



STATEMENT OF INTENT

Eagle House Group is committed to safeguarding and promoting the welfare, both physical and emotional, of every pupil both inside and outside of the school premises. We implement a whole-school preventative approach to managing safeguarding concerns, ensuring that the wellbeing of pupils is at the forefront of all action taken.

This policy sets out a clear and consistent framework for delivering this promise, in line with safeguarding legislation and statutory guidance.

It will be achieved by:

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

EAGLE HOUSE MISSION – UNLOCKING THE POTENTIAL OF CHILDREN WITH AUTISM

Our vision is for each learner to live everyday life with a sense of self-worth, ambition and belonging by:

- Offering them an irresistible invitation to learn
- Supporting them to be all they are capable of being
- Valuing everyone as a unique individual
- Empowering them to overcome barriers presented by their autism
- Giving them the skills to communicate with confidence
- Encouraging them to develop their special interests into future vocational skills

Signed:

Heads of Education:

Date: 21/11/2018

CEO:

Date: 21/11/2018

Safeguarding Director:

Date: 21/11/2018

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1. POLICY STATEMENT AND PRINCIPLES

The school's safeguarding arrangements are inspected by Ofsted under the judgments for personal development, behaviour and welfare, and leadership and management.

Our core safeguarding principles are:

- the school's responsibility to safeguard and promote the welfare of children is of paramount importance
- safer children make more successful learners
- policies will be reviewed at least annually unless an incident or new legislation or guidance suggests the need for an interim review

Child protection statement

We recognise our moral and statutory responsibility to safeguard and promote the welfare of all pupils. We endeavour to provide a safe and welcoming environment where children are respected and valued. We are alert to the signs of abuse and neglect and follow our procedures to ensure that children receive effective support, protection and justice.

The procedures contained in this policy apply to all staff and directors and are shared with each placing authority's safeguarding children board (LSCB).

Policy principles

- Welfare of the child is paramount
- All children, regardless of age, gender, ability, culture, race, language, religion or sexual identity, have equal rights to protection
- All staff have an equal responsibility to act on any suspicion or disclosure that may suggest a child is at risk of harm
- Pupils and staff involved in a child protection issue will receive appropriate support

Policy aims

- To provide all staff with the necessary information to enable them to meet their child protection responsibilities
- To ensure consistent good practice
- To demonstrate the school's commitment with regard to child protection to pupils, parents/carers and other partners

Terminology

- **Safeguarding** and promoting the welfare of children refers to the process of protecting children from maltreatment, preventing the impairment of health or development, ensuring that children grow up in circumstances consistent with the provision of safe and effective care and taking action to enable all children to have the best outcomes.

- **Child protection** refers to the processes undertaken to protect children who have been identified as suffering, or being at risk of suffering significant harm.
- **Staff** refers to all those working for or on behalf of the school, full time or part time, temporary or permanent, in either a paid or voluntary capacity.
- **Child** includes everyone under the age of 18.
- **Parent** refers to birth parents and other adults who are in a parenting role, for example step-parents, foster carers and adoptive parents

2. SAFEGUARDING LEGISLATION AND GUIDANCE

Section 157 of the Education Act 2002 and the Education (Independent Schools Standards) (England) Regulations 2003 require proprietors of independent schools to have arrangements to safeguard and promote the welfare of children who are pupils at the school.

The Teacher Standards 2012 state that teachers, including Head teachers should safeguard children's wellbeing and maintain public trust in the teaching profession as part of their professional duties.

The statutory guidance Working Together to Safeguard Children (2018) covers the legislative requirements and expectations on individual services (including schools and colleges) to safeguard and promote the welfare of children. It also provides the framework for LSCBs to monitor the effectiveness of local services, including safeguarding arrangements in schools.

The statutory guidance Keeping Children Safe in Education (2018) is issued under Section 175 of the Education Act 2002, the Education (Independent School Standards) (England) Regulations 2010 (as amended by SI 2012/2962) and the Education (Non-Maintained Special Schools) (England) Regulations 2011. Schools and colleges must have regard to this guidance when carrying out their duties to safeguard and promote the welfare of children. All staff should read Part One of this guidance and staff can find a copy on the shared drive, in the policies file in the main office and on the website. Keeping Children Safe in Education (2018) gives additional guidance in areas relating to children with SEND and specific areas including but not limited to peer on peer abuse and children and the court system. These areas are cover in section 19 and appendices to this policy.

For further, more detailed guidance, refer to DfE guidance ***Sexual violence and sexual harassment between children in schools and colleges***
Advice for governing bodies, proprietors, headteachers, principals, senior leadership teams and designated safeguarding leads
December 2017

Research suggests that around 10 per cent of children will suffer some form of abuse, and disabled children are three times more likely to be abused. Due to their day-to-day contact with pupils, school staff are uniquely placed to observe changes in children's behaviour and the outward signs of abuse. Children may also turn to a trusted adult in school when they are in distress or at risk. It is vital that school staff are alert to the signs of abuse and understand the procedures for reporting their concerns. The school will act on identified concerns and provide early help to prevent concerns from escalating.

3. SAFEGUARDING AND AUTISM

Working with autistic children can be a complex job. A clear understanding of how autism impacts upon each individual pupil is crucial in order to then consider whether there are significant safeguarding or pupil protection concerns.

Many of the traits associated with autism, if viewed in isolation, could be seen as fitting the standard indicators of pupil abuse, for example self-injurious behaviours and withdrawal from social situations. There is a risk that associated traits can be misinterpreted as indicators of abuse, or that abuse is missed because a pupil has autism.

This can lead to behaviours falling into grey areas and needing professionals with a high level of understanding of autism, safeguarding and the individual pupil involved to make judgements taking all these factors into account. This is the case in many peer on peer abuse situations involving children with autism. Every person with autism will struggle in aspects on social communication, interaction and understanding social boundaries and expectations. This can lead to situations when peer on peer abuse may have occurred without this being the intention rather due to a lack of understanding or social interaction or communication difficulty. In these situations it is important that the professionals look at intention, understanding, risk, severity and actual harm on an individual case and pupil basis. An outcome of an incident of peer on peer abuse may be that additional education for the pupils involved is needed rather than a safeguarding concern being raised, where factors indicate this would be an appropriate action.

There is an increased risk of professionals becoming over-familiar with the behaviour that an autistic pupil exhibits. They are then at risk of failing to pick up other concerns, or seeing new behaviour as an extension of behaviour they have already observed. This can lead to the professional missing signs and indicators of abuse.

While a clear understanding of autism and its impact on a pupil is imperative, so too is the ability to recognise subtle changes or other indicators, and remaining open to the possibility of abuse or neglect.

4. ROLES AND RESPONSIBILITIES

Safeguarding and promoting the welfare of children is **everyone's** responsibility. **Everyone** who comes into contact with children and their families and carers has a role to play in safeguarding children by providing a safe environment in which children can learn and also by identifying concerns, sharing information and taking prompt action. In order to fulfill this responsibility effectively, all professionals should make sure their approach is child-centred. This means that they should consider, at all times, what is in the **best interests** of the child.

All staff members should be aware of systems within school which support safeguarding and these are explained to them as part of staff induction. This includes:

- the safeguarding and child protection policy
- the staff Code of Conduct)
- the role of the designated safeguarding lead
- what to do if you are worried a child is being abused – Advice for Practitioners

Copies of policies and a copy of Part one of Keeping Children Safe in Education should be provided to staff at induction.

All schools should appoint a member of the senior leadership team to coordinate child protection arrangements.

The Designated Safeguarding Lead (DSL):

- has the status and authority within the school to carry out the duties of the post, including committing resources and supporting and directing other staff
- is appropriately trained, with updates every two years
- acts as a source of support and expertise to the school community
- provides support to staff members to carry out their safeguarding duties
- encourages a culture of listening to children and taking account of their wishes and feelings
- is alert to the specific needs of children in need, those with special educational needs and young carers
- has a working knowledge of LSCB procedures
- leads the school's work on the Prevent Duty
- has an understanding of locally agreed processes for providing early help and intervention
- keeps detailed written records of all concerns, ensuring that such records are stored securely and flagged on, but kept separate from, the pupil's general file
- refers cases of suspected abuse to children's social care or police as appropriate
- notifies children's social care if a child with a child protection plan is absent for more than two days without explanation
- ensures that when a pupil with a child protection plan leaves the school, their information is passed to their new school and the pupil's social worker is informed
- where children leave the school, ensures the child protection file is copied for any new school as soon as possible but transferred separately from the main pupil file
- attends and/or contributes to child protection conferences
- coordinates the school's contribution to child protection plans
- develops effective links with relevant statutory and voluntary agencies including the LSCB
- ensures that all staff sign to indicate that they have read and understood the Safeguarding & Promoting the Welfare of Children Policy
- ensures that the Safeguarding & Promoting the Welfare of Children Policy is regularly reviewed and updated annually
- liaises with the Chief Executive Officer and Executive Head as appropriate
- keeps a record of staff attendance at child protection training

- makes the Safeguarding & Promoting the Welfare of Children Policy available publicly, on the school's website or by other means
- ensures parents are aware of the school's role in safeguarding and that referrals about suspected abuse and neglect may be made
- works with the Executive Head to ensure cases concerning a member of staff are referred appropriately to the Designated Officer and/or the Disclosure and Barring Service (DBS)
- ensures that a referral is made to the Disclosure and Barring Service (DBS) if a person in regulated activity has been dismissed or removed due to safeguarding concerns, or would have been had they not resigned. This is a legal duty and failure to refer when the criteria are met is a criminal offence

The Deputy Designated Safeguarding Lead is appropriately trained and, in the absence of the DSL, carries out those functions necessary to ensure the ongoing safety and protection of pupils. In the event of the long-term absence of the DSL, the deputy will assume all of the functions above.

The Chief Executive Officer and Directors ensure that the school:

- appoints a DSL for child protection who is a member of the senior leadership team and who has undertaken training in inter-agency working, in addition to basic child protection training
- ensures that the DSL role is explicit in the role holder's job description
- has a Safeguarding & Promoting the Welfare of Children Policy and procedure, including a staff code of conduct, that is consistent with statutory requirements, reviewed annually and made available publicly on the school's website or by other means
- has procedures for dealing with allegations of abuse made against members of staff including allegations made against the Executive Head or Head of Education and allegations against other children
- follows safer recruitment procedures that include statutory checks on staff suitability to work with children
- develops a training strategy that ensures all staff, including the Executive Head and Head of Education, receive information about the school's safeguarding arrangements on induction and appropriate child protection training, which is regularly updated in line with statutory requirements. The DSL receives refresher training at two-yearly intervals
- ensures that all temporary staff and volunteers are made aware of the school's arrangements for child protection
- ensures that the school contributes to inter agency working and plans
- provides a coordinated offer of early help when additional needs of children are identified
- considers how pupils may be taught about safeguarding, including online as part of a broad and balanced curriculum

The Chief Executive Officer is responsible for liaising with the local authority and other agencies in

the event of an allegation being made against the Executive Head or Head of Education.

It is the responsibility of the Directors to ensure that the school's safeguarding, recruitment and managing allegations procedures are in accordance with national guidance and take into account the procedures and practice of the local authority as part of the inter-agency safeguarding procedures set up by Local Safeguarding Children Boards (LSCB)."

Head of Education:

- ensure that the Safeguarding & Promoting the Welfare of Children Policy and procedures are implemented and followed by all staff
- allocate sufficient time, training, support and resources, including cover arrangements when necessary, to enable the DSL and deputy to carry out their roles effectively, including the assessment of pupils and attendance at strategy discussions and other necessary meetings
- ensure that all staff feel able to raise concerns about poor or unsafe practice and that such concerns are handled sensitively and in accordance with the whistle blowing procedures
- ensure that pupils are provided with opportunities throughout the curriculum to learn about safeguarding, including keeping themselves safe online
- liaise with the Local Authority Designated Officer where an allegation is made against a member of staff
- ensure that anyone who has harmed or may pose a risk to a child is referred to the Disclosure and Barring Service.

5. ABUSE OF TRUST

All school staff are aware that inappropriate behaviour towards pupils is unacceptable and that their conduct towards pupils must be beyond reproach.

In addition, staff should understand that, under the Sexual Offences Act 2003, it is an offence for a person over the age of 18 to have a sexual relationship with a person under the age of 18, where that person is in a position of trust, even if the relationship is consensual. This means that any sexual activity between a member of the school staff and a pupil under 18 may be a criminal offence, even if that pupil is over the age of consent.

All school staff have read and signed the staff code of conduct (see appendix) which reflects the school's values and ethos.

6. CHILDREN WHO MAY BE PARTICULARLY VULNERABLE

Some children may have an increased risk of abuse. It is important to understand that this increase in risk is due more to societal attitudes and assumptions, and child protection procedures that fail to acknowledge children's diverse circumstances, rather than the individual child's personality, impairment or circumstances. Many factors can contribute to an increase in risk, including prejudice and discrimination, isolation, social exclusion, communication issues and reluctance on the part of some adults to accept that abuse can occur.

All children attending Eagle House School have special educational needs and as such, are more at

risk of abuse.

To ensure that all of our pupils receive equal protection, we will give special consideration to children who are:

- disabled
- young carers
- living in a domestic abuse situation
- affected by parental substance misuse
- asylum seekers
- living away from home
- vulnerable to being bullied, or engaging in bullying, including cyber bullying
- vulnerable to living in temporary accommodation
- vulnerable to living transient lifestyles
- vulnerable to living in chaotic and unsupportive home situations
- vulnerable to discrimination and maltreatment on the grounds of race, ethnicity, religion, disability or sexuality
- vulnerable to being involved directly or indirectly in child sexual exploitation
- do not have English as a first language
- at risk of female genital mutilation (FGM), forced marriage, gender based violence/violence against women and girls (teachers **must** report any disclosures of FGM immediately to the police and DSL)
- vulnerable to gangs and youth violence
- vulnerable to fabricated or induced illness
- vulnerable to faith abuse
- vulnerable to mental health problems
- privately fostered
- vulnerable to radicalisation (all staff must take the PREVENT duty on-line training annually)
- vulnerable to youth produced sexual imagery (previously known as sexting)
- vulnerable to trafficking
- homelessness
- children in the court system
- county lines
- children with family members in prison

This list provides examples of additionally vulnerable groups and is not exhaustive. Special consideration includes the provision of safeguarding information and resources in community languages and accessible formats for children with communication needs as required.

7. MISSING CHILDREN

All children, regardless of their circumstances, are entitled to a full time education, which is suitable to their age, ability, aptitude and any special educational needs they may have. Local authorities have a duty to establish, as far as it is possible to do so, the identity of children of compulsory school age who are missing education in their area. Effective information sharing between parents, schools, colleges and local authorities is critical to ensuring that all children are safe and receiving suitable education.

A child going missing from education is a potential indicator of abuse or neglect and such children are at risk of being victims of harm, exploitation or radicalisation. School staff should follow their procedures for unauthorised absence and for dealing with children that go missing from

education, particularly on repeat occasions, to help identify the risk of abuse and neglect, including sexual exploitation, and to help prevent the risks of going missing in future (see Attendance Policy, Pupil Missing from Education Procedure).

8. HELPING CHILDREN TO KEEP THEMSELVES SAFE

Children are taught to understand and manage risk through our personal, social, health and economic (PSHE) education lessons and through all aspects of school life. Our approach is designed to help children to think about risks they may encounter and with staff work out how those risks might be overcome. Discussions about risk are empowering and enabling for all children and promote sensible behaviour rather than fear or anxiety. Children are taught how to conduct themselves and how to behave in a responsible manner. Children are also reminded regularly about online safety and tackling bullying procedures. The school continually promotes an ethos of respect for children, and pupils are encouraged to speak to a member of staff in confidence about any worries they may have.

9. SUPPORT FOR THOSE INVOLVED IN A CHILD PROTECTION ISSUE

Child abuse is devastating for the child and can also result in distress and anxiety for staff who become involved.

We will support pupils, their families, and staff by:

- taking all suspicions and disclosures seriously
- nominating a link person (DSL) who will keep all parties informed and be the central point of contact
- where a member of staff is the subject of an allegation made by a pupil, separate link people will be nominated to avoid any conflict of interest
- responding sympathetically to any request from pupils or staff for time out to deal with distress or anxiety
- maintaining confidentiality and sharing information on a need-to-know basis only with relevant individuals and agencies
- storing records securely
- offering details of helplines, counselling or other avenues of external support
- following the procedures laid down in our whistle blowing, complaints and disciplinary procedures
- co-operating fully with relevant statutory agencies

Staff, therapists and the safeguarding team know how best to support non verbal pupils in being able to communicate when they are involved in a child protection issue or indicate they wish to communicate a worry through a number of strategies. This includes using PODD communication books and talking mats and are tailored to match the individuals communication needs.

10. COMPLAINTS PROCEDURE

Our complaints procedure will be followed where a pupil or parent raises a concern about poor practice towards a pupil that initially does not reach the threshold for child protection action. Poor practice examples include unfairly singling out a pupil or attempting to humiliate them, bullying or belittling a pupil or discriminating against them in some way. Complaints are managed by senior staff, the Head and CEO. An explanation of the complaints procedure is included in the Safeguarding Information Booklet for Parents and the Safeguarding Information Booklet for Pupils.

Complaints from staff are dealt with under the school's complaints and disciplinary and grievance procedures.

11. IF YOU HAVE CONCERNS ABOUT A COLLEAGUE

Staff who are concerned about the conduct of a colleague towards a pupil are undoubtedly placed in a very difficult situation. They may worry that they have misunderstood the situation and they will wonder whether a report could jeopardise their colleague's career. All staff must remember that the welfare of the child is paramount. The school's whistle blowing policy (which can be accessed on the shared drive and in the staff handbook) enables staff to raise concerns or allegations in confidence and for a sensitive enquiry to take place.

12. ALLEGATIONS AGAINST STAFF

When an allegation is made against a member of staff, set procedures must be followed. It is rare for a child to make an entirely false or malicious allegation, although misunderstandings and misinterpretations of events do happen.

A child may also make an allegation against an innocent party because they are too afraid to name the real perpetrator. Even so, we must accept that some professionals do pose a serious risk to pupils and we must act on every allegation. 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 not the default option and alternatives to suspension will always be considered. In some cases, staff may be suspended where this is deemed to be the best way to ensure that children are protected.

Allegations against staff should be referred to the Head of Education. Where there are concerns about the Head of Education this should be referred to the CEO or Directors.

The full procedures for dealing with allegations against staff can be found in *Keeping Children Safe in Education (DfE, 2018)*.

Staff, parents and directors are reminded that publication of material that may lead to the identification of a teacher who is the subject of an allegation is prohibited by law. Publication includes verbal conversations or writing, including content placed on social media sites.

13. ALLEGATIONS AGAINST PUPILS

When an allegation is made by a pupil against another pupil, members of staff should consider whether the complaint raises a safeguarding concern. If there is a safeguarding concern the Designated Safeguarding Lead (DSL) should be informed. A factual record should be made of the allegation, but no attempt at this stage should be made to investigate the circumstances.

The DSL should contact social services to discuss the case. It is possible that social services are already aware of safeguarding concerns around this young person. The DSL will follow through the outcomes of the discussion and make a social services referral where appropriate.

The DSL will make a record of the concern, the discussion and any outcome and keep a copy in both pupils' files. Appropriate action will be taken in accordance with the existing policies including: anti-bullying policy, SRE policy and Online Safety Policy.

If the allegation indicates a potential criminal offence has taken place, the police should be contacted at the earliest opportunity and parents informed (of both the pupil being complained about and the alleged victim).

It may be appropriate to exclude the pupil being complained about for a period of time according to the school's behaviour policy and procedures. The school will provide an appropriate form of support for both victim and perpetrator.

Where neither social services nor the police accept the complaint, a thorough school investigation should take place into the matter using the school's usual disciplinary procedures.

In situations where the school considers a safeguarding risk is present, a risk assessment should be prepared along with a preventative, supervision plan.

The plan should be monitored and a date set for a follow-up evaluation with everyone concerned.

14. STAFF TRAINING

It is important that all staff have safeguarding training on an annual basis to enable them to recognise the possible signs of abuse and neglect and to know what to do if they have a concern.

New staff at all levels within the organisation will receive an explanation during their induction, which includes the school's Safeguarding & Promoting the Welfare of Children Policy, reporting and recording arrangements, the staff code of conduct, what to do if they are worried a child is being abused document and details of the DSL. All staff will receive training that is updated annually and the DSL will receive training updated at least every two years, including training in inter-agency procedures.

Key staff involved in the recruitment of staff will undergo Safer Recruitment on-line training every 2 years.

All staff are provided with frequent safeguarding updates and training opportunities delivered by the DSL team and, on occasion by external advisors.

Supply staff will be given the school's Supply Staff information, which can be found in the school admin office. Other visitors will be supervised at all times and will be required to wear a visitor's badge.

15. SAFER RECRUITMENT

Our school endeavours to ensure that we do our utmost to employ 'safe' staff by following the guidance in Keeping Children Safe in Education (2018) and the school's individual procedures.

Safer recruitment means that all applicants will:

- complete an application form which includes their employment history
- provide two referees, including at least one who can comment on the applicant's suitability to work with children
- provide evidence of identity and qualifications
- be checked in accordance with the Disclosure and Barring Service (DBS) regulations as appropriate to their role
- provide evidence of their right to work in the UK
- be interviewed

The school will also verify the candidate's mental and physical fitness to carry out their work responsibilities.

At least one member of each recruitment panel will have attended safer recruitment training.

All new members of staff will undergo an induction that includes familiarisation with the school's Safeguarding & Promoting the Welfare of Children Policy and identification of their child protection and safeguarding training needs.

All staff sign to confirm they have received a copy of the Safeguarding & Promoting the Welfare of Children Policy.

The school obtains written confirmation from supply agencies that agency staff have been appropriately checked.

The school maintains a single central record of recruitment checks undertaken.

Volunteers

Volunteers will undergo checks commensurate with their work in the school and contact with pupils.

Supervised volunteers

Volunteers who work only in a supervised capacity and are not in regulated activity will undergo the safe recruitment checks appropriate to their role, in accordance with the school's policies and procedures.

Contractors

The school checks the identity of all contractors working on site, only uses registered companies and asks for them to wear ID whilst on site. The Schools' Business Office holds records of DBS checks where appropriate. Eagle House School ensures that any contractor, or any employee of the contractor, who is to work at the school has been subject to the appropriate level of DBS check. Contractors engaging in regulated activity require an enhanced DBS certificate (including barred list information). For all other contractors who are not engaging in regulated activity, but whose work provides them with an opportunity for regular contact with children, an enhanced DBS check (not including barred list information) is required. Under no circumstances should a

contractor be allowed to work unsupervised, or engage in regulated activity, if checks have not been obtained.

16. SITE SECURITY

Visitors to the school, including contractors, are asked to sign in and are given a badge, which confirms they have permission to be on site. Parents who are simply delivering or collecting their children do not need to sign in. All visitors are expected to observe the school's safeguarding and health and safety regulations to ensure children in school are kept safe. Visitors such as contractors who work on site during the pupil day are escorted or supervised while on site.

17. EXTENDED SCHOOL AND OFF-SITE ARRANGEMENTS

Where extended school activities are provided by and managed by the school, our own Safeguarding & Promoting the Welfare of Children Policy and procedures apply. If other organisations provide services or activities on our site we will check that they have appropriate procedures in place, including safer recruitment procedures.

When our pupils attend off-site activities, including day and residential visits and work related activities, we will check that effective child protection arrangements are in place.

18. PHOTOGRAPHY AND IMAGES

Photographs are regularly taken by staff and pupils for documenting their learning journey and activities. Those must be taken using school's devices, must be closely monitored and stored securely on the school drive. Use of photographs and images at Eagle House follows the guidance set in the General Data Protection Regulation (May 2018).

Staff or pupils must not take images using their own devices. If a concern is raised related to taking or storing photographs of pupils or staff on a private device, it will be seized and investigated and the images will be removed.

To protect pupils we will:

- seek parental consent for photographs to be taken or published (for example, on our website or in newspapers or publications)
- 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

19. ONLINE SAFETY

Our pupils increasingly use mobile phones, tablets and computers on a daily basis.

There are number of risks associated with the digital world. The risks range from sending hurtful or abusive texts and emails, to enticing children to engage in sexually harmful conversations, webcam photography or face-to-face meetings. The school's online safety policy, which can be accessed on the shared drive and website, explains how we try to keep pupils safe in school. Cyberbullying and youth produced sexual imagery by pupils, via texts and emails, will be treated as

seriously as any other type of bullying and will be managed through our anti-bullying procedures.

Chat rooms and social networking sites are the more obvious sources of inappropriate and harmful behaviour and pupils are not allowed to access these sites in school. Some pupils will undoubtedly be 'chatting' on mobiles or social networking sites at home and parents are encouraged to consider measures to keep their children safe when using social media. For further information about the use of mobile phones and tablets see the Online Safety policy.

Staff are not allowed to communicate electronically with pupils, or befriend parents via social networking sites.

The school is committed to raise pupil's and staff's understanding of the risks associated with Social Media and Social Networking through internet safety curriculum and CPD.

20. CHILD PROTECTION PROCEDURES

Recognising abuse

To ensure that our pupils are protected from harm, we need to understand what types of behaviour constitute abuse and neglect.

Abuse and neglect are forms of maltreatment. Somebody may abuse or neglect a child by inflicting harm, for example by hitting them, or by failing to act to prevent harm, for example by leaving a small child home alone, or leaving knives or matches within reach of an unattended toddler.

Abuse may be committed by adult men or women and by other children and young people.

There are four categories of abuse: physical abuse, emotional abuse, sexual abuse and neglect.

Physical abuse

Physical abuse is 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. (This used to be called Munchausen's Syndrome by Proxy, but is now more usually referred to as fabricated or induced illness).

Emotional abuse

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 cyber bullying), causing children frequently to feel frightened or in danger, or the exploitation, corruption or radicalisation of children. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.

Sexual abuse

Sexual abuse involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example, rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (including via the internet). Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.

Neglect

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 as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to:

- provide adequate food, clothing and shelter (including exclusion from home or abandonment);
- protect a child from physical and emotional harm or danger;
- ensure adequate supervision (including the use of inadequate care-givers); or
- ensure access to appropriate medical care or treatment.

It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

Definitions taken from *Working Together to Safeguard Children* (HM Government, 2018).

Child Sexual Exploitation

Child sexual exploitation is a form of child sexual abuse. It occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or young person under the age of 18 into sexual activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial advantage or increased status of the perpetrator or facilitator. The victim may have been sexually exploited even if the sexual activity appears consensual. Child sexual exploitation does not always involve physical contact; it can also occur through the use of technology.

Children and young people are often unwittingly drawn into sexual exploitation through the offer of friendship and care, gifts, drugs and alcohol, and sometimes accommodation. Sexual exploitation is a serious crime and can have a long-lasting adverse impact on a child's physical and emotional health. It may also be linked to child trafficking, which means *"the recruitment, transportation, transfer, harbouring or receipt of persons, by means of the threat or use of force or other forms of coercion, abduction, fraud, deception, abuse of power or of a position of vulnerability, the giving or receiving of payments or benefits to achieve the consent of a person having control over another person, for the purpose of exploitation."*

The perpetrator always 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 sexual bullying including cyberbullying and grooming. Consent cannot be given, even where a child may believe they are voluntarily engaging in sexual activity with the person who is exploiting them. A significant number of children who are victims of sexual exploitation go missing from home, care and education at some point.

There are three different models of child sexual exploitation which are not exhaustive but show a spectrum of exploitation.

- Inappropriate relationships - Usually involves one perpetrator who has inappropriate power or control over a young person. There may be a significant age gap. The young person may believe that they have a genuine friendship/ loving relationship with the abuser.
- 'Boyfriend or peer exploitation - The perpetrator grooms the victim by initiating a normal relationship and then goes onto coerce or force them to have sex with friends or associates. The victim may also be required to introduce their friends as new victims.
- Organised/ networked sexual exploitation or trafficking - victims are passed through networks possibly over geographical distances, where they may be coerced/forced into sexual activity with multiple men. This often occurs at 'sex parties' and victims may be used to recruit others into the network. This serious organised activity can involve the buying and selling of young people.

Trafficking also includes the movement of children and young people within small geographical areas such as between addresses within an area or a county.

Some of the following signs may be indicators of sexual exploitation:

- Children who appear with unexplained gifts or new possessions
- Children who associate with other young people involved in exploitation
- Children who have older boyfriends or girlfriends
- Children who suffer from sexually transmitted infections or become pregnant
- Children who suffer from changes in emotional well-being
- Children who misuse drugs and alcohol
- Children who go missing for periods of time or regularly come home late
- Children who regularly miss school or education or don't take part in education

However, it also is important to recognise that some young people who are being sexually exploited do not exhibit signs of this abuse.

Any practitioner working with a child who they think may be at risk of child sexual exploitation should follow the guidance set out in Working Together (2018).

All staff are made aware of the indicators of sexual exploitation and all concerns are reported immediately to the DSL.

Prevention of Radicalisation

Radicalisation refers to the process by which a person comes to support terrorism and forms of extremism. The Counter-Terrorism and Security Act 2015 places a duty on education and other children's services providers... "to have due regard to the need to prevent people from being drawn into terrorism ("the Prevent duty"). The Counter-Terrorism and Security Act 2015 will also place a duty on local authorities to ensure Channel panels are in place. Panels will assess the extent to which identified individuals are vulnerable to being drawn into terrorism. Schools and colleges are listed in the Act as partners of the panel.

Eagle House School follows the statutory Prevent guidance, which summarises the requirements on schools in terms of four general themes: risk assessment, working in partnership, staff training and IT policies in order to prevent the risk of students becoming radicalised.

If there is a concern that a student may be vulnerable to radicalisation, the DSL should refer them to Channel.

For additional information see Radicalisation in Appendix.

Female Genital Mutilation

Female genital mutilation is pupil abuse and a form of violence against women and girls. FGM comprises all procedures involving partial or total removal of the external female genitalia or other injury to the female genital organs. It is illegal in the UK and a form of pupil-abuse with long lasting consequences.

Professionals in all agencies, and individuals and groups in relevant communities, need to be alert to the possibility of a girl or woman being at risk of FGM, or already having undergone FGM. There are a range of potential indicators that a pupil or young person may be at risk of FGM, which individually may not indicate risk but if there are two or more indicators present this could signal a risk to the pupil or young person. Victims of FGM are likely to come from a community that is known to practise FGM. Provided that the mutilation takes place in the UK, the nationality or residence status of the victim is irrelevant. Professionals should also note that the girls and women at risk of FGM may not yet be aware of the practice or that it may be conducted on them, so sensitivity should always be shown when approaching the subject.

Specific factors that may heighten a girl's or woman's risk of being affected by FGM:

- The position of the family and the level of integration within UK society – it is believed that communities less integrated into British society are more likely to carry out FGM
- Any girl born to a woman who has been subjected to FGM must be considered to be at risk of FGM, as must other female children in the extended family
- Any girl who has a sister who has already undergone FGM must be considered to be at risk of FGM, as must other female children in the extended family
- Any girl withdrawn from Personal, Social and Health Education or Personal and Social Education may be at risk as a result of her parents wishing to keep her uninformed about her body and rights

Indications that FGM may be about to take place soon:

- The age at which girls undergo FGM varies enormously according to the community. The procedure may be carried out when the girl is newborn, during pupilhood or adolescence, at marriage or during the first pregnancy. However, the majority of cases of FGM are thought to take place between the ages of 5 and 8 and therefore girls within that age bracket are at a higher risk.
- It is believed that FGM happens to British girls in the UK as well as overseas. Girls of school age who are subjected to FGM overseas are thought to be taken abroad at the start of the school holidays, particularly in the summer holidays, in order for there to be sufficient time for her to recover before returning to her studies.

There can also be clearer signs when FGM is imminent:

- It may be possible that families will practise FGM in the UK when a female family elder is around, particularly when she is visiting from a country of origin.
- A professional may hear reference to FGM in conversation, for example a girl may tell other children about it
- A girl may confide that she is to have a 'special procedure' or to attend a special occasion to 'become' a woman.
- A girl may request help from a teacher or another adult if she is aware or suspects that she is at immediate risk
- Parents state that they or a relative will take the pupil out of the country for a prolonged period
- A girl may talk about a long holiday to her country of origin or another country where the practice is prevalent
- Parents seeking to withdraw their children from learning about FGM

Indication that FGM may have already taken place

- A girl or young woman may have difficulty walking, sitting or standing and may even look uncomfortable
- A girl or woman may spend longer than normal in the bathroom or toilet due to difficulties in urinating.
- A girl may spend long periods of time away from a classroom during the day with bladder or menstrual problems
- A girl or woman may have frequent urinary, menstrual problems
- There may be prolonged or repeated absences from school
- A prolonged absence from school with noticeable behaviour changes on the girl's return could be an indication that a girl has recently undergone FGM
- A girl or woman may be particularly reluctant to undergo normal medical examinations

- A girl or woman may confide in a professional
- A girl or woman may ask for help, but may not be explicit about the problem due to embarrassment or fear
- A girl may talk about pain or discomfort between her legs

Eagle House is aware of the importance of educating pupils and promoting awareness of FGM, this includes male and female pupils. It is important to educate all pupils, not only those who may be a victim, as with greater knowledge and awareness pupils will be able to recognise and report or ask for support for siblings, other family members and friends.

FGM mandatory reporting duty for teachers

Section 5B of the Female Genital Mutilation Act 2003 (as inserted by section 74 of the Serious Crime Act 2015) places a statutory duty upon teachers along with regulated health and social care professionals in England and Wales, to report to the police where they discover (either through disclosure by the victim or visual evidence) that FGM appears to have been carried out on a girl under 18. Those failing to report such cases will face disciplinary sanctions. It will be rare for teachers to see visual evidence, and they should not be examining pupils or students, but the same definition of what is meant by “to discover that an act of FGM appears to have been carried out” is used for all professionals to whom this mandatory reporting duty applies.

Teachers must personally report to the police cases where they discover that an act of FGM appears to have been carried out. Unless the teacher has good reason not to, they should still consider and discuss any such case with the school’s or college’s designated safeguarding lead (or deputy) and involve children’s social care as appropriate. The duty does not apply in relation to at risk or suspected cases (i.e. where the teacher does not discover that an act of FGM appears to have been carried out, either through disclosure by the victim or visual evidence) or in cases where the woman is 18 or over. In these cases, teachers should follow local safeguarding procedures.

‘Honour-based’ Violence

‘Honour-based’ violence (HBV) encompasses crimes which have been committed to protect or defend the honour of the family and/or the community, including Female Genital Mutilation (FGM), forced marriage, and practices such as breast ironing. All forms of so called HBV are abuse (regardless of the motivation) and should be handled and escalated as such. If in any doubts staff should speak to the designated safeguarding lead. Professionals in all agencies, and individuals and groups in relevant communities, need to be alert to the possibility of a child being at risk of HBV, or already having suffered HBV.

If staff have a concern regarding a child that might be at risk of HBV they should activate local safeguarding procedures, using existing national and local protocols for multi-agency liaison with police and children’s social care.

Peer on Peer Abuse including Bullying

There may be many forms of abuse that can occur between peers and we need to assess and address any reported incidents very carefully, due to the special needs associated with ASD. Such incidents are rare due to the high levels of supervision. While bullying between children is not a

separate category of abuse and neglect, it is a very serious issue that can cause considerable anxiety and distress. At its most serious level, bullying can have a disastrous effect on a child's wellbeing and in very rare cases has been a feature in the suicide of some young people.

All incidences of bullying, including cyber-bullying and prejudice-based bullying should be reported and will be managed through our anti-bullying procedure which is available to all pupils and parents on the website. The subject of bullying is addressed at regular intervals in PSHE education. If the bullying is particularly serious, or the anti-bullying procedures are deemed to be ineffective, the Head of Education and the DSL will consider implementing child protection procedures.

Children with sexually harmful behaviour

Children may be harmed by other children or young people. Staff will be aware of the harm caused by bullying and will use the school's anti-bullying procedures where necessary. However, there will be occasions when a pupil's behaviour warrants a response under child protection rather than anti-bullying procedures. In particular, research suggests that up to 30 per cent of child sexual abuse is committed by someone under the age of 18.

The management of children and young people with sexually harmful behaviour is complex and the school will work with other relevant agencies to maintain the safety of the whole school community. Young people who display such behaviour may be victims of abuse themselves and the child protection procedures will be followed for both victim and perpetrator. Staff who become concerned about a pupil's sexual behaviour should speak to the DSL as soon as possible and put their concerns in writing.

See Peer on Peer abuse in appendix for more information.

Child criminal exploitation: county lines

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

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

Indicators of abuse

Physical signs define some types of abuse, for example, bruising, bleeding or broken bones resulting from physical or sexual abuse, or injuries sustained while a child has been inadequately supervised. The identification of physical signs is complicated, as children may go to great lengths to hide injuries, often because they are ashamed or embarrassed, or their abuser has threatened further violence or trauma if they 'tell'. It is also quite difficult for anyone without medical training to categorise injuries into accidental or deliberate with any degree of certainty. For these reasons it is vital that staff are also aware of the range of behavioural indicators of abuse and report any concerns to the designated safeguarding lead (DSL).

It is the responsibility of staff to report their concerns. It is not their responsibility to investigate or decide whether a child has been abused.

A child who is being abused or neglected may:

- have bruises, bleeding, burns, fractures or other injuries
- show signs of pain or discomfort
- keep arms and legs covered, even in warm weather
- be concerned about changing for PE or swimming
- look unkempt and uncared for
- change their eating habits
- have difficulty in making or sustaining friendships
- appear fearful
- be reckless with regard to their own or other's safety
- self-harm
- frequently miss school or arrive late
- show signs of not wanting to go home
- show signs of hiding something
- display a change in behaviour – from quiet to aggressive, or happy-go-lucky to withdrawn
- challenge authority
- become disinterested in their school work
- be constantly tired or preoccupied
- be wary of physical contact
- be involved in, or particularly knowledgeable about drugs or alcohol

- display sexual knowledge or behaviour beyond that normally expected for their age

Individual indicators will rarely, in isolation, provide conclusive evidence of abuse. They should be viewed as part of a jigsaw, and each small piece of information will help the DSL to decide how to proceed.

Role of Staff in Reporting any Concerns

It is very important that staff report their concerns immediately in writing to the DSL – they do not need ‘absolute proof’ that the child is at risk.

Staff should follow the Safeguarding Procedure in the Appendix. This tells you “How to Raise and Report a Concern” and “What to Do if a Child Discloses Information of a Safeguarding Concern.”

Impact of abuse

The impact of child abuse should not be underestimated. Many children do recover well and go on to lead healthy, happy and productive lives, although most adult survivors agree that the emotional scars remain, however well buried. For some children, full recovery is beyond their reach, and the rest of their childhood and their adulthood may be characterised by anxiety or depression, self-harm, eating disorders, alcohol and substance misuse, unequal and destructive relationships and long-term medical or psychiatric difficulties.

Support for victims and perpetrators

To be discussed by SMTs at both schools – include:

SRE policy and SRE statutory Guidance

Planned curriculum

Whole school approach

Individual approach

Confidentiality and sharing information

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 being released into the public domain does not compromise evidence.

Staff should only discuss concerns with the designated safeguarding lead or deputy, Executive Head, Head of Education or CEO (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.

Child protection information will be stored and handled in line with Data Protection Act 1998 principles and guidance set in the General Data Protection Regulation (May 2018). Information is:

- processed for limited purposes
- adequate, relevant and not excessive

- accurate
- kept no longer than necessary (see Data Protection Policy)
- processed in accordance with the data subject's rights
- secure

Record of Concern forms and other written information are stored in a locked facility and any electronic information will be password protected and only made available to relevant individuals.

Every effort will be made to prevent unauthorised access, and sensitive information should 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 kept in locked storage. Child protection information will be stored separately from the pupil's school file and the school file will be 'flagged' to indicate that separate information is held.

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 Executive Head, Head of Education or DSL.

The Data Protection Act does not prevent school staff from sharing information with relevant agencies, where that information may help to protect a child.

The school's policy on confidentiality and information-sharing is available to parents and pupils on request.

Reporting directly to child protection agencies

Staff should follow the reporting procedures outlined in this policy. However, they may also share information directly with children's social care, police or the NSPCC if:

- the situation is an emergency and the designated safeguarding lead, their deputy, the Executive Head, Head of Education and the CEO are all unavailable
- they believe they have not received a satisfactory response from the DSL and are convinced that a direct report is the only way to ensure the pupil's safety

21. SPECIAL CIRCUMSTANCES

Looked After Children

The most common reason for children becoming looked after is as a result of abuse or neglect. Children with SEN/autism may also fall in to the LAC category due to their needs rather than to any abuse or neglect. The school ensures that appropriate staff have information about a child's looked after status and care arrangements. The DSL has details of the child's social worker and the name and contact details of the local authority's virtual head for children in care.

Eagle House Group understands the importance of effective and regular communication with parents and carers and ensure that this is paramount for looked after children. In addition the Designated teacher is in regular contact with virtual schools and social workers. PEP meetings are

held at the school termly and LAC reviews are generally held six monthly. The Designated Teacher is Lorraine Titchener (Deputy Head) lorraine.titchener@eaglehousegroup.co.uk for Eagle House School (Mitcham); Viki Kublickas (Deputy Head) victoria.kublickas@eaglehousegroup.co.uk for Eagle House (Sutton) and Eagle House 6th Form (Strawberry Lodge).

Children staying with host families/Private Fostered

A private fostering arrangement is essentially one that is made privately (that is to say without the involvement of a local authority) for the care of a child under the age of 16 (under 18, if disabled) by someone other than a parent or close relative with the intention that it should last for 28 days or more. Private foster carers may be from the extended family, such as a cousin or great aunt. It is the duty of local authorities to satisfy themselves that the welfare of children who are, or will be, privately fostered within their area is being, or will be, satisfactorily safeguarded and promoted. It is the local authority in whose area the privately fostered child resides which has legal duties in respect of that child.

The school should notify the local authority of a private fostering arrangement that comes to their attention.

Information obtained from *Guidance on Private Fostering*

Some pupils may reside with host families during school terms and we will work with the local authority to check that such arrangements are safe and suitable.

Some children may be privately fostered whilst their parent/carer is elsewhere.

It may be necessary to pay extra attention and carry out more rigorous checks for a child who is privately fostered whilst their parent/carer is away. This could entail: ensuring the arrangements put in place prior to the parent/carer's departure are being adhered to; ensuring contact details are updated, used and maintained successfully; remaining vigilant to all of the usual signs and symptoms that raise child protection and safeguarding concerns and are listed in this policy. Key staff will be made aware of the new arrangements and will monitor the child's disposition to ensure they are being appropriately cared for.

22. POLICY REVIEW

It is the responsibility of the Head of Education and Deputy Head (PDBW) supported by the other members of the schools' Senior Leadership Teams to monitor this policy. It should be reviewed annually or when new legislation is published. The Head of Education reports on school matters to the CEO/Directors.

23. RELATED POLICIES AND DOCUMENTATION

- ❖ Physical intervention and Challenging Behaviour Policy
- ❖ Behaviour Policy
- ❖ Intimate Care Policy
- ❖ Complaints Policy and Procedure
- ❖ Anti-bullying Policy
- ❖ Touch Policy
- ❖ Allegations Against Staff Policy
- ❖ Online Safety Policy
- ❖ Whistle blowing

- ❖ SEN and Disabilities Policy
- ❖ Peer on Peer Abuse Policy
- ❖ Attendance Policy
- ❖ Missing Student Policy
- ❖ Safer Recruitment Policy
- ❖ Grievance and disciplinary (staff handbook)

This advice should not be read in isolation. It is important for schools and colleges to consider relevant advice and guidance, including the following (which is not intended to be an exhaustive list), as part of their approach to protecting children:

- ❖ Exclusions From Maintained Schools, Academies and PRUs (statutory guidance)
- ❖ Keeping Children Safe in Education (statutory guidance)
- ❖ Sex and Relationship Education (statutory guidance)
- ❖ Working Together to Safeguard Children (statutory guidance)
- ❖ Behaviour and Discipline in Schools (advice for schools)
- ❖ Children Missing Education (advice for schools)
- ❖ Cyberbullying (advice for schools)
- ❖ Equality Act 2010 and Public Sector Equality Duty (advice for schools)
- ❖ Equality Act 2010 Technical Guidance (advice for further and higher education)
- ❖ Mental Health and Behaviour in Schools (advice for schools)
- ❖ Preventing and Tackling Bullying (advice for schools)
- ❖ The Equality and Human Rights Commission (provides advice on avoiding discrimination in a variety of educational contexts)

Appendices:

- *Staff Code of Conduct*
- *Safeguarding Procedure*
- *Flowchart: Action when a child has suffered or is likely to suffer harm*
- *Record of Concern Form and My Concern Online System*
- *Peer on Peer Abuse*
- *Domestic Abuse*
- *Radicalisation*
- *Children and the court system*
- *Children with family members in prison*
- *Homelessness*
- *Pupil Contact Information*
- *Safer Recruitment*

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Lead Reviewer:	Designated Safeguarding Lead
Version:	Final

APPENDIX A: Staff Code of Conduct

1. INTRODUCTION

At Eagle House School we are committed to creating a safe school culture that promotes equality, excellence and an environment where children and adults feel safe and valued.

We promote the core principles of respect, fairness, justice, tolerance and understanding. We recognise that everybody within the school has the right to be treated in this way but is also responsible for promoting these values in the way they work within the school.

The objectives of the code of conduct are to:

- Safeguard children
- Give staff a safe environment in which to work
- Minimise opportunities for abuse within the school environment
- Make staff feel confident to report concerns in a safe environment within appropriate levels of confidentiality
- Respond promptly to concerns which have been fully documented and will be investigated and addressed
- Create an ethos of mutual respect, openness and fairness

Despite how the subject of allegations is often portrayed in the press, malicious allegations against school employees are thankfully rare. Likewise, allegations of serious abuse are also rare.

Many allegations and concerns raised by pupils against school employees can be avoided and often arise due to the employee failing to follow good practice guidelines.

It is tempting to believe that if we have child protection procedures, undertake checks with the Disclosure and Barring Service and make our recruitment processes more robust, that children will be safeguarded. Whilst these measures are important, it is the adults surrounding the child that afford the best protection; adults who are professional, display humanity and have a sense of clear boundaries.

It is in no one's interest to engage in defensive practice or to restrict children's experiences in order to avoid an allegation; however, it is in everyone's interest, children, and adults, to ensure that children are safeguarded and, importantly, feel safe. It is also in everyone's interest that adults who work with children also feel safe, without the fear of being the subject of an allegation.

Working with children presents many challenges and can, on occasions, push tolerance to its limits. In children with autism spectrum disorders, who can exhibit high levels of anxiety, challenging behaviour is to be expected and as human beings we can feel frustration, especially on those occasions when our own defences are low. However, as professionals, we have a responsibility to develop strategies to respond effectively to these challenges and mechanisms that allow us to seek help and advice (no matter how experienced we are).

The following guidance is designed to assist. It should not be read as rules, rather as a common sense guide to working with pupils. This document provides a guide to all adults working at Eagle House School and should be read in conjunction with the school's policies and guidance on:

- Safeguarding and Promoting the Welfare of Pupils
- Behaviour Policy

- Online Safety Policy
- Physical Intervention and Challenging Behaviour Policy
- Touch Policy
- Allegations Against Staff Policy

2. THE OVERRIDING PRINCIPLES OF THIS DOCUMENT ARE AS FOLLOWS:

- The child's welfare is paramount (Children Act 1989)
- Staff working in school are responsible for their own actions and behaviour and should avoid any conduct that would lead a responsible person to question their motivation or intentions
- Staff should be seen to work with openness and transparency
- Staff should discuss any incident which could give rise for concern with their line manager as soon as possible and seek advice
- Staff should be aware that breaches of the law and other professional guidelines could result in criminal or disciplinary action being taken against them

3. PROTECTING PUPILS AND YOURSELF – GOOD PRACTICE GUIDELINES

You should be a positive role model to all pupils. In order to be such a role model, you should behave in a mature, respectful, safe, fair and considered manner. For example you must ensure that you:

- Treat all pupils equally – build positive professional relationships
- Don't carry out acts that could be considered as favouritism e.g. giving birthday cards or gifts to a particular pupil outside the normal reward systems in school
- Be aware of personal space, any physical contact should be professional
- Ensure that any physical contact is within clear boundaries and should not leave you open to any allegations of inappropriate touching (familiarise yourself with the appropriate touch policy)
- Do not embarrass or humiliate pupils
- Avoid sarcasm and do not make jokes of a personal, sexual, racist, discriminatory, intimidating or otherwise offensive nature
- Do not dress in a way that could lead a responsible adult to question your conduct, intentions or suitability to care for other people's children (Refer to the Staff Handbook for appropriate dress code)
- Do not make arrangements to contact, communicate or meet with pupils or their families outside of school (this includes the use of email, text and other messaging systems including social networking sites) except for school work and professional reasons
- Do not develop 'personal' relationships

- Do inform the pupil before initiating physical contact, such as assisting with dressing, physical support during PE or administering first aid. This could be via means of visual support and giving the pupil time to process the information you are verbally giving
- Be a good listener
- Be alert to changes in pupils’ behaviour
- Encourage positive, respectful and safe behaviour among pupils
- Read and understand the school’s safeguarding & promoting the welfare of children policy and guidance documents on wider safeguarding issues, for example anti-bullying, behaviour, physical intervention
- Apply the use of physical intervention strategies that are deemed reasonable, proportionate and necessary only as a last resort and in compliance with school, TeamTeach guidance and Safeguarding procedures
- Refer all concerns about a pupil’s safety and welfare to the Designated Safeguarding Lead (DSL)
- Talk to your line manager or Executive Head/Head of Education if you feel there is a possibility that you could lose control of your behaviour with a particular pupil

4. CONFIDENTIALITY

Staff are privy to personal information relating to children and their families. This information should be maintained confidentially. Please ensure you have read and understood the school confidentiality policy in conjunction with this code of conduct.

5. MONITORING AND EVALUATION

This code will be evaluated at least annually or when legislative change requires, in conjunction with the Safeguarding and Promoting the Welfare of Pupils Policy.

6. CONCLUSION

The code of conduct is a framework for ensuring that all staff at Eagle House School understand the requirements needed to ensure that the school is a safe, secure and stable environment for all pupils and staff. The code should be read in conjunction with other policies and procedures.

All staff are required to sign the code of conduct.

Signed:

Date:

Name: (PRINTED)

APPENDIX B: Safeguarding Procedure

Key Personnel

At Eagle House School (Mitcham):

The Designated Safeguarding Lead (DSL) is:	Lorraine Titchener, Deputy Head of Education Email: lorraine.titchener@eaglehousegroup.co.uk Tel: 020 8687 7050
The Deputy DSL is:	Katherine Walker, Head of Education Email: katherine.walker@eaglehousegroup.co.uk Tel: 020 8687 7050
The Deputy DSL is:	Amanda Atvars, Family Support Officer Email: amanda.atvars@eaglehousegroup.co.uk Tel: 020 8687 7050
The Deputy DSL is:	Sophie Lemboye, Assistant Psychologist Email: sophie.lemboye@eaglehousegroup.co.uk Tel: 020 8687 7050
The SLT lead for Prevent Duty	Katherine Walker, Head of Education Email: katherine.walker@eaglehousegroup.co.uk Tel: 020 8687 7050

At Eagle House School (Sutton):

The Designated Safeguarding Lead (DSL) is:	Viki Kublickas, Deputy Head Email: victoria.kublickas@eaglehousegroup.co.uk Tel: 020 8661 1419
The Deputy DSL is:	Francesca Arocas, Head of Education Email: francesca.arocas@eaglehousegroup.co.uk Tel: 020 8661 1419
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The Deputy DSL is:	Anna Lyndon, Assistant Psychologist Email: anna.lyndon@eaglehousegroup.co.uk Tel: 020 8661 1419
The DSL lead for Prevent Duty	Sue Jarrett, 6 th Form Liaison Manager Email: sue.jarrett@eaglehousegroup.co.uk Tel: 020 8661 1419

For both schools:

The Chief Executive Officer is:	Julia Pithouse Email: julia.pithouse@eaglehousegroup.co.uk Tel: 020 8770 7788
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Taking action

Any child, in any family in any school could become a victim of abuse. Staff should always maintain an attitude of “it could happen here”.

Key points for staff to remember for taking action are:

- in an emergency take the action necessary to help the child, for example, call 999
- report and record your concern to the DSL as soon as possible and no later than the end of the day
- do not start your own investigation
- share information on a need-to-know basis only – do not discuss the issue with colleagues, friends or family
- complete a record of your concern on My Concern, which is the school’s online safeguarding recording system. If for any reason, My Concern cannot be accessed, please complete and sign a Record of Concern and hand to the DSL. If the DSL is not available, hand the signed copy to one of the deputy DSLs.
- seek support for yourself if you are distressed

Staff and volunteers should feel able to raise concerns about poor or unsafe practice and potential failures in the school’s safeguarding regime. Appropriate whistleblowing procedures, which are highlighted in staff training and staff behaviour policies, are in place for such concerns to be raised with the school’s management team.

Where a staff member feels unable to raise the issue or feels that their genuine concerns are not being addressed, other whistleblowing channels may be open to them (see flowchart from KCSIE 2016 in Appendix).

If staff members are unsure they should always speak to the designated safeguarding lead (DSL). In exceptional circumstances, such as in emergency or a genuine concern that appropriate action has not been taken, staff members can speak directly to children’s social care.

If you are concerned about a pupil’s welfare

There will be occasions when staff may suspect that a pupil may be at risk, but have no ‘real’ evidence. The pupil’s behaviour may have changed, their artwork could be bizarre, they may write stories or poetry that reveal confusion or distress, or physical but inconclusive signs may have been noticed. In these circumstances, staff will try to give the pupil the opportunity to communicate. The signs they have noticed may be due to a variety of factors, for example, a parent has moved out, a pet has died, a grandparent is very ill. It is fine for staff to ask the pupil if

they are OK or if they can help in any way. **Staff should be aware that many children with autism can display behaviour which may be misinterpreted as a sign of abuse, as an example have bite marks, show outbursts of anger, wearing the wrong clothes for the weather or touching other people inappropriately. If in doubt, staff should speak to a senior colleague.**

Staff should use My Concern to record these early concerns. If the pupil does begin to reveal that they are being harmed, staff should follow the advice below. Following an initial conversation with the pupil, if the member of staff remains concerned, they should discuss their concerns with the DSL and put them in writing.

If a pupil discloses to you

It takes a lot of courage for a child to disclose that they are being abused. They may feel ashamed, particularly if the abuse is sexual; their abuser may have threatened what will happen if they tell; they may have lost all trust in adults; or they may believe, or have been told, that the abuse is their own fault.

If a pupil talks to a member of staff about any risks to their safety or wellbeing, **the staff member will need to let the pupil know that they must pass the information on** – staff are not allowed to keep secrets. The point at which they tell the pupil this is a matter for professional judgement. If they jump in immediately the pupil may think that they do not want to listen, if left until the very end of the conversation, the pupil may feel that they have been misled into revealing more than they would have otherwise.

During their conversations with the pupils staff will:

- allow them to speak freely
- remain calm and not overreact – the pupil may stop talking if they feel they are upsetting their listener
- give reassuring nods or words of comfort – ‘I’m so sorry this has happened’, ‘I want to help’, ‘This isn’t your fault’, ‘You are doing the right thing in talking to me’
- not be afraid of silences – staff must remember how hard this must be for the pupil
- **under no circumstances** ask investigative questions – such as how many times this has happened, whether it happens to siblings too, or what does the pupil’s mother think about all this
- at an appropriate time tell the pupil that in order to help them, the member of staff must pass the information on
- not automatically offer any physical touch as comfort. It may be anything but comforting to a child who has been abused
- avoid admonishing the child for not disclosing earlier. Saying things such as ‘I do wish you had told me about this when it started’ or ‘I can’t believe what I’m hearing’ may be the staff member’s way of being supportive but may be interpreted by the child to mean that they have done something wrong
- tell the pupil what will happen next. The pupil may agree to go to see the DSL. Otherwise let them know that someone will come to see them before the end of the day.

- report verbally to the DSL even if the child has promised to do it by themselves
- write up their conversation as soon as possible on My Concern
- seek support if they feel distressed

Notifying parents

The school will normally seek to discuss any concerns about a pupil with their parents. This must be handled sensitively and the DSL will make contact with the parent in the event of a concern, suspicion or disclosure.

However, if the school believes that notifying parents could increase the risk to the child or exacerbate the problem, advice will first be sought from children's social care.

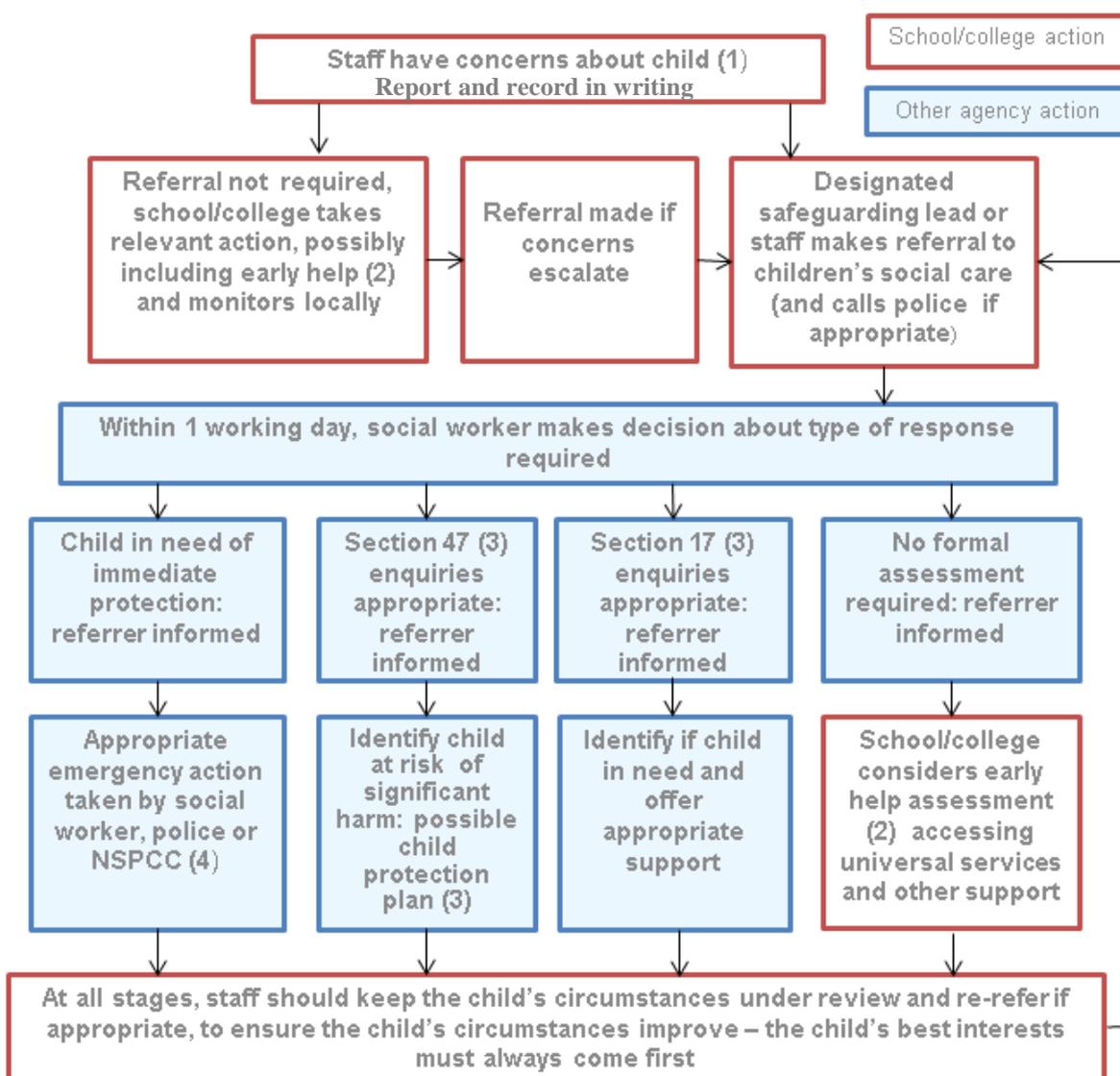
Referral to children's social care

The DSL will make a referral to children's social care if it is believed that a pupil is suffering or is at risk of suffering significant harm. The pupil (subject to their age and understanding) and the parents will be told that a referral is being made, unless to do so would increase the risk to the child.

APPENDIX C: Flowchart: Action when a child has suffered or is likely to suffer harm

This diagram (which has been taken and adapted from Keeping Children Safe in Education Guidance (September 2016)) illustrates what action should be taken and who should take it where there are concerns about a child. If, at any point, there is a risk of immediate serious harm to a child a referral should be made to children’s social care immediately. **Anybody can make a referral.**

Actions where there are concerns about a child



1. In cases which also involve an allegation of abuse against a staff member, see Part four of this guidance. 2. Early help means providing support as soon as a problem emerges at any point in a child’s life. Where a child would benefit from co-ordinated early help, an early help inter-agency assessment should be arranged. Chapter one of Working together to safeguard children provides detailed guidance on the early help process. 3. Under the Children Act 1989, local authorities are required to provide services for children in need for the purposes of safeguarding and promoting their welfare. This can include s17 assessments of children in need and s47 assessments of children at risk of significant harm. Full details are in Chapter one of Working together to safeguard children.
4. This could include applying for an Emergency Protection Order (EPO).

APPENDIX D: Record of Concern Form and My Concern Online System

Pupil's Name :			
Pupil's D.O.B :			
Ethnic Origin :		Gender :	Male / Female
Religion :		Disability :	Yes / No
Date and Time of Concern :			
Your Account of the Concern : (what was said, observed, reported and by whom)			
Your Response : (what did you do/say following the concern)			
Your Name :			
Your Position in School :			
Your Signature :			
Date and Time :			

**PLEASE PASS WITHOUT DELAY TO THE DESIGNATED STAFF MEMBER
FOR SAFEGUARDING & CHILD PROTECTION**

Additional Information : (context of concern/disclosure) <i>written by safeguarding officer</i>			
Designated Staff Signature :		Date :	

Record of Concern - Follow Up:

Pupil's Name :	
Date Concern Raised :	

MY CONCERN SAFEGUARDING SYSTEM

Eagle House Schools use My Concern, an online safeguarding system. All staff have log on to the system and receive training in how to report concerns. Using this system means all staff can report any concerns at any time of day or night and the DSL will be immediately informed via email. Following a concern being raised all actions, interventions, conversations and related documents can be added, this allows for clear and efficient monitoring. Once concerns are resolved and filed on the system they remain accessible to members of the safeguarding team allowing for all details to remain easily accessible in one place. My Concern is used to track and monitor safeguarding concerns in weekly safeguarding meetings.

APPENDIX E: Peer on Peer Abuse

Children can abuse other children. This is generally referred to as peer on peer abuse and can take many forms. This can include (but is not limited to) bullying (including cyberbullying); sexual violence and sexual harassment; physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm; sexting and initiating/hazing type violence and rituals. In most instances, the conduct of pupils towards each other will be covered by our behaviour policy. However, some allegations may be of such a serious nature that they may raise safeguarding concerns.

Eagle House Group recognises that children are capable of abusing their peers. It will not be passed off as 'banter' or 'part of growing up'.

FORMS OF PEER ON PEER ABUSE

- Domestic abuse – an incident or pattern of actual or threatened acts of physical, sexual, financial and/or emotional abuse, perpetrated by an adolescent against a current or former dating partner regardless of gender or sexuality.
- Pupil Sexual Exploitation – children under the age of 18 may be sexually abused in the context of exploitative relationships, contexts and situations by peers who are also under 18.
- Harmful Sexual Behaviour – Children and young people presenting with sexual behaviours that are outside of developmentally 'normative' parameters and harmful to themselves and others.
- Serious Youth Violence – Any offence of most serious violence or weapon enabled crime, where the victim is aged 1-19' i.e. murder, manslaughter, rape, wounding with intent and causing grievous bodily harm. 'Youth violence' is defined in the same way, but also includes assault with injury offences.

The term peer-on-peer abuse can refer to all of these definitions and a pupil may experience one or multiple facets of abuse at any one time. Therefore, our response will cut across these definitions and capture the complex web of their experiences.

There are also different gender issues that can be prevalent when dealing with peer on peer abuse (i.e. girls being sexually touched/assaulted or boys being subjected to initiation/hazing type violence).

Eagle House Group of Schools aims to reduce the likelihood of peer on peer abuse through:

- the established ethos of respect, friendship, courtesy and kindness
- high expectations of behaviour
- clear consequences for unacceptable behaviour
- providing a developmentally appropriate PSHE curriculum which develops pupils' understanding of healthy relationships, acceptable behaviour, consent and keeping themselves safe
- systems for any pupil to raise concerns with staff, knowing that they will be listened to, valued and believed
- robust risk assessments and providing targeted work for pupils identified as being a potential risk to other pupils and those identified as being at risk

Research indicates that young people rarely disclose peer on peer abuse and that if they do, it is likely to be to their friends. Therefore, Eagle House Group of Schools will also educate pupils in how to support their friends if they are concerned about them, that they should talk to a trusted adult in the school and what services they can contact for further advice.

Any concerns, disclosures or allegations of peer on peer abuse in any form should be referred to the DSL using Eagle House Group of Schools pupil protection procedures as set out in this policy. Where a concern regarding peer on peer abuse has been disclosed to the DSL(s), advice and guidance will be sought from Children Social Care and where it is clear a crime has been committed or there is a risk of crime being committed the Police will be contacted.

Working with external agencies the school will respond to the unacceptable behaviour. If a pupil's behaviour negatively impacts on the safety and welfare of other pupils then safeguards will be put in place to promote the well-being of the pupils affected and the victim and perpetrator will be provided with support.

SEXUAL ABUSE BY YOUNG PEOPLE

Sexual violence and sexual harassment can occur between two children of any age and sex. It can also occur through a group of children sexually assaulting or sexually harassing a single pupil or group of children. Children who are victims of sexual violence and sexual harassment will likely find the experience stressful and distressing. This will, in all likelihood, adversely affect their educational attainment. Sexual violence and sexual harassment exist on a continuum and may overlap, they can occur online and offline (both physical and verbal) and are never acceptable. It is important that all victims are taken seriously and offered appropriate support. Staff should be aware that some groups are potentially more at risk. Evidence shows girls, children with SEND and LGBT children are at greater risk.

The boundary between what is abusive and what is part of normal pupilhood or youthful experimentation can be blurred. The determination of whether behaviour is developmental, inappropriate or abusive will hinge around the related concepts of true consent, power imbalance and exploitation. This may include children and young people who exhibit a range of sexually problematic behaviour such as indecent exposure, obscene telephone calls, fetishism, bestiality and sexual abuse against adults, peers or children.

Developmental Sexual Activity encompasses those actions that are to be expected from children and young people as they move from infancy through to an adult understanding of their physical, emotional and behavioural relationships with each other. Such sexual activity is essentially information gathering and experience testing. It is characterised by mutuality and of the seeking of consent.

Inappropriate Sexual Behaviour can be inappropriate socially, inappropriate to development, or both. In considering whether behaviour fits into this category, it is important to consider what negative effects it has on any of the parties involved and what concerns it raises about a pupil or young person.

It should be recognised that some actions may be motivated by information seeking, but still cause significant upset, confusion, worry, physical damage, etc. It may also be that the behaviour is “acting out” which may derive from other sexual situations to which the pupil or young person has been exposed. If an act appears to have been inappropriate, there may still be a need for some form of behaviour management or intervention.

For some children, educative inputs may be enough to address the behaviour. Abusive sexual activity included any behaviour involving coercion, threats, aggression together with secrecy, or where one participant relies on an unequal power base. In order to more fully determine the nature of the incident the following factors should be given consideration.

The presence of exploitation in terms of:

- Equality – consider differentials of physical, cognitive and emotional development, power and control and authority, passive and assertive tendencies
- Consent – agreement including all the following:
 - o Understanding that is proposed based on age, maturity, development level, functioning and experience
 - o Knowledge of society’s standards for what is being proposed
 - Awareness of potential consequences and alternatives
 - Assumption that agreements or disagreements will be respected equally
 - Voluntary decision
 - Mental competence
- Coercion – the young perpetrator who abuses may use techniques like bribing, manipulation and emotional threats of secondary gains and losses that is loss of love, friendship, etc. Some may use physical force, brutality or the threat of these regardless of victim resistance.

In evaluating sexual behaviour of children and young people, the above information should be used only as a guide. Further information and advice to assist in identifying and responding appropriately to sexual behaviour is available from the Brook Sexual Behaviours Traffic Light Tool

Assessment, Consultation and Therapy (ACT) 01306 745310 can also assist professionals in identifying sexual behaviour of concern in children and adolescents.

<https://www.brook.org.uk/our-work/category/sexual-behaviours-traffic-light-tool>

WHAT IS SEXUAL VIOLENCE AND SEXUAL HARASSMENT?

Sexual violence

It is important that school and college staff are aware of sexual violence and the fact children can, and sometimes do, abuse their peers in this way. When referring to sexual violence we are referring to sexual offences under the Sexual Offences Act 2003¹⁰⁵ as described below:

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

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

Sexual Assault: A person (A) commits an offence of sexual assault if: s/he intentionally touches another person (B), the touching is sexual, B does not consent to the touching and A does not reasonably believe that B consents.

Sexual harassment

When referring to sexual harassment we mean 'unwanted conduct of a sexual nature' that can occur online and offline. When we reference sexual harassment, we do so in the context of pupil on pupil sexual harassment. Sexual harassment is likely to: violate a pupil's dignity, and/or make them feel intimidated, degraded or humiliated and/or create a hostile, offensive or sexualised environment. Whilst not intended to be an exhaustive list, sexual harassment can include:

- sexual comments, such as: telling sexual stories, making lewd comments, making sexual remarks about clothes and appearance and calling someone sexualised names;
- sexual "jokes" or taunting;
- physical behaviour, such as: deliberately brushing against someone, interfering with someone's clothes (schools and colleges should be considering when any of this crosses a line into sexual violence - it is important to talk to and consider the experience of the victim) and displaying pictures, photos or drawings of a sexual nature; and
- online sexual harassment. This may be standalone, or part of a wider pattern of sexual harassment and/or sexual violence.¹⁰⁸ It may include:
 - non-consensual sharing of sexual images and videos;
 - sexualised online bullying;
 - unwanted sexual comments and messages, including, on social media; and
 - sexual exploitation; coercion and threats

Youth produced sexual imagery (sexting)

The practice of children sharing images and videos via text message, email, social media or mobile messaging apps has become commonplace. However, this online technology has also given children the opportunity to produce and distribute sexual imagery in the form of photos and videos. Such imagery involving anyone under the age of 18 is illegal.

Young people may think 'sexting' is harmless but it can leave them vulnerable to:

- Blackmail - An offender may threaten to share the pictures with the pupil's family and friends unless the pupil sends money or more images.
- Bullying - If images are shared with their peers or in school, the pupil may be bullied.
- Unwanted attention - Images posted online can attract the attention of sex offenders, who know how to search for, collect and modify images.
- Emotional distress - Children can feel embarrassed and humiliated. If they are very distressed this could lead to suicide or self-harm.

Youth produced sexual imagery refers to both images and videos where:

- A person under the age of 18 creates and shares sexual imagery of themselves with a peer under the age of 18.
- A person under the age of 18 shares sexual imagery created by another person under the age of 18 with a peer under the age of 18 or an adult.
- A person under the age of 18 is in possession of sexual imagery created by another person under the age of 18.

All incidents of this nature should be treated as a safeguarding concern and in line with the UKCCIS guidance 'Sexting in schools and colleges: responding to incidents and safeguarding young people' Cases where sexual imagery of people under 18 has been shared by adults and where sexual imagery of a person of any age has been shared by an adult to a pupil is pupil sexual abuse and should be responded to accordingly.

If a member of staff becomes aware of an incident involving youth produced sexual imagery they should follow the pupil protection procedures and refer to the DSL as soon as possible. The member of staff should confiscate the device involved and set it to flight mode or, if this is not possible, turn it off.

Staff should not view, copy or print the youth produced sexual imagery.

The DSL should hold an initial review meeting with appropriate school staff and subsequent interviews with the children involved (if appropriate).

Parents should be informed at an early stage and involved in the process unless there is reason to believe that involving parents would put the pupil at risk of harm.

At any point in the process if there is concern a young person has been harmed or is at risk of harm a referral should be made to Children's Social Care or the Police as appropriate.

Immediate referral at the initial review stage should be made to Children's Social Care/Police if:

- The incident involves an adult

- There is good reason to believe that a young person has been coerced, blackmailed or groomed or if there are concerns about their capacity to consent (for example, owing to special education needs)
- What you know about the imagery suggests the content depicts sexual acts which are unusual for the pupil's development stage or are violent
- The imagery involves sexual acts
- The imagery involves anyone aged 12 or under
- There is reason to believe a pupil is at immediate risk of harm owing to the sharing of the imagery, for example the pupil is presenting as suicidal or self-harming.
- If none of the above apply then the DSL will use their professional judgement to assess the risk to pupils involved and may decide, with input from the Head of Education, to respond to the incident without escalation to Children's Social Care or the police.

If the image or video has been shared with an adult:

- It will be reported to CEOP, the Pupil Exploitation and Online Protection Centre. CEOP are the national policing lead for online pupil sexual exploitation.

CEOP's Thinkuknow give advice for parents, as well as children and young people of different ages, on staying safe online. Thinkuknow have created short videos regarding why children 'sext', how to talk to them about it and what to do if their pupil is affected.

In applying judgement the DSL will consider if:

- there is a significant age difference between the sender/receiver
- there is any coercion or encouragement beyond the sender/receiver
- the imagery was shared and received with the knowledge of the pupil in the imagery
- the pupil is more vulnerable than usual i.e. at risk
- there is a significant impact on the children involved
- the image is of a severe or extreme nature
- the pupil involved understands consent
- the situation is isolated or if the image been more widely distributed
- there other circumstances relating to either the sender or recipient that may add cause for concern i.e. difficult home circumstances
- the children have been involved in incidents relating to youth produced imagery before

If any of these circumstances are present the situation will be escalated according to our pupil protection procedures, including reporting to the police or children's social care. Otherwise, the situation will be managed within the school.

The DSL will record all incidents of youth produced sexual imagery, including both the actions taken, actions not taken, reasons for doing so and the resolution in line with safeguarding recording procedures.

APPENDIX F: Domestic Abuse

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. Domestic abuse affecting young people can also occur within their personal relationships, as well as in the context of their home life. Domestic abuse/violence has a significant impact on the physical health and emotional wellbeing of children, and therefore on their ability to enjoy and achieve and to learn.

Domestic abuse, as defined by the Home Office, is:

‘Any incident of threatening behaviour, violence or abuse (psychological, physical, sexual, financial or emotional) between adults who are or have been intimate partners or family members, regardless of gender or sexuality.’

The main characteristic of domestic abuse is that the behaviour is intentional; it forms a pattern of coercive and controlling behaviour and is calculated to exercise power and control within a relationship.

KEY FEATURES OF DOMESTIC ABUSE

Domestic Abuse can best be understood as a coercive pattern of control, usually involving a range of abusive behaviours that typically escalate in frequency and severity over time.

Some examples of these behaviours include:

- Psychological/emotional abuse: intimidation and threats (e.g. to kill or maim, to report victim to agencies, to remove or hurt the children or family pets), social isolation, verbal abuse, humiliation, constant criticism, enforced trivial routines, over-intrusiveness, etc.
- Physical abuse: slapping, pushing, kicking, stabbing, damage to property or items of sentimental value, attempted murder or murder, etc.
- Physical restriction of freedom: controlling who the mother or child/ren see/s or where they go, what they wear or do, stalking, imprisonment, forced marriage etc.
- Sexual abuse: any non-consensual sexual activity, including rape, sexual assault, coercive sexual activity or refusing safer sex, verbal sexual remarks etc.
- Financial abuse: stealing, depriving or taking control of money, running up debts, withholding benefits books or bank cards, etc.
- Domestic abuse can affect a child’s ability to reach their full potential emotionally, physically, socially and academically.
- Children experiencing Domestic Abuse may have a disruptive effect on other pupils, through violent outbursts or bullying
- Schools / Children’s Services can provide a safe environment where positive relationships with adults and peers can be modelled

In any situations where there is suspected domestic abuse the Eagle House safeguarding procedure should be followed and the DSL informed.

APPENDIX G: Radicalisation

INDICATORS OF VULNERABILITY TO RADICALISATION

1. Radicalisation refers to the process by which a person comes to support terrorism and forms of extremism leading to terrorism.
2. Extremism is defined by the Government in the Prevent Strategy as: Vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs. We also include in our definition of extremism calls for the death of members of our armed forces, whether in this country or overseas.
3. Extremism is defined by the Crown Prosecution Service as: The demonstration of unacceptable behaviour by using any means or medium to express views which:
 - Encourage, justify or glorify terrorist violence in furtherance of particular beliefs
 - Seek to provoke others to terrorist acts
 - Encourage other serious criminal activity or seek to provoke others to serious criminal acts or
 - Foster hatred which might lead to inter-community violence in the UK.
4. There is no such thing as a “typical extremist”. Those who become involved in extremist actions come from a range of backgrounds and experiences, and most individuals, even those who hold radical views, do not become involved in violent extremist activity.
5. Young people may become susceptible to radicalisation through a range of social, personal and environmental factors - it is known that violent extremists exploit vulnerabilities in individuals to drive a wedge between them and their families and communities. It is vital that NAS staff are able to recognise those vulnerabilities.

Indicators of vulnerability include:

Identity Crisis – the young person is distanced from their cultural / religious heritage and experiences discomfort about their place in society;

Personal Crisis – the young person may be experiencing family tensions; a sense of isolation; and low self-esteem; they may have dissociated from their existing friendship group and become involved with a new and different group of friends; they may be searching for answers to questions about identity, faith and belonging;

Personal Circumstances – migration; local community tensions; and events affecting the young person’s country or region of origin may contribute to a sense of grievance that is triggered by personal experience of racism or discrimination or aspects of Government policy;

Unmet Aspirations – the young person may have perceptions of injustice; a feeling of failure; rejection of civic life;

Experiences of Criminality – which may include involvement with criminal groups, imprisonment, and poor resettlement / reintegration;

Autism or Special Educational Needs – the young person may experience difficulties with social interaction, empathy with others, understanding the consequences of their actions and awareness of the motivations of others. Some autistic young people may also have a very clear sense of what they perceive to be justice / injustice and this may make them more vulnerable to radicalisation. However, this list is not exhaustive, nor does it mean that all young people experiencing the above are at risk of radicalisation for the purposes of violent extremism.

More critical risk factors could include:

- Being in contact with extremist recruiters;
- Accessing violent extremist websites, especially those with a social networking element;
- Possessing or accessing violent extremist literature;
- Using extremist narratives and a global ideology to explain personal disadvantage;
- Justifying the use of violence to solve societal issues;
- Joining or seeking to join extremist organisations;
- Significant changes to appearance and / or behaviour;
- Experiencing a high level of social isolation resulting in issues of identity crisis and / or personal crisis.

If staff have any concerns regarding a particular pupil they should activate local safeguarding procedures, using existing national and local protocols from multi-agency liaison with police and children's social care.

The Department for Education has dedicated a telephone helpline (020 7340 7264) to enable staff and governors to raise concerns relating to extremism directly. Concerns can also be raised by email to counter.extremism@education.gsi.gov.uk. Please note that the helpline is not intended for use in emergency situations, such as a child being at immediate risk of harm or a security incident, in which case the normal emergency procedures should be followed

(Section 26 of the Counter-Terrorism and Security Act 2015 (the Act) places a duty on certain bodies ("specified authorities" listed in Schedule 6 to the Act), in the exercise of their functions, to have "due regard to the need to prevent people from being drawn into terrorism". This guidance is issued under section 29 of the Act. The Act states that the authorities subject to the provisions must have regard to this guidance when carrying out the duty).

THE PREVENT DUTY

All schools and colleges are subject to a duty under section 26 of the Counter-Terrorism and Security Act 2015 (the CTSA 2015), in the exercise of their functions, to have "due regard to the need to prevent people from being drawn into terrorism". This duty is known as the Prevent duty.

The Prevent duty should be seen as part of schools' and colleges' wider safeguarding obligations. Designated safeguarding leads and other senior leaders should familiarise themselves with the revised Prevent duty guidance: for England and Wales, especially paragraphs 57-76, which are specifically concerned with schools (and also covers childcare). The guidance is set out in terms of four general themes: Risk assessment, working in partnership, staff training, and IT policies.

CHANNEL

Channel is a programme which focuses on providing support at an early stage to people who are identified as being vulnerable to being drawn into terrorism. It provides a mechanism for schools to make referrals if they are concerned that an individual might be vulnerable to radicalisation. An individual's engagement with the programme is entirely voluntary at all stages.

Eagle House DSLs are aware of local procedures for making a Channel referral. As a Channel partner, the school or college may be asked to attend a Channel panel to discuss the individual referred to

determine whether they are vulnerable to being drawn into terrorism and consider the appropriate support required.

APPENDIX H: Children and the court system

Children are sometimes required to give evidence in criminal courts, either for crimes committed against them or for crimes they have witnessed. There are two age appropriate guides to support children 5-11-year olds and 12-17 year olds.

Staff will work with parents and carers following guidance in Keeping Children Safe in Education (2018) to explain each step of the process and support and special measures that are available. There are diagrams illustrating the courtroom structure and the use of video links is explained.

Making child arrangements via the family courts following separation can be stressful and entrench conflict in families. This can be stressful for children. The Ministry of Justice has launched an online child arrangements information tool with clear and concise information on the dispute resolution service. Parents and carers will be directed to this by Eagle House staff as this may be useful for some parents and carers.

APPENDIX I: Children with family members in prison

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

Eagle House works following guidance to ensure pupils and families are supported in these situations.

APPENDIX J: Homelessness

Being homeless or being at risk of becoming homeless presents a real risk to a child's welfare. The designated safeguarding lead (and any deputies) should be aware of contact details and referral routes in to the Local Housing Authority so they can raise/progress concerns at the earliest opportunity. Indicators that a family may be at risk of homelessness include household debt, rent arrears, domestic abuse and anti-social behaviour, as well as the family being asked to leave a property. Whilst referrals and or discussion with the Local Housing Authority should be progressed as appropriate, and in accordance with local procedures, this does not, and should not, replace a referral into children's social care where a child has been harmed or is at risk of harm.

The Homelessness Reduction Act 2017 places a new legal duty on English councils so that everyone who is homeless or at risk of homelessness will have access to meaningful help including an assessment of their needs and circumstances, the development of a personalised housing plan, and work to help them retain their accommodation or find a new place to live. The following factsheets usefully summarise the new duties: Homeless Reduction Act Factsheets. The new duties shift focus to early intervention and encourage those at risk to seek support as soon as possible, before they are facing a homelessness crisis.

In most cases school and college staff will be considering homelessness in the context of children who live with their families, and intervention will be on that basis. However, it should also be

recognised in some cases 16 and 17 year olds could be living independently from their parents or guardians, for example through their exclusion from the family home, and will require a different level of intervention and support. Children's services will be the lead agency for these young people and the designated safeguarding lead (or a deputy) should ensure appropriate referrals are made based on the child's circumstances. The department and the Ministry of Housing, Communities and Local Government have published joint statutory guidance on the provision of accommodation for 16 and 17 year olds who may be homeless and/ or require accommodation.

APPENDIX K: Pupil Contact Information

Two emergency contact details will be held for each pupil where possible.

Staff will monitor pupils who do not attend the school on the agreed date and will notify the LA at the earliest opportunity.

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

- The full name of the parent with whom the pupil will live
- The new address
- The date from when the pupil will live at that address

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

- The name of the new school
- The date on which the pupil first attended, or is due to attend, that school

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

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

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

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

If a pupil is to be removed from the admissions register, the school will provide the LA with the following information:

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

The school will work with the LA to establish methods of making returns for pupils back into the school.

The school will highlight to the LA where they have been unable to obtain necessary information from parents, e.g. where an address is unknown.

The school will also highlight any other necessary contextual information including safeguarding concerns

APPENDIX L: Safer Recruitment

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

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

The DfE's DBS Workforce Guides will be consulted when determining whether a position fits the child workforce criteria.

PRE-EMPLOYMENT CHECKS

- Verifying the candidate's identity, preferably from the most current photographic ID and proof of address except where, for exceptional reasons, none is available.
- Obtaining a certificate for an enhanced DBS check with barred list information where the person will be engaged in regulated activity.
- Obtaining a separate barred list check if an individual will start work in regulated activity before the DBS certificate is available.
- Checking that a candidate to be employed as a teacher is not subject to a prohibition order issued by the Secretary of State, using the TRA Teacher Services' System.
- Verifying the candidate's mental and physical fitness to undertake their working responsibilities, including asking relevant questions about disability and health to establish whether they have the physical and mental capacity for the specific role.

- Checking the person's right to work in the UK. If there is uncertainty about whether an individual needs permission to work in the UK, the advice set out on the Gov.UK website will be followed.
- If the person has lived or worked outside the UK, making any further checks that the school considers appropriate; this includes checking for any teacher sanctions or restrictions that an EEA professional regulating authority has imposed.
- Checking professional experience, QTS and qualifications as appropriate using Teacher Services.
- Academies, free schools and independent schools only confirming that an individual taking up a management position is not subject to a section 128 direction.

An enhanced DBS certificate will be obtained from candidates before or as soon as practicable after appointment. An online update check may be undertaken through the DBS update service if an applicant has subscribed to it and gives their permission.

Internal candidates

- If an individual moves from a position within the college that did not involve the provision of education to one that does, it will be treated as if the individual were a new member of staff and all required pre-appointment checks will be carried out.
- References from internal candidates will always be scrutinised before appointment.

ITT candidates

Where applicants for ITT are salaried by the school, the school will ensure that enhanced DBS checks with barred list information are carried out.

Written confirmation will be obtained to ensure that an enhanced DBS certificate and barred list check has been carried out for all fee-funded trainees.

Those who have lived or worked outside of the UK

For those who have lived or worked outside of the UK, additional checks regarding teacher sanctions or restrictions will be conducted, this includes checking for any teacher sanctions or restrictions that an EEA professional regulating authority has imposed.

Barred list check

An enhanced DBS check may be requested for anyone working in school that is not in regulated activity but does not have a barred list check.

If there are concerns about an applicant, an enhanced DBS check with barred list information may be requested, even if they have worked in regulated activity in the three months prior to appointment.

Written information about their previous employment history will be obtained from candidates and the appropriate checks undertaken to ensure information is not contradictory or incomplete.

References

References will be obtained directly from referees and scrutinised, with all concerns satisfactorily resolved prior to confirmation of employment.

References will only be accepted from a senior person and not from a colleague.

References will be sought on all short-listed candidates, including internal ones, before an interview and checked on receipt to ensure that all specific questions were answered satisfactorily.

References will be obtained prior to interviews taking place and discussed during interviews. Open testimonials will not be considered.

Information about past disciplinary actions or allegations will be considered carefully when assessing an applicant's suitability for a post.

Information sourced directly from a candidate or online source will be carefully vetted to ensure they originate from a credible source.

Volunteers

No volunteer will be left unsupervised with a pupil or allowed to work in regulated activity until the necessary checks have been obtained.

An enhanced DBS certificate with barred list check will be obtained for all new volunteers in regulated activity that will regularly teach or look after children on an unsupervised basis or provide personal care on a one-off basis.

Personal care includes helping a child with eating and drinking for reasons of illness, or care in connection with toileting, washing, bathing and dressing for reasons of age, illness or disability. A supervised volunteer who regularly teaches or looks after children is not in regulated activity. The school will obtain an enhanced DBS certificate with barred list check for existing volunteers that provide pastoral care.

Unless there is cause for concern, the school will not request any new DBS certificates with barred list check for existing volunteers that have already been checked.

A risk assessment will be undertaken for volunteers not engaged in regulated activity when deciding whether to seek an enhanced DBS check.

Contractors

The school will ensure that any contractor or employee of the contractor working on the premises has been subject to the appropriate level of DBS check.

Checks will be conducted to ensure that the contractor presenting themselves for work is the same person on whom the checks have been made.

Contractors without a DBS check will be supervised if they will have contact with children. The identity of the contractor will be checked upon their arrival at the school.

Data retention

DBS certificates will be securely destroyed as soon as practicable, but not retained for longer than six months from receipt.

A copy of the other documents used to verify the successful candidate's identity, right to work and required qualifications will be kept for the personnel file. The personnel file will be held for the duration of the employee's employment plus six years.

Referral to the DBS

The school will refer to the DBS anyone who has harmed a child or poses a risk of harm to a child, or if there is reason to believe the member of staff has committed an offence and has been removed from working in regulated activity.