

---

# **SAFEGUARDING & CHILD PROTECTION POLICY – THE ALBANY ACADEMY**

---



**RÆDWALD**  
**T · R · U · S · T**

RATIFIED BY THE TRUST BOARD:  
4TH OCTOBER 2023

---

**NEXT REVIEW DATE: SEPTEMBER 2024**

## SAFEGUARDING & CHILD PROTECTION POLICY

<b>Person responsible for this policy:</b>	Angela Ransby
<b>Policy author:</b>	Angela Ransby
<b>Date to Trust Board:</b>	September 2023
<b>Date Ratified:</b>	4 <sup>th</sup> October 2023
<b>Date to be Reviewed:</b>	September 2024
<b>Policy displayed on website:</b>	Yes

<b>CEO Signature:</b>	Angela Ransby
<b>Trust Board Signature:</b>	Alan Whittaker

<b>Updates made:</b>	<b>Date:</b>
Amended and updated in line with KCSIE 2023 for ratification at Trust Board October 2023.	29 <sup>th</sup> August 2023
DSLs and contact information updated.	
Link to Mental Health Procedure added.	
Named DSLs updated	20 <sup>th</sup> November 2023 27 <sup>th</sup> November 2023

---

## TABLE OF CONTENTS

Key Personnel .....	5
Aims.....	6
Raedwald Trust Safeguarding Procedures for Staff .....	7
Raedwald Trust Safeguarding Flow Chart – What to do if I am worried about a child....	8
Introduction.....	9
Terminology.....	9
The role of Trust staff .....	10
What Trust staff need to know .....	11
What Trust staff should look out for .....	12
What Trust staff should do if they have concerns about a child.....	13
Early help .....	13
Statutory Assessments.....	14
What Trust staff should do if a child is in danger or at risk of harm.....	14
What Trust staff should do if they have concerns about safeguarding practices within the Trust - whistleblowing .....	14
Roles and responsibilities.....	15
Training.....	18
Temporary Staff & Visitors.....	18
Supporting Children .....	19
Confidentiality .....	19
Supporting Staff.....	20
Safer Recruitment.....	21
Physical Intervention/Positive Handling.....	22
Anti-Bullying .....	23
Health & Safety.....	23

---

Children with Special Educational Needs .....	23
LGBTQ+ .....	24
Sighting Students .....	24
Absconding / Missing Persons.....	24
Young People Not in Education, Employment or Training (NEET) .....	25
Home Educated Pupils .....	25
Private fostering .....	25
Children in Care (CiC) and previously CiC .....	26
Children with an allocated Social Worker .....	26
Mental Health.....	27
Types of abuse and neglect.....	27
Specific safeguarding issues.....	28
Trauma .....	30
Opportunities to teach safeguarding .....	30
Allegations of abuse made against other children (child on child abuse) .....	31
Dealing with Disclosures .....	31
APPENDIX A – SPECIFIC FORMS OF ABUSE AND SAFEGUARDING ISSUES .....	34
APPENDIX B – ALLEGATIONS AGAINST STAFF FLOW CHART.....	52
APPENDIX C – EARLY HELP OFFER .....	55
APPENDIX D - ONLINE SAFETY PROCEDURE.....	60
APPENIX E - HARMFUL SEXUAL BEHAVIOUR PROCEDURE.....	71

---

## Key Personnel

### The Albany Academy

Role:	Name and contact details:
Designated Safeguarding Lead (DSL)	Darryl James 01473 550472 <a href="mailto:darryljames@raedwaldtrust.org">darryljames@raedwaldtrust.org</a>
Deputy DSL	Nancy Sinclair 01473 550472 <a href="mailto:nancysinclair@raedwaldtrust.org">nancysinclair@raedwaldtrust.org</a>
Named Safeguarding Trustee	Anna Hennell James 01473 550472 <a href="mailto:ahennelljames@raedwaldtrust.org">ahennelljames@raedwaldtrust.org</a>
Chair of Trustees	Alan Whittaker 01473 550472 <a href="mailto:awhittaker@raedwaldtrust.org">awhittaker@raedwaldtrust.org</a>

The CEO is: Angela Ransby 01473 550472, [aransby@raedwaldtrust.org](mailto:aransby@raedwaldtrust.org)

---

## **Aims**

Safeguarding children is the first priority of the Raedwald Trust and its academies. Through a strong and vigilant culture of collaboration, transparency and a relentless focus on improvements, we are driven to deliver excellence with, for and on behalf of our children.

At Raedwald Trust we are committed to safeguarding children and young people and we expect everyone who works in our school to share this commitment. Adults in our school take all welfare concerns seriously and encourage children and young people to talk to us about anything that worries them. We will always act in the best interest of the child. Safeguarding and child protection are at the forefront and underpin all the work we do within our school settings – it is a whole school approach, ensuring the best interests of the child are at the heart of all we do.

## **Reporting a Concern**

On the Raedwald Trust website Home Page there is a 'Report a concern button', located in the top right hand corner in bright red.

This is designed for all pupils across the Trust to use in order to report a concern regarding anything that is worrying them or if they are worried about their family or friends. The report will be sent to Trust Safeguarding Leads who will respond and pass on to the relevant DSL.

---

## **PART 1**

### Raedwald Trust Safeguarding Procedures for Staff

#### **Disclosure / Concern Raised**

All staff must follow the published Academy flow chart.

#### **Record Keeping**

All documents relating to safeguarding or child protection will be stored electronically on SchoolPod with visibility restricted to the safeguarding team. Raedwald Trust attendance to all 'safeguarding' meetings (including FNM, CiN, and CP) will be by, or directed by, the DSL in consultation with the Head Teacher.

In all academies, pupil's individual Risk Assessment will serve as the information sharing document for all staff.

All RT staff remain responsible for requesting access to DSL actions at any time, in order they can activate the Whistleblowing Policy as they deem necessary.

All staff must strictly adhere to academy based attendance procedures as part of their safeguarding responsibilities.

#### **Pupil Level Risk Assessments**

All pupil have a pupil level risk assessment completed. These are regularly reviewed by Head Teacher / Head of School.

#### **Safeguarding Training**

All staff are responsible for ensuring they comply with, and are engaged in, the mandatory training requirements published by the RT. A live breakdown of your progression through these training requirements can be accessed at by contacting your Head Teacher/Head of School or the Trust Safeguarding Leads.

## Raedwald Trust Safeguarding Flow Chart – What to do if I am worried about a child

### Report concerns / disclosure to a member of the Raedwald Trust Safeguarding team

For concerns that need immediate action, please call one of the safeguarding team. Completing a record of concern on SchoolPod will send a text and email to the DSL and DDSLs.

#### Designated Safeguarding Leads (DSLs)

**Alderwood Academy** – Tom Baker

**Outreach KS4** – Louise Chapman

**First Base Bury St Edmunds** – Stacey Laws

**First Base Ipswich** – Stacey Laws

**Ipswich Hospital School** – Kate Kingsford-Bere

**Parkside Academy KS4 School** – Kirsty Osborne

**St Christopher's Academy** – Kate Kingsford-Bere

**The Albany Academy** – Darryl James

**West Suffolk Hospital** – Kate Kingsford-Bere

**Westbridge Academy** – Emily Duque

**Central Team** – Fe Dunachie

#### Deputy DSLs

Jayne Crapnell & Ellen Whight

Kayleigh Southgate

Lily Perkins

Tanya Gray

Nicole Phillips & Cath Sparrow

Emma Osborne & Kayleigh Southgate

Sharon Furzer & Cath Sparrow

Nancy Sinclair

Nicola Edwards

Nic Reah & Emily Langdon

Angela Ransby, Laura Leeder, Kayleigh Southgate, Ellen Whight, Nic Reah & Sharon Furzer

You may also be able to contact the above at 01473 550472.

Don't forget to record your concerns on School Pod.



### The DSL will consider further actions required, including;

Consultation with MASH 0808 800 4005 or the Police if a child is in immediate danger or at risk of significant harm.

For inpatients, discuss with the hospital safeguarding team.

Discussion with the main school DSL/DDSL

### Recording

- Make a record of your concern / child's disclosure, using [www.schoolpod.co.uk](http://www.schoolpod.co.uk)
- Remember to record the date, time, your name and role and keep your record as factual as possible.
- Use the child's own words.
- If there are marks on a child record these on a body map within the School Pod slip.

### Informing Carers/Parents

- Carers & parents should be informed of all concerns and referrals unless this may cause harm to the child.
- This will usually be undertaken by the DSL/DDSL, in conjunction with the mainstream school (where applicable).

### Reflect

- Ask yourself if you have done everything you can within your role, but do not investigate.
- Refer any remaining concerns to the DSL/DDSL.
- Dealing with disclosures can be difficult and disturbing; seek support for yourself, but be aware of principles of confidentiality.



---

## PART 2

### Introduction

This policy has been developed in accordance with the principles established by the Children Act 1989; and in line with the following:

- “Keeping Children Safe in Education” 2023
- “Working Together to Safeguard Children” 2018
- “Framework for the Assessment of Children in Need and their Families” 2000
- “What to do if you are worried a Child is being Abused” 2015
- Suffolk Safeguarding Partnership guidelines and the 3 safeguarding partners
- Information on School’s Advice
- Inspecting Safeguarding
- GDPR

The Raedwald Trust takes seriously its responsibility under section 11 of the Children Act and duties under “working together” to safeguard and promote the welfare of children; to work together with other agencies to ensure adequate arrangements exist within our setting to identify, and support those children who are suffering harm or are likely to suffer harm.

We recognise that all staff and Trustees have a full and active part to play in protecting our pupils from harm, and that the child’s welfare is our paramount concern.

Our Trust should provide a safe, caring, positive and stimulating environment that promotes the social, physical and moral development of the individual child free from discrimination or bullying where children can learn and develop happily.

This policy applies to all staff, Trustees, contractors and volunteers working within our Trust.

This policy has been written in line with Keeping Children Safe in Education 2023. All staff will sign to confirm they have read and understood this policy.

### Terminology

Safeguarding and promoting the welfare of children is defined as:

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

*Keeping Children Safe in Education (2023)*

Child protection is:

- Part of safeguarding and promoting welfare. This refers to the activity that is undertaken to protect specific children who are suffering, or are likely to suffer, significant harm.

*Working Together to Safeguard Children 2018*

---

## Early Help

- Early help means providing support as soon as a problem emerges at any point in a child's life, from the foundation years through to the teenage years.

*Keeping Children Safe in Education (2023)*

## A Child is:

- Anyone who has not yet reached their 18th birthday. The fact that a child has reached 16 years of age, is living independently or is in further education, is a member of the armed forces, is in hospital or in custody in the secure estate, does not change their status or entitlements to services or protection.

*Working Together to Safeguard Children 2018*

'Parent' refers to birth parents and other adults who are in a parenting role, for example step-parents, foster carers and adoptive parents.

DSL: Designated Safeguarding Lead

DDSL: Deputy Designated Safeguarding Lead

## The role of Trust staff

Our Trust staff are particularly important as they are in a position to identify concerns early, provide help for children, and prevent concerns from escalating.

- All our staff have a responsibility to provide a safe environment in which children can learn.
- Our academies have a DSL who will provide support to our staff members to carry out their safeguarding duties and who will liaise closely with other services such as children's social care. The DSL (and any deputies) are most likely to have a complete safeguarding picture and be the most appropriate person to advise on the response to safeguarding concerns.
- All our staff will be equipped to identify children who may benefit from early help. Staff know in the first instance to discuss their concerns with the DSL, and understand they may be required to support other agencies and professionals in assessments for early help.
- Staff are aware they should share any concerns about a child with the DSL/DDSL however, they are equally aware that sometimes children will not feel ready or know how to tell someone that they are being abused, exploited or neglected and/or they may not recognize their experiences as harmful.
- Any of our staff members who have a concern about a child's welfare should follow the referral processes (detailed on page 6). Staff should expect to support Social Workers and other agencies following any referral.

---

### What Trust staff need to know

- All our staff members are aware of the systems within our Trust which support safeguarding, these are explained to them as part of their induction and include:
  - This Child Protection and Safeguarding policy
  - The RT Code of Conduct
  - The role of the DSL (including the identity of the DSL and any deputies)
  - Keeping Children Safe in Education
  - Whistleblowing Policy
  - Managing allegations about staff or volunteers
  - The safeguarding response to children who go missing from education
  - What to do if they have a concern about a child
- All staff members receive appropriate safeguarding and child protection training which is updated regularly. In addition to this training, all staff members receive safeguarding and child protection updates via the Trust Safeguarding Leads throughout the year to provide them with relevant skills and knowledge to be able to safeguard the children in our setting effectively.
- All staff are made aware of the early help process, and understand their role in this. This includes staff being able to identify emerging problems, liaising with our DSL (and deputies), sharing information with other professionals to support early identification and assessment and, in some cases, where appropriate, acting as the lead professional in undertaking any early help assessment. Our Early Help Offer is shared with staff, parents and carers and is found on the RT website.
- All staff are aware of the process for making child protection referrals to children's social care and statutory assessments that may follow, under the Children Act 1989, especially section 17 (children in need) and section 47 (a child suffering, or likely to suffer, significant harm) that may follow a referral, along with the role that might be expected to play in such assessments.
- All staff know what to do if a child tells them they are being abused or neglected. Staff understand how to maintain an appropriate level of confidentiality. They understand that this means only to involve those who need to be involved such as the DSL (and/or a deputy) and children's social care.
- Staff will never promise a child that they will not tell anyone about the allegation/disclosure that the child has made, as this may ultimately not be in the best interests of the child.
- Raedwald Trust staff are aware that technology is a significant component in many safeguarding and wellbeing issues. Staff know that children are at risk of abuse and other risks online as well as face to face.
- At Raedwald Trust we recognise the possibility that adults working in the school may harm children, including Trustees, volunteers, supply teachers, agency staff and caretakers. Any

---

concerns about the conduct of other adults in the school should be taken to the Head Teacher without delay; any concerns about the Head Teacher should go to the CEO who can be contacted on [ceo@raedwaldtrust.org](mailto:ceo@raedwaldtrust.org) ; and any concerns about the CEO should go to the Chair of Trustees, Alan Whittaker by email [awhittaker@raedwaldtrust.org](mailto:awhittaker@raedwaldtrust.org).

- The Head Teacher has to decide whether the concern is an allegation or low-level concern. The term 'low-level' concern does not mean that it is insignificant, it means that the behaviour towards a child does not meet the threshold for referral to the Local Authority Designated Officer (LADO):
  - Simon Hope
  - LADO team – 0300 123 2044
  - <mailto:Lado.safeguardingchildren@oxfordshire.gov.uk>[LADO@suffolk.gov.uk](mailto:LADO@suffolk.gov.uk)
- **The guidance in KCSIE (Part Four) should be followed where it is alleged that anyone working in the school or college that provides education for children under 18 years of age, including supply teachers and volunteers has:**
  - behaved in a way that has harmed a child, or may have harmed a child;
  - possibly committed a criminal offence against or related to a child;
  - behaved towards a child or children in a way that indicates they may pose a risk of harm to children; or
  - behaved or may have behaved in a way that indicates they may not be suitable to work with children.

#### What Trust staff should look out for

Any child may benefit from early help, but our Trust staff are particularly alert to the potential need for early help for a child who;

- Is a young carer;
- Is disabled and has specific additional needs;
- Has special educational needs (whether or not they have a statutory education, health and care plan);
- Is showing signs of being drawn into anti-social or criminal behaviour, including gang involvement and association with organised crime groups;
- Is frequently missing/goes missing from care or from home;
- Is misusing drugs or alcohol themselves;
- Is at risk of modern slavery, trafficking or exploitation;
- Is in a family circumstance presenting challenges for the child, such as substance abuse, adult mental health problems or domestic abuse;
- Has returned home to their family from care;
- Is showing early signs of abuse and/or neglect;
- Is at risk of being radicalised or exploited;
- Is a privately fostered child;
- Is a child in care (CiC) or previously CiC.

---

All Trust staff members are aware of the signs of abuse and neglect so they are able to identify children who may be in need of help or protection (see part 2 of this policy for the definitions).

Departmental advice: What to do if you are worried a child is being abused- Advice for practitioners provides more information on understanding and identifying abuse and neglect.

<https://www.gov.uk/government/publications/what-to-do-if-youre-worried-a-child-is-being-abused--2>

Staff members at our Trust are advised to maintain an attitude at all times of “it could happen here” where safeguarding is concerned. When concerned about the welfare of a child, staff members should always act in the best interests of the child.

Knowing what to look for is vital to the early identification of abuse and neglect. If staff members are unsure they should always speak to the DSL or DDSL or the Trust Safeguarding Leads.

#### What Trust staff should do if they have concerns about a child

If our staff have any concerns about a child’s welfare, they should act on them immediately. See page 8 for a flow chart setting out the process for our staff when they have concerns about a child.

If staff have a concern, they should follow this child protection policy and speak to the DSL (or DDSL)

Options will then include:

- Managing any support for the child internally via the school’s own pastoral support processes;
- An early help assessment;
- Liaison with allocated lead professional to explore any further support/interventions required;
- A referral for statutory services, for example as the child might be in need, is in need or suffering or likely to suffer harm.

The DSL or DDSL should always be available to discuss safeguarding concerns. If in exceptional circumstances, the DSL (or deputy) is not available, this should not delay appropriate action being taken. Staff should contact the Trust Safeguarding Leads or the Trust CEO. In these circumstances, any action taken must be included in the RT Safeguarding slip and shared with the DSL (and/or deputies) as soon as possible.

Our staff should not assume a colleague or another professional will take action or share information that might be critical in keeping children safe. They should be mindful that early information sharing is vital for effective identification, assessment and allocation of appropriate service provision.

#### Early help

If early help is appropriate, the DSL (or DDSL) will generally lead on liaising with other agencies and setting up a multi-agency assessment as appropriate. Staff may be required to support other agencies and professionals in an early help assessment. Any such cases should be kept under constant review alongside multi-agency professionals and consideration given to a referral to children’s social care for assessment for statutory services, if the child’s situation does not appear to be improving or is getting worse.

---

### Statutory Assessments

Where a child is suffering, or is likely to suffer from harm, it is important that a referral to children's social care (and if appropriate the police) is made immediately. This is completed via Customer First – a phone referral if the child is in immediate danger (followed up with a MARF) or via a MARF on the Suffolk Children and Young People's portal online. This will be completed by the DSL (or DDSL).

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

- If a child is in immediate danger or is at risk of harm a referral should be made to children's social care and/or the police immediately. Where referrals are not made by the DSL/DDSL or Trust Safeguarding Leads, the DSL/DDSL should be informed, as soon as possible, that a referral has been made. Best practice is for the DSL/DDSL to complete this, or the Trust Safeguarding Leads. However, if not available, anyone can make a referral.

### What Trust staff should do if they have concerns about safeguarding practices within the Trust - whistleblowing

- We recognise that children cannot be expected to raise concerns in an environment where staff fail to do so.
- All our staff should feel able to raise concerns about poor or unsafe practice and potential failures in the Trust's safeguarding regime and that such concerns will be taken seriously by the CEO and Trustees.
- All staff should be aware of their duty to raise concerns about the attitude or actions of colleagues and appropriate advice will be sought from the LADO where necessary.
- See full details in the RT Whistleblowing Policy.
- Where a staff member feels unable to raise an issue with their employer or feels that their genuine concerns are not being addressed, other whistleblowing channels may be open to them:
  - General guidance can be found at - [Advice on whistleblowing](#)
  - The NSPCC whistleblowing helpline is available as an alternative route for staff who do not feel able to raise concerns regarding child protection failures internally or have concerns about the way a concern is being handled by their school. Staff can call: 0800 028 0285 – line is available from 8:00 AM to 8:00 PM, Monday to Friday and Email: [help@nspcc.org.uk](mailto:help@nspcc.org.uk)
- A whistleblowing disclosure must be about something that affects the general public such as:
  - a criminal offence has been committed, is being committed or is likely to be committed
  - an legal obligation has been breached
  - there has been a miscarriage of justice
  - the health or safety of any individual has been endangered
  - the environment has been damaged
  - information about any of the above has been concealed.

---

### Roles and responsibilities

All schools have a named DSL and at least one DDSL, to coordinate child protection arrangements and this person is named in this policy guidance. The Trust ensures that the DSL or DDSL will be contactable at all times that the school is open to discuss safeguarding concerns.

### The Trust Board

The Board of Trustees undertakes the regular review of safeguarding related policies and procedures that operate within our Trust.

The Trust Board have a crucial role in monitoring and challenging staff on the effectiveness of safeguarding arrangements.

Our Trust Board ensures there is:

- A DSL for safeguarding and child protection who is a member of the senior leadership team and who has undertaken appropriate DSL training.
- Safeguarding and Child protection policy and procedures that are consistent with Suffolk Safeguarding Partnership requirements, reviewed annually and made available to parents and carers on request.
- Procedures for dealing with allegations of abuse made against members of staff including allegations made against the Head Teacher and CEO.
- Safer recruitment procedures that include the requirement for appropriate checks in line with national guidance.
- A training strategy that ensures all staff, including the CEO and Head Teacher, receive safeguarding and child protection training, with regular refresher training. The DSL and DDSL receive DSL refresher training at two-yearly intervals. The Deputy DSLs will be trained to the same level as the DSL, as required by Suffolk Safeguarding Partnership.
- Regular safeguarding updates for staff. Keeping staff up to date with any changes and ensuring that safeguarding remains a priority within the setting.
- Arrangements to ensure that all temporary staff, contractors and volunteers are made aware of the school's arrangements for safeguarding and child protection.
- All members of the Trust Board take part in mandatory safeguarding training to ensure that they can assure themselves that the safeguarding policies and procedures in place are effective.

### The Head Teacher:

- Ensures that the safeguarding and child protection policy and procedures are implemented and followed by all staff.

- 
- Allocates sufficient time and resources to enable the DSL and deputy to carry out their roles effectively, including the assessment of pupils and attendance at strategy discussions and other necessary meetings.
  - Ensures that all staff feel able to raise concerns about poor or unsafe practice and that such concerns are handled sensitively and in accordance with the school's whistle blowing procedures.
  - Ensures that child's safety and welfare is addressed through the curriculum.

DSL:

- The designated safeguarding lead takes lead responsibility for safeguarding and child protection (including online safety and understanding the filtering and monitoring systems and processes in place).
- Be available in term time, school hours, for staff to discuss any safeguarding concerns.
- Manage referrals and refer cases where there is suspected abuse or neglect, radicalization concerns, a person dismissed or left due to risk/harm to a child to DBS, concern a crime may have been committed to the police.
- Raise awareness of safeguarding and child protection amongst staff and parents/carers and support staff.
- Will attend DSL Safeguarding training every two years and keep up to date with changes.
- Acts as a source of support and expertise to the school community.
- Has an understanding of Suffolk Safeguarding Partnership procedures.
- Ensures that when a child leaves the school, their safeguarding information is passed to their new school and receipt obtained.
- Attends and/or contributes to child protection conferences in accordance with local procedure and guidance.
- Develops effective links with relevant statutory and voluntary agencies.
- Ensures that all staff sign to confirm they have read and understood this policy.
- Liaises with the nominated Safeguarding Trustee and Head Teacher as appropriate.



- 
- Makes this policy available to parents/carers via the Trust website and as a hard copy on request.
  - Ensures electronic records of all safeguarding concerns are completed on School Pod.
  - Shares safeguarding concerns and actions taken with relevant professionals, in particular, to the DSL/DDSL at the pupil's main school for dual registered pupils.
  - Follow Suffolk Safeguarding Partnership guidance on record keeping.
  - Refers cases of suspected neglect and/or abuse to children's social care or police in accordance with the guidance below.
  - Work with others to ensure that the Trust's filtering and monitoring systems are functional and effective.

#### Deputy DSLs:

- Is appropriately trained to the same level as the DSL and, in the absence of the DSL, carries out those functions necessary to ensure the ongoing safety and protection of children. In the event of the long-term absence of the DSL, one of the Deputy DSLs will assume all of the functions above.
- Whilst the activities of the DSL can be delegated to the DDSLs, the ultimate lead responsibility for child protection remains with the DSL. This responsibility should not be delegated.

#### All staff will:

Follow the Suffolk Safeguarding Partnership Procedures in all cases of abuse, or suspected abuse.

#### We will therefore:

- Implement and follow part 1 and 2 of this policy.
- Understand that safeguarding children is everyone's responsibility. Everyone who comes into contact with children has an important role to play.
- Support the child's development in ways that will foster security, confidence and resilience.
- Provide an environment in which children and young people feel safe, secure, valued and respected, feel confident and know how to approach adults if they are in difficulties.
- Provide a systematic means of monitoring children known or thought to be at risk of harm, and ensure we contribute to assessments of need and support plans for those children where appropriate.

- 
- Ensure that detailed and accurate written records of concerns about a child are kept even if there is no need to make an immediate referral. This will be done using our electronic management information system, SchoolPod.

### Training

All staff/volunteers are expected to read at least Part 1 and all annexes of KCSIE 2023 and sign to say they have read and understood. Online induction safeguarding training is completed by new staff on the first day of their position.

New staff members are registered to attend the next available safeguarding training session. This is delivered annually to all staff by trained T4T trainers.

A range of online safeguarding training, including Prevent and FGM is completed by new staff on their first day of employment.

Regular safeguarding updates take place through PD days, teaching and learning meetings, regular safeguarding emails to all staff, and Trust Safeguarding Group fortnightly meetings chaired by the Trust CEO, Trust Safeguarding Leads and attended by DSL/DDSLs across the Trust.

Induction Training – this is mandatory and includes;

- the Safeguarding & Child Protection Policy, including Safeguarding and Child Protection which is completed online and includes the expectations, applicable roles and responsibilities in relation to filtering and monitoring;
- the RT Positive Behaviour Change Policy;
- the RT Code of Conduct Policy;
- the safeguarding response to children who go missing from education; and
- the role of the DSL (including the identity of the DSL and any deputies). (see KCSIE (2023))

All Raedwald Trust staff should read the following relevant documents:

- Keeping Children Safe in Education (2023)
- RT Code of Conduct
- RT Safeguarding and Child Protection Policy
- RT Positive Behaviour Change Policy

The Trust Safeguarding Leads ensure that the training staff access is up to date with correct content and is delivered well and engages staff. Online training completed by staff requires a pass percentage rate obtained from answering questions on the given topic in order to gain certification. A safeguarding quiz is sent from Trust Safeguarding Leads to all staff annually to ensure understanding of the policies and procedures.

### Temporary Staff & Visitors

Temporary staff and visitors are directed to the safeguarding board in the school's main office and are made aware of the safeguard team on site. There are Posters and leaflets around the school building offering advice and contact numbers for Customer First and whistleblowing numbers.

---

### Supporting Children

- We recognise that a child who is abused, who witnesses violence or who lives in a violent environment may feel helpless and humiliated, may blame him/herself, and find it difficult to develop and maintain a sense of self-worth.
- We accept that research shows that the behaviour of a child in these circumstances may range from that which is perceived to be normal to aggressive or withdrawn.

Our Trust will support all children and young people by:

- Encouraging the development of self-esteem and resilience in every aspect of life.
- Promoting a caring, safe and positive environment.
- Liaising and working together with all other support services and those agencies involved in the safeguarding of children.
- Notifying Social Care as soon as there is a significant concern.
- Notifying Social Care when a child/young person attending the setting is privately fostered for 28 days or more.
- Providing continuing support to a pupil (about whom there have been concerns) who leaves the school by ensuring that such concerns and school records are forwarded under confidential cover to the DSL/DDSL at the pupil's new school within timeframes specified by KCSIE 2023.
- Our pupils and families are aware who the safeguarding team within the school is and that they can go to them for advice and guidance. This is also promoted through admissions meetings and the induction process.
- Posters are displayed throughout the school building for children to access for agencies such as ChildLine and ChatHealth.
- Each setting has a safeguarding display board with information for pupils and families.
- The Raedwald Trust website has a 'Report a Concern' button accessible to pupils, during term times.
- Build trusting relationships with pupils and families to encourage them to discuss with us any concerns they have and gain extra support moving forward e.g. through our Early Help offer.

### Confidentiality

- We recognise that all matters relating to child protection are confidential. The Raedwald Trust will ensure that information shared will be in line with the guidance document 'Information sharing: advice for practitioners providing safeguarding services' (DfE 2018).

- 
- It is not necessary to seek consent to share information for the purposes of safeguarding and promoting the welfare of a child provided that there is a lawful basis to process any personal information required – this is in line with ‘Working Together to Safeguard Children 2018’.
  - The DSL/DDSLs will disclose personal information about a child or young person to other members of staff on a need to know basis only.
  - However, all staff are aware they have a professional responsibility to share information with other agencies in order to safeguard children.
  - All staff are aware that they cannot promise a child to keep secrets which might compromise the child’s safety or well-being or that of another.
  - We will always undertake to share our intention to refer a child to Social Care with their parents /carers unless to do so could put the child at greater risk of harm, or impede a criminal investigation. If in doubt, we will consult with the Trust Safeguarding Leads or the MASH professional consultation line.
  - For dual registered students, the Raedwald Trust DSL/DDSL will always share safeguarding concerns with the DSL/DDSL from the pupil’s main school. The main school hold the full picture of their pupils and information of a safeguarding nature that may come to light while working with Raedwald Trust staff, however small, may add to that bigger picture.
  - The Data Protection Act 2018 and GDPR do not prevent the sharing of information for the purposes of keeping children safe. This includes allowing practitioners to share information without consent.
  - Information sharing is vital in identifying and tackling all forms of abuse and neglect, and in promoting children’s welfare, including their educational outcomes. We as a school have clear powers to share, hold and use information for these purposes.

#### Supporting Staff

- We recognise that staff working in the school who have become involved with a child who has suffered harm, or appears to be likely to suffer harm may find the situation stressful and upsetting.
- We will support such staff by providing an opportunity to talk through their anxieties with the DSL and to seek further support. This could be provided by another trusted colleague, Occupational Health, and/or a representative of a professional body or trade union, as appropriate.

- In consultation with all staff, we have adopted a code of conduct for staff at our setting. This forms part of staff induction and is in the staff handbook. We understand that staff should have access to advice on the boundaries of appropriate behaviour.
- We recognise that our DSL/DDSs should have access to support and appropriate workshops, webinars, courses to support them in their role.

### Safer Recruitment

- Safer recruitment procedures are in line with the current legislation, Keeping Children Safe in Education 2023 part three. This is where further detail can be found.
- An enhanced DBS certificate, which includes barred list information, is required for any staff and volunteers who will be engaging in regulated activity (working unsupervised with children). For all other staff and volunteers who have opportunity for regular contact with children, but who are not engaging in regulated activity, an enhanced DBS check, which does not include a barred list check, will be appropriate.
- There are additional requirements for Trustees / proprietors – see KCSIE. They are required to have an enhanced criminal records certificate from the DBS including a section 128 check to check that they have not been prohibited from teaching.
- In addition, anyone who is appointed to carry out teaching work will require an additional check to ensure they are not prohibited from teaching.
- A single central record is kept by the school and meets the requirements as set out in of ‘Keeping Children Safe in Education’ 2023.
- We will follow guidance on Disqualification by Association for staff who come into regular and frequent contact with children of reception age.
- As part of our recruitment checks, online searches will be undertaken on all shortlisted candidates. Candidates will be made aware of this during the recruitment process.

### Low-level Concerns regarding staff/volunteers/Trustees/contractors

Concerns may be graded Low-level if the concern does not meet the criteria for an allegation; and the person\* has acted in a way that is inconsistent with the staff code of conduct, including inappropriate conduct outside of work. Example behaviours include, but are not limited to:

- being over friendly with children;
- having favourites;
- taking photographs of children on their mobile phone;
- engaging with a child on a one-to-one basis in a secluded area or behind a closed door; or,
- using inappropriate sexualised, intimidating or offensive language.

---

If the concern has been raised via a third party, the Head Teacher should collect as much evidence as possible by speaking:

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

Reports about supply staff and contractors should be notified to their employers, so any potential patterns of inappropriate behaviour can be identified.

Staff are encouraged and feel confident to self-refer, where, for example, they have found themselves in a situation which could be misinterpreted, might appear compromising to others, and/or on reflection they believe they have behaved in such a way that they consider falls below the expected professional standards.

Low-level concerns should be recorded in writing, including:

- name\* of individual sharing their concerns
- details of the concern
- context in which the concern arose
- action taken

(\* if the individual wishes to remain anonymous then that should be respected as far as reasonably possible)

Records must be kept confidential, held securely and comply with the Data Protection Act 2018. Schools and colleges should decide how long they retain such information, but it is recommended that it is kept at least until the individual leaves their employment.

Records will be reviewed so that potential patterns of concerning, problematic or inappropriate behaviour can be identified.

If a concerning pattern of behaviour is identified and then meets the criteria for an allegation, then the matter will be referred to the LADO.

The records' review might identify that there are wider cultural issues within the school or college that enabled the behaviour to occur. This might mean that policies or processes could be revised or extra training delivered to minimise the risk of it happening again.

See flowcharts in Appendix B on 'Managing Allegations' and 'Managing Low-Level Concerns'.

#### Physical Intervention/Positive Handling

- The need to use physical intervention with pupils is unlikely but could be necessary in extreme circumstances. We recognise that members of school staff have a legal power to use reasonable force to prevent pupils from hurting themselves or others, from damaging property, or from causing disorder (Use of reasonable force, Advice for Head Teachers, Staff and Governing Bodies, DfE July 2013).

- 
- When using reasonable force in response to risk presented by incidents involving children with SEN or disabilities or with medical conditions, we will consider the risks carefully and recognise the additional vulnerability of children in these groups. We will also consider our duties under the Equality Act 2010 in relation to making reasonable adjustments, non-discrimination and our Public Sector Equality Duty.
  - Wherever possible we will work with medical and education colleagues to plan positive and proactive behaviour support, for instance through drawing up individual behaviour plans for more vulnerable children, and agreeing them with parents/carers. By doing this we aim to reduce the occurrence of challenging behaviour and the need to use reasonable force.
  - In our hospital setting, if restraint is necessary, immediate assistance should be sought from nursing staff who have been trained to safely restrain patients and/or security staff. Staff should ensure they are aware of procedures to call for help such as the location and use of emergency buttons.
  - Such events should be recorded and signed by a witness.
  - We understand that physical intervention of a nature which is both unreasonable and disproportionate to the circumstances and or causes injury or distress to a child may be considered under child protection or disciplinary procedures.

#### Anti-Bullying

- Our policy on the prevention and management of bullying is set out in a separate policy and acknowledges that to allow or condone bullying may lead to consideration under child protection procedures. Bullying is a safeguarding matter that if left unresolved can become a child protection matter. Our setting will take seriously any bullying concerns and both investigate and take action to protect pupils where appropriate.
- We will liaise with the anti-bullying co-ordinator from SCC where appropriate.
- See full details in our Anti-Bullying Policy.

#### Health & Safety

- Our Health & Safety policy, reflects the consideration we give to the protection of our children both physically within the school environment and, for example, in relation to internet use, and when away from the school when undertaking school trips and visits.
- See full details in our Health and Safety Policy.

#### Children with Special Educational Needs

In our Trust we recognise that children with special educational needs or disabilities (SEND) or certain health conditions can face additional safeguarding challenges. This policy reflects the fact that

---

additional barriers can exist when recognising abuse and neglect in this group of children. This can include:

- assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's disability without further exploration;
- these children being more prone to peer group isolation or bullying (including prejudice-based bullying) than other children;
- the potential for children with SEND or certain medical conditions being disproportionately impacted by things like bullying- without outwardly showing any signs; and
- communication barriers and difficulties in managing or reporting these challenges.

At Raedwald Trust we identify pupils who might need more support to keep safe and we will put in place reasonable adjustments to overcome any barriers.

### LGBTQ+

Staff are aware that a child or young person who is LGBTQ+ is not in itself an inherent risk factor for harm. However, children who are LGBTQ+ can be targeted by other children. In some cases, a child who is perceived by other children to be LGBTQ+ (whether they are or not) can be just as vulnerable as children who identify as LGBTQ+.

Risks can be compounded where children who are LGBTQ+ lack a trusted adult with whom they can be open. At Raedwald Trust we endeavour to reduce the additional barriers faced by providing a safe space for them to speak to a nominated member of staff.

### Sighting Students

- In some of our schools, we will work with some students that have little or no contact with other professionals. In these situations we will agree responsibility for regular sightings of the student with our commissioners and/or the main school for dual registered students. A protocol will be agreed so that if a student is not seen by a member of staff for a specified period of time then staff will visit the home with the specific intention of sighting the young person to ensure they are safe and well.
- We will be clear with parents/carers that this is part of our role in supporting the school to carry out their safeguarding duties.
- Repeated failed attempts to sight the student will result in referral(s) to appropriate social care and/or the policy to carry out a welfare check.
- Young people that are not in receipt of education for a period exceeding four weeks should be referred to the Children Missing Education Officer at Suffolk County Council Tel: 01473 265224

### Absconding / Missing Persons

- When a young person goes missing from a school site, or does not arrive at their specified location, if appropriate school staff can pursue if not guardians should be made aware so that they can complete initial searches prior to notifying the police themselves.



- 
- The only time school staff would be expected to report the young person missing would be if there are safeguarding concerns around the individual or their guardians. This report should be made by calling 101 or 999 whichever is most appropriate at the time.

#### Young People Not in Education, Employment or Training (NEET)

- In our Hospital School we encounter young people over the age of 16 that are NEET. In these cases we will seek their consent to refer them to the Suffolk County Council Education, Employment and Training (EET) Service <https://www.enter website> who can provide them with appropriate information, advice and guidance.
- If there are other safeguarding concerns around the young person then we may refer them to the EET team without seeking their consent.

#### Home Educated Pupils

- In our Hospital School we encounter young people who are electively home educated. In these cases we will check they are known to the Suffolk County Council Elective Home Education Team (<https://www.suffolk.gov.uk/children-families-and-learning/schools/elective-home-education-ehe-educating-your-child-at-home/>) or similar team in the area in which they live to enable them to carry out their duties to establish and maintain contact with families educating their children at home and to offer parents appropriate advice and support in the best interests of their children.

#### Private fostering

- Private fostering occurs when a child under the age of 16 (under 18, if 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.
- A close family relative is defined as a: grandparent, brother, sister, uncle, aunt and includes half siblings and step-parents; it does not include great aunt or uncles, great grandparents or cousins.
- The school will notify the local authority to allow the local authority to check the arrangement is suitable and safe for the child.
- Parents and private foster carers both have a legal duty to inform the relevant local authority at least six weeks before the arrangement is due to start; not to do so is a criminal offence.
- Whilst most privately fostered children are appropriately supported and looked after, they are a potentially vulnerable group who should be monitored by the local authority, particularly when the child has come from another country. In some cases privately fostered children are

---

affected by abuse and neglect, or be involved in trafficking, child sexual exploitation or modern-day slavery.

- Schools have a mandatory duty to report to the local authority where they are aware or suspect that a child is subject to a private fostering arrangement. Although schools have a duty to inform the local authority, there is no duty for anyone, including the private foster carer or social workers to inform the school. However, it should be clear to the school who has parental responsibility.
- School staff should notify the DSL/DDSL when they become aware of private fostering arrangements. The DSL will speak to the family of the child involved to check that they are aware of their duty to inform the LA. The school itself has a duty to inform the local authority of the private fostering arrangements.
- On admission to the school, we will take steps to verify the relationship of the adults to the child who is being registered

#### Children in Care (CiC) and previously CiC

We recognise that children in care are particularly vulnerable - the most common reason for children becoming a child in care is as a result of abuse and/or neglect.

The DSL/DDSL will liaise with the Designated Teacher for Children in Care to ensure that appropriate staff have the information they need in relation to a child's looked after legal status i.e. whether they are looked after:

- under voluntary arrangements with consent of parents or
- on an interim or full care order

and contact arrangements with birth parents or those with parental responsibility. They should also have information about the child's care arrangements and the levels of authority delegated to the carer by the authority looking after them.

The DSL/DDSL will ensure details of the child's social worker and the name of the virtual school head in the authority that looks after the child are recorded on SchoolPod.

Our staff understand that children previously in care potentially remain vulnerable. This status will be highlighted to staff.

#### Children with an allocated Social Worker

At Raedwald Trust we recognise that when a child has a social worker, it is an indicator that the child is more at risk than most pupils. This may mean that they are more vulnerable to further harm, as well as facing educational barriers to attendance, learning, behaviour and poor mental health. We take these needs into account when making plans to support pupils who have a social worker.

---

From June 2021, the Virtual Headteacher has responsibility to promote the education of children who have a Social Worker and our school DSL/DDSL/Designated Teacher for Children in Care will ensure they liaise with this service.

### Mental Health

All staff at Raedwald Trust are 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. School staff are not expected or trained to diagnose mental health conditions or issues, but may notice behaviours that may be of concern.

Where staff have a mental health concern about a child that may also be a safeguarding concern, they should raise the issue immediately by informing the DSL/DDSL, following our Raedwald Trust policies. Raedwald Trust also has staff trained as Mental Health First Aiders and Mental Health Champions.

### Types of abuse and neglect

Types of Abuse and Neglect can be found in 'Keeping Children Safe in Education (2023)' (Part 1).

All Trust staff should be aware that abuse, neglect and safeguarding issues are rarely standalone events that can be covered by one definition or label. In most cases multiple issues will overlap with one another.

- Abuse: a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others (e.g. via the internet). They may be abused by an adult or adults or another child or children.
- Physical abuse: a form of abuse which may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm to a child. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child.
- Emotional abuse: the persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. It may involve conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability as well as overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyberbullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.

- Sexual abuse: involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving 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.
- Neglect: the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to: provide adequate food, clothing and shelter (including exclusion from home or abandonment); protect a child from physical and emotional harm or danger; ensure adequate supervision (including the use of inadequate care-givers); or ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

#### Specific safeguarding issues

- All staff have an awareness of safeguarding issues - some of which are listed below. Staff are made aware that behaviours linked to the likes of drug taking, alcohol abuse, truancy and sharing nudes and semi-nudes (previously known as sexting) put children in danger.
- All staff are made aware that safeguarding issues can manifest themselves via child on child abuse. This is most likely to include, but not limited to: bullying (including cyber bullying), physical abuse such as hitting, kicking, shaking, biting, hair pulling or otherwise causing physical harm, sexual violence/sexual harassment, gender-based violence, sharing nudes and semi-nudes (previously known as sexting) and limitation/hazing type violence and rituals. Staff are clear about our policy and procedures with regards to child on child abuse.
- All staff are aware that the DfE's advice on Sexual Violence and Sexual Harassment between children in schools and colleges (DfE 2021) has been merged into Keeping Children Safe in Education 2023. As part of this merger, the term child on child abuse is used, rather than peer on peer abuse.
- All staff are aware of the changes to the Voyeurism (Offences) Act 2019 which criminalise the act of 'upskirting'. The Crown Prosecution Service (CPS) defines 'upskirting' as a colloquial term referring to the act of placing equipment such as a camera or mobile phone beneath a person's clothing to take a voyeuristic photograph without their permission. It is not only confined to victims wearing skirts or dresses and equally applies when men or women are

---

wearing kilts, cassocks shorts or trousers. It is often performed in crowded public places, for example on public transport or at music festivals, which can make it difficult to notice offenders.

- We are aware that safeguarding incidents and/or behaviours can be associated with factors outside the school and/or can occur between children outside the school. All staff, but especially the DSL/DDSL should be considering the context within which such incidents and/or behaviours occur. This is known as contextual safeguarding, which simply means assessments of children should consider whether wider environmental factors are present in a child's life that are a threat to their safety and/or welfare. Children can be at risk of abuse or exploitation in situations outside their families. Extra-familial harms take a variety of different form and children can be vulnerable to multiple harms including (but not limited to) sexual abuse (including harassment and exploitation), domestic abuse in their own intimate relationships (teenage relationship abuse), criminal exploitation, serious youth violence, county lines and radicalisation.

#### Online safety

- In our schools our pupils increasingly work online, we recognise that it is crucial to safeguard our pupils from potentially harmful and inappropriate online material. When children use the school's network to access the internet, they are protected from inappropriate content by our filtering and monitoring systems, which are reviewed monthly in the ICT operations meetings for their effectiveness. However, many pupils are able to access the internet using their own data plan.
- Weekly monitoring reports are sent to the Trust Safeguarding & Compliance Lead and the Trust PA for review who will work alongside the Head Teacher to address any concerns raised as appropriate.
- Staff undergo safeguarding training regularly, including online safety.
- Children are taught about safeguarding, including online safety, throughout the curriculum and particularly during PSHE in an age appropriate way.
- Safeguarding training for staff, including online safety training, is integrated, aligned and considered as part of the whole school safeguarding approach and wider staff training and curriculum planning.
- Teachers manage behaviour effectively to ensure a good and safe educational environment and they have a clear understanding of the needs of all pupils.
- Staff are sensitive to the specific needs and vulnerabilities of individual children, including children who are victims of abuse and children with Special Educational Needs or disabilities.

Within online safety, the breadth of issues can be categorised into four areas of risk:

- 1) **content:** being exposed to illegal, inappropriate or harmful content, for example: pornography, fake news, racism, misogyny, self-harm, suicide, anti-Semitism, radicalisation and extremism.
- 2) **contact:** being subjected to harmful online interaction with other users; for example: 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.

- 
- 3) **conduct:** personal online behaviour that increases the likelihood of, or causes, harm; for example, 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
  - 4) **commerce:** risks such as online gambling, inappropriate advertising, phishing and or financial scams

The Raedwald Trust Online Safety procedure incorporates further information regarding use of mobile phones and smart technology, and the school's approach to keeping children safe. This also reflects the fact that many children have unlimited and unrestricted access to the internet via mobile phone networks (i.e. 3G, 4G, 5G). This access means some children, whilst at Raedwald Trust, could sexually harass their peers via their mobile and smart technology, share indecent images: consensually and non-consensually (often via large chat groups) and view and share pornography and other harmful content.

### Trauma

#### **Definition of Trauma**

Raedwald Trust has adopted a wider definition of trauma which encompass *any* event that is experienced as frightening, painful or out of control, characterised by there being no one available to support or mitigate the impact of traumatic toxic stress. Day-to-day exposure to events such as divorce, loss of a loved one, illness within the family, preparing for an exam or moving to a new house can be experienced as traumatic.

Children who have experienced traumatic events in their past can have more emotional and mental health needs, as well as more behavioural difficulties than most children. Early life trauma impacts on their brain development. Understanding how this trauma impacts the development of the brain allows us to understand the resulting behaviours.

**Our aim is to ensure** pupils have stability and feel secure and safe; succeed in their learning; develop good relationships with others; and become independent and enthusiastic learners. We will ensure we identify needs as they arise and to provide support as early as possible; monitor situations and need; work in a productive partnership with other agencies to ensure there is a multi-professional approach; and support our pupils' wellbeing and mental health.

At Raedwald Trust we do not discriminate and will make reasonable adjustments.

**Trauma can occur** through a variety of ways which can be deemed as frightening, out of control or painful. Some examples of trauma would be: death of family; illness; separation or divorce; moving house; entering the care system; exams; early childhood experiences; witnessing or experiencing abuse; and the ongoing effects of Covid-19.

At the Raedwald Trust, we will continue to support all pupils through working closely with other agencies and professionals such Educational Psychologists (EP), Social Services, School Nursing team, Health Professionals, mental health services and the Early Help teams, to ensure that the needs of the child are identified and met.

#### Opportunities to teach safeguarding

In our schools we ensure our pupils are taught about safeguarding, including online, through various teaching and learning opportunities, as part of providing a broad and balanced curriculum. Children

---

are taught to recognise when they are at risk and how to get help when they need it. This may include covering relevant issues through personal, social, health and economic education (PSHE), and through relationship and sex education (RSE).

Across the curriculum at Raedwald Trust, pupils are introduced to, and encouraged to use a skills based approach to keeping themselves safe. These skills are introduced through PSHE lessons and include risk taking, recognition of healthy and unhealthy relationships and coercive behaviour. Students are then supported, within the safety of the school community, to develop their use of these skills in appropriate and effective ways.

#### Allegations of abuse made against other children (child on child abuse)

Our staff recognise that children are capable of abusing their peers. In a situation where child abuse is alleged to have been carried out by another child, our child protection procedures should be adhered to for both the victim and the alleged abuser; this means it should be considered as a child care and protection issue for both children.

Child on child abuse can take many forms, and gender issues can be prevalent when dealing with this type of abuse. This could for example include girls being sexually touched/assaulted or boys being subject to initiation/hazing type violence.

Annex A contains important additional information about specific forms of abuse and safeguarding issues.

#### Dealing with Disclosures

**If a pupil asks to speak to you about a problem do not promise confidentiality but explain that it will be necessary to share with the safeguarding team.**

Always stop and listen straight away to someone who wants to tell you about incidents or suspicions of abuse. Listen quietly and actively, giving your undivided attention. Allow silences when needed. Do not show shock or disbelief but take what is said seriously.

#### **Reassure**

Stay calm, no judgements, empathise. Never make a promise that you can keep what a child has said a secret. Give reassurance that only those who need to know will be told. Reassure the young person that they were right to tell you.

#### **React**

React to the pupil only as far as is necessary for you to establish whether or not you need to refer this matter, but don't interrogate for full details.

Don't ask leading questions – keep the open questions e.g. 'is there anything else you want to say?'

If you need to try to get more details again keep to open questions, "tell me a bit more about that"



---

If you do ask questions remember to record the questions you ask as well as the responses the young person gives.

Do not criticise the alleged perpetrator; the student may have affection for them.

Explain what you will do next – inform the DSL/DDSL.

Repeat – verbally to the DSL/DDSL.

### **Record**

Complete an RT Safeguarding slip on School Pod.

Record what was actually said by the pupil rather than your interpretation of what they are telling you. Be factual at all times.

Follow the RT Safeguarding slips guidance for clear guidance on recording disclosures.

If staff are unsure or require support, speak to their DSL/DDSL.

**Never attempt to carry out an investigation of suspected abuse by interviewing the pupil or any others involved. This is a highly skilled role and any attempts by yourself could affect possible criminal proceedings.**

### **How will we respond to concerns or allegations of child on child abuse?**

The DSL/DDSL will discuss the concern or allegation with the member of staff who has reported it and will, where necessary, take any immediate steps to ensure the safety of the child/all children affected.

Where any concern or allegation indicates that indecent images of a child or children may have been shared online, the DSL/DDSL will consider what urgent action can be taken in addition to the actions and referral duties set out in this policy.

DSL/DDSLs will always use their professional judgement to assess the nature and seriousness of the alleged behaviour and determine whether it is appropriate for the alleged behaviour to be dealt with internally and, if so, whether any external specialist support is required. In borderline cases the DSL/DDSL may wish to consult with children's social care or other relevant agencies in accordance with the Local Safeguarding Partnership's procedures to determine the most appropriate response. Additional guidance can be sourced from the MASH professional consultation line.

The DSL/DDSL will discuss the concern(s) or allegation(s) with appropriate multi-agencies and agree on a course of action.



---

#### Dealing with Disclosures regarding individuals/organisations using Raedwald Trust premises

If an allegation relating to an incident that happened when an individual or organisation was using Raedwald Trust school premises for the purposes of running activities for children (for example community groups, sports associations, or service providers that run extra-curricular activities), as with any safeguarding allegation, we will follow the Raedwald Trust safeguarding policies and procedures, including informing the LADO as appropriate.

---

## APPENDIX A – SPECIFIC FORMS OF ABUSE AND SAFEGUARDING ISSUES

Issues covered in this annex:

- Children and the court system
- Children missing from education (CME)
- Children with family members in prison
- Child criminal exploitation (CCE)
- Child sexual exploitation (CSE)
- County lines
- Domestic abuse
- Homelessness
- So-called ‘honour-based’ abuse
- FGM
- Forced Marriage
- Preventing radicalisation
- The Prevent Duty
- Channel
- Child on child abuse
- Sexual violence and sexual harassment between children in schools and colleges
- Upskirting
- The response to a report of sexual violence or sexual harassment

### Children and the court system

- Children are sometimes required to give evidence in criminal courts, either for crimes committed against them or for crimes they have witnessed. There are two age appropriate guides to support children 5-11-year olds and 12-17 year olds.
- The guides explain each step of the process, support and special measures that are available. There are diagrams illustrating the courtroom structure and the use of video links is explained.
- Making child arrangements via the family courts following separation can be stressful and entrench conflict in families. This can be stressful for children. The Ministry of Justice has launched an online child arrangements information tool with clear and concise information on the dispute resolution service. This may be useful for some parents and carers.

### Children missing from education

Knowing where children are during school hours is an extremely important aspect of Safeguarding. Missing school can be an indicator of abuse and neglect and may also raise concerns about others safeguarding issues, including the criminal exploitation of children. It may indicate mental health problems, risk of substance abuse, risk of travelling to conflict zones, risk of female genital mutilation or risk of forced marriage. Early intervention is necessary to identify the existence of any underlying safeguarding risk and to help prevent the risks of a child going missing in future.

We monitor attendance carefully and address poor or irregular attendance without delay.

---

We will always follow up with parents/carers when pupils are not at school. This means we need to have a least two up to date contacts numbers for parents/carers. Parents should remember to update the school as soon as possible if the numbers change.

In response to the guidance in Keeping Children Safe in Education (2023) the Trust has:

1. Staff who understand what to do when children do not attend regularly
2. Appropriate policies, procedures and responses for pupils who go missing from education (especially on repeat occasions).
3. Staff who know the signs and triggers for travelling to conflict zones, FGM and forced marriage.
4. Procedures to inform the local authority when we plan to take pupils off-roll when they:
  - a. leave school to be home educated
  - b. move away from the school's location
  - c. remain medically unfit beyond compulsory school age
  - d. are in custody for four months or more (and will not return to school afterwards); or
  - e. are permanently excluded

We will ensure that pupils who are expected to attend the school, but fail to take up the place will be referred to the local authority.

When a pupil leaves the school, we will record the name of the pupil's new school and their expected start date.

#### Children with family members in prison

- Approximately 200,000 children in England and Wales have a parent sent to prison each year. These children are at risk of poor outcomes including poverty, stigma, isolation and poor mental health. NICCO provides information designed to support professionals working with offenders and their children, to help mitigate negative consequences for those children.

#### Child Criminal Exploitation (CCE)

- CCE is where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child into any criminal activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial or other advantage of the perpetrator or facilitator and/or (c) through violence or the threat of violence.
- The victim may have been criminally exploited even if the activity appears consensual. CCE does not always involve physical contact; it can also occur through the use of technology.
- CCE can include children being forced to work in cannabis factories, being coerced into moving drugs or money across the country (county lines, see page 85 for more information), forced to shoplift or pickpocket, or to threaten other young people.
- Some of the following can be indicators of CCE:
  - children who appear with unexplained gifts or new possessions;
  - children who associate with other young people involved in exploitation;
  - children who suffer from changes in emotional well-being;
  - children who misuse drugs and alcohol;
  - children who go missing for periods of time or regularly come home late; and

- children who regularly miss school or education or do not take part in education
- The experience of girls who are criminally exploited can be very different to that of boys. The indicators may not be the same, however professionals should be aware that girls are at risk of criminal exploitation too. It is also important to note that both boys and girls being criminally exploited may be at higher risk of sexual exploitation.

### Child Sexual Exploitation (CSE)

- CSE occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into sexual activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial advantage or increased status of the perpetrator or facilitator. The victim may have been sexually exploited even if the sexual activity appears consensual. CSE does not always involve physical contact; it can also occur through the use of technology. CSE can affect any child or young person (male or female) under the age of 18 years, including 16 and 17 year olds who can legally consent to have sex. It can include both contact (penetrative and non-penetrative acts) and non-contact sexual activity and may occur without the child or young person's immediate knowledge (e.g. through others copying videos or images they have created and posted on social media). CSE is a form of child sexual abuse.
- Indicators of CSE may include:
  - Acquisition of money, clothes, mobile phones, etc. without plausible explanation;
  - Gang-association and/or isolation from peers/social networks;
  - Exclusion or unexplained absences from school, college or work;
  - Leaving home/care without explanation and persistently going missing or returning late;
  - Excessive receipt of texts/phone calls;
  - Returning home under the influence of drugs/alcohol;
  - Inappropriate sexualised behaviour for age/sexually transmitted infections;
  - Evidence of/suspicions of physical or sexual assault;
  - Relationships with controlling or significantly older individuals or groups;
  - Multiple callers (unknown adults or peers);
  - Frequenting areas known for sex work;
  - Concerning use of internet or other social media;
  - Increasing secretiveness around behaviours; and
  - Self-harm or significant changes in emotional well-being.
- Potential vulnerabilities include:
 

Although the following vulnerabilities increase the risk of child sexual exploitation, it must be remembered that not all children with these indicators will be exploited. Child sexual exploitation can occur without any of these issues.

  - Having a prior experience of neglect, physical and/or sexual abuse;
  - Lack of a safe/stable home environment, now or in the past (domestic abuse or parental substance misuse, mental health issues or criminality, for example);
  - Recent bereavement or loss;
  - Social isolation or social difficulties;
  - Absence of a safe environment to explore sexuality;
  - Economic vulnerability;
  - Homelessness or insecure accommodation status;
  - Connections with other children and young people who are being sexually exploited;

- 
- Family members or other connections involved in adult sex work;
  - Having a physical or learning disability;
  - Being in care (particularly those in residential care and those with interrupted care histories); and
  - Sexual identity.

Further information on signs of a child's involvement in sexual exploitation is available in Home Office guidance: Child sexual exploitation: guide for practitioners.

### County lines

- County lines is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs (primarily crack cocaine and heroin) into one or more importing areas [within the UK], using dedicated mobile phone lines or other form of "deal line".
- Exploitation is an integral part of the county lines offending model with children and vulnerable adults exploited to move [and store] drugs and money. Offenders will often use coercion, intimidation, violence (including sexual violence) and weapons to ensure compliance of victims.
- Children can be targeted and recruited into county lines in a number of locations including schools, further and higher educational institutions, pupil referral units, special educational needs schools, children's homes and care homes. Children are often recruited to move drugs and money between locations and are known to be exposed to techniques such as 'plugging', where drugs are concealed internally to avoid detection. Children can easily become trapped by this type of exploitation as county lines gangs create drug debts and can threaten serious violence and kidnap towards victims (and their families) if they attempt to leave the county lines network.
- One of the ways of identifying potential involvement in county lines are missing episodes (both from home and school), when the victim may have been trafficked for the purpose of transporting drugs and a referral to the National Referral Mechanism should be considered. If a child is suspected to be at risk of or involved in county lines, a safeguarding referral should be considered alongside consideration of availability of local services/third sector providers who offer support to victims of county lines exploitation.

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

### Serious Violence

- Staff are aware of the indicators, which may signal children are at risk from, or are involved with serious violent crime. These may include increased absence from school, a change in friendships or relationships with older individuals or groups, a significant decline in performance, signs of self-harm or a significant change in wellbeing, or signs of assault or unexplained injuries. Unexplained gifts or new possessions could also indicate that children have been approached by, or are involved with, individuals associated with criminal networks or gangs and may be at risk of criminal exploitation.
- Staff are aware of the range of risk factors which increase the likelihood of involvement in serious violence, such as being male, having been frequently absent or permanently excluded

---

from school, having experienced child maltreatment and having been involved in offending, such as theft or robbery. Advice for schools and colleges is provided in the Home Office's Preventing youth violence and gang involvement and its Criminal exploitation of children and vulnerable adults: county lines guidance.

### Domestic abuse

In April 2021, the Domestic Abuse Act 2021 received Royal Assent and introduced a statutory definition for the first time.

Definition: The Domestic Abuse Act 2021 (Part 1) defines domestic abuse as any of the following behaviours, either as a pattern of behaviour, or as a single incident, between two people over the age of 16, who are 'personally connected' to each other:

- (a) physical or sexual abuse;
- (b) violent or threatening behaviour;
- (c) controlling or coercive behaviour;
- (d) economic abuse (adverse effect of the victim to acquire, use or maintain money or other property; or obtain goods or services); and
- (e) psychological, emotional or other abuse.

People are 'personally connected' when they are, or have been married to each other or civil partners; or have agreed to marry or become civil partners. If the two people have been in an intimate relationship with each other, have shared parental responsibility for the same child, or they are relatives.

The definition of Domestic Abuse applies to children if they see or hear, or experience the effects of, the abuse; and they are related to the abusive person.

Types of domestic abuse include intimate partner violence, abuse by family members, teenage relationship abuse and child/adolescent to parent violence and abuse. Anyone can be a victim of domestic abuse, regardless of sexual identity, age, ethnicity, socio-economic status, sexuality or background and domestic abuse can take place inside or outside of the home.

### Operation Encompass

- Operation Encompass operates in the majority of police forces across England. It helps police and schools work together to provide emotional and practical help to children. The system ensures that when police are called to an incident of domestic abuse, where there are children in the household who have experienced the domestic incident, the police will inform the key adult (usually the DSL) in school before the child or children arrive at school the following day. This ensures that the school has up to date relevant information about the child's circumstances and can enable support to be given to the child according to their needs. Police forces not signed up to Operation Encompass will have their own arrangements in place.

### National Domestic Abuse Helpline

- Refuge runs the National Domestic Abuse Helpline, which can be called free of charge and in confidence, 24 hours a day on 0808 2000 247. Its website provides guidance and support for potential victims, as well as those who are worried about friends and loved ones. It also has a form through which a safe time from the team for a call can be booked.

Additional advice on identifying children who are affected by domestic abuse and how they can be helped is available at:

- NSPCC- UK domestic-abuse Signs Symptoms Effects
- Refuge what is domestic violence/effects of domestic violence on children
- SafeLives: young people and domestic abuse.

### Homelessness

- Being homeless or being at risk of becoming homeless presents a real risk to a child's welfare. The DSL/DDSL should be aware of contact details and referral routes in to the Local Housing Authority so they can raise/progress concerns at the earliest opportunity. Indicators that a family may be at risk of homelessness include household debt, rent arrears, domestic abuse and anti-social behaviour, as well as the family being asked to leave a property. Whilst referrals and/or discussion with the Local Housing Authority should be progressed as appropriate, and in accordance with local procedures, this does not, and should not, replace a referral into children's social care where a child has been harmed or is at risk of harm.
- The Homelessness Reduction Act 2017 places a new legal duty on English councils so that everyone who is homeless or at risk of homelessness will have access to meaningful help including an assessment of their needs and circumstances, the development of a personalised housing plan, and work to help them retain their accommodation or find a new place to live. The new duties shift focus to early intervention and encourage those at risk to seek support as soon as possible, before they are facing a homelessness crisis.
- In most cases school and college staff will be considering homelessness in the context of children who live with their families, and intervention will be on that basis. However, it should also be recognised in some cases 16 and 17 year olds could be living independently from their parents or guardians, for example through their exclusion from the family home, and will require a different level of intervention and support. Children's services will be the lead agency for these young people and the DSL/DDSL should ensure appropriate referrals are made based on the child's circumstances. The department and the Ministry of Housing, Communities and Local Government have published joint statutory guidance on the provision of accommodation for 16 and 17 year olds who may be homeless and/or require accommodation.
- Further guidance on how Social Care and Housing authorities should work together to prevent 16/17 year olds becoming homeless, and how the duty to refer should operate in this context, can be found in the 'Prevention of homelessness and provision of accommodation for 16 and 17 year old young people who may be homeless and/or require accommodation guidance' – 'Working Together to Safeguard Children 2018.

### So-called 'honour-based' abuse

So-called 'honour-based' abuse (HBA) 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 (FGM), forced marriage, and practices such as breast ironing. Abuse committed in the context of preserving “honour” often involves a wider network of family or community pressure and can include multiple perpetrators. It is important to be aware of this dynamic and additional risk factors when deciding what form of safeguarding action to take. All forms of HBA are abuse (regardless of the motivation) and should be handled and escalated as such. 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 HBA, or already having suffered HBA. Where staff are concerned that a child might be at risk of HBA, they must contact the DSL/DDSL.

#### Actions

- If staff have a concern regarding a child that might be at risk of HBA or who has suffered from HBA, they should speak to the DSL/DDSL. As appropriate, they will activate local safeguarding procedures, using existing national and local protocols for multi-agency liaison with police and children’s social care. Where FGM has taken place, since 31 October 2015 there has been a mandatory reporting duty placed on teachers that requires a different approach (see following section).

#### FGM

- FGM comprises all procedures involving partial or total removal of the external female genitalia or other injury to the female genital organs for non medical reasons. It is illegal in the UK and a form of child abuse with long-lasting harmful consequences.
- FGM typically takes place between birth and around 15 years old; however, it is believed that the majority of cases happen between the ages of 5 and 8.
- Risk factors for FGM include:
  - low level of integration in to UK society
  - mother or a sister who has undergone FGM
  - girls who are withdrawn from PSHE
  - visiting female elder from the country of origin
  - being taken on a long holiday to the country of origin
  - talk about a ‘special procedure to become a woman’
- Symptoms of FGM:
  - FGM may be likely if there is a visiting female elder, there is talk of a special procedure or celebration to become a woman, or parents wish to take their daughter out of school to visit an ‘at risk’ country (especially before the summer holidays), or parents who wish to withdraw their children from learning about FGM. Staff should not assume that FGM only happens outside the UK.
- Indications that FGM may have already taken place may include:
  - difficulty walking, sitting or standing and may even look uncomfortable.
  - spending longer than normal in the bathroom or toilet due to difficulties urinating.
  - spending long periods of time away from a classroom during the day with bladder or menstrual problems.
  - frequent urinary, menstrual or stomach problems.
  - prolonged or repeated absences from school or college, especially with noticeable behaviour changes (e.g. withdrawal or depression) on the girls return.



- 
- the reluctance to undergo normal medical examinations.
  - confiding in a professional without being explicit about the problem due to embarrassment or fear.
  - talking about pain or discomfort between her legs

#### FGM mandatory reporting duty for teachers

- Where there is a disclosure of FGM it is important that staff know what their statutory response should be. Keeping Children Safe in Education (2023), paragraph 44 says ‘whilst all staff should speak to the DSL or deputy) with regard to any concerns about female genital mutilation (FGM), there is a specific legal duty on teachers. If a teacher, in the course of their work in the profession, discovers that an act of FGM appears to have been carried out on a girl under the age of 18, the teacher must report this to the police’.
- Teachers would follow the mandatory reporting procedures as found here - <https://www.gov.uk/government/publications/mandatory-reporting-of-female-genital-mutilation-procedural-information/mandatory-reporting-of-female-genital-mutilation-procedural-information-accessible-version#reporting>

#### Forced marriage

- Forcing a person into a marriage is a crime in England and Wales. A forced marriage is one entered into without the full and free consent of one or both parties and where violence, threats or any other form of coercion is used to cause a person to enter into a marriage. 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 perpetrators use perceived cultural practices as a way to coerce a person into marriage. Schools can play an important role in safeguarding children from forced marriage.
- The Marriage and Civil Partnership (minimum age) Act 2022 came into force in February 2023 means that 16 and 17 year olds will no longer be allowed to marry or enter a civil partnership, even if they have parental consent. As with the existing forced marriage law, this applies to non-binding, unofficial ‘marriages’ as well as legal marriages.
- The Forced Marriage Unit has published statutory guidance and Multi-agency guidelines, of which focus on the role of schools and colleges. School staff can contact the Forced Marriage Unit if they need advice or information: Contact: 020 7008 0151 or email [fmfu@fco.gov.uk](mailto:fmfu@fco.gov.uk).
- Any concerns that students may be getting married should be referred to the DSL.

#### Preventing radicalisation

- Children are vulnerable to extremist ideology and radicalisation. Similar to protecting children from other forms of harms and abuse, protecting children from this risk is part of our safeguarding approach.
  - Extremism is the vocal or active opposition to our fundamental values, including democracy, the rule of law, individual liberty and the mutual respect and tolerance of different faiths and beliefs. This also includes calling for the death of members of the armed forces.
  - Radicalisation refers to the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups.

- 
- Terrorism is an action that endangers or causes serious violence to a person/people; causes serious damage to property; or seriously interferes or disrupts an electronic system. The use or threat must be designed to influence the government or to intimidate the public and is made for the purpose of advancing a political, religious or ideological cause.
  - There is no single way of identifying whether a child is likely to be susceptible to an extremist ideology. Background factors combined with specific influences such as family and friends may contribute to a child's vulnerability however, all children can be at risk. Similarly, radicalisation can occur through many different methods (such as social media or the internet) and settings (such as within the home).
  - It is however possible to protect vulnerable people from extremist ideology and intervene to prevent those at risk of radicalisation being radicalised. As with other safeguarding risks, staff should be alert to changes in children's behaviour, which could indicate that they may be in need of help or protection. Staff should use their judgement in identifying children who might be at risk of radicalisation and act proportionately which may include the DSL/DDSL making a Prevent referral.

### The Prevent Duty

As part of the Counter Terrorism and Security Act 2015, schools have a duty to 'prevent people being drawn into terrorism'. This has become known as the 'Prevent Duty'.

Where staff are concerned that children and young people are developing extremist views or show signs of becoming radicalised, they should discuss this with the DSL/DDSL.

The DSL/DDSL has received training about the Prevent Duty and tackling extremism and is able to support staff with any concerns they may have. Staff have also undertaken 'anti-radicalisation and prevent awareness' training.

Safer Recruitment training has been carried out by leaders, managers and those responsible for governance.

The Trust works alongside safeguarding partnership in the area, including the police, Suffolk Safeguarding Partnership and details of our single point of contact (SPOC) for prevent. Information sharing protocols are in place via our RT safeguarding procedures allowing us to timely share relevant information with prevent partners.

We use the curriculum to ensure that children and young people understand how people with extreme views share these with others, especially using the internet.

We are committed to ensuring that our pupils are offered a broad and balanced curriculum that aims to prepare them for life in modern Britain. Teaching the school's core values alongside the fundamental British Values supports quality teaching and learning, whilst making a positive contribution to the development of a fair, just and civil society.

### Recognising Extremism

Early indicators of radicalisation or extremism may include:

- showing sympathy for extremist causes
- glorifying violence, especially to other faiths or cultures
- making remarks or comments about being at extremist events or rallies outside school
- evidence of possessing illegal or extremist literature
- advocating messages similar to illegal organisations or other extremist groups
- out of character changes in dress, behaviour and peer relationships (but there are also very powerful narratives, programmes and networks that young people can come across online so involvement with particular groups may not be apparent.)
- secretive behaviour
- online searches or sharing extremist messages or social profiles
- intolerance of difference, including faith, culture, gender, race or sexuality
- graffiti, art work or writing that displays extremist themes
- attempts to impose extremist views or practices on others
- verbalising anti-Western or anti-British views
- advocating violence towards others

### Channel

- Channel is a voluntary, confidential support programme which focuses on providing support at an early stage to people who are identified as being vulnerable to being drawn into terrorism. Prevent referrals may be passed to a multi-agency Channel panel, which will discuss the individual referred to determine whether they are vulnerable to being drawn into terrorism and consider the appropriate support required. A representative from the school may be asked to attend the Channel panel to help with this assessment. An individual's engagement with the programme is entirely voluntary at all stages. Guidance on Channel is available at <https://www.gov.uk/government/publications/channel-and-prevent-multi-agency-panel-pmap-guidance>

### Additional support

- The department has published further advice for schools on the Prevent duty. The advice is intended to complement the Prevent guidance and signposts to other sources of advice and support. The Prevent Duty: Safeguarding learners vulnerable to radicalization can be found at <https://www.gov.uk/government/publications/the-prevent-duty-safeguarding-learners-vulnerable-to-radicalisation>
- Educate Against Hate, is a government website designed to support school teachers and leaders to help them safeguard their students from radicalisation and extremism. The platform provides free information and resources to help school staff identify and address the risks, as well as build resilience to radicalisation.
- 'Let's Talk About It' is an initiative designed to provide practical help and guidance to the public in order to stop people becoming terrorists or supporting terrorism.
- Act early – provides support and guidance if you have concerns someone is expressing extreme views or hatred which could lead to them harming themselves or others.
- The government provides online training in The Prevent Duty where you can learn about different forms of extremism and terrorism; the risk around radicalization, making a prevent referral and the interventions and support available.

---

### Child on child abuse

- Children can abuse other children and this can happen both inside and outside of school. This is generally referred to as child on child abuse and can take many forms. This can include (but is not limited to): abuse within intimate personal relationships; bullying (including cyberbullying, prejudice-based and discriminatory bullying); sexual violence and sexual harassment; physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm.
- Abuse is abuse and should never be tolerated or passed off as “banter” or “part of growing up”. Different gender issues can be prevalent when dealing with child on child abuse. This could for example include girls being sexually touched/assaulted or boys being subject to initiation-type violence. We recognise that it is more likely that girls will be victims and boys perpetrators, but that all child on child abuse is unacceptable and will be taken seriously.
- At Raedwald Trust we believe that all children have a right to attend school and learn in a safe environment. Children should be free from harm by adults in the school and other students. We recognise that some students will sometimes negatively affect the learning and wellbeing of others and their behaviour will be dealt with under the school’s Behaviour Policy. Staff can recognise the indicators and signs of child on child abuse and know how to identify it and report it via Raedwald Trust systems.
- All staff are clear on the School’s policy and procedures with regards to child on child abuse and the important role they have to play in preventing it and responding where they believe a child may be at risk from it.
- There are systems in place for children to confidently report abuse, knowing their concerns will be treated seriously. There are clear processes in place to support victims, perpetrators and other children affected by child on child abuse.
- Behaviour incident logs are regularly reviewed to help identify any changes in behaviour and/or concerning patterns or trends at an early stage.

**All staff recognise that even if there are no reported cases of child on child abuse, such abuse may still be taking place and is simply not being reported.**

Occasionally, allegations may be made against students by others in the school, which are of a safeguarding nature. Safeguarding issues raised in this way may include physical abuse, emotional abuse, sexual abuse and sexual exploitation. It is likely that to be considered a safeguarding allegation against a pupil, some of the following features will be found.

The allegation:

- is made against an older pupil and refers to their behaviour towards a younger pupil or a more vulnerable pupil
- is of a serious nature, possibly including a criminal offence
- raises risk factors for other pupils in the school
- indicates that other pupils may have been affected by this student
- indicates that young people outside the school may be affected by this student

---

At Raedwald Trust we will support the victims of child on child abuse.

In cases of sharing nudes and semi-nudes (previously known as sexting) we follow guidance given to schools and colleges by the UK Council for Child Internet Safety (UKCIS) published in 2020: 'Sharing nudes and semi-nudes'

### Sexual violence and sexual harassment between children in schools and colleges

#### Context

- Sexual violence and sexual harassment can occur between two or more children of any age and sex. It can also occur through a group of children sexually assaulting or sexually harassing a single child or group of children.
- Children who are victims of sexual violence and sexual harassment will likely find the experience stressful and distressing. This will, in all likelihood, adversely affect their educational attainment. Sexual violence and sexual harassment exist on a continuum and may overlap, they can occur online and offline (both physical and verbal) and are never acceptable. It is important that all victims are taken seriously, kept safe and not made to feel like they are creating a problem for reporting abuse, sexual violence or sexual harassment, and offered appropriate support. Staff should be aware that some groups are potentially more at risk. Evidence shows girls, children with SEND and LGBTQ+ children are at greater risk.
- Staff should be aware of the importance of:
  - making clear 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”; and
  - challenging behaviours (potentially criminal in nature), such as grabbing bottoms, breasts and genitalia, flicking bras and lifting up skirts.
  - dismissing or tolerating such behaviours risks normalising them.

### What is sexual violence and sexual harassment?

#### Sexual violence

- All Raedwald Trust staff are aware of sexual violence and the fact children can, and sometimes do, abuse their peers in this way. Staff maintain an attitude of ‘it could happen here’. When referring to sexual violence we are referring to sexual violence offences under the Sexual Offences Act 2003 as described below:

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

**Assault by Penetration:** A person (A) commits an offence if: s/he intentionally penetrates the vagina or anus of another person (B) with a part of her/his 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: s/he intentionally touches another person (B), the touching is sexual, B does not consent to the touching and A does not reasonably believe that B consents.

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

Educating pupils about consent includes teaching them basic facts such as:

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

#### Sexual harassment

- When referring to sexual harassment we mean ‘unwanted conduct of a sexual nature’ that can occur online and offline and both inside and outside of school. When we reference sexual harassment, we do so in the context of child on child sexual harassment. Sexual harassment is likely to: violate a child’s dignity, and/or make them feel intimidated, degraded or humiliated and/or create a hostile, offensive or sexualised environment.
- Whilst not intended to be an exhaustive list, sexual harassment can include:
  - sexual comments, such as: telling sexual stories, making lewd comments, making sexual remarks about clothes and appearance and calling someone sexualised names;
  - sexual “jokes” or taunting;
  - physical behaviour, such as: deliberately brushing against someone, interfering with someone’s clothes
  - displaying pictures, photos or drawings of a sexual nature;
  - upskirting and;
  - online sexual harassment. This may be standalone, or part of a wider pattern of sexual harassment and/or sexual violence. It may include:
    - consensual and non-consensual sharing of sexual images and videos;
    - sharing of unwanted or explicit content;
    - sexualised online bullying;
    - unwanted sexual comments and messages, including on social media;
    - sexual exploitation; coercion and threats;
    - coercing others into sharing images of themselves or performing acts they are not comfortable with online

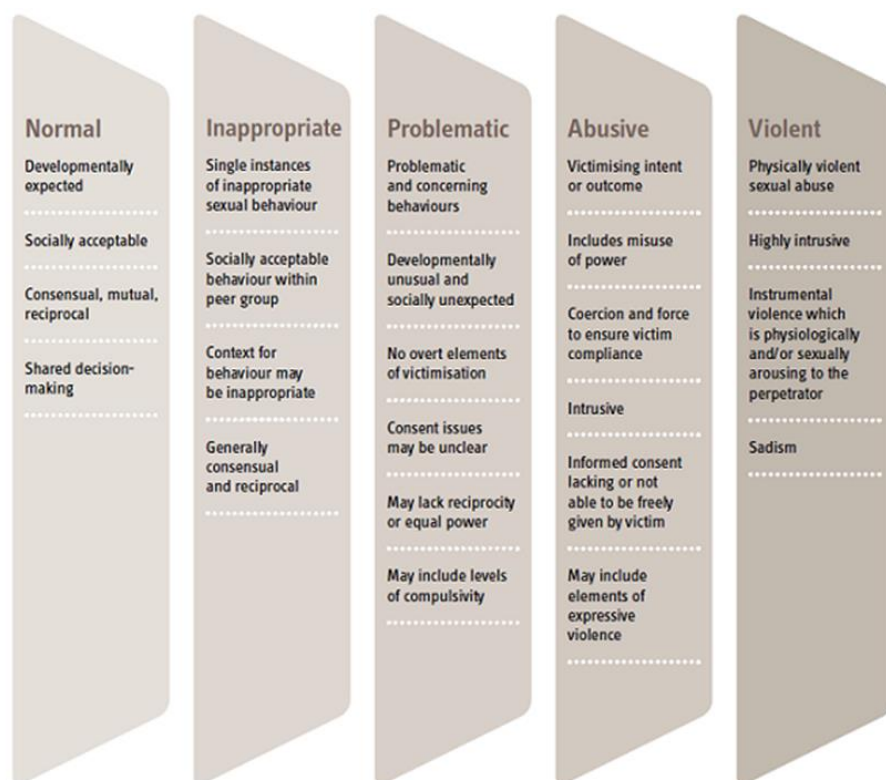
Raedwald Trust staff are aware that sexual harassment (as set out above) creates a culture that, if not challenged, can normalise inappropriate behaviours and provide an environment that may lead to sexual violence.

## Understanding behaviour

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

Sexual Behaviour:

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



*A continuum of children and young people's sexual behaviours*  
(Hackett, 2010)

## Upskirting

- The Voyeurism (Offences) Act, which is commonly known as the Upskirting Act, came into force on 12 April 2019. 'Upskirting' is where someone takes a picture under a person's clothing (not necessarily a skirt) without their permission and/or knowledge, with the intention of viewing their genitals or buttocks (with or without underwear) to obtain sexual gratification, or cause the victim humiliation, distress or alarm. It is a criminal offence. Anyone of any gender, can be a victim.



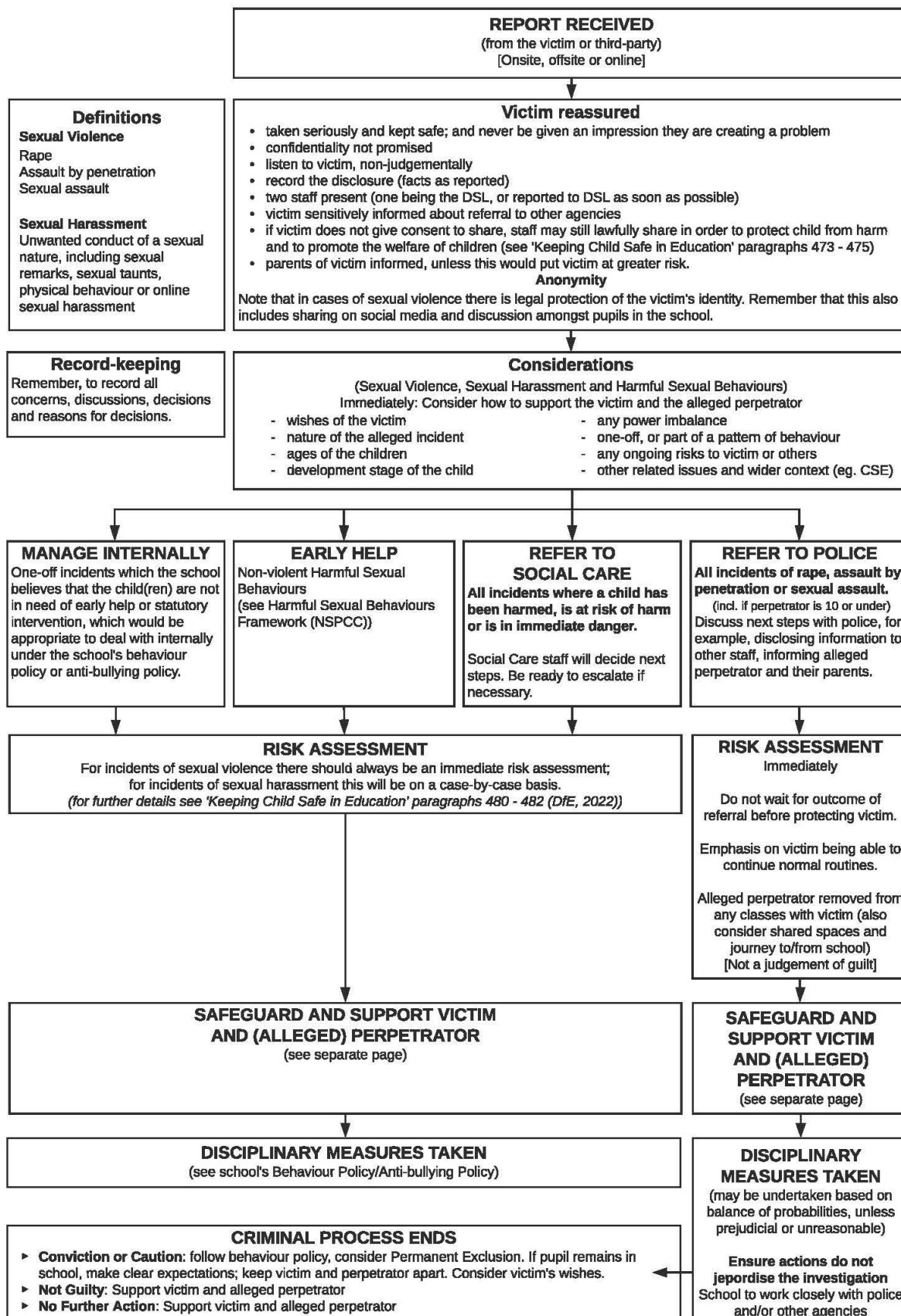
---

### The response to a report of sexual violence or sexual harassment

- The initial response to a report from a child is important. It is essential that all victims are reassured that they are being taken seriously and that they will be supported and kept safe. A victim should never be given the impression that they are creating a problem by reporting sexual violence or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report.
- If staff have a concern about a child or a child makes a report to them, they should follow the referral process as per Raedwald Trust reporting guidance. As is always the case, if staff are in any doubt as to what to do they should speak to the DSL/DDSL.
- Following a report of sexual violence or sexual harassment, the safeguarding team will ensure they are supported in dealing with this by following the guidance in Part 5 of Keeping Children Safe in Education (2023).
- The DSL/DDSL will take lead on dealing with the disclosure and decide on actions to be taken moving forward. This could include writing risk assessments with actions required to make the location safer; it could also involve identifying any necessary support for siblings.



## \*PART FIVE: CHILD-ON-CHILD SEXUAL VIOLENCE AND SEXUAL HARASSMENT



---

## Additional advice and support

### Abuse

- What to do if you're worried a child is being abused – DfE advice
- Domestic abuse: Various Information/Guidance - Home Office (HO)
- Faith based abuse: National Action Plan - DfE advice
- Relationship abuse: disrespect nobody - Home Office website

### Bullying

- Preventing and Tackling Bullying - DfE advice
- Cyber bullying: advice for Head Teachers and school staff - DfE advice

### Children missing from education, home or care

- Children missing education - DfE statutory guidance
- Child missing from home or care - DfE statutory guidance
- Children and adults missing strategy - Home Office strategy

### Children with family members in prison

- National Information Centre on Children of Offenders - Barnardo's in partnership with HM Prison and Probation Service

### Child Exploitation

- Trafficking: safeguarding children - DfE and HO guidance

### Drugs

- Drugs: advice for schools – DfE and ACPO advice
- Drug strategy 2017 - Home Office strategy
- Information and advice on drugs - Talk to Frank website
- ADEPIS platform sharing information and resources for schools: covering drug (& alcohol) prevention - Website by Mentor UK

### “Honour Based Abuse” (so called)

- Female genital mutilation: information and resources- Home Office guidance
- Female genital mutilation: multi agency statutory guidance - DfE, DH, and HO statutory guidance

### Health and Well-being

- Fabricated or induced illness: safeguarding children - DfE, DH, HO
- Rise Above: Free PSHE resources on health, wellbeing and resilience - Public Health England
- Medical-conditions: supporting pupils at school - DfE statutory guidance
- Mental health and behaviour - DfE advice

### Homelessness

- Homelessness: How local authorities should exercise their functions - Ministry of Housing, Communities & Local Government guidance

---

## Online

- Sharing nudes and semi-nudes' - UK Council for Internet Safety

## Private fostering

- Private fostering: local authorities - DfE statutory guidance

## Radicalisation

- Prevent duty guidance- Home Office guidance
- Prevent duty: additional advice for schools and childcare providers - DfE advice
- Educate Against Hate website - DfE and Home Office advice
- Prevent for FE and Training - Education and Training Foundation (ETF)

## Upskirting

- Upskirting know your rights – UK Government

## Violence

- Gangs and youth violence: for schools and colleges - Home Office advice
- Ending violence against women and girls 2016-2020 strategy - Home Office strategy
- Violence against women and girls: national statement of expectations for victims - Home Office guidance
- Sexual violence and sexual harassment between children in schools and colleges - DfE advice
- Serious violence strategy - Home Office Strategy

---

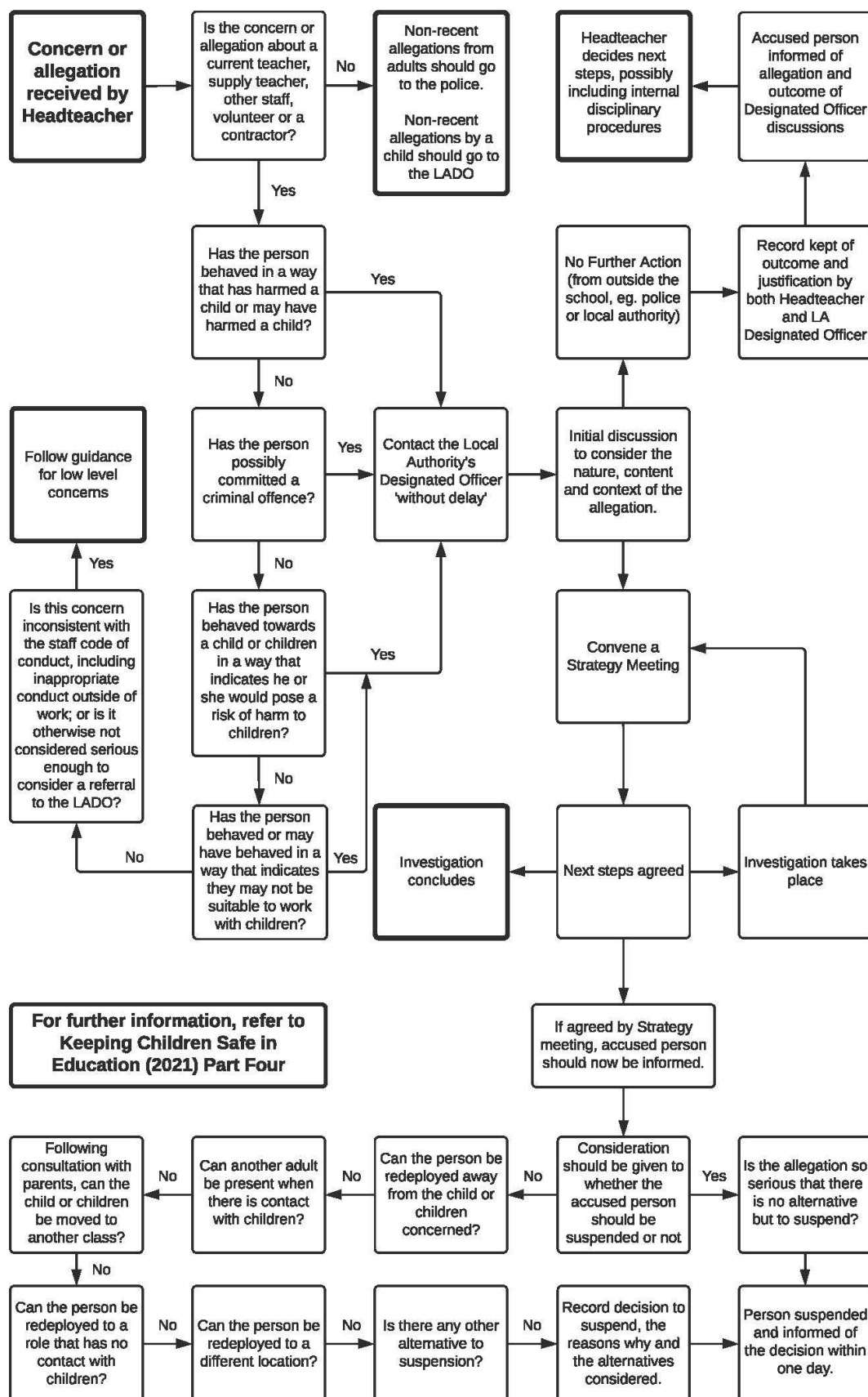
## **APPENDIX B – ALLEGATIONS AGAINST STAFF FLOW CHART**

The Raedwald Trust and its academies operate in a culture of openness and transparency in all matters including safeguarding. Please refer to our Managing Allegations of Abuse Against Adults Policy available on our website for full details of how we respond to an allegation against a staff member.

**If you have a concern that a person who works with children and young people may have behaved inappropriately or you have received information that may constitute an allegation you must:**

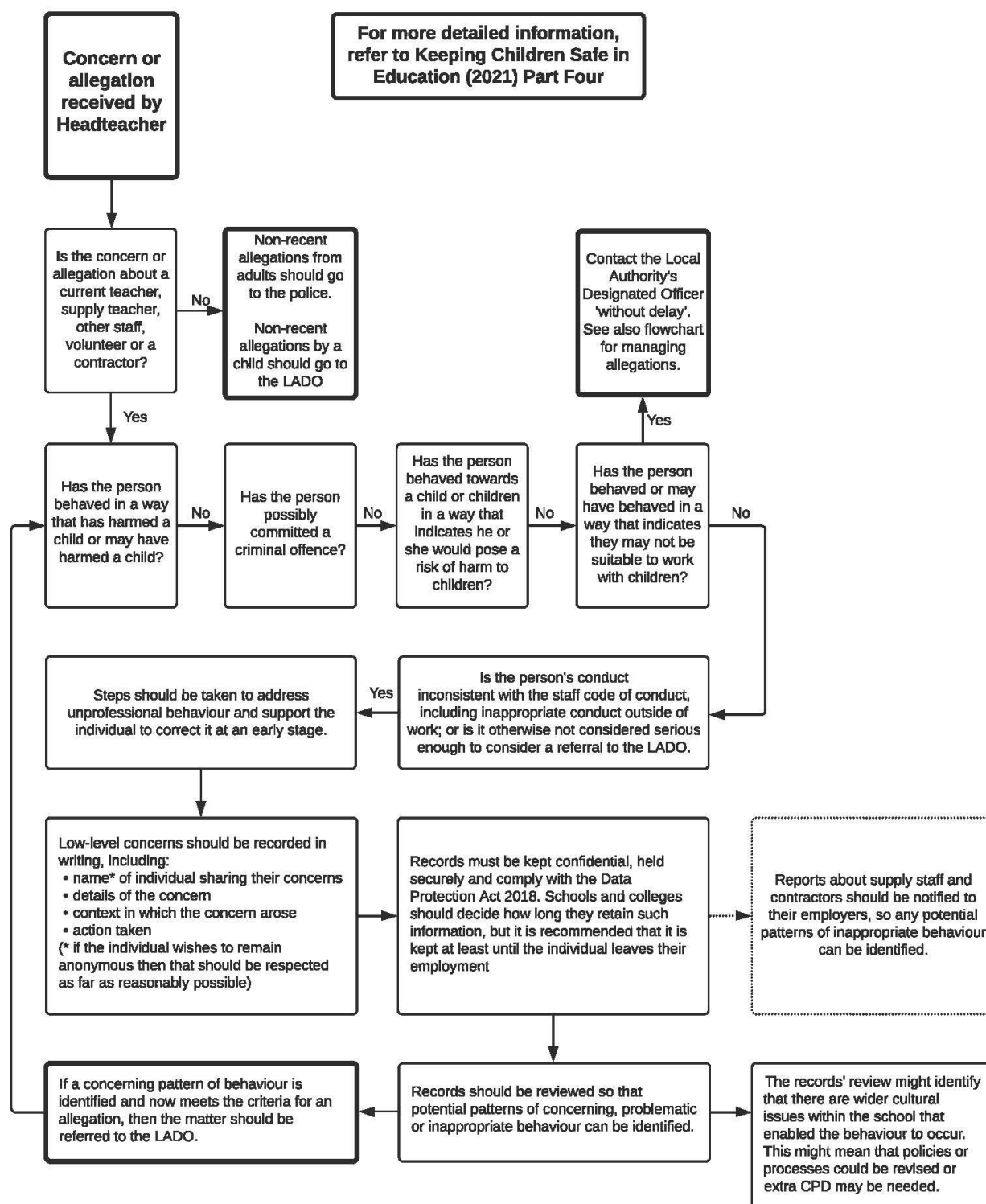


**Allegations made against/Concerns raised in relation to  
teachers, including supply teachers, other staff, volunteers**





## Managing low level concerns raised in relation to teachers, including supply teachers, other staff, volunteers and contractors



### What is a low level concern?

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

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

## APPENDIX C

Raedwald Trust: Early Help Offer	
SSCB website.	<p>Important information for parents and professionals across Suffolk in relation to keeping children safe and avenues of support including early help options.</p> <p><a href="http://www.sscb.org.uk/">http://www.sscb.org.uk/</a> (Suffolk Safeguarding Children's Board)</p>
RT universal support for all RT pupils and families.	<p>All RT staff are available in a pastoral capacity should parents or carers have a concern about anything at all. RT staff may not have the answer but will try to find out the answer or sign-post parents/other professionals in the right direction. Parents/carers can either talk directly with the RT staff or Head teacher. RT staff are available within office hours (8.30am – 4.30pm on weekdays during term-time).</p> <p><b>Alderwood Academy – 01473 725860</b>  <b>First Base Bury St Edmunds Academy – 01284 762453</b>  <b>First Base Ipswich Academy – 01473 719553</b>  <b>Parkside Academy Lindbergh Road– 01473 719559</b>  <b>Parkside Academy Spring Road – 01473 717013</b>  <b>St Christopher's Academy – 01473 725115</b>  <b>The Albany Academy – 01473 550472</b>  <b>Westbridge Academy – 01473 251329</b></p>
RT Personal Development Curriculum	<p>RT have combined PSHE (Personal Social Health Education), SRE (Sex and Relationships Education) and SMSC (Spiritual Moral Social and Cultural) Education and Careers Education, Advice and Guidance and called it the Personal Development Curriculum. The comprehensive RT Personal Development curriculum covers many aspects of keeping young people safe, healthy, resilient and aware of the world around them so that they can make informed decisions. Where pupils have specific issues that need discussing or addressing we will make their Personal Development curriculum bespoke to them. Other specific topics helping pupils stay safe covered within the wellbeing curriculum include (age appropriate content):</p> <p>Sex education: positive relationships, contraception help/advice/where to get further information. Fertility and the impact of STIs/drugs, legal consent age and the definition of informed consent.</p> <p>Gender, identity and tolerance: preventing homophobic and transphobic bullying; preventing bullying of pupils from different types of families (e.g. same sex parents); avoiding anti-gay derogatory language; Gender identity - there isn't such thing as a typical girl or a typical boy. Understanding and acceptance of others different than us, including those with different religions.</p> <p>Drugs: Alcohol, Smoking and illegal drugs.</p>

	<p>Keeping Safe: Online safety (safe use of Facebook and internet); personal safety (out and about); How to respond to an emergency; Sharing nudes and semi-nudes (previously known as Sexting) - what is it, is it illegal and how to take control and stay safe. Appropriate assertiveness. How to stay safe from radicalisation and extremism, how to stay safe from teenage relationship abuse and other current safeguarding issues.</p> <p>Emotional well-being: Where to go for help if you, your friend or family member is struggling with emotional well-being/mental health problems, what the signs are that someone is struggling, what makes you feel good; How to look after your own emotional well-being; Personal strength and self-esteem; Stress management; more effective coping mechanisms than self-harming behaviours, suicide prevention and recognising that not everyone is happy all of the time.</p> <p>Relationships: How to make and maintain positive friendship; family relationships; different types of families; abusive relationships (recognition of teenage relationship abuse and child on child abuse)</p> <p>Healthy Living: Taking responsibility for managing your own health; importance of sleep; the main components of healthy living (diet, exercise and wellbeing); focus on breakfast; managing health and wellbeing when you are unwell (making sure you take your medicine when you should, have the right perspective, doing what you can do within the limitations of your health condition)</p> <p>Healthy and respectful relationships, respectful behavior and consent and how sexual violence and sexual harassment is always wrong. We have an open, honest and respectful culture in our schools.</p>
Home-school support	<p>When a dual registered/inpatient young person is due to return to their school, both parents/carers and pupils may feel they need some specific support. Part of the role of RT is to liaise with the home-school while pupils are with RT. Schools have their own offer or early help as well as targeted support. RT can speak to schools about support that might be needed or may help in whatever circumstance. Generally support required is discussed at reintegration planning meetings.</p>
Helping pupils know where to go for help if they need help.	<p>Information on where pupils can get help include:</p> <p>Samaritans national contact ring Freephone: 116 123 (UK)</p> <p>Childline: 0800 1111</p> <p>YoungMinds <a href="http://www.youngminds.org.uk">www.youngminds.org.uk</a> (web based support for young people and parents/carers)</p> <p>PAPYRUS: <a href="http://www.papyrus-uk.org">www.papyrus-uk.org</a> Provides confidential help and advice to prevent suicide in young people. Tel HOPELineUK: 08000 0684141 Text: 07860 039967</p> <p>Chat Health – School Nurse Service: 07507333356</p>



Online safety	<a href="http://www.ceop.police.uk">www.ceop.police.uk</a> <a href="http://www.nspcc.org.uk">www.nspcc.org.uk</a> <a href="http://www.esafety-adviser.com">www.esafety-adviser.com</a>
Whistle blowing	<p>If a member of RT staff is concerned about the conduct or behaviour of another member of staff, visitor or volunteer, they are aware of the RT Whistle Blowing Policy and to report it immediately to the Head Teacher.</p> <p>If the concern is about the Head Teacher, then they will inform the CEO</p>
RT link to mental health services	<p>The RT has its own Mental Health First Aider and work closely with mental health services. Through our links, we are able to help with all aspects of well-being including support during transitions such as reintegration back to school, and how to manage exam anxiety.</p> <p>The RT often provides advice and guidance to school staff on how to support children and young people with complex mental health difficulties, and can undertake initial assessments and provide evidence to support a request for appropriate provision.</p>
Bullying (including cyber-bullying)/child death/suicide /prevention	<p>All Suffolk schools including RT schools are committed to tackling bullying. We want to know immediately if there any issues with bullying at RT so that it can be addressed. It could be that bullying is related to a child's home-school. RT staff can contact the school if parents do not feel comfortable doing so. RT can also offer bespoke lessons on anti-bullying for anyone who has suffered bullying to encourage behaviours that might avert it in the future (e.g. assertiveness) or to boost self esteem. In serious cases of bullying parents should contact the police; particularly if there are threats involved. In an emergency call 999 or 101. Other sources of help and advice are: <a href="http://www.suffolksp.org.uk">http://www.suffolksp.org.uk</a> (Suffolk Safeguarding Partnership) and <a href="http://www.familylives.org.uk">http://www.familylives.org.uk</a></p> <p>Education about bullying is an integral part of the RT Personal Development programme.</p>
Suffolk Local Offer	<p>Services for children and young people in Suffolk (aged 0-25) with special educational needs and disabilities</p> <p><a href="https://infolink.suffolk.gov.uk/kb5/suffolk/infolink/localoffer.page?localofferchannelnew=0">https://infolink.suffolk.gov.uk/kb5/suffolk/infolink/localoffer.page?localofferchannelnew=0</a></p>
Suffolk Safeguarding	<p>The Multi-Agency Safeguarding Hub (MASH)</p> <p>The MASH can advise on whether a family needs early help or whether they meet the threshold for statutory child protection.</p> <p>Call Customer First on 0808 800 4005.</p> <p>To make a referral to the MASH please use the multi-agency referral form found on the online portal.</p> <p>DSL/DDSLs can also seek additional advice and guidance from the MASH professional consultation line.</p>
Drug concerns	<p>Drugs education is covered in the RT Personal Development curriculum as a preventative measure.</p>

Child Sexual exploitation (CSE)	<p>National 24/7 CSE helpline launched for children and young people: Call or text 116 000.</p> <p>A new helpline has been launched to enable children and young people to discuss any concerns relating to CSE themselves or a friend at any time. The new helpline is open 24 hours, 365 days per year.</p> <p>Any concerns that a child is being sexually exploited should be discussed with the DSL/DDSL in the first instance. The CSE screening toolkit for professionals (can be located on the Suffolk Safeguarding Partnership website: <a href="http://www.suffolksp.org">www.suffolksp.org</a> and should be completed if CSE is suspected. Clear information about CSE and warning signs can be found in the on the same website.</p> <p>Referrals should be made to Suffolk MASH Team (see above).</p> <p>Further information: PACE UK (Parents Against Child Sexual Exploitation) <a href="http://www.paceuk.info">www.paceuk.info</a></p>
Domestic violence and abuse	<p>For more information please refer to the following website <a href="http://www.suffolksp.org.uk/safeguarding-topics/domestic-abuse-and-violence/">http://www.suffolksp.org.uk/safeguarding-topics/domestic-abuse-and-violence/</a></p>
Teenage relationship abuse	<p>Pupils at RT are taught about positive relationships in the Personal Development Curriculum (see SRE above).</p> <p>All violence or suspected violence in teenage relationships should be reported to via the DSL/DDSL.</p>
Fabricated illness	<p>For information on behaviours and motivation behind FI: <a href="https://www.suffolksp.org.uk/fabricated-illness#gsc.tab=0">https://www.suffolksp.org.uk/fabricated-illness#gsc.tab=0</a></p>
Female genital mutilation (FGM)	<p>Female Genital Mutilation (FGM) comprises all procedures involving partial or total removal or the external female genitalia. FGM is illegal in the UK and as of October 2015 mandatory reporting commenced. If staff discover that an act FGM appears to have been carried out on a girl under 18 years old there is a statutory duty to report it to the police.</p> <p>Read <a href="http://www.nhs.uk/Conditions/female-genital-mutilation">http://www.nhs.uk/Conditions/female-genital-mutilation</a> for NHS information and signs of FGM. Any suspicion of FGM should be referred to the Police and social care.</p> <p>All RT staff have received training on FGM.</p>
Forced marriage / Honour based abuse	<p>Suffolk Safeguarding Partnership information can be found at <a href="https://suffolksp.org.uk/safeguarding-topics/forced-marrage/">https://suffolksp.org.uk/safeguarding-topics/forced-marrage/</a></p> <p>Call 999 (police) in an emergency.</p> <p>Please see 'Multi-Agency Practice Guidelines- Handling cases of Forced Marriage' for more information and detail: <a href="https://www.gov.uk/forcedmarriage">https://www.gov.uk/forcedmarriage</a>.</p> <p><i>All staff must be aware of this, that is they may only have <u>one chance</u> to speak to a potential victim and thus they may only have one chance to save a life. This means that all practitioners working within statutory agencies need to be aware of their responsibilities and obligations when they come across forced marriage cases. If the victim is allowed to walk out of the door without support being offered, that one chance might be wasted.</i></p> <p>Prevention - <a href="http://www.freedomcharity.org.uk">www.freedomcharity.org.uk</a> The Freedom Charity (UK charity) have a helpline, text facility and app which can be downloaded to help to provide support</p>

	<p>and protection for victims of abuse, FGM or forced marriage. They can be contacted on tel: 0845 607 0133 or text 4freedom to 88802 or go to the website to download the app from the app page.</p> <p>Karma Nirvana - This organisation offers support, information and help with re-housing to victims of forced marriages, domestic violence and honour based crimes. It also offers a bi-lingual service. Phone confidential helpline: 01332 604098</p>
Gender-based violence/ violence against women and girls	<p>Home office policy tackling violence against women and girls – July 2021.</p> <p>Suffolk Rape Crisis <a href="https://srchelp.org.uk">https://srchelp.org.uk</a> Tel: 01473 231200.</p>
Private fostering	<p>Suffolk County council website information on private fostering. <a href="https://www.suffolk.gov.uk/children-families-and-learning/keeping-children-safe/private-fostering">https://www.suffolk.gov.uk/children-families-and-learning/keeping-children-safe/private-fostering</a></p> <p>A private fostering arrangement is essentially one that is made without the involvement of a local authority. Private fostering is defined in the Children Act 1989 and occurs when a child or young person under the age of 16 (under 18 if disabled) is cared for and provided with accommodation, for 28 days or more, by someone who is not their parent, guardian or a close relative. (Close relatives are defined as; step-parents, siblings, brothers or sisters of parents or grandparents).</p>
Radicalisation and Extremism (PREVENT duty).	<p><b>Prevention:</b> RT teach traditional British values through the Personal Development and RE Curriculums, and through its pastoral programmes: democracy, rule of law, respect for others, liberty, tolerance of those with different faiths and beliefs and promotion of 'Britishness'. Online-safety is an important aspect of the curriculum to keep pupils safe from radicalisation. Pupils need to understand that radicalisation can be a form of grooming online and understand the notion of propaganda. They need to be taught to be discerning about what they read on the internet as the dangers of speaking to strangers online.</p> <p>All RT staff and Trustees have completed Prevent training.</p> <p>Any concerns regarding extremist behaviour must be reported to the DSL/DDSL.</p>
Sharing nudes and semi-nudes (previously known as Sexting)	<p>Prevention: pupils are taught about the dangers and legal implications of sharing nudes and semi-nudes through the PSHE and IT lessons.</p> <p>Advice for schools: <a href="http://www.gov.uk">UK Council for Internet Safety - GOV.UK (www.gov.uk)</a> Further information can be found at: <a href="https://www.nspcc.org.uk/keeping-children-safe/online-safety/sexting-sending-nudes/">https://www.nspcc.org.uk/keeping-children-safe/online-safety/sexting-sending-nudes/</a> Childnet: <a href="http://www.childnet.com/help-and-advice/sexting">http://www.childnet.com/help-and-advice/sexting</a> Booklet: 'So you got naked online' can be accessed at <a href="https://swgfl.org.uk/resources/so-you-got-naked-online/">https://swgfl.org.uk/resources/so-you-got-naked-online/</a></p>
Child Trafficking and Modern Day Slavery	<p>Trafficking can include a young person being moved across the same street to a different address for the purpose of exploitation. It doesn't have to include people, children or young people being moved great distances.</p> <p>Local information from Suffolk Safeguarding Partnership can be found at: <a href="https://suffolksp.org.uk/parents-and-carers/child-trafficking-and-modern-slavery/">https://suffolksp.org.uk/parents-and-carers/child-trafficking-and-modern-slavery/</a></p>

Children who run away or go missing	Local procedures can be found on SSP website at: <a href="https://suffolksp.org.uk/parents-and-carers/missing-children/">https://suffolksp.org.uk/parents-and-carers/missing-children/</a>
<p>CME (Children missing education)</p> <p>A child missing from education is a potential indicator of abuse or neglect. Keeping Children Safe in Education (2023) has further information on CME which has been read by all RT staff.</p>	<p>Local procedures can be found on Suffolk County Council website at: <a href="https://www.suffolk.gov.uk/">https://www.suffolk.gov.uk/</a></p> <p>Children Missing Education (CME) refers to 'any child of compulsory school age who is not registered at any formally approved education activity e.g. school, alternative provision, elective home education, and has been out of education provision for at least 4 weeks'. CME also includes those children who are missing (family whereabouts unknown and are usually children who are registered on a school roll / alternative provision. This might be a child who is not at their last known address and either: has not taken up an allocated school place as expected, or has 10 or more days of continuous absence from school without explanation, or left school suddenly and the destination is unknown. It is the responsibility of the Local Authority (LA), to: Collate information on all reported cases of CME of statutory school aged children.</p>
Refugee and Asylum Seeker Support	<p>Ukraine: anti-slavery safeguarding</p> <p>Protecting Ukrainian refugees from the risk of trafficking and being exploited on their arrival in the UK is a priority for councils and is a focus of discussions with the Government. Suffolk Safeguarding Partnership are also engaging on Ukraine specific risks with partners in the anti-trafficking sector whom they work with regularly on wider modern slavery risks and practice.</p> <p>The anti-trafficking charity Hope for Justice have collated a <a href="#">suite of materials</a> that will support organisations working with new arrivals from Ukraine. Councils may also find useful the resources signposted in the recent <a href="#">guidance on modern slavery and homelessness</a>, as well as the resources on the SSP's <a href="#">modern slavery webpage</a>.</p> <p>Further information can be found at: <a href="https://suffolksp.org.uk/working-with-children-and-adults/refugee-and-asylum-seeker-support/">https://suffolksp.org.uk/working-with-children-and-adults/refugee-and-asylum-seeker-support/</a></p>

---

## APPENDIX D – ONLINE SAFETY PROCEDURE

### 1. Aims

Our Trust aims to:

- Have robust processes in place to ensure the online safety of pupils, staff, volunteers and Trustees
- Deliver an effective approach to online safety, which empowers us to protect and educate the whole Trust community in its use of technology, including mobile and smart technology (which we refer to as ‘mobile phones’)
- Establish clear mechanisms to identify, intervene and escalate an incident, where appropriate

### 2. Legislation and guidance

This procedure is based on the Department for Education’s (DfE’s) statutory safeguarding guidance, Keeping Children Safe in Education, and its advice for schools on:

- Teaching online safety in schools
- Preventing and tackling bullying and cyber-bullying: advice for headteachers and school staff
- Relationships and sex education
- Searching, screening and confiscation

It also refers to the DfE’s guidance on protecting children from radicalisation.

It reflects existing legislation, including but not limited to the Education Act 1996 (as amended), the Education and Inspections Act 2006 and the Equality Act 2010. In addition, it reflects the Education Act 2011, which has given teachers stronger powers to tackle cyber-bullying by, if necessary, searching for and deleting inappropriate images or files on pupils’ electronic devices where they believe there is a ‘good reason’ to do so.

This procedure complies with our funding agreement and articles of association.

### 3. Roles and responsibilities

#### 3.1 The Trust Board

The Trust Board has overall responsibility for monitoring this procedure and holding the Head Teacher to account for its implementation.

The Trust Board will make sure all staff undergo online safety training as part of child protection and safeguarding training, and ensure staff understand their expectations, roles and responsibilities around filtering and monitoring.

The Trust Board will also make sure all staff receive regular online safety updates (via email and staff meetings), as required and at least annually, to ensure they are continually provided with the relevant skills and knowledge to effectively safeguard children.

---

The Trust Board should ensure children are taught how to keep themselves and others safe, including keeping safe online.

The Trust Board must ensure the Trust has appropriate filtering and monitoring systems in place on Trust devices and Trust networks, and will regularly review their effectiveness. The board will review the DfE filtering and monitoring standards, and discuss with Central Team and IT service providers what needs to be done to support the Trust in meeting those standards, which include:

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

The named safeguarding member of the Trust Board is Anna Hennell James, this includes online safety.

All Trustees will:

- Ensure they have read and understand this procedure
- Agree and adhere to the terms on acceptable use of the Trust's ICT systems and the internet
- Ensure that online safety is a running and interrelated theme while devising and implementing their whole-Trust approach to safeguarding and related policies and/or procedures
- Ensure that, where necessary, teaching about safeguarding, including online safety, is adapted for vulnerable children, victims of abuse and some pupils with special educational needs and/or disabilities (SEND). This is because of the importance of recognising that a 'one size fits all' approach may not be appropriate for all children in all situations, and a more personalised or contextualised approach may often be more suitable

### 3.2 The Head Teacher

The Head Teacher is responsible for ensuring that staff understand this procedure, and that it is being implemented consistently throughout the academy.

### 3.3 The Designated Safeguarding Lead

Details of each academy's designated safeguarding lead (DSL) and deputy/deputies are set out in the Raedwald Trust Safeguarding and Child Protection Policies.

The DSL takes lead responsibility for online safety in the academy, in particular:

- Ensuring that staff understand this procedure and that it is being implemented consistently throughout the school
- Taking the lead on understanding the filtering and monitoring systems and processes in place on Trust devices and Trust networks
- Working with the Central team and ICT service providers to make sure the appropriate systems and processes are in place
- Addressing any online safety issues or incidents

- 
- Ensuring that any online safety incidents are logged and dealt with appropriately
  - Ensuring that any incidents of cyber-bullying are logged and dealt with appropriately
  - Ensuring staff complete training on online safety as well as receive regular updates
  - Liaising with other agencies and/or external services if necessary
  - Undertaking annual risk assessments that consider and reflect the risks children face

### 3.4 The ICT service provider

The ICT service provider is responsible for:

- Putting in place an appropriate level of security protection procedures, such as filtering and monitoring systems on Trust devices and Trust networks, which are reviewed and updated at least annually to assess effectiveness and ensure pupils are kept safe from potentially harmful and inappropriate content and contact online while at school, including terrorist and extremist material
- Ensuring that the Trust's ICT systems are secure and protected against viruses and malware, and that such safety mechanisms are updated regularly
- Conducting a full security check and monitoring the Trust's ICT systems on a regular basis
- Blocking access to potentially dangerous sites and, where possible, preventing the downloading of potentially dangerous files
- Ensuring that any online safety incidents are raised with the Central team via weekly reports

### 3.5 All staff and volunteers

All staff, including contractors, agency staff, and volunteers are responsible for:

- Understanding this procedure
- Implementing this procedure consistently
- Agreeing and adhering to the terms on acceptable use of the Trust's ICT systems and the internet and ensuring that pupils follow the Trust's terms on acceptable use
- Ensuring any online safety incidents, including cyber-bullying are reported to the DSL/DDSL
- Responding appropriately to all reports and concerns about sexual violence and/or harassment, both online and offline, and maintaining an attitude of 'it could happen here'

### 3.6 Parents/carers

Parents/carers are expected to:

- Notify the Head Teacher of any concerns or queries regarding this procedure
- Ensure their child has read, understood and agreed to the terms on acceptable use of the school's ICT systems and internet (appendices 1 and 2 of the Admissions Form)

Parents/carers can seek further guidance on keeping children safe online on the Raedwald Trust website <https://www.raedwaldtrust.com/pupils-and-families/keeping-safe-online/>

- What are the issues? – [UK Safer Internet Centre](#)
- Hot topics – [Childnet International](#)
- Parent resource sheet – [Childnet International](#)

---

### 3.7 Visitors and members of the community

Visitors and members of the community who use the Trust's ICT systems or internet will be made aware of this procedure, when relevant, and expected to read and follow it. If appropriate, they will be expected to agree to the terms on acceptable use.

## **4. Educating pupils about online safety**

Pupils will be taught about online safety through their curriculum offer across all Key Stages.

It is also taken from the guidance on relationships education, relationships and sex education (RSE) and health education.

All schools have to teach:

- Relationships education and health education in primary schools
- Relationships and sex education and health education in secondary schools

### In Key Stage 1:

Computing is not part of the Springboard curriculum. However, we recognise the importance of ensuring our pupils are knowledgeable regarding online safety and address this topic through other curriculum areas. Pupils will learn about online safety through our PSHE and RSE curriculum, Thrive sessions, stories, displays around school and targeted 1:1 work where required. Specifically, they will be taught to:

- Use technology safely and respectfully, keeping personal information private
- Identify where to go for help and support when they have concerns about content or contact on the internet or other online technologies

### In Key Stage 2:

Online safety is delivered through the PSHE curriculum at KS2. Within the Health and Wellbeing topic in Primary PSHE, students are taught to recognise risks online and learn about strategies to manage these risks. A key focus explored is the term 'privacy' and the right of the pupils to keep things private and to also respect others privacy. Pupils draw on various resources, from CEOP, NSPCC etc. to support learning and to more easily identify hazards. The structure of the KS2 curriculum allows pupils to revisit online safety again within their placement to consolidate learning and secure long-term knowledge acquisition.

Due to the nature of the provision and cohort, there is a need to responsive to the need to the pupils, this can result in Online Safety being delivered as a priority for an individual/group of students at any point during placement. This can be done either through delivering the explicit curriculum content, or a more bespoke/individual piece of work delivered with the support of the site based safeguarding team. Specifically, pupils will be taught to:

- Use technology safely, respectfully and responsibly
- Recognise acceptable and unacceptable behaviour
- Identify a range of ways to report concerns about content and contact



---

By the end of primary school, pupils will know:

- That people sometimes behave differently online, including by pretending to be someone they are not
- That the same principles apply to online relationships as to face-to-face relationships, including the importance of respect for others online, including when we are anonymous
- The rules and principles for keeping safe online, how to recognise risks, harmful content and contact, and how to report them
- How to critically consider their online friendships and sources of information including awareness of the risks associated with people they have never met
- How information and data is shared and used online
- What sorts of boundaries are appropriate in friendships with peers and others (including in a digital context)
- How to respond safely and appropriately to adults they may encounter (in all contexts, including online) whom they do not know

#### In Key Stage 3:

Online safety is delivered through the PSHE curriculum at KS3. Pupils are delivered a 4-week online safety topic. Key areas of focus within this are social networking, online friendships, sharing photos and videos and gaming. Throughout this topic, pupils will understand their rights, responsibilities, and opportunities online. Furthermore, pupils will identify acceptable behaviour when it comes to communicating safely online and recognizing bullying in all its forms, especially cyber bullying.

Due to the nature of the provision and cohort, there is a need to responsive to the need to the pupils, this can result in Online Safety is delivered as a priority for an individual/group of students at any point during placement. This can be done either through delivering the explicit curriculum content, or a more bespoke/individual piece of work delivered with the support of the site based safeguarding team. Specifically, pupils will be taught to:

- Understand a range of ways to use technology safely, respectfully, responsibly and securely, including protecting their online identity and privacy
- Recognise inappropriate content, contact and conduct, and know how to report concerns

#### In Key Stage 4:

Online safety and keeping safe online are addressed in a variety of ways. These include:

- PSHE curriculum specific lessons taught to address this content.
- Each subject makes specific links to using ICT in the classroom where specific guidance regarding keeping safe online are reiterated
- A zero-tolerance policy on mobile phones and a narrative around this for families and pupils that emphasises the importance of mobile phone, online use and positive mental health.

Where specific cases regarding online safety and keeping safe online are raised, bespoke 1-1 intervention sessions can be delivered through the PSHE teacher, PSED lessons led by form tutors and our Trust PCSO. As such online safety and keeping safe online are addressed through specific practice and part of a wider culture and ethos to safeguard each pupil in our care. Specifically, pupils will be taught:

- 
- To understand how changes in technology affect safety, including new ways to protect their online privacy and identity
  - How to report a range of concerns

#### In our Hospital Schools:

Online Safety is taught within the PSHE Curriculum and through awareness events such as Internet Safety Day. Teaching takes place in the classroom and at bedside by the Lead teacher and Teaching Assistants on a needs basis. SMART Targets are displayed and attention is regularly drawn to them. Digital parenting magazines are given to parents on the ward when applicable and information about keeping safe online is displayed in the classroom through displays and posters.

Online safety is also explicitly taught if there is a relevant and particular safeguarding concern. It is also possible for a long term pupil to follow specific online safety PSHE work provided by their Home School Curriculum. Due to time being limited for relationship building, the delivery of PSHE topics can be cohort dependent.

All pupils sign an acceptable use form before using Hospital School digital technology – including AV1 telepresence robots. Parents/carers are also given information about safe use of our online equipment.

#### In our Medical Pathway:

We ensure that when adults, young people or children are using the internet, social media or mobile devices, the safety and wellbeing of our pupils is prioritised.

We do this by providing:

- > explicit teaching of on-line safety during 1:1/group PSHE lessons
- > offering specific on-line safety workshops delivered by our Trust PCSO
- > displaying interactive on-line safety information and learning materials within our classroom.
- > providing our pupils with individual laptops and i pads whereby all access to internet sites is closely monitored in line with teaching and learning and not in isolation.
- > working in accordance with our Trust mobile phone policy, ensuring this is clearly explained to our pupils and closely monitored by all staff.
- > ensuring our pupils and parents are made aware of our acceptable use policy in relation to all internet and device use.
- > carefully supporting pupils with specific medical needs to select appropriate apps/playlists for relaxation, when medical incidences occur.
- > when accessing mainstream/dual school lessons via AV1 technology we use a contractual agreement which inherently includes on-line safety, conducive to good practice in teaching and learning.
- > our use of AV1 technology stipulates high restrictive access for pupils, in relation to on-line safety

---

By the end of secondary school, pupils will know:

- Their rights, responsibilities and opportunities online, including that the same expectations of behaviour apply in all contexts, including online
- About online risks, including that any material someone provides to another has the potential to be shared online and the difficulty of removing potentially compromising material placed online
- Not to provide material to others that they would not want shared further and not to share personal material which is sent to them
- What to do and where to get support to report material or manage issues online
- The impact of viewing harmful content
- That specifically sexually explicit material (e.g. pornography) presents a distorted picture of sexual behaviours, can damage the way people see themselves in relation to others and negatively affect how they behave towards sexual partners
- That sharing and viewing indecent images of children (including those created by children) is a criminal offence that carries severe penalties including jail
- How information and data is generated, collected, shared and used online
- How to identify harmful behaviours online (including bullying, abuse or harassment) and how to report, or find support, if they have been affected by those behaviours
- How people can actively communicate and recognise consent from others, including sexual consent, and how and when consent can be withdrawn (in all contexts, including online)

As detailed above, the safe use of social media and the internet will also be covered in other subjects where relevant.

Where necessary, teaching about safeguarding, including online safety, will be adapted for vulnerable children, victims of abuse and some pupils with SEND.

## **5. Educating parents/carers about online safety**

The Trust will raise parents/carers' awareness of internet safety in letters or other communications home, and in information via our website. This procedure will be available to parents/carers on the Raedwald Trust website. A hard copy can be provided upon request.

The school will let parents/carers know:

- What systems the school uses to filter and monitor online use
- What their children are being asked to do online, including the sites they will be asked to access and who from the school (if anyone) their child will be interacting with online

If parents/carers have any queries or concerns in relation to online safety, these should be raised in the first instance with the Head Teacher.

## **6. Cyber-bullying**

### **6.1 Definition**

Cyber-bullying takes place online, such as through social networking sites, messaging apps or gaming sites. Like other forms of bullying, it is the repetitive, intentional harming of 1 person or group by another person or group, where the relationship involves an imbalance of power.

---

## 6.2 Preventing and addressing cyber-bullying

To help prevent cyber-bullying, we will ensure that pupils understand what it is and what to do if they become aware of it happening to them or others. We will ensure that pupils know how they can report any incidents and are encouraged to do so, including where they are a witness rather than the victim.

The school will actively discuss cyber-bullying with pupils, explaining the reasons why it occurs, the forms it may take and what the consequences can be.

Teaching staff are also encouraged to find opportunities to use aspects of the curriculum to cover cyber-bullying. This includes personal, social, health and economic (PSHE) education, and other subjects where appropriate.

In relation to a specific incident of cyber-bullying, the school will follow their normal safeguarding processes as set out in the Safeguarding and Child Protection Policy. Where illegal, inappropriate or harmful material has been spread among pupils, the Trust will use all reasonable endeavours to ensure the incident is contained. The DSL/DDSLs will take the appropriate action which could include reporting to the police as soon as is reasonably practicable, if they have reasonable grounds to suspect that possessing that material is illegal. They will also work with external services if it is deemed necessary to do so.

## 6.3 Examining electronic devices

The Head Teacher, and any member of staff authorised to do so by the Head Teacher can carry out a search and confiscate any electronic device that they have reasonable grounds for suspecting:

- Poses a risk to staff or pupils, and/or
- Is identified in the school rules as a banned item for which a search can be carried out, and/or
- Is evidence in relation to an offence

Before a search, if the authorised staff member is satisfied that they have reasonable grounds for suspecting any of the above, they will also:

- Make an assessment of how urgent the search is, and consider the risk to other pupils and staff. If the search is not urgent, they will seek advice from [the Head Teacher / DSL / appropriate staff member]
- Explain to the pupil why they are being searched, how the search will happen, and give them the opportunity to ask questions about it
- Seek the pupil's co-operation

Authorised staff members may examine, and in exceptional circumstances erase, any data or files on an electronic device that they have confiscated where they believe there is a 'good reason' to do so.

When deciding whether there is a 'good reason' to examine data or files on an electronic device, the staff member should reasonably suspect that the device has, or could be used to:

- Cause harm, and/or
- Undermine the safe environment of the school or disrupt teaching, and/or
- Commit an offence

---

If inappropriate material is found on the device, it is up to [the staff member in conjunction with the DSL / Head Teacher / other member of the senior leadership team] to decide on a suitable response. If there are images, data or files on the device that staff reasonably suspect are likely to put a person at risk, they will first consider the appropriate safeguarding response.

When deciding if there is a good reason to erase data or files from a device, staff members will consider if the material may constitute evidence relating to a suspected offence. In these instances, they will not delete the material, and the device will be handed to the police as soon as reasonably practicable. If the material is not suspected to be evidence in relation to an offence, staff members may delete it if:

- They reasonably suspect that its continued existence is likely to cause harm to any person, and/or
- The pupil and/or the parent/carer refuses to delete the material themselves

If a staff member suspects a device could pose a risk to staff and/or pupils, or there is evidence in relation to an offence, or that it may contain an indecent image of a child (also known as a nude or semi-nude image), they will:

- Not view the image
- Inform the DSL/DDSL immediately, and raise an RT Safeguarding slip.
- The DSL/DDSL will make the decision on further action to be taken, this may include referring to the DfE's latest guidance on screening, searching and confiscation and the UK Council for Internet Safety (UKCIS) guidance on sharing nudes and semi-nudes: advice for education settings working with children and young people

Any searching of pupils will be carried out in line with:

- The DfE's latest guidance on searching, screening and confiscation
- UKCIS guidance on sharing nudes and semi-nudes: advice for education settings working with children and young people

Any complaints about searching, screening or confiscating will be dealt with through the Trust's Complaints Procedure.

## **7. Acceptable use of the internet in school**

All pupils and staff, volunteers and Trustees are expected to sign an agreement regarding the acceptable use of the Trust's ICT systems and the internet.

Visitors will be expected to read and agree to the Trust's terms on acceptable use if relevant.

Use of the Trust's internet must be for educational purposes only, or for the purpose of fulfilling the duties of an individual's role.

We will monitor the websites visited by pupils, staff, volunteers, Trustees and visitors (where relevant) to ensure they comply with the above and restrict access through filtering systems where appropriate.

---

## **8. Staff using work devices outside school**

All staff members will ensure they follow the schedule/policy RT Staff Handbook.

If staff have any concerns over the security of their device, they must seek advice from the RT Chief Financial Officer.

## **9. How the school will respond to issues of misuse**

Where a pupil misuses the Trust's ICT systems or internet, we will follow the procedures set out in our policies the Head Teacher alongside the safeguarding team (and Central Team where required) will decide on the appropriate action. The action taken will depend on the individual circumstances, nature and seriousness of the specific incident, and will be proportionate.

Where a staff member misuses the Trust's ICT systems or the internet, or misuses a personal device where the action constitutes misconduct, the matter will be dealt with in accordance with the RT Disciplinary Procedure and/or the RT Staff Code of Conduct.

The action taken will depend on the individual circumstances, nature and seriousness of the specific incident.

The Trust will consider whether incidents that involve illegal activity or content, or otherwise serious incidents, should be reported to the police.

## **10. Training**

All new staff members will receive training, as part of their induction, on online safety.

All staff members will receive refresher training at least once each academic year as part of safeguarding training, as well as relevant updates as required (for example through emails, and staff meetings).

All staff take part in annual cyber security training.

By way of this training, all staff will be made aware that:

- Technology is a significant component in many safeguarding and wellbeing issues, and that children are at risk of online abuse
- Children can abuse their peers online through:
  - Abusive, harassing, and misogynistic messages
  - Non-consensual sharing of indecent nude and semi-nude images and/or videos, especially around chat groups
  - Sharing of abusive images and pornography, to those who don't want to receive such content
- Physical abuse, sexual violence and initiation/hazing type violence can all contain an online element

Training will also help staff:

- Develop better awareness to assist in spotting the signs and symptoms of online abuse

- 
- Develop the ability to ensure pupils can recognise dangers and risks in online activity and can weigh up the risks
  - Develop the ability to influence pupils to make the healthiest long-term choices and keep them safe from harm in the short term

The DSL/DDSLs will undertake Safeguarding and Child Protection training regularly. They will also attend refresher DSL training every two years and update their knowledge and skills on the subject of online safety at regular intervals.

Trustees will receive safeguarding training which will include online safety.

Volunteers will receive appropriate training and updates, if applicable.

---

## APPENDIX E – HARMFUL SEXUAL BEHAVIOUR PROCEDURE

### 1. Legislative Background and Context

In the Sexual Offences Act 2003, the term Harmful Sexual Behaviour (HSB) covers a wide range of behaviours. HSB can occur online, offline or in a blend of both environments. The term HSB is widely acknowledged in child protection and should be treated in this context.

“Child-on-child” has evolved from the term “peer-on-peer” in recognition that age and development is a factor in making decisions about behaviour. A significant age difference between the children involved in an incident may lead to a decision about the behaviour being harmful or not. For example, this could be an older child’s behaviour towards a pre-pubescent child, or a younger child’s behaviour towards an older child with learning difficulties. It is important that designated safeguarding leads (DSL) and deputy designated safeguarding leads (DDSL) know what is and is not HSB.

DSLs/DDSLs should be involved in planning the curriculum for HSB, planning preventative actions and ensuring a whole-school culture that tackles HSB, alongside all other forms of abuse and harassment. This template policy provides a basis for an effective approach to managing sexual violence and harassment.

Harmful sexual behaviours can be self-directed, for example, using highly sexualised language, persistent private and or public masturbation, prolifically watching or searching for pornographic content/ age-inappropriate materials. To understand more about the range of behaviours that should be recognised as harmful, please refer to the [NSPCC Harmful sexual behaviour framework](#).

### 2. What is Sexual Violence?

The following are sexual offences under the [Sexual Offences Act 2003](#):

#### Rape

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

#### Assault by Penetration

A person (A) commits an offence if: s/he intentionally penetrates the vagina or anus of another person (B) with a part of her/his 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: s/he intentionally touches another person (B), the touching is sexual, B does not consent to the touching and A does not reasonably believe that B consents. (sexual assault covers a very wide range of behaviour so a single act of kissing someone without consent or touching someone’s bottom/breasts/genitalia without consent, can still constitute sexual assault.)



---

### **Causing someone to engage in sexual activity without consent**

A person (A) commits an offence if: s/he intentionally causes another person (B) to engage in an activity, the activity is sexual, B does not consent to engage 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.)

### **3. What is Sexual Harassment?**

Part 5 in the Keeping children safe in education statutory guidance (2023) states:

*When referring to sexual harassment we mean ‘unwanted conduct of a sexual nature’ that can occur online and offline and both inside and outside of school/college. When we reference sexual harassment, we do so in the context of child-on-child sexual harassment. Sexual harassment is likely to: violate a child’s dignity, and/or make them feel intimidated, degraded or humiliated and/or create a hostile, offensive or sexualised environment.*

*Whilst not intended to be an exhaustive list, sexual harassment can include:*

- *Sexual comments, such as: telling sexual stories, making lewd comments, making sexual remarks about clothes and appearance and calling someone sexualised names*
- *Sexual “jokes” or taunting*
- *Physical behaviour, such as: deliberately brushing against someone, interfering with someone’s clothes (schools and colleges should make clear that when any of this crosses a line into sexual violence – it is important to talk to and consider the experience of the victim) and displaying pictures, photos or drawings of a sexual nature; and*
- *Online sexual harassment may be standalone, or part of a wider pattern of sexual harassment and/or sexual violence. It may include:*
- *Consensual and non-consensual sharing of nude and semi-nude images and/or videos. Taking and sharing nude photographs of U18s is a criminal offence.*
- *Sharing of unwanted explicit content*
- *Upskirting (this is a criminal offence)*
- *Sexualised online bullying*
- *Unwanted sexual comments and messages, including, on social media*
- *Sexual exploitation; coercion and threats*

*It is important that schools and colleges consider sexual harassment in broad terms. Sexual harassment (as set out above) creates a culture that, if not challenged, can normalise inappropriate behaviours and provide an environment that may lead to sexual violence.*

### **4. Online**

This section is to help staff understand how online content and contact can be an element of, or impact on, the harmful sexual behaviour being displayed. It is important to understand every aspect of the child’s life to ensure a rounded response and this will include their online life. The behaviour may also be facilitated by online technologies.

Schools and colleges should recognise that sexual violence and sexual harassment occurring online (either in isolation or in connection with face-to-face incidents) can introduce a number of complex

---

factors. Amongst other things, this can include widespread abuse or harm across social media platforms that leads to repeat victimisation. Online concerns can be especially complicated, and support is available from a range of organisations – see the [Helpful Links](#) section below.

In the context of harmful sexual behaviour, children and young people may experience inappropriate contact online and threats. Inappropriate contact could include sexualised communications from peers, adults, or unknown people and or grooming. Online threats can include threats to share nude images or expose personal information. For this reason, schools should ensure they have an effective child protection policy which includes online safety. We suggest that this online procedure is robust, up-to-date and comprehensive. [Our online safety procedure is an example of good practice.](#)

## **5. Key Documents**

[Department for Education: Keeping children safe in education](#)

[Department for Education: Sharing Nudes and Semi-Nudes: Advice for Education Settings working with Young People](#)

[Department for Education: Working together to safeguard children](#)

The [Everyone's Invited](#) website was created with the mission to “expose and eradicate rape culture with empathy, compassion and understanding” and to provide “a safe place for survivors to share their stories completely anonymously”; attracting thousands of testimonials about incidents that occurred in schools in the UK. This highlighted a wide range of abuse scenarios involving children abusing other children. As a result, the then Education Secretary requested a rapid review into sexual abuse in schools and colleges in England. [Ofsted published its findings in June 2021](#). This led to a series of recommendations for schools, multi-agency partners and government, and resulted in Ofsted making changes to the school inspection handbook.

## **6. Ofsted's School Inspection Handbook**

The school inspection handbook states that Ofsted will look at how leaders ensure that their school's culture addresses harmful sexual behaviour. Inspectors will expect schools to assume that sexual harassment, online sexual abuse and sexual violence are happening in the community, and potentially in the school, even when there are no specific reports, and put in place a whole-school approach to address them.

Schools should have appropriate and well-communicated school-wide policies in place that make it clear that sexual harassment, online sexual abuse and sexual violence (including sexualised language) are unacceptable.

As a part of a school inspection, Ofsted will:

- Request that college leaders supply records and analysis of sexual harassment and sexual violence, including online, to inspectors
- Speak with groups of pupils, where this helps them to better understand a school or college's approach to tackling sexual harassment and violence, including online

- 
- Feed this part of the inspection into a judgement of safeguarding and leadership and management. If a school's processes are not adequate, Ofsted is likely to judge both their safeguarding practices and leadership and management as inadequate
  - The Independent Schools Inspectorate will also specifically request schools to provide the same records upon notification of inspection, in addition to its current practice
  - Your school's behaviour and safeguarding/child protection policies will likely be checked to see whether they set out clear and effective procedures to prevent and respond to incidents. It will be expected that you have a zero-tolerance approach to all harmful sexual behaviour

## **7. Statement of Intent**

Raedwald Trust has a zero-tolerance approach to any harmful sexual behaviour involving children and acknowledges that it could be occurring at our schools and in our school community. The Trust is proactive in its approach to assessing prevalence, responding to incidents and challenging and changing behaviour. This procedure applies to all Trustees, staff and learners.

Schools and colleges have a statutory duty to safeguarding the children in their setting. We work together to foster an environment that creates healthy relationships for children and young people. Our whole-school approach encourages healthy relationships and works to prevent harmful sexual behaviour. We provide high quality education within the curriculum to reduce the likelihood of the situations occurring.

We recognise that harmful sexual behaviour is harmful to both the child/children affected by the behaviours and the child/children who displayed the behaviour and provide ongoing support for all involved.

Our approach is to treat everything as a safeguarding incident in the first instance - we distinguish between behaviours that are exploratory and part of healthy age and ability appropriate development and those that may be harmful.

As a Trust we provide regular opportunities for staff to understand what harmful sexual behaviours might look like and what they should do in the event of a report. We do this by providing training and regular updates where possible.

We also use the RSHE curriculum to help educate students about these issues as well as regularly remind and promote reporting routes within school to ensure they know what to do should an incident occur.

## **8. Related Policies**

The following policies and procedures that should be read in conjunction with this procedure:

- Child Protection and Safeguarding Policies
- Whistleblowing Procedure
- Positive Behaviour Change Policy
- Anti-Bullying Procedure
- Online Safety Procedure

- 
- Acceptable Use Agreements
  - Use of External Agencies Procedure
  - Safer Recruitment Policy

## **9. Leaders and Designated Safeguarding Leads (DSLs)**

Our leaders and DSLs have ultimate responsibility in dealing with all incidents of harmful sexual behaviour, including online. It is the expectation that all incidents of harmful sexual behaviour/sexual violence and harassment are reported to the school in line with the Trust's safeguarding and child protection procedures. We ensure that our DSLs/DDSs receive appropriate training so that they are confident in Trust safeguarding processes. They know when it is necessary to escalate and have information on what national specialist support is available to support all children involved in harmful sexual behaviour and are confident as to how to access this support when required.

Our DSLs/DDSs have an in-depth working knowledge of key documentation, particularly KCSIE 2023. We ensure that they receive appropriate specialist training, commensurate with their role, and provide ongoing training for all Trust staff.

It is the role of school leaders and DSLs to ensure that all staff and Trustees receive training specific to harmful sexual behaviour and that it is included as part of induction.

## **10. Staff**

It is the responsibility of all staff to have read and understood this procedure and associated policies and procedures. All staff must report any incidents or suspected incidents of harmful sexual behaviour in line with Trust policy and ensure they are informed of the outcome. It is expected that all staff will challenge any harmful sexual language or inappropriate behaviour. Staff have a duty to ensure that the school environment is one which is safe, and which supports learners to understand safe and healthy relationships and appropriate behaviour through delivery of our curriculum.

## **11. Trustees**

We ensure our Trustees receive appropriate training about what harmful sexual behaviour is, when it can pose a risk to children and how to keep children safe. Our Trustees receive regular training and updates, both in terms of what sexualised behaviour is, but also how to effectively support establishments and their stakeholders whilst holding provision to account.

As part of the CEO's report, our Trust Board has the opportunity to monitor and evaluate the approach to harmful sexual behaviour to ensure it is adequate and effective. This includes evaluation of the curriculum, pupil voice activity and evaluation of parent/carers engagement. It is the responsibility of the Trustees to ensure that risks relating to these issues are identified, that a number of reporting routes are available, and that risks are effectively mitigated.

## **12. Learners**

All learners have the right to learn in a safe, healthy and respectful school environment. Our learners benefit from a broad and balanced curriculum. They are taught about healthy relationships and how and when to report and that a range of different reporting routes are available to them. Our learners are encouraged to report any harmful sexual behaviour, even if they are not directly involved. All

---

learners will be listened to if they make a disclosure and will be treated sensitively - whilst we cannot guarantee confidentiality, their requests will be considered when supporting them.

### **13. Parents/Carers**

We work hard to engage parents and carers by:

- Running regular in school sessions
- Sharing newsletters
- Sharing information online e.g., website, social media
- Providing curriculum information

Our parents and carers are made aware of how and when to report any concerns to the school, that all incidents will be handled with care and sensitivity, and that it may sometimes be necessary to involve other agencies.

### **14. Vulnerable Groups**

We recognise that, nationally, vulnerable learners may be more likely to be at risk of experiencing HSB. These include:

- A child with additional needs and disabilities
- A child living with domestic abuse
- A child who is at risk of/suffering significant harm
- A child who is at risk of/or has been exploited or at risk of exploited (CRE, CSE)
- A care experienced child
- A child who goes missing or is missing education
- Children who identify as, or are perceived as, LGBTQI+ and/or any of the other protected characteristics
- Children displaying HSB have often experienced their own abuse and trauma. We work to ensure that any vulnerable learner is offered appropriate support, both within and outside school, sometimes via specialist agencies

### **15. Training**

Through the provision of good quality training and support, we strive to foster in our DSLs/DDSs a good understanding of HSB. This will form part of their safeguarding training. Supporting them in planning preventative education and measures, drafting and implementing an effective child protection policy and incorporating the approach to sexual violence and sexual harassment into the whole school or college approach to safeguarding. The training includes:

- Brook traffic light tool
- NSPCC training
- Whole staff training

Our training strategy supports staff to respond effectively to different types of harassment and sexual misconduct incidents. An assessment of the training needs of all staff will be undertaken regularly and will form the basis of our training strategy. This strategy will be reviewed and evaluated on a regular basis to ensure it is fit for purpose.

---

Training will be made available on an ongoing basis for all staff and students to raise awareness of harassment and sexual misconduct with the purpose of preventing incidents and encouraging reporting where they do occur.

## **16. Helpful links**

### Child Exploitation and Online Protection command

CEOP is a law enforcement agency which aims to keep children and young people safe from sexual exploitation and abuse. Online sexual abuse can be reported on their website and a report made to one of their Child Protection Advisors.

### The NSPCC

provides a helpline for professionals at 0808 800 5000 and [help@nspcc.org.uk](mailto:help@nspcc.org.uk). The helpline provides expert advice and support for school and college staff, and will be especially useful for the designated safeguarding lead (and their deputies).

### Specialist Sexual Violence Sector Organisations

You can access support from specialist sexual violence sector organisations such as Rape Crisis or The Survivors Trust.

The Anti-Bullying Alliance has developed guidance for schools about Sexual and sexist bullying.

### The UK Safer Internet Centre

Provides an online safety helpline for professionals at 0344 381 4772 and <mailto:helpline@saferinternet.org.uk>. The helpline provides expert advice and support for school and college staff regarding online safety issues.

### Internet Watch Foundation

If the incident/report you are dealing with involves sexual images or videos that have been made and circulated online, the victim can be supported to get the images removed by the Internet Watch Foundation (IWF).

### Childline/IWF Report Remove

is a free tool that allows children to report nude or sexual images and/or videos of themselves that they think might have been shared online.

### UKCIS Sharing Nudes and Semi-nudes Advice

Advice for education settings working with children and young people on responding to reports of children sharing non-consensual nude and semi-nude images and/or videos (also known as sexting and youth produced sexual imagery).

### Thinkuknow

from NCA-CEOP provides support for the children's workforce, parents and carers on staying safe online.

---

The Centre of Expertise on Child Sexual Abuse has developed a range of helpful resources to identify and respond to child sexual abuse, including a guide for professionals supporting children following incidents of HSB.

#### Lucy Faithfull Foundation

is a UK-wide charity dedicated solely to preventing child sexual abuse. They work to prevent abuse from happening in the first place by working with all those affected including adult male and female abusers

#### Marie Collins Foundation

Support people to recover from technology assisted sexual abuse in childhood. We do this directly by supporting individuals and their families, and indirectly through advocacy and education.

#### NSPCC National Clinical and Assessment Service

(NCATS) a national service that offers assessment, treatment, consultation and training for and about children and young people where there are concerns about harmful sexual behaviour

#### Project deSHAME from Childnet

Provides useful research, advice and resources regarding online sexual harassment.

### **17. Education**

Our Trust's educational approach seeks to develop knowledge and understanding of healthy, problematic or sexually harmful behaviours, and empowers young people to make healthy, informed decisions. Our Trust's approach is delivered predominantly through PSHE and RSE with additional opportunities provided through:

- Cross curricular programmes (e.g., using the ProjectEVOLVE resources)
- Computing

Our approach is given the time it deserves and is authentic i.e., based on current issues nationally, locally and within our setting. It is shaped and evaluated by learners and other members of the Trust community to ensure that it is dynamic, evolving and based on need. We do this through:

- Surveys
- Focus groups
- Parental engagement
- Staff consultation
- Staff training

The following resources are used:

- ProjectEVOLVE - <https://projectevolve.co.uk>

### **18. Reporting**

Our systems are well promoted in order to be easily understood and easily accessible for children and young people to confidently report abuse, knowing their concerns will be treated seriously. All reports will be dealt with swiftly and sensitively and outcomes shared where appropriate. We also

---

respond to anonymous reports, or reports made by third parties. This can be done via the 'Report a Concern' on the Raedwald Trust website.

We also recognise that incidents will not always be reported directly to us, therefore we also train staff to recognise and spot signs of harmful sexual behaviour.

### **19. Responding to an Incident or Disclosure**

We recognise the importance of distinguishing between healthy, problematic and harmful sexual behaviour.

Our response is always based on sound safeguarding principles and follows Trust safeguarding processes. It is considered appropriate and puts the learner at the centre of all decisions made.

The Trust will always adopt a multi-agency approach and seek external support and guidance, in line with Trust policy, if deemed necessary. This may include MASH, Early Help, CAMHS, Police etc.

### **20. Risk Assessment**

The Trust may deem it necessary to complete a harmful sexual behaviour risk assessment as part of the response to any reported incidents. The purpose of the risk assessment is to protect and support all those involved by identifying potential risk, both in and out of school (e.g., public transport, after school clubs etc) and by clearly describing the strategies put in place to mitigate such risk.

The risk assessment will be completed following a meeting with all professionals working with the learner, as well as parents or carers. Where appropriate, the learners involved will also be asked to contribute.

The risk assessment will be shared with all staff who work with the learner, as well as parents and carers. It will respond to any changes in behaviour and will be regularly updated and evaluated to assess impact.