in Education (September 2020).

Child sexual exploitation

The following list of indicators is not exhaustive or definitive, but it does highlight common signs which can assist professionals in identifying children or young people who may be victims of sexual exploitation. Signs include:

- underage sexual activity;
- inappropriate sexual or sexualised behaviour;
- sexually risky behaviour, 'swapping' sex;
- repeated sexually transmitted infections;
- in girls, repeated pregnancy, abortions, miscarriage;
- receiving unexplained gifts or gifts from unknown sources;
- having multiple mobile phones and worrying about losing contact via mobile phone;
- having unaffordable new things (clothes, mobile phone) or expensive habits (alcohol, drugs);
- changes in the way they dress;
- going to hotels or other unusual locations to meet friends;
- seen at known places of concern;
- moving around the country, appearing in new towns or cities, not knowing where they are;
- getting in/out of different cars driven by unknown adults;
- having older boyfriends or girlfriends;
- contact with known perpetrators;
- involved in abusive relationships, intimidated and fearful of certain people or situations;
- hanging out with groups of older people, or anti-social groups, or with other vulnerable peers;
- associating with other young people involved in sexual exploitation;
- recruiting other young people into exploitative situations;
- truancy, exclusion, disengagement with the Academy, opting out of education altogether;
- unexplained changes in behaviour or personality (chaotic, aggressive, sexual, mood swings, volatile behaviour, emotional distress;
- self-harming, suicidal thoughts, suicide attempts, overdosing, eating disorders;
- drug or alcohol misuse;
- getting involved in crime / police involvement, police records;
- involved in gangs, gang fights, gang membership;
- injuries from physical assault, physical restraint, sexual assault.

Child Criminal Exploitation/ County Lines

Criminal exploitation of children is a geographically widespread form of harm that is a typical feature of county lines. Criminal networks or gangs groom and exploit children and young people to carry drugs and money from urban areas to suburban and rural areas, market and seaside towns. Key to identifying potential involvement in county lines are missing episodes, when the victim may have been trafficked for purposes of transporting drugs. A referral to the National Referral Mechanism should be considered. Like other forms of abuse and exploitation, county line exploitation:

- can affect any child or young person (male or female) under the age of 18 years;
- can affect a vulnerable adult over the age of 18 years;
- can involve force and/or enticement-based methods of compliance and is often accompanied by violence or threats of violence;
- can be perpetrated by individuals or groups, males or females, and young people or adults;
- is typified by some form of power imbalance in favour of those perpetrating the exploitation. Whilst age may be the most obvious, this power imbalance can also be linked to gender, cognitive ability, physical strength, status and access to economic or other resources.

Signs and Symptoms may include:

- persistently going missing from home or the Academy;
- being found out of area;
- unexplained acquisition of money, clothes or mobile phone;
- excessive receipt of calls and text messages;
- relationships with older controlling individuals;
- associated with gangs;
- leaving home or care without explanation;
- suspicion of self-harm, physical assault or unexplained injuries;
- parental concerns;
- significant decline in Academy performance;
- significant changes in emotional wellbeing;

Belief and faith-related abuse Female Genital Mutilation (FGM)

It is essential that staff are aware of FGM practices and the need to look for signs, symptoms and other indicators of FGM. FGM involves procedures that intentionally alter/injure the female genital organs for non-medical reasons. There are four types of procedure:

Type 1	Type 2	Type 3	Type 4
Clitoridectomy: partial/total removal of clitoris	Excision: partial/total removal of clitoris and labia minora	Infibulation entrance to vagina is narrowed by repositioning the inner/outer labia	All other procedures that may include: pricking, piercing, incising, cauterising and scraping the genital area.

Why is it carried out?

Belief that:

- FGM brings status/respect to the girl – social acceptance for marriage;
- preserves a girl's virginity;
- part of being a woman / rite of passage;
- upholds family 'honour';
- cleanses and purifies the girl;
- gives a sense of belonging to the community;
- fulfils a religious requirement;
- perpetuates a custom/tradition;
- helps girls be clean / hygienic;
- is cosmetically desirable;
- mistakenly believed to make childbirth easier.

Is FGM legal?

FGM is internationally recognised as a violation of human rights of girls and women. It is **illegal** in most countries including the UK. Circumstances and occurrences that may point to FGM happening:

- child talking about getting ready for a special ceremony;
- family taking a long trip abroad;
- child's family being from one of the 'at risk' communities for FGM (Kenya, Somalia, Sudan, Sierra Leon, Egypt, Nigeria, Eritrea as well as non-African communities including Yemeni, Afghani, Kurdistan, Indonesia and Pakistan);
- knowledge that the child's sibling has undergone FGM;
- child talks about going abroad to be 'cut' or to prepare for marriage.

Signs that may indicate a child has undergone FGM:

- prolonged absence from the Academy and other activities;
- behaviour change on return from a holiday abroad, such as being withdrawn and appearing subdued;
- bladder or menstrual problems;
- finding it difficult to sit still and looking uncomfortable;
- complaining about pain between the legs;
- mentioning something somebody did to them that they are not allowed to talk about;
- secretive behaviour, including isolating themselves from the group;

- reluctance to take part in physical activity;
- repeated urinal tract infection;
- disclosure.

The 'One Chance' rule:

As with forced marriage there is the 'One Chance' rule. It is essential that staff take action **without delay**. As KCSIE now states: *'Under section 5B of the Female Genital Mutilation Act 2003 (as inserted by sect 74 of the Serious Crime Act 2015) places a statutory duty upon teachers, along with social workers and healthcare professionals, to report to the police where they discover that FGM appears to have been carried out on a girl under 18. Those falling to report such cases will face disciplinary sanctions'*

Further information:
www.gov.uk/government/publications/multi-agency-statutory-guidance-on-female-genital-mutilation

So-called 'honour-based' violence

So-called 'honour-based violence (HBV) encompasses incidents or crimes which have been committed to protect or defend the honour of the family and/or the community, including:

- female genital mutilation;
- forced marriage;
- breast ironing.

Abuse committed in the context of preserving "honour" often involves a wider network of family or community pressure and can include multiple perpetrators. It is important to be aware of this dynamic and additional risk factors when deciding what form of safeguarding action to take. All forms of HBV are abuse (regardless of the motivation) and should be handled and escalated as such. If in any doubt, staff should speak to the Designated Safeguarding Lead (or deputy). Professionals in all agencies, and individuals and groups in relevant communities, need to be alert to the possibility of a child being at risk of HBV, or already having suffered HBV.

Forced marriage

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

Signs and symptoms may include:

- young people may appear anxious, depressed and emotionally withdrawn with low self-esteem;
- they may have mental health disorders and display behaviours such as self-harming, self- cutting or anorexia;
- sometimes they may come to the attention of the police having been discovered shoplifting or taking drugs or alcohol;
- often young people' symptoms can be exacerbated in the periods leading up to the holiday season;
- young people may present with a sudden decline in their performance, aspirations or motivation;
- they may be subject to excessive restrictions and control at home;
- some young people may not be allowed to attend any extra-curricular or after-Academy activities;
- girls and young women may be accompanied to and from the Academy, and even during lunch breaks;
- some young people may stop attending the Academy;
- their homework is incomplete or appears rushed; this may be the result of being actively discouraged from doing it by family members;
- young people may do their homework late at night, which frequently shows in the Academy because they are lethargic, unable to concentrate and have a general appearance of tiredness;
- professionals being told that the student is out of the country;
- there are occasions when older siblings (usually brothers) and cousins keep a close eye on girls to make sure that they do not meet anyone or talk to friends;
- conflict between the student and their parents about whether the student will be allowed to continue their education;
- family history of older siblings leaving education early and marrying early.

How education professionals can help:

- signposting, where appropriate, to forced marriage materials or where further support and advice can be accessed;
- displaying relevant information e.g. details of the NSPCC Helpline, Childline, and appropriate local and national support groups on forced marriage;
- ensuring that a private telephone is made available should young people need to seek advice discreetly;
- educating teachers, lecturers and other staff about the issues surrounding forced marriage and the presenting symptoms – appropriate training should be included in continuing professional development (CPD);
- referring young people to an Education Welfare Officer, VMG Tutor, Learning Manager or Academy Inclusion co-ordinator as appropriate;
- encouraging young people to access appropriate advice, information and support.

Radicalisation

The Counter Terrorism and Security Act 2015 was published on 12th March 2015. Section 26 of the Act places a duty on academies in England (and Wales) to prevent people being drawn into terrorism. This duty applies to all schools, whether publicly-funded or independent, and organisations covered by the Early Years Academy Stage framework.

Schools Leaders must:

- establish or use existing mechanisms for understanding the risk of extremism;
- ensure staff understand the risk and build capabilities to deal with it;
- communicate and promote the importance of the duty;
- ensure staff implement the duty effectively.

Other duties on academies include:

- effective partnership working with other local agencies, eg. Safeguarding Partners (former LSCB) police, health, etc.;
- information sharing;
- maintaining appropriate records;
- assessing local risk of extremism (including Far Right extremism);
- demonstrating they are protecting children;
- developing clear protocols for visiting speakers;
- safeguarding policies that take account of Local Safeguarding Partners' policies and procedures;
- training staff to give them knowledge and confidence;
- ensuring there is robust ICT protocols that filter out extremist materials;
- Academy buildings must not be used to give a platform to extremists.

Understanding and recognising risks and vulnerabilities of radicalisation

Children and young people can be drawn into violence or they can be exposed to the messages of extremist groups by many means. These may include through the influence of family members or friends and/or direct contact with extremist groups and organisations or, increasingly, through the internet and social media. This can put a young person at risk of being drawn into criminal activity and has the potential to cause **Significant Harm**.

The risk of radicalisation is the product of a number of factors and identifying this risk requires that staff exercise their professional judgement, seeking further advice as necessary. It may be combined with other vulnerabilities or may be the only risk identified.

Possible indicators include:

- use of inappropriate language;
- possession of violent extremist literature;
- behavioural change;
- advocating violent actions and means;
- association with known extremists;
- seeking to recruit others to an extremist ideology.

Further information:

www.gov.uk/government/publications/prevent-duty-guidance

Private fostering

Many people find themselves looking after someone else's child without realising that they may be involved in private fostering. A private fostering arrangement is one that is made privately (that is to say without the involvement of a local authority) for the care of a child under the age of 16 (under 18, if disabled) by someone other than a parent or immediate relative. If the arrangement is to last, or has lasted, for 28 days or more it is private fostering.

The Children Act 1989 defines an immediate relative as a grandparent, brother, sister, uncle or aunt (whether of full blood or half blood or by marriage or civil partnership), or a step parent.

People become involved in private fostering for all kinds of reasons. Examples of private fostering include:

- children who need alternative care because of parental illness;
- children whose parents cannot care for them because their work or study involves long or antisocial hours;
- children sent from abroad to stay with another family, usually to improve their educational opportunities;
- unaccompanied asylum seeking and refugee children;
- teenagers who stay with friends (or other non-relatives) because they have fallen out with their parents;

There is a mandatory duty on the Academy to inform the Local Authority of a Private Fostering Arrangement. The Local Authority has a duty to check that the young person is being properly cared for and that the arrangement is satisfactory.

Further information:

www.gov.uk/government/publications/children-act-1989-private-fostering

Children missing education

A child going missing from education is a potential indicator of abuse or neglect, including sexual exploitation, FGM, forced marriage or travelling to conflict zones. Academy staff will be alert to these safeguarding concerns when a young person's goes missing for an extended period, or on repeat occasions.

The Academy must notify the Local Authority of any young persons who fails to attend the Academy regularly after making reasonable enquiries, or has been absent without the Academy's permission for a continuous period of 10 days or more. The Academy (regardless of designation) must also notify the Local Authority and the Trust of any young persons who is to be deleted from the admission register because s/he:

- ☐ has been taken out of the Academy by their parents and is being educated outside the Academy system (e.g. home education);
- ☐ has ceased to attend the Academy and no longer lives within a reasonable distance of the Academy at which s/he is registered (moved within the city, within the country or moved abroad but failed to notify the Academy of the change);
- ☐ displaced as a result of a crisis e.g. domestic violence or homelessness;
- ☐ is in custody for a period of more than four months due to a final court order and the proprietor does not reasonably believe s/he will return to the Academy at the end of that period;
- ☐ has been permanently excluded.

The Academy will demonstrate that it has taken reasonable steps to ascertain the whereabouts of children that would be considered 'missing'. Academy absences may be a sign of abuse.

Further information:

Children Missing Education: statutory guidance for local authorities – September 2016

www.gov.uk/government/publications/children-missing-education

Peer on peer abuse:

Epic Academy recognises that children are vulnerable to and capable of abusing their peers. Such abuse is taken as seriously as abuse perpetrated by an adult. Peer on peer abuse will not be tolerated or passed off as part of "banter" or "growing up".

In cases where peer on peer abuse is identified the Academy will follow child protection procedures, recognising that both the victim and perpetrator will require support.

The Academy recognises that peer on peer abuse can manifest itself in many ways such as:

- child sexual exploitation / child criminal exploitation;
- bullying;
- radicalisation;
- abuse in intimate friendships / relationship abuse;
- children who display sexually harmful behaviour;
- gang associated and serious violence;
- technology can be used for bullying and other abusive behaviour.

There are a number of factors that make children more vulnerable to peer-on-peer abuse: experience of abuse within their family, living with domestic violence, young people in care, children who go missing, children with additional needs (SEN and/or disabilities).

Research tells us that girls are more frequently identified as being abused by their peers, and girls are more likely to experience unwanted sexual touching in schools. Boys are less likely to report intimate relationship abuse. Boys report high levels of victimisation in areas where they are affected by gangs.

There is an increasing evidence base emerging about the sexual exploitation of boys (both by adults and peers). The Academy recognises that both boys and girls experience peer on peer abuse but they do so in gendered ways.

A difficult feature of peer-on-peer abuse is that the perpetrators could be victims themselves and possibly are being abused by their parents or caregivers.

Relationship abuse is unacceptable behaviour between two people. You don't have to be an 'official couple' to experience abuse and it doesn't matter what your relationship looks like; gay, straight or bi, or whether you're a girl, boy or have another gender identity.

Further information:

www.disrespectnobody.co.uk/relationship-abuse/what-is-relationship-abuse/ details some of the complicated reasons why children abuse other children:

- the child may have been emotionally, physically, or sexually abused themselves;
- the child may have witnessed physical or emotional violence;
- the child may have viewed sexually explicit movies, video games or other materials;
- the child may have just acted impulsively without meaning to harm anyone;
- peer abuse must be taken extremely seriously for these reasons; It could be an indicator of even worse abuse going on in the child's home.

Preventing Peer on Peer Abuse:

Peer abuse can be prevented. Adults who work with children must be aware of the potential for abuse between children and:

- have clear robust policies on dealing with key issues such as online bullying;
- ensure staff and young people are aware of the policies;
- identify any blind spots within the Academy;
- supervise and be aware of potential risky areas, tents in play areas etc;
- pay attention and monitor children who may be hiding in areas out of view;
- take steps to prevent isolation;
- separate children if needed;
- increase supervision during key times;
- if they suspect a child is abusing another, ensure they pass this onto a Designated Person;
- where risk is identified have a student risk assessment in place. Page 30 of

Sexually harmful behaviour

Green Behaviours	Amber Behaviours	Red Behaviours
are part of safe and healthy sexual development which are: ▪ displayed between children or young people of similar age or developmental ability ▪ reflect curiosity, experimentation, consensual activities and positive choices ▪ 'normal' but inappropriate within the Academy/classroom setting	are potentially outside safe and healthy development due to: ▪ age or developmental differences ▪ activity type, frequency, duration or context	are clearly outside safe and healthy development and: ▪ involve much more coerciveness, secrecy, compulsiveness and threats ▪ require action from Academy and other agencies

For further information of sexualised behaviour thresholds visit www.brook.org.uk.

Sexual violence and harassment in academies:

Sexual violence and sexual harassment can occur between two children of any sex. They can also occur through a group of children sexually assaulting or sexually harassing a single child or group of children.

- sexual harassment is 'unwanted conduct of a sexual nature' that can occur online and offline;
- sexual harassment can include sexual comments, such as: telling sexual stories, making lewd comments, making sexual remarks about appearance, sexual "jokes" or taunting; physical behaviour, such as: deliberating brushing against someone, interfering with someone's clothes;
- online sexual harassment, which might include: non-consensual sharing of sexual images / videos and sharing sexual images and videos (both often referred to as sexting); inappropriate sexual comments on social media; exploitation; coercion and threats;
- it is more likely that girls will be the victims of sexual violence and more likely that sexual harassment will be perpetrated by boys;
- children with Special Educational Needs and Disabilities (SEND) can be especially vulnerable. The Academy is aware of the importance of:
    - making clear at an age-appropriate level that sexual violence and sexual harassment is not acceptable, will never be tolerated and is not an inevitable part of growing up;
    - not tolerating or dismissing sexual violence or sexual harassment as "banter", "part of growing up", "just having a laugh" or "boys being boys";
    - challenging behaviours (which are potentially criminal in nature), such as grabbing bottoms, breasts and genitalia; dismissing or tolerating such behaviours risks normalising them.

Up skirting

'Up skirting' typically involves taking a picture under a person's clothing without them knowing, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm. This is now a criminal offense so staff should report concerns immediately to the Designated Safeguarding Lead.

Further information: www.gov.uk/government/publications/sexual-violence-and-sexual-harassment-between-children-in-schools-and-colleges

Sexting:

Sexting can be defined as 'sending or posting sexually suggestive images, including nude or semi-nude photographs, via mobiles or over the internet.'

If staff become concerned about a 'sexting' issue they should not look at, share or print any indecent image and should:

Step 1: if a device is involved, confiscate it and set it to flight mode or, if not possible, switch it off

Step 2: seek advice: give the electronic device immediately to the DSL. Report your concerns following your normal child protection procedures.

Concerning factors that DSLs should look out for:
- is there a significant age difference between the sender/receiver;
- is there any external coercion involved or encouragement beyond the sender/receiver;
- do you recognise the child as more vulnerable than usual i.e. at risk;
- is the image of a severe or extreme nature;
- is the situation isolated or has the image been more widely distributed;
- have these children been involved in a sexting incident before;
- are there other circumstances relating to either sender or recipient that may add cause for concern i.e. difficult home situation?

Remember: The production and distribution of sexting images involving anyone under the age of 18 is illegal and needs very careful management for all those involved.

Further information:
www.gov.uk/government/groups/uk-council-for-child-internet-safety-ukccis

Trafficking and modern slavery

"Trafficking of persons" means the recruitment, transportation, transfer, harbouring or receipt of persons, by means of the threat or use of force or other forms of coercion, of abduction, of fraud, of deception, of the abuse of power or of a position of vulnerability or of the giving or receiving of payments or benefits to achieve the consent of a person having control over another person, for the purpose of exploitation. Exploitation includes, at a minimum, the exploitation of the prostitution of others or other forms of sexual exploitation, forced labour or services, slavery or practices similar to slavery, servitude or the removal of organs;

"Child" shall mean any person under eighteen years of age.

The Palermo Protocol establishes children as a special case. Any child transported for exploitative reasons is considered to be a trafficking victim, whether or not they have been forced or deceived. This is partly because it is **not considered possible for children to give informed consent**. Even when a child understands what has happened, they may still appear to submit willingly to what they believe to be the will of their parents or accompanying adults. It is important that these children are protected too.

Why are children trafficked?

Children are trafficked for many reasons, including sexual exploitation, domestic servitude, labour, benefit fraud and involvement in criminal activity such as pick-pocketing, theft and working in cannabis farms. There are a number of cases of minors being exploited in the sex industry. Although there is no evidence of other forms of exploitation such as 'organ donation or 'harvesting', all agencies should remain vigilant.

Children may be trafficked from other countries for a variety of reasons. There are a number of factors in the country of origin which might make children vulnerable to being trafficked.

The factors listed below are by no means a comprehensive list:

- poverty
- lack of education
- discrimination
- cultural attitudes
- grooming
- dysfunctional families
- political conflict and economic transition and
- inadequate local laws and regulations

Once in the UK the child:

- receives unexplained/unidentified phone calls whilst in placement/temporary accommodation;
- shows signs of physical or sexual abuse, and/or has contracted a sexually transmitted infection or has an unwanted pregnancy;
- has a history with missing links and unexplained moves;
- has gone missing from Local Authority care;
- is required to earn a minimum amount of money every day;
- works in various locations;
- has limited freedom of movement;
- appears to be missing for periods of time;
- is known to beg for money;
- performs excessive housework chores and rarely leaves the residence;
- is being cared for by adult/s who are not their parents and the quality of the relationship between the child and their adult carers is not good; is one among a number of unrelated children found at one address;
- has not been registered with or attended a GP practice;
- has not been enrolled in the Academy;
- has to pay off an exorbitant debt, e.g. for travel costs, before having control over own earnings, is permanently deprived of a large part of their earnings by another person;
- is excessively afraid of being deported.

Further information:

www.gov.uk/government/publications/safeguarding-children-who-may-have-been-trafficked-practice-guidance

Domestic abuse

The cross-government definition of domestic violence and abuse is:

Any incident or pattern of incidents of controlling, coercive, threatening behaviour, violence or abuse between those aged 16 or over who are, or have been, intimate partners or family members regardless of gender or sexuality. The abuse can encompass, but is not limited to:

- psychological
- physical
- sexual
- financial
- emotional

Exposure to domestic abuse and/or violence can have a serious, long lasting emotional and psychological impact on children. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result.

Signs, indications and effects:

It is often difficult to tell if domestic abuse is happening because it usually takes place in the family home and abusers can act very differently when other people are around. Children who witness domestic abuse may:

- become aggressive;
- display anti-social behaviour;
- suffer depression or anxiety;
- not do as well in the Academy, due to difficulties at home or disruption of moving to as well as from refuges.

Other signs and symptoms may include:

Becoming withdrawn, suddenly behaving differently, being clingy, problems sleeping, eating disorders, wetting the bed, soiling clothes, taking risk, being absent from the Academy, changes in eating habits, obsessive behaviour, nightmares, drugs, alcohol, self-harm, thoughts of suicide (see www.nspcc.org.uk).

Homelessness: types of homelessness and bad housing

- living in temporary or emergency accommodation (such as B&Bs and hostels);
- hidden homelessness (staying with friends or family on a temporary basis or living in overcrowded conditions);
- couch / sofa surfing, moving from one place to another;
- being at risk of abuse or violence leading to homelessness or overcrowding.

Impact of homelessness

- practical issues include loss of possessions required for the Academy e.g. books, uniform etc.;
- maybe unkempt due to lack of laundry services;
- physically exhausted due to sleeping arrangements;
- emotionally exhausted due to increased stress;
- signs of severe emotional trauma leading to emotional stress, anxiety;
- changes in behaviour or/and problematic behaviour;
- student may become withdrawn or aggressive;
- if placed out of area they may arrive late or miss school due to transport / financial difficulties;
- the student's ability to maintain relationships may be affected;
- may 'stand out' more to peers, leading to feelings of alienation and self-consciousness;
- impact on attainment levels and ability to learn.

Self-Harm

Self-harm refers to a person's harming their own body on purpose. About 1 in 100 people hurts himself or herself in this way. More females hurt themselves than males. A person who self-harms usually does not mean to kill himself or herself, however they are at higher risk of attempting suicide if they do not get help.

Self-harm tends to begin in teen or early adult years. Some people may engage in self-harm a few times and then stop. Others engage in it more often and have trouble stopping.

Examples of self-harm include:

Cutting yourself (such as using a razor blade, knife, or other sharp object to cut the skin)

Punching yourself or punching things (like a wall)

Burning yourself with cigarettes, matches, or candles

Pulling out your hair

Poking objects through body openings

Breaking your bones or bruising yourself

Many people cut themselves because it gives them a sense of relief. Some people use cutting as a means to cope with a problem. Some teens say that when they hurt themselves, they are trying to stop feeling lonely, angry, or hopeless.

Further information:

https://www.mentalhealth.gov/what-to-look-for/mood-disorders/self-harm