



Child Protection Policy

The designated safeguarding lead for Wroughton Academies is: Angie Chusonis.

The deputy designated safeguarding lead(s) for Academy are: Michelle Mann and Jo Snelling

The local authority's safeguarding procedures are available at:
<https://www.norfolkscb.org/about/policies-procedures/>

For immediate advice or in case of an emergency:

Designated Safeguarding Lead: **Angie Chusonis 01493 806780**

Deputy Designated Safeguarding Lead: **Michelle Mann/Jo Snelling 01493 806780**

Local Authority Children's Services: 0344 800 8021

NSPCC email: **help@nspcc.org.uk** or telephone **0808 800 5000**

Dedicated helpline for victims of sexual abuse in schools:

NSPCC: 0800 136 663

Scope

1. This policy defines a 'child' as anyone under the age of 18 years or any learner of any age on the academy roll.
2. This policy applies to all employed CET colleagues, including all permanent, temporary and support staff members, trainers, Academy Council Members, volunteers, contractors and external service or activity providers.
3. Creative Education Trust's Executive Safeguarding Lead is Director of Quality Assurance, Dr Jason Howard. The Chairperson of the Trustee's Safeguarding Committee is Diana Gerald.
4. The Principal/Headteacher is responsible for implementing this policy, publishing it on the school's website and ensuring that all staff at the school, including supply staff and volunteers are aware of and comply with it.
5. The Principal/Headteacher will ensure that the school has a designated safeguarding lead (DSL) who is a senior member of staff and a member of the school's leadership team, and one or more deputies.



6. The DSL will provide support to staff to carry out their safeguarding duties and will liaise closely with other services, such as children's social care. The designated safeguarding lead's duties are clearly outlined in his/her job description in line with the guidance in Annex C of *Keeping Children Safe in Education April 2021*. The Principal/Headteacher will ensure that the DSL and deputies are provided with sufficient time to carry out their duties and will ensure that supervision arrangements are in place to provide professional and emotional support.
7. This policy applies throughout the response to Covid-19 and must be applied along with the most recent addendum to the policy.
8. Safeguarding and promoting the welfare of children is defined as:
 - a) protecting children from maltreatment
 - b) preventing impairment of children's mental and physical health or development
 - c) ensuring that children grow up in circumstances consistent with the provision of safe and effective care
 - d) taking action to enable all children to have the best outcomes.

Principles

9. Creative Education Trust is committed to providing a safe and secure environment for pupils, staff and visitors and promoting a climate where pupils and adults feel confident about sharing any concerns that they may have about their own safety or the wellbeing of others.
10. Safeguarding is everyone's responsibility: all staff, Academy Council Members and volunteers must fulfil their full part in keeping children safe. We have a whole school approach to safeguarding. This means ensuring that safeguarding and child protection are at the forefront of, and underpin all, relevant processes and policy development and operate in the best interests of the child.
11. We follow a child-centred approach, informed by a clear understanding of the needs and views of children. We recognise the importance of enabling children to talk openly about anything that worries them, or to access well-publicised systems for reporting or disclosing abuse or harm, and to feel confident that they will be listened to.
12. The academy contributes to inter-agency working in line with the statutory guidance, *Working together to safeguard children*¹, and follows the local authority's safeguarding procedures set up by the three safeguarding partners.

¹ Working together to safeguard children, H M Government, July 2018 (updated December 2020) ³
Statutory framework for the early years foundation stage, Department for Education, March 2017



13. This policy is based on the DfE publication: *Keeping children safe in education, September 2021* and should be read in conjunction with that document. The policy is not intended to replicate the content of the DfE publication and it is a requirement that all staff read, understand and know the contents of part 1 of this document. The documents can be accessed via the following links:

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/999348/Keeping_children_safe_in_education_2021.pdf

<https://www.gov.uk/government/publications/working-together-to-safeguard-children--2>

14. This policy takes account of the welfare requirements for children under 5 years of age included in the *Statutory framework for the early years foundation stage*³.

15. This policy has due regard to statutory legislation and relevant guidance including, but not limited to:

- The Education Act (2002)
- Keeping Children Safe in Education (2021)
- Working Together to Safeguard Children (2018)
- What to do if you are worried about a child (2015)
- Information sharing: Advice for practitioners (2018)
- Guidance for safer working practice for adults who work with children and young people in education settings (2019)
- The Data Protection Act (2018)
- Serious Crime Act (2015)
- Teaching online safety in school (2018)
- UKCIS Education for a connected world (2018)
- Prevent Duty (2015)
- Sexual Offences Act 2003
- Preventing youth violence and gang involvement (2013)
- Criminal exploitation of children and vulnerable adults: county lines guidance (2018)

16. The policy is applicable to all on- and off-site activities undertaken by pupils whilst they are the responsibility of the school.

17. All staff have a responsibility to provide a safe environment in which children can learn. They must:

- a know who the academy's designated safeguarding lead (DSL) and any deputy designated safeguarding leads are



- b 'think the unthinkable' and accept that child abuse can happen anywhere, including in schools, maintaining an attitude of **'it could happen here'**
- c be alert to the signs of abuse
- d maintain an attitude that harmful sexual behaviour, sexual harassment/violence is never acceptable and will not be tolerated; being alert to inappropriate language and other possible indicators of abuse
- e raise any concerns with the designated safeguarding lead or a deputy
- f treat all abuse seriously, including peer-on-peer abuse, and never tolerate abuse or pass it off as 'banter', 'just having a laugh' or 'part of growing up'
- g understand that any adult in school can report their concerns directly to social care or the police, and that a referral should be made to children's social care immediately, following local processes if at any point a child is at risk of serious harm
- h refer to the Principal/Headteacher any low-level concern about another member of staff, and any allegations of abuse. If the concerns are about the Principal/Headteacher, these should be referred to the chair of the local Academy Council. If the chair of the local Academy Council is unavailable, staff should refer directly to the LADO and to the CEO of CET.
- i ensure that their safeguarding and child protection training is up to date
- j raise concerns about poor or unsafe practice and potential failures in the academy's safeguarding arrangements by referring these to the leadership team wherever possible or through the Whistleblowing Policy where this is necessary.
- k be aware of Norfolk and Norfolk Safeguarding Children Partnership safeguarding procedures (<https://www.norfolkscb.org/about/policies-procedures>) and ensuring these procedures are followed
- l seek early help where a child and family would benefit from coordinated support from more than one agency via Norfolk Safeguarding Children Partnership Multi-Agency Safeguarding Hub (MASH)
- m understand that safeguarding incidents and/or behaviours can be associated with factors outside the academy and/or can involve children who are not the academy's pupils. Staff, particularly the Designated Safeguarding Lead and deputies, must consider whether children are at risk of abuse or exploitation in situations outside their families. Extra-familial harms take a variety of different forms and children can be vulnerable to multiple harms including sexual exploitation, criminal exploitation and serious youth violence. This is known as contextual safeguarding
- n have a clear understanding about the wide range of safeguarding concerns, including those listed below. Further information about all of these is available in *Keeping Children Safe In Education 2021*:

- Abuse – including domestic, faith and relationship
- Bullying
- Children and the courts
- Children missing from education, home or care
- Children with family member in prison
- Child exploitation – county lines, child sexual exploitation, trafficking
- Drugs



- Honour-based abuse – FGM, forced marriage
- Health and well-being – fabricated illness, medical conditions, mental health
- Homelessness
- On-line – including the consensual or non-consensual sharing of nudes and semi-nude images or videos
- Private fostering
- Radicalisation – Prevent
- Violence – gangs, women and girls, sexual

18. The safeguarding of children is also part of other school policies. Staff should understand and follow:

- a Staff code of conduct
- b Anti-bullying policy
- c Behaviour for learning policy
- d Attendance policy, including children missing from education procedures for their school
- e First aid policy
- f Health and safety policy
- g Educational visits policy
- h Physical restraint policy
- i Safer recruitment policy
- j Supporting pupils with medical needs policy
- k E-safety policy
- l Public sector equality duty statement
- m Whistle blowing policy

Induction and training

19. As part of their induction, all new staff will be provided with a copy of this policy, part 1 of *Keeping Children Safe in Education 2021*, and access to all of the above policies.
20. They will also be introduced to the designated safeguarding lead who will explain his/her role and provide them with basic safeguarding training.
21. The Principal/Headteacher will determine the level of information that will be provided to temporary staff and volunteers.
22. All staff members will be provided with regular safeguarding and child protection training, at least annually, along with child protection updates as required, in order for them to have the relevant skills and knowledge to safeguard children effectively. All training follows the latest advice from the three safeguarding partners. Staff training will include training in online safety.



The Designated Safeguarding Lead

23. The Designated Safeguarding Lead will:

- take lead responsibility for safeguarding and child protection in the school
- ensure that he/she, and any deputies, have a complete safeguarding picture of the academy
- always be available, or ensure a deputy DSL is available, during term time and school hours for staff in school to discuss any safeguarding concerns
- undergo appropriate training which will be updated every two years in addition to updating his/her knowledge and skills at regular intervals to keep up to date with any developments relevant to the role
- ensure that all staff receive the appropriate training, and keep it up to date, in line with advice from Norfolk County Council
- maintain strong links with mental health agencies
- have an overview of all safeguarding concerns and follow the procedures set out in local guidance and in *Keeping Children Safe in Education* to ensure that appropriate action is taken in every case
- monitor all safeguarding concerns and escalate any concerns the DSL considers are meeting threshold for further intervention/assessment
- notify children's social care if there are concerns over unexplained absences of a pupil, following the Child Missing in Education (CME) policy and local procedure (<https://www.schools.norfolk.gov.uk/pupil-safety-and-behaviour/children-missing-education/contact-the-cme-team>)
- inform the local authority when a private fostering arrangement is in place
- review security within the academy regularly
- ensure that important safeguarding related policies, such as those for behaviour and bullying, are kept relevant and up to date
- have in place effective ways to identify emerging problems and potential unmet needs for individual children and families
- ensure that the curriculum makes best use of Citizenship and PSHE, RSHE opportunities to cover safeguarding issues with children
- ensure that at least one person on any appointment panel has undertaken safer recruitment training
- ensure the adherence to statutory responsibilities to check staff working with children, taking proportionate decisions on whether to ask for checks beyond what is required; ensure that volunteers are appropriately supervised
- ensure procedures are in place to handle allegations against members of staff and volunteers (though the Principal/Headteacher will lead on this process)
- ensure there are procedures in place to handle allegations against other children (peer-on-peer abuse) and that all staff are aware of these
- ensure that there is support available for staff involved in difficult child protection cases/incidents both at the academy and externally through counselling and/or other services



- create a culture of listening to children and taking account of their wishes and feelings, both in individual decisions and in the academy's development
- ensure that through the safeguarding curriculum that pupils know the process of raising a concern (about themselves or a friend/other), that they know the identities of the academy's Designated Safeguarding Lead (and deputy/deputies), and are aware of other support mechanisms such as ChildLine etc
- promote positive educational outcomes by knowing the issues that children in need have experienced/are experiencing
- knowing which children have a social worker and maintaining high aspirations for them
- ensure that staff are competent to carry out their responsibilities for safeguarding and promoting the welfare of children, and creating an environment where staff feel able to raise concerns and feel supported in their safeguarding role
- ensure that staff understand the importance of sharing information both internally and externally, keeping appropriate records
- supporting teaching staff to provide additional support to help children in need/those with a social worker to reach their educational potential
- ensure all records are kept up to date and secure and kept separately from the main pupil file in a locked location
- maintain written records, which must be signed and dated, of all child protection concerns, ensuring these are kept secure and confidential to those individuals and organisations that need to know
- ensure that all safeguarding concerns, discussions and decisions made, and the reasons for those decisions, are recorded in writing
- ensure that written records are up-to-date and in line with the statutory requirements in *Keeping Children Safe in Education 2021* as a minimum. Records will include a clear and comprehensive summary of the concern; details of how the concern was followed up and resolved; a note of any action taken, decisions reached, and the outcome. A separate child protection file will be kept for each child about which there are concerns.
- support staff who make referrals to the Channel programme
- have an overview of the numbers of safeguarding and child protection referrals made and share this with the principal and local Academy Council
- raise awareness of safeguarding and child protection amongst parents, making this and other relevant policies available; promote supportive engagement with parents
- ensure that child protection information is transferred to the pupil's new school/academy
- ensure that appropriate processes are followed when parents decide to home educate, including informing the local authority
- ensure that the Academy Council has a nominated safeguarding governor to liaise with the designated lead for Norfolk County Council and any partner agencies in the event of allegations of abuse made against the principal

The role of the Board of Trustees of the Trust and the Academy Council/Academy Improvement Board



24. This policy has been prepared by the Trust Safeguarding Lead and is reviewed annually, or more frequently as required.
25. The Academy Council/Academy Improvement Board will appoint a safeguarding governor who will visit the school regularly and meet with the designated safeguarding lead. He/she will provide a report at each Academy Council/Academy Improvement Board meeting using the Creative Education Trust safeguarding visit template to support the trust in fulfilling its requirement to ensure that the school's arrangements for safeguarding are effective.
26. Where the Academy Council allows the school premises to be used for non-school activities by organisations or individuals, they should ensure that the body concerned has appropriate safeguarding and child protection policies and procedures in place to keep pupils safe, as detailed within *Keeping Children Safe in Education 2021*¹.
27. The Principal/Headteacher will report statutory safeguarding information to the trust each half term using the standard Creative Education Trust academy report template.

The local context

28. This academy is Norfolk. The academy follows the procedures of and works with the three safeguarding partners (see link above).
29. Current local priorities are: domestic abuse; mental health, of both the parent and young person; neglect, and child exploitation. This includes: county lines, gang and youth violence and sexual exploitation.
30. The academy plays an active role in multi-agency approaches including: networking meetings and sharing collaborative working with other local primary schools and local agencies. Training is sought from the Local Authority and other specialists on a range of safeguarding concerns e.g. domestic violence, PREVENT and online safety.

Multi-agency working

31. This academy is committed to multi-agency working and we work closely with the following: (the LA re issues of attendance and punctuality, child protection, child in need and other social care needs; the clinical commissioning group in the LA re immunisation, FGM, PSHE topics (mental health and well-being, pregnancy, sex education etc.); the police re attendance issues, FGM, Prevent, British Values, issues within the wider community, GYV, knife crime, county lines etc.

Concerns about other staff members and procedures for dealing with allegations against staff (including supply staff and volunteers)

¹ See, in particular, para. 156.



32. We will seek to prevent people who pose risks to children from working in our academy by ensuring that all individuals working in any capacity have been subjected to safeguarding checks in line with the statutory guidance *Keeping Children Safe in Education 2021*. We recognise the possibility that adults working in the academy may harm children. Any concerns (allegations or low level) about the conduct of adults in the academy (including supply staff and volunteers and contractors) should be taken to the Principal/Headteacher without delay (or where that is not possible to the LADO and the Director of Quality Assurance at CET)
33. Where an allegation is made against a supply teacher, the Principal/Headteacher will immediately contact both the agency concerned and the LADO. The school will continue to support any investigation that is required.
34. If a staff member has concerns about the Principal/Headteacher or a member of head office staff, they must refer this to the Chief Executive Officer of Creative Education Trust.
35. If a staff member has concerns about the Chief Executive Officer of Creative Education Trust, they must refer this to the Chair of Trustees.
36. The person receiving the referral becomes the 'case manager'.
37. In all cases concerning staff members that appear to meet one or more of the criteria outlined in *Keeping Children Safe in Education*, the case manager must refer it to the designated officer at the local authority and/or the police to discuss the case and then follow the advice given. The criteria are that a member of staff or volunteer has:
 - a. behaved in a way that has harmed a child, or may have harmed a child
 - b. possibly committed a criminal offence against or related to a child
 - c. behaved towards a child or children in a way that indicates he or she may pose a risk of harm to children
 - d. behaved or may have behaved in a way that indicates they may not be suitable to work with children.
38. In all cases, the case manager should inform the accused person about the allegation as soon as possible after consulting the designated officer and in line with his/her advice. The case manager should act in such a way as to minimise stress and ensure that support is in place for the individual, advising them to contact their trades union or a colleague for support. Staff who are the subject of an allegation have the right to have their case dealt with fairly, quickly and consistently and to be kept informed of its progress. Suspension is neither mandatory nor automatic, but in some cases staff may be suspended where this is deemed to be the best way to ensure that children or the staff member are protected.
39. Where a pupil makes an allegation against a staff member, supply teacher or



volunteer, the allegation will be taken seriously and acted upon immediately. Parents will be contacted as soon as reasonably possible. The pupil will be offered support and their wishes will be carefully considered before any actions related to said pupil begin.

40. All those involved must follow the reporting restrictions introduced in The Education Act 2002 which prevent the publication of any material that may lead to the identification of a teacher who has been accused by, or on behalf of, a pupil from the same school. The reporting restrictions apply until the point that the accused person is charged with an offence, or the Secretary of State publishes information about an investigation or decision in a disciplinary case arising from the allegation.
41. If a person in regulated activity is dismissed or removed due to safeguarding concerns, or would have been had they not resigned, the case manager must make a referral to the Disclosure and Barring Service (DBS). **This is a legal duty and failure to refer when the criteria are met is a criminal offence.** The case manager must also consider whether to refer the case to the Secretary of State via the Teaching Regulation Agency.

Types of abuse and neglect

42. 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. The definitions below are from *Keeping Children Safe in Education*, September 2021. This publication provides additional information and links to other sources about specific types of abuse. Staff members should refer to these sources and to the designated safeguarding lead for further information.

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.

43. The physical signs of abuse may include:

- unexplained bruising, marks or injuries on any part of the body
- multiple bruises- in clusters, often on the upper arm, outside of the thigh
- cigarette burns
- human bite marks
- broken bones
- scalds, with upward splash marks
- multiple burns with a clearly demarcated edge



44. Most children will collect cuts, bruises and injuries and these should always be interpreted in the context of the child's medical and social history, developmental stage and the explanation given. Most accidental bruises are seen over bony parts of the body, e.g. elbows, knees, shins, and are often on the front of the body. Some children, however, will have bruising that is more than likely inflicted rather than accidental. Important indicators of physical abuse are bruises or injuries that are either unexplained or inconsistent with the explanation given, or visible on the 'soft' parts of the body where accidental injuries are unlikely, e.g. cheeks, abdomen, back and buttocks.
45. A delay in seeking medical treatment when it is obviously necessary is also a cause for concern.
46. Changes in behaviour that can also indicate physical abuse:
- increasingly withdrawn behaviours
 - fear of parents being approached for an explanation
 - aggressive behaviour or severe temper outbursts
 - flinching when approached or touched
 - running away from home
 - reluctance to get changed, for example in hot weather
 - depression

Emotional abuse:

47. Emotional abuse is 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.
48. Emotional abuse can be difficult to identify as there are often no outward physical signs. Indications may be a developmental delay due to a failure to thrive and grow. However, children who appear well cared for may nevertheless be emotionally abused by being taunted, put down or belittled. They may receive little or no love, affection or attention from their parents or carers. Emotional abuse can also take the form of children not being



allowed to mix or play with other children. It may involve conveying to children that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may also involve 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 also be imposing inappropriate expectations (for age or development stage) being imposed on a child. These may include interactions that are beyond the child's developmental capability, as well as overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction. It may involve seeing or hearing the ill treatment of another or causing children to feel frightened or in danger. It may involve serious bullying or the exploitation or corruption of children.

49. Changes in behaviour which can indicate emotional abuse include:

- being unable to play
- fear of making mistakes
- sudden speech disorders
- self-harm
- fear of parent being approached regarding their behaviour
- developmental delay in terms of emotional progress
- neurotic behaviour e.g. sulking, hair twisting, rocking

Neglect

50. Neglect is the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy due to 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.

51. The physical signs of neglect may include (but not limited to):

- Being constantly dirty or 'smelly'
- constant hunger, sometimes stealing food from other children
- losing weight, or being constantly underweight
- inappropriate or dirty clothing

52. Neglect may be indicated by changes in behaviour which may include:

- mentioning being left alone or unsupervised
- not having many friends
- complaining of being tired all the time
- not requesting medical assistance and/or failing to attend appointments



Vulnerable children and Early Help

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

- a) is showing signs of mental health problems
- b) is disabled and has specific additional needs
- c) has special educational needs (whether or not they have a statutory education, health and care plan)
- d) is a young carer
- e) is showing signs of being drawn into anti-social or criminal behaviour, including gang involvement and association with organised crime groups
- f) is frequently missing/goes missing from care or from home
- g) is misusing drugs or alcohol themselves
- h) is at risk of modern slavery, trafficking or exploitation
- i) is in a family circumstance presenting challenges for the child, such as substance abuse, adult mental health problems or domestic abuse
- j) has returned home to their family from care
- k) is showing early signs of abuse and/or neglect
- l) is at risk of being radicalised or exploited
- m) is a privately fostered child
- n) has a family member in prison or is affected by parental reoffending
- o) is at risk of 'honour' based abuse such as FGM or forced marriage
- p) is persistently absent from education, including persistent absences for part of the school day

54. Some vulnerable children will have a social worker. Local authorities should share information about these children with the school. The DSL will use this information to make decisions in the child's best interests and to respond quickly to unauthorised absence or children missing from education, for example.

55. The DSL will maintain a list of pupils who the school has identified to be at potential risk, including those with a social worker, and ensure that relevant staff are made aware and that these pupils are monitored closely and supported to achieve the best possible educational outcomes. Many of these children will be looked after children (LAC), or previously LAC, or have special educational needs or disabilities (SEND).

56. The most common reason for children becoming LAC is as a result of abuse and/or neglect. Staff must be clear about the care arrangements for individual LAC and be especially vigilant with regard to their well-being.

57. The designated safeguarding lead must have details of each LAC's social worker and the name of the virtual school Headteacher.



58. The DSL, in cooperation with the designated teacher for LAC, will liaise with the Local Authority Personal Adviser to ensure appropriate support for any care leavers in the academy.

59. Children with special educational needs and disabilities can face additional safeguarding challenges as adults can assume that indicators of possible abuse such as behaviour, mood and injury relate to the child's condition without further exploration. Children with SEND are often more prone to peer group isolation or bullying (including prejudice-based bullying) than other children. Children with SEND, or with certain medical conditions, do not necessarily show any signs or may have communication barriers and difficulties in managing or reporting these challenges. Staff must be especially vigilant for any signs of abuse and neglect with these children and not assume that any signs relate to a child's disability or special educational needs. We offer regular intervention sessions to support pupils with SEND, including small group work or one to one work, including meeting the emotional wellbeing needs of the children through sessions with our Pastoral manager or counsellor. Through these interventions, children have opportunities to discuss any worries they may have.

Sexual abuse

60. 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) regardless of whether the child is aware of what is happening. The activities may involve physical contact or 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).

61. Physical signs of sexual abuse may include:

- pregnancy
- pain or itching in the genital area
- bruising or bleeding near genital area
- sexually transmitted disease
- vaginal discharge or infection
- stomach pains
- discomfort when walking or sitting down

62. Changes in behaviour which can also indicate sexual abuse include:

- sexual knowledge which is beyond their age (or developmental level) or sexual drawings/language
- saying that they have secrets that they cannot tell anyone about



- sudden or unexplained changes in behaviour e.g. becoming aggressive or withdrawn
- fear of being left with a specific person or group of people
- having nightmares
- running away from home
- bedwetting
- eating problems such as overeating or anorexia
- self-harm or mutilation, sometimes leading to suicide attempts
- substance or drug abuse
- suddenly having unexplained sources of money
- not allowed to have friends (particularly in adolescence)
- acting in a sexually explicit way towards adults
- Sexual abuse is not solely perpetrated by adult males. Women also commit acts of sexual abuse, as can other children (peer-on-peer abuse).

Child criminal exploitation (CCE) and Exploitation of Vulnerable Adults (County Lines and Serious Violence)

63. CCE is a form of abuse and occurs where an individual, or group, takes advantage of an imbalance in power to coerce, manipulate or deceive a child into sexual or criminal activity.
64. Some specific forms of CCE can include children being forced or manipulated into transporting drugs or money through county lines, working in cannabis factories, shoplifting or pickpocketing. They can also be forced or manipulated into committing vehicle crime or threatening/committing serious violence to others.
65. Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including gender, sexual identity, cognitive ability, physical strength, status, and access to economic or other resources.
66. In some cases, the abuse will be in exchange for something the victim needs or wants, and/or will be to the financial benefit or other advantage (such as increased status) of the perpetrator or facilitator. The abuse can be perpetrated by individuals or groups, males or females, and children or adults.
67. The abuse can be a one-off occurrence or a series of incidents over time and range from opportunistic to complex organised abuse. It can involve force and/or enticement based methods of compliance and may, or may not, be accompanied by violence or threats of violence. Victims can be exploited even when activity appears consensual and exploitation can be facilitated and/or take place online. The experience of girls who are criminally exploited can be very different to that of boys.
68. Some of the following can be indicators of CCE:



- a. children who appear with unexplained gifts or new possessions
 - b. children who associate with other young people involved in exploitation
 - c. children who suffer from changes in emotional well-being
 - d. children who misuse drugs and alcohol
 - e. children who go missing for a period of time or regularly come home late
 - f. children who regularly miss school or do not take part in education.
69. County lines, where drugs are moved around by victims of CCE, frequently involve children and vulnerable adults who have been trafficked. County lines is the police term for urban gangs supplying drugs to suburban areas/market or coastal towns using dedicated mobile phone lines or “deal lines”.
70. It also involves child criminal exploitation (CCE), as gangs use children and vulnerable people to move drugs and money. Gangs establish a base in the market location, typically by taking over the homes of local vulnerable adults by force or coercion in a practice referred to as ‘cuckooing’. County lines is a major, cross-cutting issue involving drugs, violence, gangs, safeguarding, criminal and sexual exploitation, modern slavery, and missing persons; and the response to tackle it involves the police, the National Crime Agency, a wide range of Government departments, local government agencies and VCS (voluntary and community sector) organisations.
71. County lines activity and the associated violence, drug-dealing and exploitation has a devastating impact on young people, vulnerable adults and local communities.
72. In these cases the DSL will consider the need to involve the police who can use the National Referral Mechanism run by the National Crime Agency.
73. Signs to look out for:
- Going missing from school or home and / or being found out-of-area (though criminal gangs are becoming ‘wise’ to this method of identifying children that have been exploited and are moving to exploit children in the local area to avoid notice)
 - Unexplained acquisition of money, clothes, or mobile phones
 - Excessive receipt of texts / phone calls
 - Relationships with controlling / older individuals or groups
 - Leaving home / care without explanation
 - Suspicion of physical assault / unexplained injuries
 - Parental concerns
 - Carrying weapons
 - Significant decline in school results / performance
 - Gang association or isolation from peers or social networks
 - Self-harm or significant changes in emotional well-being
74. Where staff or volunteers have a concern around county lines, they should inform their DSL immediately, who will follow the local authority safeguarding procedures. Where there



is a risk of imminent harm an immediate referral to the police should be made. Contact Norfolk Children's Advice and Duty Service (CADS) on 0344 800 8020.

75. Regardless of gender or the role that they have been made to undertake, any child or adult who has experienced criminal exploitation is likely to have experienced, or to have been threatened with, serious violence to themselves or their family or community.

76. Serious violence indicators include:

- increased absence from school
- a significant decline in performance
- changes in friendships or relationships with older individuals or groups
- indicators of self-harm
- a significant change in well-being or signs of assault or unexplained injuries
- unexplained gifts or new possessions could also indicate that children have been approached by or involved with individuals associated with criminal networks or gangs

77. Staff training will include these signs and indicators in line with the Home Office guidance 'Preventing youth violence and gang involvement' and 'Criminal exploitation of children and vulnerable adults: county lines guidance (2018) and contextual safeguarding.

78. Colleagues are also trained on the additional risk factors associated with 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.

Preventing youth violence and gang involvement:

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/418131/Preventing_youth_violence_and_gang_involvement_v3_March2015.pdf

County Lines:

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/741194/HOCountryLinesGuidanceSept2018.pdf

Contextual Safeguarding Network:

<https://www.contextualsafeguarding.org.uk/>

Child Sexual Exploitation

79. CSE is a form of child sexual abuse. Sexual abuse may involve physical contact, including assault by penetration (for example, rape or oral sex), or nonpenetrative acts such as



masturbation, kissing, rubbing, and touching outside clothing. It may include noncontact activities, such as involving children in the production of sexual images; forcing children to look at sexual images or watch sexual activities; encouraging children to behave in sexually inappropriate ways; or grooming a child in preparation for abuse, including via the internet. CSE can occur over time, or be a one-off occurrence, and may happen without the child's immediate knowledge e.g. through others sharing videos or images of them on social media.

80. Child sexual exploitation (CSE) involves exploitative situations, contexts and relationships where young people receive something (for example food, accommodation, drugs, alcohol, gifts, money or in some cases simply affection) as a result of engaging in sexual activities. There is always an imbalance of power in the relationship. It is a form of sexual abuse. It is also important to recognise that some young people who are being sexually exploited do not exhibit any external signs of this abuse. CSE can affect any child, who has been coerced into engaging in sexual activities. This includes 16 and 17 year- olds who can legally consent to have sex.
81. Many children and young people who are victims of sexual exploitation do not recognise themselves as such. This can be an additional barrier to disclosure. Colleagues receive training and updates on CSE to ensure awareness of, and to mitigate, these additional difficulties to ensure children receiving appropriate intervention and support at the earliest opportunity.
82. Sexual exploitation can take many forms ranging from the seemingly 'consensual' relationship where sex is exchanged for affection or gifts, to serious organised crime by gangs and groups. The perpetrator holds some kind of power over the victim which increases as the exploitative relationship develops. Sexual exploitation involves varying degrees of coercion, intimidation or enticement, including unwanted pressure from peers to have sex, or sexual bullying including cyberbullying and grooming.

There are three main types of child sexual exploitation:

'Inappropriate relationships'

Usually involves just one abuser who has inappropriate power which might be physical, emotional or financial – or control over a young person. The young person may believe they have a genuine friendship or loving relationship with their abuser.

'Boyfriend'

Abuser grooms the victim by striking up a relationship with them, giving them gifts and meeting in cafés or shopping centres. A seemingly consensual sexual relationship develops but later turns abusive. Victims might be required to attend 'parties' and sleep with multiple men and are threatened with violence (directly or against family members) if they try to seek help.

'Organised exploitation and trafficking'



Victims are trafficked through criminal networks, often between towns and cities and are forced or coerced into sex with multiple men. They may also be used to recruit new victims. This serious organised activity can involve the buying and selling of young people.

For more information on CSE and a guide for practitioners please go to:

<https://www.gov.uk/government/publications/child-sexual-exploitation-definition-and-guide-for-practitioners>

Key indicators of children being sexually exploited may include:

- receiving unexplained gift or gifts from unknown sources
- associating with other young people involved in exploitation
- going missing for periods of time or regularly coming home late (please refer to the academy attendance policy)
- regularly missing education or not taking part
- displaying inappropriate sexualised behaviour
- having multiple phones
- mood swings or changes in emotional wellbeing
- being seen at strange meeting places (hotels or known places of concern)
- having older boyfriends / girlfriends (where the age difference might create an imbalance of power)
- self-harming / drug or alcohol misuse
- injuries (physical).

Academy safeguarding procedures for reporting any concerns apply. All concerns must be recorded and reported as soon as is reasonably possible and certainly on the same day that they arise.

The local response and support for CSE can be found at: <https://www.norfolk.gov.uk/children-and-families/keeping-children-safe/child-sexual-exploitation>

Peer on peer abuse

83. All staff should be aware that children can abuse other children, either inside of the academy or outside, and treat any concerns about peer-on-peer abuse in the same way as that involving adults. This is most likely to include, but may not be limited to:

- a. bullying (including cyber bullying, prejudice-based or discriminatory)
- b. abuse in intimate physical relationships between peers
- c. physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (this may include an online element which facilitates, threatens and/or encourages physical abuse)



- d. sexual violence, such as rape, assault by penetration and sexual assault (this may include an online element which facilitates, threatens and/or encourages physical abuse)
- e. sexual harassment, such as sexual comments, remarks, jokes and on-line sexual harassment, which may be stand-alone or part of a broader pattern of abuse
- f. causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party
- g. consensual and non-consensual sharing of nudes and semi-nude images and or videos (also known as sexting or youth produced/involved sexual imagery)
- h. upskirting; see below
- i. sexting; see below
- j. initiation/hazing type violence and rituals (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element).

84. Measures to minimise these risks are included in the anti-bullying and behaviour for learning policies. These policies must be applied in addition to child protection procedures when dealing with any issue of peer-on-peer abuse.

85. The academy does not accept and will not tolerate peer-on-peer abuse of any kind.

Sexual Violence and Sexual Harassment/Harmful Sexual Behaviour (HSB)

86. **Sexual harassment and sexual violence are never acceptable and will not be tolerated.** All staff understand that even if there are no disclosures in the academy, it does not mean it is not happening, it may be the case that it is just not being reported. As such all colleagues are trained to notice and identify signs and indicators of peer on-peer abuse and, where they have any concerns regarding peer-on-peer abuse, how to report these to the DSL or deputy through formal safeguarding systems.

87. Disclosures made by pupils will be believed and responded to. Pupils will be kept safe and never made to feel that they are creating a problem by reporting the abuse, sexual violence or sexual harassment. Incidents will be accessed and responded to on a case-by-case basis taking into account harm, immediate safety, pupil wishes and seeking advice and making referrals as required.

88. We will follow and adhere to Part 5 of KCSIE 2021 (statutory guidance) and Department for Education advice for schools 'Sexual violence and sexual harassment between children in school and colleges (2021)': https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/999239/SVSH_2021.pdf

It covers:



- how we prevent peer-on-peer abuse
- what sexual violence and harassment is
- schools' and colleges' legal responsibilities
- a whole school or college approach to safeguarding and child protection
- how to respond to reports of sexual violence and sexual harassment

The departmental advice, when referring to **sexual violence**, refers to sexual offences as described under the Sexual Offences Act 2003. This includes:

- rape
- assault by penetration
- sexual assault

89. The advice sets out that **sexual harassment** is 'unwanted conduct of a sexual nature' that can occur online and offline. It is likely to violate a child's dignity, and/or make them feel intimidated, degraded or humiliated and/or creates a hostile, offensive or sexualised environment. All staff should be aware that sometimes such abuse becomes normalised for a child, who then regards it as 'normal.'

90. We believe that all children have a right to learn in a safe environment. Academy leaders will minimise the risk of peer-on-peer abuse by: investigating all reported incidences of bullying, homophobic, racist or sexual abuse. The investigations will include pupil voice, discussions with staff members and parents.

91. Occasionally, allegations of a safeguarding nature may be made against pupils by others in the academy. Where this is the case an appropriate risk assessment and referrals will be undertaken to establish next steps to deal with the allegation. The peer-on-peer risk assessment will include as a minimum:

- If a relationship has previously existed in any format; is there an imbalance of power within their relationships?
- is the allegation of a serious nature?
- If the allegation includes a criminal offence, has the referral to the police and child service been made?
- Does this allegation raise risk factors for other pupils in the academy?
- Does the allegation indicate that other pupils may have been/could be affected by this pupil?
- Does the allegation indicate that young people outside the academy may be affected by this pupil?
- Does this allegation indicate that the contextual safeguarding within the academy environments should be reviewed?
- What support does this allegation indicate are needed for both the victim and alleged perpetrator of the peer-on-peer abuse?



92. Academy leaders will support the victims and perpetrators and alleged perpetrators of peer-on-peer abuse by: ensuring all victims are reassured that they are being taken seriously and that they are safe; ensure reports are managed by two members of staff; DSL to assess the risk and need of the victim, the perpetrator(s) and any other children involved; DSL will engage with children's social care or any other specialist services; DSL will engage with the family of the victim, perpetrator(s) and any other children involved; DSL to report to the police where necessary; refer to 'Sexual violence and sexual harassment between children at schools and colleges' for advice on how to support the victim and perpetrator(s).

Support for victims can be found at

- The Harbour Centre (SARC): <https://www.theharbourcentre.co.uk/are-you-under-18/are-you-under-13>
- Childline: <https://www.childline.org.uk/get-support/>
- Just One Number: <https://www.justonenorfolk.nhs.uk/> or 0300 300 0123

93. In all cases of alleged child-on-child sexual violence, staff and the DSL will refer to the detailed guidance contained in *Keeping Children Safe in Education 2021* and the additional documents it refers to, in addition to seeking advice from the local authority and the police as appropriate.

94. Reports of sexual violence and sexual harassment are likely to be complex and require difficult decisions to be made quickly, but staff will always adhere to the procedures set out in this policy.

95. Victims will always be reassured that they are being taken seriously, that they will be supported and kept safe. Where possible, two members of staff, including the DSL, will be present when managing reports from pupils.

96. Following the completion of investigations and any police action, perpetrators will be managed through the academy's behaviour for learning and anti-bullying policies.

97. All staff and volunteers must be aware that adults or children, who use children to meet their own sexual needs, abuse both girls and boys of all ages. In all cases, children who tell someone about sexual abuse do so because they want it to stop. It is important, therefore, that children are always listened to and taken seriously and (as in all cases of abuse or neglect) that our reporting system is followed systematically without fail.

Sharing of nude or semi-nude images: 'Sexting' 'Nudes' 'Pics'

98. We will adhere to the guidance issued by the UK Council for Child Internet Safety (2020) <https://www.gov.uk/government/publications/sharing-nudes-and-semi-nudes-advice-for-education-settings-working-with-children-and-young-people/sharing-nudes-and-semi-nudes-advice-for-education-settings-working-with-children-and-young-people>

99. The consensual or non-consensual sharing of nude or semi-nude images involves someone sharing sexual, naked or semi-naked images or videos of themselves (or others)



or sending sexually explicit messages. They can be sent, received or forwarded using any device that allows you to share media and messages. Sexting may also be called 'trading nudes', 'dirties', 'pic for pic' or 'pics.'

100. There are many reasons why a young person may want to send a naked or semi naked picture, video or message to someone else.

- joining in because they think that 'everyone is doing it'
- boosting their self-esteem
- flirting with others and testing their sexual identity
- exploring their sexual feelings
- to get attention and connect with new people on social media
- they may find it difficult to say no if somebody asks them for an explicit image, especially if the person asking is persistent
- exploitation or blackmail

101. It is easy to send a photo or message, but the sender has no control about how it's passed on. When images are stored or shared online, they become public. Some people may think that images and videos only last a few seconds on social media before they are deleted (such as Snapchat) but they can still be saved or copied by others. Images used on social media are, in many cases, owned by the media that the child has used; for example, anything in the Apple cloud is owned by Apple, and anything posted on Facebook is owned by Facebook, and will remain within their storage area. These storage areas are open to hacking and often are. This means that photos or videos which a young person may have shared privately could still end up being shared between adults they don't know.

102. However due to awareness campaigns, many young people are aware of the permanence of online images and need support and guidance in reducing the visibility of the image by contacting external agencies, support with parents and mental health and wellbeing provision.

103. Some sources of support for wellbeing and mental health that we recommend include:

- Just One Number: <https://www.justonenorfolk.nhs.uk/> or 0300 300 0123
- Point 1: Point1-support@ormistonfamilies.org.uk or <http://www.ormiston.org/what-we-do/mental-health-and-wellbeing/point-1/>
- Young Minds: <https://www.youngminds.org.uk/young-person/>
- MAP (for 11+): <https://www.map.uk.net/>

104. Associated risks of sexting include *blackmail*; offenders may threaten to share the pictures with the child's family and friends unless the child sends money or more images. *Unwanted attention*; Images posted online can attract the attention of sex offenders, who know how to search for, collect and modify images and pose an even greater personal risk to the young person. *Bullying*: If images are shared with their peers or in school, the child will be humiliated and



may be bullied. Emotional distress: children can feel embarrassed and humiliated. If they're very distressed this could lead to suicide or [self-harm](#).

105. All staff will be trained in online safety and will have a role in preventing young people from sexting. All staff will be available and approachable for pupils to make disclosures about sexting which will then be referred to the DSL for further investigation. Every child is different, so our approach will be based on their exact situation. We will seek to prevent young people sexting through educating them about the laws and potential consequences of sexting. This may be addressed through: e-safety sessions during lessons, specialised e-safety sessions, PHSE, and assemblies.
106. We will:
- Outline our expectations and explain the rules of having a mobile phone tablet or smartphone at Wroughton Academies.
 - Ask pupils what they feel is acceptable to send to other people, then discuss appropriate images and the dangers of inappropriate images (listed above)
 - Make sure pupils are comfortable saying no, that they know their body is private, and that being asked to share explicit images is inappropriate and illegal. Talk about whether a person who asks for an image from you might also be asking other people for images.
 - Explain to pupils about the importance of trust and consent in a healthy relationship.
 - Tell pupils that it's not all right for someone to make them feel uncomfortable, to pressure them into doing things that they don't want to do, or to show them things that they're unhappy about seeing.
 - Tell pupils what can happen if things go wrong, using real life examples such as television programs or news stories as far as possible, but also make clear that there is help and support to remove images and 'get through' any situation they or their peers find themselves in. Encourage them to seek support from us.
 - Provide details of support and coping strategies if the young person finds themselves in an uncomfortable position, such as contacting ChildLine if the situation has got out of control.
 - Let pupils know that they can speak to staff if this ever happens, and that disclosures will be treated confidentially and without embarrassment and support will be given.
 - Train staff to react calmly and listen to the concerns of the child and explain that they must share the information confidentially with the DSL.
107. When a child has been affected by the sharing of nude or semi-nude imagery we will:
- Recognise that if the child has been sending explicit images or videos of themselves, the child may feel anxious and there may be additional barriers due to perceived 'guilt' or the fear of having done something unlawful



- Recognise, while listening to the child, that they themselves may feel shocked, upset, angry, or confused. As an adult, avoid showing these emotions in any way
- Give ourselves time to process the information, remembering that the child will be watching their reactions
- Reassure the child that they aren't alone
- Listen and offer support – they're probably upset and need help and advice, never criticism or comments such as 'I told you not to do that'
- Not ask questions like "why have you done it" as this may stop them from opening up
- Discuss the problem and the wider pressures that they may face, to help them to understand what's happened, and any possible wider safeguarding concerns
- Assure the child that they'll do all they can to help and explain that they will seek the support of the DSL
- Remind them that they can always talk to [Childline](#) or another trusted adult if they aren't comfortable talking directly to the staff member.

108. If a child has shared an explicit image, we will:

- Ask them who they initially sent it to, their age, and if they know whether it's been shared with anyone else.
- Support the pupil to ask the social media site to remove the image and get in touch with [Childline](#). Together, Childline and the Internet Watch Foundation (IWF) will try to get the image removed.
- Alternatively, if it is in the best interests of the pupil, we will make a report direct to the [Internet Watch Foundation](#) (IWF). Childline is a confidential service, but to make a report on a child's behalf to the IWF we need to confirm who the child is and their date of birth.
- Staff need to provide Childline or IWF with a link to the image which may require the police (because staff should not look at the image) to be involved (assess this against the 'aggravating factors'). After the link is sent staff will not keep a copy of the image for evidence as it's illegal to share or store child abuse images.
- Discuss wider safeguarding concerns and agree who will be contacted and when they will contact parents/police/CEOP/ as appropriate to the case.
- Contact the [Child Exploitation and Online Protection Centre](#) (CEOP) as well as the police if the image was requested by an adult, as this is [grooming](#) which is illegal.
- If the image was requested by a school aged pupil not from this academy, we will contact the DSL at that school to raise awareness of potential wider safeguarding issues or circulation of the image in their school.

109. We will encourage the child to:



- Delete images from their social media accounts if they've have uploaded the image themselves
- If they're sharing an image which somebody else uploaded, consider asking that person to delete it
- If the image or video was shared over the web, not to comment on it or share it as this may mean the image is seen more widely.

110. If a child has been sent a sexually explicit image:

- Staff will ask them if they know the person who sent it and their age
- If the image was sent by another young person, staff may want to help the child to speak to the sender to try to stop future messages. If the child agrees, staff can also help them to block the sender on social media
- Staff should look at [Net Aware](#) for information and advice about this or contact the O2 and NSPCC online safety helpline on [0800 800 5002](tel:08008005002)
- If the image was sent by an adult, staff should contact [CEOP](#), the Child Exploitation and Online Protection Centre, as this may be part of the [grooming](#) process. Staff should follow local referral processes as appropriate.

111. A young person is breaking the law if they:

- Take an explicit photo or video of themselves or a friend. (We will follow the guidance on aggravating factors and when to report to the police. In most cases of consensual sharing of images, the police will not need to be notified. Where there is an aggravating factor that includes a form of abuse – incidents will be reported to the police)
- Share an explicit image or video of a child, even if it's shared between children of the same age
- Possess, download or store an explicit image or video of a child, even if the child gave their permission for it to be created
- However, as of January 2016, if a young person is found creating or sharing images, the police can choose to record that a crime has been committed but that taking formal action isn't in the public interest
- Crimes recorded this way are unlikely to appear on future records or checks, unless the young person has been involved in other similar activities which may indicate that they're a risk.

'Upskirting'



112. 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.
113. Any concerns related to upskirting must be reported to the DSL in line with the reporting process outlined within this policy.

Signposts for support or advice:

- **CEOP's [Thinkuknow](#)** gives advice for parents, as well as children and young people of different ages, on staying safe online. Thinkuknow have created [short videos](#) to help parents understand why children 'sext', how to talk to them about it and what to do if their child is affected.
- [Internetmatters.org](#) work to help parents keep their children safe online. They provide free advice on online issues affecting children, including [sexting](#) and [grooming](#).
- [The UK Safer Internet Centre](#) gives advice and resources for parents and professionals on online safety. Their website has links to games and quizzes for [primary](#) and [secondary](#) aged children that encourages them to be safe online.
- **O2 and NSPCC** Help Line: [0808 8005002](#)
- **Zipit app:** This app provides children with alternative images to send in response to a request for explicit images.

Domestic Abuse and Young People

114. The cross-government definition of domestic violence and abuse is: any incident or pattern of incidents of controlling, coercive, threatening behaviour, violence or abuse between those aged 16 or over who are, or have been, intimate partners or family members regardless of gender or sexuality.
115. The abuse can encompass but is not limited to: psychological; physical; sexual; financial; and emotional. All children can witness and be adversely affected by domestic abuse in the context of their home life where domestic abuse occurs between family members. Exposure to domestic abuse and/or violence can have a serious, long lasting emotional and psychological impact on children. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result. Children who witness domestic abuse are now categorised as victims of domestic abuse and those fleeing an area where domestic abuse has occurred should be given priority placements in schools through fair access arrangements.
116. We encourage pupils to come forward by raising awareness of the issue and teaching pupils about health relationships through SRE, the wider curriculum



and modelling behaviour in the academy.

117. The emotional responses of children who witness domestic violence may include fear, guilt, shame, sleep disturbances, sadness, depression, and anger (at both the abuser for the abuse and at the victim for being unable to prevent the abuse). Physical responses may include stomach aches and/or headaches, bedwetting, and loss of ability to concentrate. Some children may also experience physical or sexual abuse or neglect. Others may be injured while trying to intervene on behalf of the victim or a sibling.
118. The behavioural responses of children who witness domestic violence may include acting out, withdrawal, or anxiousness to please. The children may exhibit signs of anxiety and have a short attention span which may result in poor academic performance and attendance. They may experience developmental delays in speech, motor or cognitive skills. They may also use violence to express themselves displaying increased aggression with peers or family. They can become self-injuring.
119. If a child discloses that they have witnessed domestic abuse, or an adult linked to a child in your academy discloses that they are being abused staff and volunteers are directed to follow Wroughton Academies safeguarding procedures and report your concern to the DSL.
120. Incidents of domestic abuse have risen sharply during the 2020 Covid-19 pandemic.
121. Local police forces will inform schools of local cases, often through Operation Encompass. The DSL will ensure that any pupils reported to them are added to the list of vulnerable pupils and are supported appropriately in school.

Adolescent to Parent Violent Abuse

122. APVA is a hidden form of domestic violence and abuse that is often not spoken about. By raising awareness around this issue, we can provide better protection to victims and apply an appropriate safeguarding approach.

For more information on APVA go to:

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/420963/APVA.pdf

Honour-Based Abuse

123. 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.

124. 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.
125. It is important to be aware of this dynamic and additional risk factors when deciding what form of safeguarding action should take, once the concern has been shared with the Designated Safeguarding Lead (DSL) or deputy (DDSL).
126. All forms of HBV are abuse (regardless of the motivation) and should be handled and escalated as such. If in any doubt, staff should speak to the DSL (or deputy).

Female Genital Mutilation (FGM)

127. Female Genital Mutilation (FGM) refers to procedures that intentionally alter or cause injury to the female genital organs for non-medical reasons. The practice is illegal in the UK. 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.
128. Risk factors for FGM include:
 - a low level of integration into UK society
 - having a mother or a sister who has undergone FGM
 - girls who are withdrawn from PSHE
 - visiting female elder from the country of origin (where FGM is known to be prevalent)
 - being taken on a long holiday to the country of origin (where FGM is known to be prevalent)
 - talk about a ‘special’ procedure to become a woman
129. 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 academy especially with noticeable behaviour changes (e.g. withdrawal or depression) on the girl’s return
 - reluctance to undergo 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.
130. The Serious Crime Act 2015 sets out a duty on professionals (including teachers) to notify police when they discover that FGM appears to have been carried out on a girl under 18. This will usually come from a disclosure. Under no circumstances should staff physically examine pupils.
131. Staff must report to the police cases where they discover that an act of FGM appears to have been carried out and discuss any such cases with the Designated Safeguarding Lead (DSL) who will refer to children's social care. *The duty to report to the police does not apply in relation to at risk or suspected cases though staff will always refer to the DSL to take the next appropriate steps.*

For further advice from the Home Office on FGM please go to:
<https://www.gov.uk/government/collections/female-genital-mutilation>

For the multi-agency statutory guidance please go to:
<https://www.gov.uk/government/publications/multi-agency-statutory-guidance-on-female-genital-mutilation>

The following is a useful summary of the FGM mandatory reporting duty from the Home Office:
https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/496415/6_1639_HO_SP_FGM_mandatory_reporting_Fact_sheet_Web.pdf

Forced Marriage

132. A forced marriage is where one or both people do not (or in cases of people with learning disabilities, cannot) consent to the marriage and pressure or abuse is used. A marriage must be entered into with the free and full consent of both parties, there must be a choice.
133. Forced marriage is recognised as a form of violence against women and men, domestic/child abuse, and a serious abuse of human rights.
134. The pressure put on people to marry against their will can be physical (including threats, actual physical violence and sexual violence) or emotional and psychological (for example, when someone is made to feel like they're bringing shame on their family). In some case people may be taken abroad without knowing that they are to be married. When they arrive in that country, their passport(s)/travel documents may be taken to try to stop them from returning to the UK.
135. An *arranged* marriage is not the same as a forced marriage. In an arranged



marriage, the families take a leading role in choosing the marriage partner, but both parties are free to choose whether to enter into the marriage or not.

136. Forced marriage is an abuse of human rights, a form of violence against men and women. It is child abuse when it affects children and abuse of vulnerable people when it affects those with disabilities.
137. Where staff or volunteers have any reason to suspect that someone is experiencing pressure or being forced in marriage, they must report this to the DSL through the academy process.

For more information on forced marriage go to:

<https://www.gov.uk/government/publications/what-is-a-forced-marriage>

Breast Ironing/Flattening

138. Breast ironing or flattening is the process during which young pubescent girls' Breasts are ironed, massaged, flattened and/or pounded down over a period of time (sometimes years) in order for the breasts to disappear or delay the development of the breasts entirely. Girls aged between 9 and 15 have hot pestles, stones or other implements rubbed on their developing breast to stop them growing further. In the vast majority of known cases breast ironing is carried out by mothers or grandmothers and the men in the family are unaware.
139. The practice of breast ironing is seen as a protection to girls by making them seem 'child-like' for longer and reduce the likelihood of pregnancy. Once girls' breasts have developed, they are at risk of sexual harassment, rape, forced marriage and kidnapping; consequently, breast ironing is more prevalent in cities. It is seen by the perpetrator as a protective measure for the child.
140. Breast ironing is a form of physical abuse that has been condemned by the United Nations and identified as gender-based Violence. Although countries where breast ironing is prevalent have ratified the African Charter on Human Rights to prevent harmful traditional practices, the practice is not against the law.
141. Breast ironing does not stop the breasts from growing, but development can be Slowed down. Damage caused by the 'ironing' can leave women with malformed breasts, difficulty breastfeeding or producing milk, severe chest pains, infections and abscesses. In some cases, it may be related to the onset of breast cancer.
142. Concerns have been raised that breast ironing is also to be found amongst African communities in the UK, with as many as 1,000 girls at risk. Keeping Children Safe in Education (2021) mentions breast ironing as part of the section on so-called 'Honour' Based Abuse'.



143. Staff or volunteers worried about the risk of breast ironing in the academy should refer through the appropriate channels to the Designated Safeguarding Lead as soon as possible who will make a referral to children's services. If staff or volunteers are concerned that the girl is in immediate danger, contact the police by calling 999.
144. The DSL will also contact the Foreign and Commonwealth Office if the girl has been taken abroad:
- telephone: 020 7008 1500
 - from overseas: +44 (0)20 7008 1500

For more information on breast ironing or flattening go to:
<http://nationalfgmcentre.org.uk/breast-flattening/>

Radicalisation and extremism

145. The Counter-Terrorism and Security Act, 2015, places a duty on specified authorities, including local authorities and childcare, education and other children's services providers, in the exercise of their functions, to have due regard to the need to prevent people from being drawn into terrorism "the Prevent Duty".
146. 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 Designated Safeguarding Lead (DSL).
147. The designated safeguarding lead will undertake Prevent awareness training and ensure that all staff are suitably trained and kept up to date in order that they are equipped to identify children at risk of being drawn into terrorism and to challenge extremist ideas.
148. The designated safeguarding lead will guide staff to ensure that any concerns that a child might be vulnerable to radicalisation are referred to Channel when appropriate.

Channel guidance is available at: <https://www.gov.uk/government/publications/channel-guidance>

149. We use the safeguarding through the curriculum to ensure that children and Young people understand how people with extreme views share these (including online) to radicalise others.
150. 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 our 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.



151. The school will work closely with parents, unless it has specific reason to think that this would put the child at risk, to identify early signs of radicalisation, keeping them informed about any concerns in school and pointing them towards the right support mechanisms.
152. Through the E-safety policy, the school will have in place measures to prevent Children from accessing terrorist and extremist material on the internet.
153. 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 academy
 - 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 or artwork 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

For the revised Prevent Duty Guidance please go to:

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/445977/3799_Revised_Prevent_Duty_Guidance_England_Wales_V2-Interactive.pdf

For further guidance for schools and childcare providers on preventing children and young people from being drawn into terrorism from the Home Office please go to:

<https://www.gov.uk/government/publications/protecting-children-from-radicalisation-the-prevent-duty>

The Government's 'Educate Against Hate' provides information on training resources for teachers, staff and school and college leaders, such as Prevent e-learning, via the Prevent Training catalogue.

<https://educateagainsthate.com/>

Mental Health

154. Staff should also be aware that mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation.



155. Only appropriately trained professionals should attempt to make a diagnosis of a mental health problem. Staff however, are well placed to observe children day-to-day and identify those whose behaviour suggests that they may be experiencing a mental health problem or be at risk of developing one.
156. Where children have suffered abuse and neglect, or other potentially traumatic adverse childhood experiences, this can have a lasting impact throughout childhood, adolescence and into adulthood. It is key that staff are aware of how these children's experiences, can impact on their mental health, behaviour and education.
157. We will ensure that we have clear systems and processes in place for identifying possible mental health problems, including routes to escalate and clear referral and accountability systems.
158. Where children have suffered abuse and neglect, or other potentially traumatic adverse childhood experiences (ACEs), this can have a lasting impact throughout childhood, adolescence and into adulthood. We will ensure that staff are aware of how these children's experiences, can impact on their mental health, behaviour and education.
159. We seek to embed positive mental health and mental health awareness through our academy to create a culture where pupils can self-identify, signpost peers and seek support themselves. We undertake staff training and promote mental health awareness through the PSHE schemes.
160. If staff have a mental health concern about a child that is also a safeguarding concern, they must immediately report this using the school's procedures.

Useful information:

<https://www.gov.uk/government/publications/mental-health-and-behaviour-in-schools--2>

<https://www.gov.uk/government/publications/promoting-children-and-young-peoples-emotional-health-and-wellbeing>

<https://campaignresources.phe.gov.uk/schools/topics/rise-above/overview>

Safeguarding and the curriculum

161. We ensure that pupils are taught about safeguarding, including online safety, through various teaching and learning opportunities, as part of providing a broad and balanced curriculum including the DfE's 'Teaching online safety in school (June 2018) and UKCIS 'Education for a connected world' (Feb, 2018) and the four areas of risk in *Keeping Children Safe in Education 2021*: content, contact, conduct and commerce.



https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/811796/Teaching_online_safety_in_school.pdf

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/759003/Education_for_a_connected_world_PDF.PDF

162. We understand that it is essential that children are safeguarded from harmful online content and wider online harms. We take a whole school approach that protects, empowers and educates pupils and staff in their use of technology and establishes mechanisms to identify, intervene in, and escalate any concerns where appropriate.
163. We ensure that pupils are taught about safeguarding, including online safety, through various teaching and learning opportunities, as part of providing a broad and balanced curriculum including the DfE's 'Teaching online safety in school (June 2018)' and UKCIS 'Education for a connected world' (Feb, 2018) and the four areas of risk in *Keeping Children Safe in Education*: content, contact, conduct and commerce.

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/811796/Teaching_online_safety_in_school.pdf

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/759003/Education_for_a_connected_world_PDF.PDF

164. The relationships and sex education policy includes teaching about safe relationships.

Mobile phones and cameras

165. The use of personal mobile phones or cameras by pupils or staff is not permitted at any time when pupils are present. The only exception to this is the use of a mobile phone to make calls during an emergency situation.
166. Staff and supervised pupils may use school cameras for educational purposes with the approval of the Principal/Headteacher.

Safer Recruitment

167. We will ensure that the statutory Safer Recruitment practices are always followed (KCSIE 2021)
168. The school operates a safer recruitment policy to ensure that all staff employed by the school are suitable for the posts they are employed for and all volunteers are suitable to work with children.
169. Every interview panel will have at least one member who has a certificate in Safer Recruitment. We will check on the identity of candidates, follow up references with referees and scrutinise applications for gaps in employment. We will record the



answers to safeguarding questions asked during the interview process on staff personnel files. We will ensure that safeguarding considerations are at the centre of each stage of the recruitment process.

170. Pupils will be included within recruitment processes in a meaningful manner.
171. We will ensure that agencies and third parties supplying staff provide us evidence that they have made the appropriate level of safeguarding checks on individuals working in our academy.
172. We will ensure that any alternative provision facility working with the academy provide us evidence that they have made the appropriate level of safeguarding checks on individuals working in their provision.
173. Every job description and person specification will have a clear statement about the safeguarding responsibilities of the post holder.
174. We will ensure that all staff involved in recruitment are aware of government guidance on safer recruitment and that its recommendations are followed.
175. The Disclosure and Barring Service (DBS) helps employers make safer recruitment decisions and prevent unsuitable people from working with vulnerable groups, including children. We will ensure the correct level of DBS certificate is sought and ensure a prohibition check is undertaken.
176. The types of checks undertaken will be in accordance with the guidance given in *Keeping Children Safe in Education 2021*. We will not accept CVs from candidates in place of application forms. Shortlisted candidates will complete a self-declaration of any criminal record or information that might mean they are unsuitable to work with children.
177. We will check a candidate's name on their birth certificate in case they have changed their identify.
178. Any offer of appointment made to a successful candidate (including one who has lived or worked abroad) will be conditional on satisfactory completion of the necessary pre employment checks as required in the guidance given in *Keeping Children Safe in Education 2021*.
179. Where an enhanced DBS Certificate is required, it will be obtained from the candidate before, or as soon as is practicable after, the person is appointed. Where a candidate is using the DBS update service, we will still obtain the original DBS certificate.
180. We will carry out a Section 128 check on those applying for the post of



headteacher, principal, deputy/assistant headteacher, academy council member and any other individual whose additional responsibilities could be considered to constitute 'taking part in management.'

181. We will keep records of vetting has been carried out, the result and the recruitment decision made after relevant information has been destroyed.
182. We will always ask for written information about previous employment history and check that information is not contradictory or incomplete. Reference will be sought on all shortlisted candidates, including internal ones, before interview, so that any issues or concerns they raise can be explored with the referee and taken up with the candidate at interview. (Unless in some instances where candidates have expressly denied permission for the employer to approach their referees). In these cases, references will be taken up before the candidate's appointment. References from a previous employer should be completed by a sufficiently senior person, such as the principal/headteacher.
183. The academy leaders will keep a single central record, in accordance with the regulations given in *Keeping Children Safe in Education 2021*.
184. Recruitment and employment checks will be undertaken, as stated in *Keeping Children safe in Education 2021*.
185. We reserve the right to carry out all relevant and necessary checks if there is concern about an existing member of staff and will refer to the LADO and DBS and other relevant agencies anyone who has harmed or poses a risk of harm to a child or vulnerable adult.
186. The SCR will be monitored to ensure that it is accurate and up to date as follows:
 - a. The Principal and the Designated Safeguarding Lead will have access to undertake spot checks to assure themselves that the appropriate processes are being followed, or to verify information that may be connected to a safeguarding concern;
 - b. The designated safeguarding lead member of the Academy Council or Academy Improvement Board will inspect the SCR as part of their routine safeguarding reviews and report to the Board that robust processes are in place;
 - c. An annual review will be undertaken by the Head Office team to ensure that the required safeguarding standards are in place and the SCR will be included in this review.

Staff Training



187. Every year all staff (including non-teaching and volunteers) must undertake safeguarding training. This is recorded and logged. All staff are informed clearly on how to report anything of concern to the DSL, Angie Chusonis, or DDSLs, Michelle Mann or Jo Snelling, immediately.
188. All new members of staff, including newly-qualified teachers and teaching assistants, will be given an induction that includes basic child protection training on how to recognise signs of abuse, how to respond to any concerns, e-safety and familiarisation with the safeguarding and child protection policy, behaviour for learning policy, staff code of conduct, systems and processes for CME and Keeping Children Safe in Education: Statutory Guidance for Academies and Colleges, Part One (September 2021), and other related policies.
189. The Designated Safeguarding Lead will undergo updated child protection training for DSLs every two years and in addition to formal training, their knowledge and skills will be refreshed at least annually.
190. All Academy Council members must undergo annual governor specific safeguarding training.
191. Staff members who miss the whole-academy training will be required to undertake other relevant in-house training to remedy this.
192. We will ensure that staff members provided by other agencies and third parties, e.g. supply teachers and contractors, have received appropriate child protection training commensurate with their roles before starting work. They will be given the opportunity to take part in whole-academy training if it takes place during their period of work for the academy.
193. The Designated Safeguarding Lead will provide at least an annual briefing to the academy on any changes to child protection legislation and procedures and relevant learning from local and national child safeguarding practice reviews.
194. The academy leaders will maintain accurate records of staff induction and training.

Record keeping

195. Staff should only discuss concerns with the DSL/DDSL, Principal or chair of the Academy Council (depending on who is the subject of the concern). That person will then decide who else needs to have the information and they will disseminate it on a need-to-know basis.
196. All staff will understand that child protection issues warrant a high level of confidentiality, not only out of respect for the pupil and staff involved, but also to



ensure that anything being released into the public domain does not compromise evidence. We will act in accordance with GDPR 2018.

197. The DSL ensures that all safeguarding concerns are recorded in writing and that all notes are signed, dated and stored securely and separate from educational records. The records may only be accessed by the designated safeguarding lead, any deputy safeguarding leads and the senior leaders of the school. The Academy Council governor responsible for safeguarding may make appropriate quality assurance checks of record-keeping.
198. Child Protection records are not open to pupils or parents. Paper records of concern forms and other written information will be stored in a locked facility accessed only by the Designated Safeguarding Lead and those identified as appropriate within the academy. Any electronic information will be password protected and only made available to relevant individuals. Every effort will be made to prevent unauthorised access. Sensitive information will not be stored on laptop computers, which, by the nature of their portability, could be lost or stolen. If it is necessary to store child protection information on portable media, such as a CD or flash drive; these items will also be password protected and kept in locked storage.
199. Child protection information will be stored separately from the pupil's academy file and the academy file will be 'tagged' to indicate that separate information is held. If such records need to be sent to a new school or academy, they will be sent separate from the pupil's file and under a confidential cover or in an encrypted electronic file.
200. Child protection records are normally exempt from the disclosure provisions of the Data Protection Act, which means that children and parents do not have an automatic right to see them. If any member of staff receives a request from a pupil or parent to see child protection records, they will refer the request to the Principal or Designated Safeguarding Lead. The Data Protection Act does not prevent academy staff from sharing information with relevant agencies, where that information may help to protect a child.
201. Academy Councils and proprietors should ensure relevant staff have due regard to the relevant data protection principles, which allow them to share (and withhold) personal information, as provided for in the Data Protection Act 2018 and the GDPR. This includes:
 - being confident of the processing conditions which allow them to store and share information for safeguarding purposes, including information which is sensitive and personal, and should be treated as 'special category personal data'.
 - understanding that 'safeguarding of children and individuals at risk' is a processing condition that allows practitioners to share special category personal data. This includes allowing practitioners to share information without consent where there is good reason to do so, and that the sharing of information will enhance the safeguarding of a child in a timely manner but it is



not possible to gain consent, it cannot be reasonably expected that a practitioner gains consent, or if to gain consent would place a child at risk.

- for schools, not providing pupils' personal data where the serious harm test under the legislation is met. For example, in a situation where a child is in a refuge or another form of emergency accommodation, and the **serious harms test** is met, they must withhold providing the data in compliance with schools' obligations under the Data Protection Act 2018 and the GDPR. Where in doubt schools should seek independent legal advice.

Link to serious harm test:

<https://www.gov.uk/guidance/making-barring-referrals-to-the-dbs#what-is-the-harm-test>

Link to new data protection tool kit for schools:

<https://www.gov.uk/government/publications/data-protection-toolkit-for-schools>

202. Records will be shared with other agencies as appropriate. The Data Protection Act 2018 and GDPR do not prevent the sharing of information for the purposes of keeping children safe. Fears about the sharing of information will never be allowed to stand in the way of the need to safeguard and promote the welfare and protect the safety of children.
203. The school will seek parental consent before making a Child in Need (S17) referral to Children's Social Care (Children's Services). If consent is withheld, consideration will be given to the potential impact of this for the child and to the need for a child protection referral (S47), which does not require parental consent. The school will take into account the views and wishes of the child who is the subject of the concern but staff will be alert to the dangers of colluding with dangerous 'secrets'.
204. When a child moves to another school, the designated safeguarding lead ensures that all safeguarding records are sent securely to the new school and separate from educational records. The academy must ensure that safe receipt is confirmed. Where the DSL considers it to be appropriate, he/she will share child protection information about a pupil with a new school in advance of a pupil transferring. For example, to allow the receiving school to have procedures in place to support a victim of abuse without delay.

Photography and Images

205. The vast majority of people who take or view photographs or videos of children do so for entirely innocent, understandable and acceptable reasons. Sadly, some people abuse children through taking or using images, so we must ensure that we have some safeguards in place.
206. To protect pupils, we will:



- Seek their consent for photographs to be taken or published (for example, on our website or in newspapers or publications)
- Seek parental consent when their child joins the school
- Use only the pupil's first name with an image
- Ensure pupils are appropriately dressed
- Encourage pupils to tell us if they are worried about any photographs that are taken of them.

207. Parents, carers or relatives may only take still or video photographic images of pupils in the academy or on academy-organised activities with the prior consent of the academy and then only in designated areas. If parents do not wish their children to be photographed or filmed and express this view in writing, their rights will be respected. At Wroughton Academies a permission form is completed on entry to provide permission for taking and using photographs or videos in school, on the website, on school publications, on social media or in the press. This information can be amended by contacting the school office.

Private Fostering

208. A private fostering arrangement is one that is made privately (without the involvement of a local authority) for the care of a child under the age of 16 years (under 18, if disabled) by someone other than a parent or close relative, in their own home, with the intention that it should last for 28 days or more.
209. A close family relative is defined as a 'grandparent, brother, sister, uncle or aunt' and includes half-siblings and step-parents; it does not include great-aunts or uncles, great grandparents or cousins.
210. 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. If a member of staff becomes aware of an arrangement such as this, they should report via CPOMS to ensure that the DSL is fully aware of the situation for that child.
211. 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 are involved in trafficking, child sexual exploitation or modern-day slavery.
212. We 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 academies 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 academy. However, it should be clear to the academy who has parental responsibility.



213. Academy staff will notify the DSL 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 academy itself has a duty to inform the local authority of the private fostering arrangements.
214. In addition, on admission to Wroughton Academies, we will take steps to verify the relationship of the adults to the child who is being registered.

Children who go missing in education

215. In order to try to prevent children going missing in education all parents are requested to provide at least two emergency contact numbers for each pupil. All contact numbers provided are held on a pupil's record.
216. The school will maintain an admission register and attendance registers in line with statutory requirements.
217. The school will inform the local authority before it removes a child from the Admission register where the pupil:
 - a. has been taken out of school by their parents and the school has received written notification from the parent they are being educated outside the school system e.g. home education
 - a. has ceased to attend school and no longer lives within reasonable distance of the school at which they are registered
 - b. has been certified by the school medical officer as unlikely to be in a fit state of health to attend school before ceasing to be of compulsory school age, and neither he/she nor his/her parent has indicated the intention to continue to attend the school after ceasing to be of compulsory school age
 - c. is in custody for a period of more than four months due to a final court order and the Principal/Headteacher does not reasonably believe they will be returning to the school at the end of that period
 - d. has been permanently excluded.
218. The school will inform the local authority of any pupil who fails to attend school regularly or has been absent without the school's permission for a period of 10 consecutive school days or more.