



# **THE REGENT SECONDARY SCHOOL**

## **Child Protection and Safeguarding Policy**

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Reviewed by the Designated Safeguarding Lead: October 2024  
Previous Review: August 2023

Next Review:  
Approved by the Board: October 2024

October

2025

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# Key Contacts for Safeguarding and Child Protection at the School

## Designated Safeguarding Lead (DSL)

Name	Mrs. Uwakwe
Contact email	avppastoral.ks3@regentschoolabuja.com
Telephone	+234 809 230 5901

## Deputy Designated Safeguarding Lead (DDSL)

Name	Mrs. Esther Ajala
Contact email	avpsim@regentschoolabuja.com
Telephone	+2348168440035

## Safeguarding Officers

Contact details	Mr. Obot, csosec@regentschoolabuja.com Mrs. Kalu, kalu@regentschoolabuja.com Ms. Ezeh, ezeh@regentschoolabuja.com Mrs. Williams, williams@regentschoolabuja.com Mrs. Uwagwu, Uwagwu@regentschoolabuja.com Dr. Onuntuei, onuntuei@regentschoolabuja.com
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## Pastoral Staff

Contact	Mr. Akinola (Vice Principal Pastoral and Boarding), boarding@regentschoolabuja.com, +2348072293282 Mrs. Uwagwu (Assistant Vice Principal Pastoral, Head of Year 9), avppastoral.ks4@regentschoolabuja.com +2349126389097 Mrs. Uwakwe (Assistant Vice Principal Pastoral & DSL), avppastoral.ks3@regentschoolabuja.com +234 809 230 5901 Ms. Ezeh (Head of Year 7), ezeh@regentschoolabuja.com Mrs. Williams (Head of Year 8), williams@regentschoolabuja.com Dr. Onuntuei (Head of Year 10), onuntuei@regentschoolabuja.com Mrs. Kalu (Head of Year 11), kalu@regentschoolabuja.com Mr. Abdulrahman (House Parent, Danfodio Hostel), abdulraheem@regentschoolabuja.com, +2348072293285 Mrs. Decker (Assistant Vice Principal Boarding-Girls), avpboarding.girls@regentschoolabuja.com, +2348072293556 Mr. Okolo (Assistant Vice Principal Boarding - Boys), avpboarding.boys@regentschoolabuja.com, +2348072290100
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## Nominated Board Member for Safeguarding

Name	Mrs A. AbdulRazaq
Contact email	proprietress@regentschoolabuja.com

## Key Contacts for Safeguarding and Child Protection at the School

### Others within the school with any responsibilities for Child Protection / Safeguarding

Contact details	Mr. Anderson Obot (Chief Security Officer) Tel: <u>234-807-229-3292</u> <u>csosec@regentschoolabuja.com</u> Mr. Abiodun Abdulrazak (Health and Safety Officer) <u>tabiodun@regentschoolabuja.com</u>
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If you are concerned about extremism in school, or if you think a child might be at risk of extremism, contact the Designated Safeguarding Lead, Mrs Uwakwe, AVP Pastoral, email: [avppastoral.ks3@regentschoolabuja.com](mailto:avppastoral.ks3@regentschoolabuja.com); tel:+2348092305901.

### Purpose of Policy

The Regent Secondary School fully recognises its responsibilities for safeguarding children. Our students' welfare and safety are at the heart of our school's ethos and in everything we do.

In this policy, a 'child' means all children and young people below 18 years of age.

In accordance with relevant law and guidance, as set out below in the second section, this policy details our procedures for safeguarding and child protection.

It is applicable to the whole school community. Safeguarding and promoting the welfare of children is everyone's responsibility, whether they work or volunteer in the school. Everyone has a role to play in child protection and safeguarding.

All staff and volunteers will ensure that their approach and actions are child-centred. This means that they'll consider, at all times, what is in the best interests of the child. Because of the day to day contact with students, school staff and volunteers are well placed to observe signs of harm, abuse, neglect, peer on peer sexual violence and sexual harassment, victimisation and/or exploitation.

The Regent Secondary School ensures that arrangements are in place to safeguard and promote the welfare of students by:

- Creating and maintaining an environment where all students feel secure, are encouraged to communicate, and

are listened to.

- Making sure that all students know which adults in the school they can approach if they have any worries.
  - Student Handbook
  - School Website
  - Google Classroom
- Teaching students to keep themselves safe from all forms of abuse including: child sexual exploitation, female genital mutilation, forced marriage, extremism, radicalisation, and peer on peer abuse including sexual violence and sexual harassment.
- Appointing senior members of staff from the school leadership team to the roles of Designated and Deputy Safeguarding Leads.
- Providing effective, relevant and ongoing training and development for all staff and Board Members. We do this through a variety of external providers.
  - CPD training on Educare.
  - In-house Safeguard training.
- Swiftly and effectively addressing any concerns and ensuring robust, timely referrals are made to other agencies. Ensuring effective links with relevant agencies in all matters regarding safeguarding and child protection.
- Reviewing and supporting students who are subject to child protection plans and contributing to the implementation of the plan.
- Keeping meticulous, written records of concerns about students, even where there is no need to refer the matter immediately (this includes recording dates, times, people responsible, and actions), and ensuring all records are kept securely and shared appropriately.
- Ensuring the suitability of all staff through safe recruitment practice and maintaining an accurate and up to date Single Central Register.
- Making sure that all school staff and volunteers understand their responsibilities with regard to safeguarding and child protection.
- Ensuring that parents and carers also have an understanding of the responsibility placed on the school and its staff for safeguarding and child protection.
- Maintaining awareness of those students who are persistently absent or missing from school, notifying the relevant national authority in line with 'Children Missing in Education' protocols, where U.K. schools would notify the Local Authority.
- Maintaining clear procedure in line with the latest guidance for reporting allegations against staff members. Furthermore, The Regent Secondary School recognises that:
  - Some students may be at increased risk of abuse.
  - Some students may face additional barriers with respect to recognising or disclosing abuse.

The school is committed to recognising diversity and ensures anti-discriminatory practices. We ensure that all students have the same protection. We give special consideration to students who:

- Have special educational needs (SEN) or disabilities (further information is in section 9).
- Are young carers.
- Show signs of mental health problems.
- Are missing education.
- May experience discrimination due to their race, ethnicity, religion, gender identification, or sexuality.
- Are at risk of FGM, sexual exploitation, forced marriage, or radicalisation.
- Are asylum seekers.

- Have English as an additional language.
- Are known to be living in difficult situations e.g. where there are issues at home, such as: substance abuse/misuse or domestic violence or where a family member has mental health needs.
- Are at risk due to either their own or a family member's mental health needs. Safeguarding Children

**1.1** The Regent Secondary School recognises that safeguarding covers a broad range of areas and it aims to achieve the following:

- Protecting children from maltreatment.
- Preventing impairment of children's mental and physical health and/or development.
- Ensuring children are growing up in circumstances consistent with the provision of safe and effective care.
- Undertaking that role so as to enable children to have optimum life chances, so they can enter adulthood successfully

**1.2** As part of meeting a child's needs, The Regent Secondary School:

- Recognises that sharing information, particularly with safeguarding partner agencies and other professionals, in a timely manner is crucial in identifying and tackling all forms of abuse and neglect. Fears about sharing information must not be allowed to stand in the way of the need to promote the welfare, and protect the safety of children.
- Will identify children who may benefit from the Early Help process and make timely disclosures to the relevant national authority to enable that process to begin. Working with safeguarding partners and other professionals to assist with these assessments and work flowing from these assessments.
- Recognises that mental health issues can be an indicator of abuse and neglect and will share any such concerns appropriately.
- Will identify students who may be suffering from significant harm and make child protection referrals.
- Will identify students who need extra help and make appropriate referrals, including to early help service, to prevent concerns escalating.

**1.3** The Regent Secondary School also understands the importance of contextual safeguarding, i.e. that incidents or behaviours can be associated with factors outside the school and can occur between children outside of school. All staff should be considering the context within which such incidents and behaviours occur. This is known as contextual safeguarding and simply means that assessments should consider whether wider environmental factors are present in a child's life that are a threat to their safety and/or welfare.

## 2. Legislation and guidance

This policy for The Regent Secondary School is derived from a variety of legislative provisions and statutory guidance. In particular, it is based on good practice found in:

- Keeping Children Safe in Education (2024).
- Working Together to Safeguard Children (2018).
- Governance Handbook.

Our safeguarding policy and procedures comply with all of this guidance and are updated with local arrangements agreed and published by the three local safeguarding partners.

The following legislation is also incorporated into this policy:

- The Children Act 1989 (and 2004 amendment), which gives a broad framework for the care and protection of children and includes provisions for Local Authority inquiries, care proceedings, and emergency provisions.
- Female Genital Mutilation Act 2003 S 5B(11), as inserted by section 74 of the Serious Crime Act 2015, places a statutory duty on teachers to report to the police where they discover/find that female genital mutilation (FGM) appears to have been carried out on a girl under 18. Responsibilities for safeguarding and supporting girls affected by FGM are found in Statutory guidance on FGM.
- The Rehabilitation of Offenders Act 1974 outlines provisions for when people with criminal convictions can work with children.
- 'Regulated activity' in relation to children is found in Schedule 4 of the Safeguarding Vulnerable Groups Act 2006.
- Schools' "PREVENT" duties under the Counter-Terrorism and Security Act 2015 with respect to protecting people from the risk of radicalisation and extremism can be found in: Statutory guidance on the Prevent duty.

Other statutory provisions relevant to child protection and safeguarding include:

- The Education Act 2002 (section 175/157).
- The Education (pupil information) (England) Regulations 2005.
- Prevent Duty Guidance for England and Wales – September 2015.
- The Sexual Offences Act, 2003, Home Office.
- Teaching on-line safety in schools, DfE, 2019.

A full list of the guidance this policy has referred to, and which staff can refer to for further information, can be found in Appendix 3: 'The Schools' Statutory Duty.

## **2.1 Related Policies**

Safeguarding covers more than the contribution made to child protection in relation to individual young people. It also encompasses issues such as staff conduct, health and safety, bullying, online safety, arrangements for meeting medical needs, providing first aid and/or intimate care, drugs and substance misuse, positive behaviour management, and the use of physical intervention and restraint.

This document must therefore be read, used, and applied alongside the school policies and procedures referred to below:

- The Single Central Record of identity, qualification, and vetting checks for all staff and volunteers.
- The guidelines for visitors.
- The Safer Working Practices guidelines for staff and volunteers.
- The E-safety and Information Technology Acceptable Use Policy.
- Staff Behaviour Policy or Code of Conduct (whichever applies to the school).
- Data Protection Policy.
- Online Safety Policy.
- The guidelines for using a computer and personal technology in school (students).
- The school's 'Ladder of Consequences' in relation to the acceptable use of ICT equipment by students.
- The Behaviour and Anti-bullying Policy.
- The Confidentiality Policy.
- The Health and Safety Policy.
- The Trips and Visits Policy.



- The Whistleblowing Policy.

### **3. Responsibilities**

The Regent Secondary School recognises that safeguarding and promoting the welfare of children is everyone's responsibility. Everyone who comes into contact with children and their parents or carers has a role to play in safeguarding children.

All staff working (including visiting staff) in The Regent Secondary School are required to:

- Read and understand part 1 and Annex A of the Department for Education's statutory safeguarding guidance, Keeping Children Safe in Education, and review this guidance at least annually.
- Be aware of our child protection and safeguarding policy and procedures, including referrals to statutory agencies. They must understand the role of the DSL and know how to deal with children missing from education.
- Observe and comply with the staff code of conduct.
- Attend all relevant training and development provided by the school and be aware of all their responsibilities in line with Keeping Children Safe in Education 2020.
- Know how to deal with a disclosure. If a student discloses to a member of staff that they are being abused, the staff member should follow the guidance set out in Appendix 1.
- Report instances of actual or suspected child abuse or neglect to the Designated Safeguarding Lead, or in their absence, the Deputy, in line with the Child Protection Procedures and legal duty for reporting FGM as set out in this policy.
- Understand the school's management policy and procedure and knows what to do in the event of an allegation made against someone working with children.
- Be alert to the signs of harm and abuse, including issues that can manifest themselves due to peer on peer abuse. This is most likely to include, but not limited to: bullying (including cyber bullying), gender-based violence/sexual assaults and sexting. Staff should follow the Child Protection Procedures with regards to peer on peer abuse as outlined in this policy. Further information can be found in Appendix 2.
- Know the Designated and Deputy Safeguarding Lead's name and contact details including telephone numbers and email.
- Be aware of the early help process. This includes identifying emerging problems, liaising with the Designated Safeguarding Lead, sharing information with other professionals to support early identification and assessment and, in some cases, acting as the lead professional in undertaking an early help assessment.

The Board will:

- Assess the impact of this policy in keeping children safe.
- Contribute any local, contextual information that may support children's safety and welfare.
- Appoint a nominated Board member to liaise with the Principal and Designated Safeguarding Lead (DSL) on Safeguarding issues.
- Receive and consider regular reports from the Principal about the effectiveness of safeguarding and child protection at the school.
- Keep abreast of training to ensure that staff have the skills, knowledge and understanding necessary to keep all children safe.
- Review and annually approve the safeguarding policy, ensuring it complies with all law, regulation and good practice. They will also hold the Principal to account for its implementation.
- Ensure all Board Members read Keeping Children Safe in Education 2020.

- Receive any allegations made against the Principal.

### **All Board Members must read Keeping Children Safe in Education.**

The Principal will:

- Be responsible for the implementation of this and all related policies and procedures, ensuring that the outcomes are monitored.
- Ensure that whilst the activities of the Designated Safeguarding Lead (DSL) can be delegated to appropriately trained deputies, the ultimate lead responsibility for safeguarding and child protection, as set out below, remains with the DSL.
- Meet regularly with the DSL.
- Ensure that the DSL has appropriate time, funding, training, and resources to fulfil all of their functions and ensure adequate cover in the event that the DSL isn't available.
- Ensure that everyone connected to the school is aware of this policy including safeguarding and child protection procedures.
- Attend advanced training with an accredited provider.
- Ensure that all staff are vigilant to harm and abuse, are able to identify those students for whom there are child protection concerns, and can make appropriate referrals, including to early help services.
- Be alert to the signs of harm and abuse and specific safeguarding issues including but not limited to: Child Sexual Exploitation (CSE); Child Criminal Exploitation activity; serious violent crime including serious violent sexual offences; peer on peer abuse, FGM, and radicalisation. Peer on peer abuse can manifest itself in many ways but often in bullying (including cyber bullying) gender based violence / sexual assaults and sexting. Staff should follow the Child Protection Procedures with regards to peer on peer abuse as outlined in this policy.
- Appoint a designated teacher to promote the educational achievement and welfare of students who are looked after and to ensure that this person has appropriate training.
- Communicate clearly to school councillors, visitors, parents, and students so everyone understands the school's safeguarding policy and procedures.
- Appoint a DSL and Deputy DSL giving consideration to the range of responsibilities the DSL undertakes, e.g. the DSL needs to have the flexibility to act immediately on a referral that requires an urgent response and time to attend lengthy meetings or case conferences.
- Ensure that contact and role details of the DSL and Deputy DSL are clearly displayed in staff online areas and the website (along with this policy).
- Report to the Board regularly regarding the effectiveness of safeguarding and implementation of related policies.
- Ensure safe recruitment practice is followed when recruiting for posts, and ensure appropriate action is taken when an allegation is made against a member of staff.
- Ensure all appropriate checks are made in relation to all staff, volunteers, and visitors.
- Ensure the school offers a safe environment via a robust health and safety policy and procedure to meet the statutory responsibilities for the safety of students and staff at the school.

The Designated Safeguarding Lead is responsible for:

- Being available for all staff to discuss any safeguarding issues or concerns.
- Ensuring all staff are aware of the DSL and deputy contact details.
- Ensuring that all cases of suspected or actual problems associated with child protection or safeguarding concerns (including cases where the early help process may be appropriate) are referred to the appropriate agencies in line with procedures set out in this policy, keeping the Principal apprised.

- Ensuring the school's safeguarding policy and practice is relevant and consistent with the most recent statutory guidance outlined in Appendix 3 and 4.
- Being aware of the latest national and local guidance and requirements and keeping the Principal and staff informed as appropriate.
- Attending accredited, enhanced training each year, as required to fulfil the role.
- Ensuring that appropriate training for staff (including periodic updates via e-bulletins, email, or as part of staff meetings) is organised according to the agreed programme with the Principal and renewed through ongoing professional development.
- Ensuring families are fully aware of the school policies and procedures and kept informed and involved.
- Ensuring that effective communication and liaison takes place between the school and the relevant national authority or partner agencies, and any other relevant agencies, where there is a Safeguarding concern in relation to a student.
- Ensuring that all staff have an understanding of child abuse, neglect, and peer on peer abuse (including serious violence and serious sexual violence, Child Criminal Exploitation, FGM, and Prevent) and their main indicators, including for looked after children and additional vulnerabilities of children with special educational needs and disabilities (SEND).
- Maintaining details of parents and guardians.
- Dealing with allegations of abuse, including assessments for early help, in accordance with local and statutory procedures.
- Supporting the staff member in liaising with other agencies and setting up an interagency assessment as appropriate if early help is appropriate.
- Ensuring that adequate reporting and recording systems are in place.
- Liaising with the Board's nominated board members for safeguarding.
- Ensuring relevant records (and further information not contained in the child's child protection file) are passed on appropriately when students transfer to other schools, or are being educated at alternative provision or off-site education.
- Presenting an annual safeguarding Board Report.
- Referring suspected cases, as appropriate, to the relevant body (relevant national authority), and support staff who make such referrals directly.
- Contributing and helping other staff to contribute to early help assessments.
- Meeting regularly with the Principal to discuss safeguarding issues including outcomes and implementation of actions relating to case conferences and core groups and all current case work. Other key staff will be invited as appropriate. Safeguarding matters arising will be discussed routinely at each staff and/or Senior Leadership Team (SLT) meeting.

## **4. Child Protection Procedures**

**4.1** Staff at The Regent Secondary School will follow the necessary child protection procedures if an incident occurs. They will be made aware that:

- Where a child is in immediate danger or at risk of harm, a referral should be made to children's social care and/or the police immediately.
- Anyone can make a referral.
- Staff should not assume that somebody else will take action/share information that might be critical in keeping children safe.
- Where referrals are not made by the Designated Safeguarding Lead, the Designated Safeguarding Lead should

be informed, as soon as possible, that a referral has been made.

- The reporting of concerns relating to Female Genital Mutilation (FGM) is mandatory.
- The DSL or Deputy DSL will always be available to discuss safeguarding concerns.

When a member of staff at The Regent Secondary School suspects that any student may have been subject to abuse, or a student has suggested that abuse has taken place either to themselves or another student, the allegation must be reported immediately to the Designated Safeguarding Lead (DSL) or the Deputy DSL if the DSL is off site.

The DSL or Deputy DSL will:

- Ensure the allegation is acted on within the school day.
- Ensure that the Principal is informed of all allegations unless the allegation is against the Head, in which case the Board will be informed.
- Deal with the allegation in accordance with the agreed procedures. In the case of a violent sexual assault or sexual harassment matter, The Regent Secondary School will follow the latest procedures as set out in Keeping Children Safe in Education 2022.
- Be best placed to carry out a risk assessment of the issue and determine the escalation and timescales for dealing with the allegation.

It is best practice to ensure that all colleagues who are involved in the allegation are informed of the outcome, so there is closure or continual vigilance as necessary.

## **Allegations of Abuse**

Appendix 1 provides guidance and detail about:

- Each child abuse category.
- Potential signs of abuse.
- Specific procedures about how to deal with a disclosure.

### **4.2 Female Genital Mutilation (FGM)**

The FGM Mandatory Reporting Duty is a legal duty provided for in the FGM Act 2003 (as amended by the Serious Crime Act 2015). The legislation requires teaching staff to make a report to the police where, in the course of their professional duties, they either:

- Are informed by a girl under 18 that an act of FGM has been carried out on her; or they
- Observe physical signs which appear to show that an act of FGM has been carried out on a girl under 18 and they have no reason to believe that the act was necessary for the girl's physical or mental health or for purposes connected with labour or birth.

### **4.3 Allegations Against Members of Staff**

All allegations of abuse made against a member of staff (including supply teachers and volunteers) in relation to a student must be brought to the attention of the Principal.

In the event the Principal is the subject of the allegation, the report will be sent to the Board immediately to establish 'the nature, content and context of the allegation' and agree the appropriate course of action. In some cases, allegations may be so serious that they will require immediate intervention by the police.

If the allegation against a teacher or member of staff (including supply teachers and volunteers) meets any of the

following criteria, the Principal (or other lead person) must report it to the Board on the same day:

- They have behaved in a way that has harmed a child, or may have harmed a child.
- They possibly committed a criminal offence against or related to a child.
- They have behaved towards a child or children in a way that indicates they may pose a risk of harm to children.
- They've behaved towards a child or children in a way that indicates he/she is unsuitable to work with children.

For other allegations, the Principal and DSL will decide if further enquiries are required prior to referral to the relevant national authorities

Where the Principal considers that a referral may be warranted under Child Protection Procedures and an allegation appears to meet the criteria, the Principal will inform the Board and/or relevant national authority.

The Board or relevant national authority must be informed of all allegations that come to the school's attention that meet the criteria, so that he/she can consult the police as appropriate. The Board or relevant national authority should also be informed of any allegations that are made directly to the police. All alleged physical injuries must be investigated by the appropriate external agencies.

#### **4.4 Whistleblowing**

Where a staff member at The Regent Secondary School feels unable to raise an issue with their employer, or feels that their genuine concerns are not being addressed, other whistleblowing channels may be open to them.

#### **4.5 Training for staff**

The Regent Secondary School ensures all staff complete safeguarding and child protection training as part of their induction. The school also has a commitment to updating training for all staff each year and for appropriate staff to attend Safeguarding Board Meetings.

To achieve this:

- Time will be given to enable this commitment to be met.
- The Designated Safeguarding Lead (DSL) and Deputy DSL will receive relevant training every year.
- All staff and volunteers new to the school will be given appropriate safeguarding training as part of their induction programme to the school. Updates will feature regularly in all staff and SLT meetings, as appropriate.
- All school staff and Board members will undertake the training at least every two years as organised by the DSL.
- Newly recruited staff will complete the online training as part of their induction and will receive school-specific training, including being made aware of local risk factors for extremism.
- The DSL will attend safeguarding update and other training courses as necessary and other appropriate inter-agency training every year.
- The DSL will attend training as provided by the School.
- The Principal will attend advanced training with a designated provider.
- The Senior Leadership team, Pastoral Leaders, and the Board will attend training with a designated provider.

#### **4.6 Suitability of staff and safe recruitment practices**

The school recognises that safe recruitment practices are an essential part of creating a safe environment for children and young people. Consequently, we will ensure that staff (including supply teachers) and volunteers working at the

school are suitable to do so and therefore do not pose any kind of risk to our students.

Appropriate members of SLT, Board, and other relevant staff are required to complete Safer Recruitment Training in order to ensure that one panel member on every selection panel is trained as 'Safer Recruitment.'

## **5. Prevent duty - Safeguarding students who are vulnerable to extremism.**

### **5.1 The school's prevent strategy**

The Regent Secondary School follows the statutory guidance on the school's responsibility to fulfil our Prevent Duty. We are aware that there have been occasions, both locally and nationally, in which extremist groups have attempted to radicalise vulnerable children to hold extreme views including those justifying political, religious, sexist, or racist violence, or to steer them into a rigid and narrow ideology that is intolerant of diversity and leaves them vulnerable to future radicalisation.

The Prevent strategy aims to stop people from becoming terrorists or supporting terrorism.

It is rare for children to become involved in terrorist activity. However, some students from an early age can be exposed to terrorist and extremist influences or prejudiced views. Consequently, the school takes the view that early intervention is always preferable and includes this in its procedures as it does for all safeguarding concerns.

In line with both the fundamental British, Nigerian and the School Values, the following key principles underpin the community in which the school is based:

- Inclusion.
- Tolerance.
- Freedom of speech.
- The expression of beliefs and ideology.

Both students and teachers have the right to speak freely and voice their opinions. However, freedom comes with responsibility. Free speech that is designed to manipulate the vulnerable or that leads to violence and harm of others goes against the moral principles in which freedom of speech is valued.

Free speech is subject to treating others with respect, understanding differences, equality, an awareness of human rights, community safety, and community cohesion. The Prevent statutory guidance requires schools to have clear protocols for ensuring that any visiting speakers are appropriately supervised and suitable.

The school is committed to working with the BSO, COBIS and other local partners, families, and communities to play a key role in ensuring young people and our communities are safe from the threat of terrorism. The DSL will keep up to date with all local policies and procedures relating to Prevent.

Staff must consider the level of risk to identify the most appropriate referral, which could include reference to Channel or Children's Social Care.

### **5.2 Visiting speakers**

Visiting speakers will be expected to understand that, where appropriate, their session should actively promote the Nigerian and British values of democracy, the rule of law, individual liberty, and mutual respect and tolerance of those with different faiths and beliefs and at no point undermine these. In some cases, the school may request a copy of the visiting speaker's presentation and/or footage in advance of the session being provided.

Visiting speakers, whilst on the school site, will be supervised by a school employee. On attending the school, visiting speakers will be required to show an original current identification document that includes a photograph, such as a passport or photo card driving licence. The school shall also keep a formal register of visiting speakers retained in line with its Data Protection Policy.

### 5.3 Reducing risks of extremism

The Principal and the Designated Safeguarding Lead will assess the level of risk within the school and put actions in place to reduce that risk.

Visiting speakers, whilst on the school site, will be supervised by a school employee. On attending the school, visiting speakers will be required to show an original current identification document that includes a photograph, such as a passport or photo card driving licence. The school shall also keep a formal register of visiting speakers retained in line with its Data Protection Policy.

Actions will include consideration of:

- PSHE Lessons.
- Behavioural Policy
- Assembly content.

Risk assessments will include:

- The use of school premises by external agencies.
- Integration of students by gender and SEND.
- Anti-bullying policy.
- Other issues specific to the school's profile and community.

There is no single way of identifying an individual who is likely to be susceptible to a terrorist/radical ideology. As with managing other safeguarding risks, all school staff will be vigilant to changes in students' behaviour which could indicate that they may be in need of help or protection.

It is commonly recognised that children at risk of radicalisation may display changes in behaviour, show different signs or seek to hide their views. Staff are advised to use their professional judgement in identifying students who might be at risk of radicalisation and always act proportionately and seek support if they are concerned.

The school recognises that the Prevent duty does not ask teachers to carry out unnecessary intrusions into family life, but as with any other safeguarding risk, they must take action when they observe behaviour of concern.

### 5.4 Potential signs of radicalisation and extremism

There is no limit to the signs that you might notice – every student is different. However, some of the indicators staff should look out for include:

- **Vulnerability:** identity crisis, personal crisis, migration, unmet aspirations, and history of criminality.
- **Access to extremist influences:** friendship groups, internet activity, activities abroad i.e. military camps, and vocalised support of illegal or extremist/militant groups.
- **Experiences and influences:** social rejection, personal impact from civil unrest and wide spread media coverage of international events, change in appearance and behaviour, family conflict over religious reviews, and verbal or written evidence of support for terrorist activities.

- **Travel:** pattern of regular extended travel, evidence of falsifying identity documents, and unexplained absences.
- **Social factors:** disadvantaged background, lack of empathy and/or affinity with others, severe learning difficulties or mental health, being a child of a foreign national or refugee, experience of trauma or sectarian conflict, and extremist views of a significant other.

It is always worth remembering that numerous factors can contribute to and influence the range of behaviours that are defined as violent extremism, but most children or young people do not become involved in extremist action. For this reason, the appropriate interventions in any particular case may not have any specific connection to the threat of radicalisation. For example, they may address mental health, relationship, or drug/alcohol issues.

## **5.5 Response**

The Regent Secondary School will appoint a Prevent Single Point of Contact (SPOC) to be the lead within the school for safeguarding in relation to protecting individuals from radicalisation and involvement in terrorism. This will normally be the Designated Safeguarding Lead.



## **6. Safeguarding students who are vulnerable to exploitation, child sexual exploitation, honour based abuse (forced marriage and female genital mutilation), and at risk from or involved with violent crime and peer-on-peer abuse.**

All staff at The Regent Secondary School will be provided with an awareness of safeguarding issues that can put children at risk of harm. Behaviours linked to issues such as drug taking, alcohol abuse, deliberately missing education, and sexting (also known as youth produced sexual imagery) put children in danger.

### **6.1 Children Missing From Education**

All staff should be aware that children who go missing from education, particularly repeatedly, can act as a vital warning sign of a range of safeguarding possibilities. This may include abuse and neglect, which may include sexual abuse or exploitation, and can also be a sign of child criminal exploitation.

It may also indicate mental health problems, risk of substance abuse, risk of travelling to conflict zones, risk of female genital mutilation, or risk of forced marriage. Early intervention is necessary to identify the existence of any underlying safeguarding risks and to prevent the risks of a child going missing in future. All staff should be aware of The Regent Secondary School's unauthorised absence and children missing from education procedures, which are set out in section 9.

### **6.2 Child Criminal Exploitation**

Child criminal exploitation (CCE) is a form of abuse where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate, or deceive a child into criminal activity, in exchange for something the victim needs or wants, and/or for the financial or other advantage of the perpetrator or facilitator, and/or through violence or the threat of violence.

The abuse can be perpetrated by males or females, and children or adults. It can be a one-off occurrence or a series of incidents over time, and range from opportunistic to complex organised abuse.

The victim can be exploited even when the activity appears to be consensual. It does not always involve physical contact and can happen online. For example, young people may be forced to work in cannabis factories, coerced into moving drugs or money across the country, forced to shoplift or pickpocket, or to threaten other young people.

All staff at The Regent Secondary School will be made aware of the indicators that may signal children are at risk from, or are involved with, serious violent crime.

Signs may include:

- Increased absence.
- Change in friendships.
- New relationships with older individuals or groups.
- A significant decline in performance.
- Signs of self-harm.
- Significant change in wellbeing.
- Signs of assault.
- Unexplained injuries.
- Unexplained gifts or new possessions.

These could indicate that children have been approached by, or are involved with, individuals associated with criminal networks or gangs.

Indicators of CCE can include a child:

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

If a member of staff suspects CCE, they will discuss this with the DSL. The DSL will trigger the local safeguarding procedures, including a referral to the Board, and relevant national authority, if appropriate.

### **6.3 Child Sexual Exploitation (CSE)**

Child sexual exploitation is a form of child sexual abuse. It occurs when 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 activity appears consensual. Child sexual exploitation does not always involve physical contact; it can also occur through the use of technology.

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

Signs include:

- Underage sexual activity.
- Inappropriate sexual or sexualised behaviour.
- Sexually risky behaviour, 'swapping' sex.
- Repeat sexually transmitted infections.
- In girls, repeat pregnancy, abortions, and miscarriage.
- Receiving unexplained gifts or gifts from unknown sources.
- Having multiple mobile phones and worrying about losing contact via mobile.
- Having unaffordable new things (clothes, a mobile phone, etc.) or expensive habits (alcohol, drugs, etc.).
- Changes in the way they dress.
- Going to hotels or other unusual locations to meet friends.
- Seen at known places of concern (e.g. brothels).
- Moving around the country, appearing in new towns or cities, not knowing where they are.
- Getting in/out of different cars driven by unknown adults.
- Having older boyfriends or girlfriends.
- Contact with known perpetrators.

- Involved in abusive relationships, intimidated, and fearful of certain people or situations.
- Hanging out with groups of older people, or anti-social groups, or with other vulnerable peers.
- Associating with other young people involved in sexual exploitation.
- Recruiting other young people to exploitative situations.
- Truancy, exclusion, disengagement with school, opting out of education altogether.
- Unexplained changes in behaviour or personality (chaotic, aggressive, sexual, etc.).
- Mood swings, volatile behaviour, emotional distress.
- Self-harming, suicidal thoughts, suicide attempts, overdosing, eating disorders.
- Drug or alcohol misuse.
- Getting involved in crime.
- Police involvement, police records.
- Involved in gangs, gang fights, gang membership.
- Injuries from physical assault, physical restraint, sexual assault.

#### **6.4 Honour-based Abuse: Forced Marriage (FM)**

Young men and women can be at risk in affected ethnic groups. Evidence shows that the issue of forced marriage affects certain sectors of communities, typically girls in the age range of 14 – 16 years old often occur in some parts of the country.

A signal of FM is the removal of the students from school and lengthy absence which is often unexplained. Other indicators may be detected by changes in adolescent behaviours. Whistleblowing may come from younger siblings.

Any member of staff at The Regent Secondary School with any concerns should report this immediately to the DSL, who should raise the concern with the Board by email or phone. Whilst the onus of the investigation for criminal offences will remain with the Police, the DSL should co-operate and liaise with the relevant agencies in line with current child protection responsibilities.

#### **6.5 Honour-based Abuse: Female Genital Mutilation (FGM)**

There is a specific legal duty on teachers regarding FGM. If, during the course of their work, a member of staff discovers that an act of FGM appears to have been carried out on a girl under the age of 18 years, then they must report it to the DSL. All staff at The Regent Secondary School will recognise this responsibility.

##### **The 'One Chance' rule.**

As with Forced Marriage, there is the 'One Chance' rule regarding FGM. This refers to staff potentially only having one chance to speak to a potential victim and thus may only have one chance to save a life. It is essential that the school takes action without delay.

##### **What is FGM?**

Female genital mutilation involves procedures that intentionally alter/injure the female genital organs for non-medical reasons.

##### **Why is it carried out?**

It is often based on a belief that FGM:

- Brings status/respect to the girl – social acceptance for marriage.
- Preserves a girl's virginity.

- Is part of being a woman/rite of passage.
- Upholds family honour.
- Cleanses and purifies the girl.
- Gives a sense of belonging to the community.
- Fulfils a religious requirement.
- Perpetuates a custom/tradition.
- Helps girls be clean/hygienic.
- Is cosmetically desirable.
- Is mistakenly believed to make childbirth easier.

All staff at The Regent Secondary School will be made aware of FGM practices and the need to look for signs, symptoms, and other indicators of FGM.

All teachers have a mandatory responsibility to report FGM if they discover it (through disclosure not physical examination) to the DSL immediately.

Circumstances and occurrences that may point to FGM happening include:

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

Signs that may indicate a child has undergone FGM:

- Prolonged absence from school and other activities.
- Behaviour change on return from a holiday abroad, such as being withdrawn and appearing subdued.
- Bladder or menstrual problems.
- Finding it difficult to sit still and looking uncomfortable.
- Complaining about pain between the legs.
- Mentioning something somebody did to them that they are not allowed to talk about.
- Secretive behaviour, including isolating themselves from the group.
- Reluctance to take part in physical activity.
- Repeated urinary tract infection.
- Disclosure.

## **6.6 Peer-on-peer abuse**

All staff at The Regent Secondary School will be made aware that children can abuse other children (referred to as peer-on-peer). This is most likely to include, but may not be limited to:

- Bullying (including cyberbullying).
- Physical abuse such as hitting, biting, kicking, shaking, hair-pulling, or causing physical harm.
- Sexual violence, such as rape, assault by penetration, and sexual assault.
- Sexual harassment, such as sexual comments, remarks, jokes, and online sexual harassment, which may be

stand- alone or part of a broader pattern of abuse.

- Upskirting, which is a form of abuse that has been high on school and court agendas for a number of years and is a criminal offence in its own right under the Voyeurism (Offences) Act 2019. Upskirting occurs when someone takes a picture under a person's clothing, with or without underwear, without them knowing or without permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification or cause the victim humiliation, distress, or alarm. It is a common aspect of peer-on-peer abuse and can happen to any gender.
- Sexting (also known as youth produced sexual imagery).
- Initiation/hazing type violence and rituals.

## 6.7 Sexting

### Your responsibilities when responding to an incident

If you are made aware of an incident involving sexting (also known as 'youth produced sexual imagery'), you must report it to the DSL immediately.

You must not:

- View, download, or share the imagery yourself, or ask a pupil to share or download it. If you have already viewed the imagery by accident, you must report this to the DSL.
- Delete the imagery or ask the pupil to delete it.
- Ask the pupil(s) who are involved in the incident to disclose information regarding the imagery (this is the DSL's responsibility).
- Share information about the incident with other members of staff, the pupil(s) it involves, or their, or other, parents and/or carers.
- Say or do anything to blame or shame any young people involved.

You should explain that you need to report the incident, and reassure the pupil(s) that they will receive support and help from the DSL.

This policy on sexting should also be shared with pupils so they are aware of the processes the school will follow in the event of an incident.

## **7. Procedure for students identified as being 'at risk' or vulnerable to exploitation, child sexual exploitation; honour-based abuse (forced marriage and female genital mutilation), children who are at risk from or involved with violent crime and peer-on-peer abuse**

Where risk factors are present but there is no evidence of a particular risk, the DSL at

The Regent Secondary School will advise staff on preventative work that can be done within the school to engage the student into mainstream activities and social groups.

The DSL may well be the person who talks to the student's family where appropriate, sharing the school's concern about the student's vulnerability and how the family and school can work together to reduce the risk.

In this situation, depending on the level of concern and agreement with the parent and the student (as far as possible):

- The DSL can decide to notify the Board and/or relevant national authority of the decision so that a strategic overview can be maintained and any themes or common factors can be recognised; and
- The school will review the situation after taking appropriate action to address the concerns.

The DSL will also offer and seek advice about undertaking an early help assessment and/or making a referral to the Board. If the concerns about the student are significant and meet the additional needs/complex need criteria, he/she will be referred to the Board. This includes concerns about a student who is affected by the behaviour of a parent or other adult in their household.

## **8. Children Missing in Education**

All students, regardless of their circumstances or background, are entitled to full-time education that is suitable to their age, ability, aptitude, and any special educational needs and disabilities.

The Regent Secondary school operates a strong attendance tracking system that is overseen by a member of the leadership team. The tracking and use of effective attendance management strategies enables the school to ensure each day that every child is accounted for.

The school takes a range of actions to tackle Persistent Absentees and completes official reports on children who are persistently absent from school.

The school will only authorise leave of absence in exceptional circumstances. The Principal, or Deputy in their absence, will determine the length of time that the child can be away from the school.

The school recognises that some children seeking leave of absence are vulnerable to risk of abuse, neglect, or travelling to conflict zones, or at risk of FGM or forced marriage.

Attendance staff are trained to look out for these triggers and the school to ensure localised risks are particularly taken note of and shared with all staff. Staff who have pastoral responsibility undergo training on attendance and safeguarding issues on an annual basis.

As a matter of course: student absence must be followed up on a daily basis – this must be a priority. Unless circumstances indicate that a student is at risk and immediate action is necessary, the Board will be informed of every student who has a continuous period of unexplained absence of three days or more.

The admissions register at the school is kept up to date and the Board is informed of all students who are removed from the school roll when they:

- Have been taken out of school by their parents and are being educated outside the school system e.g. home education.
- Have been certified by the school medical officer as unlikely to be in a fit state of health to attend school before ceasing to be of compulsory school age, and neither he/she nor his/her parent has indicated the intention to continue to attend the school after ceasing to be of compulsory school age.
- Are in custody for a period of more than four months due to a final court order and the proprietor does not reasonably believe they will be returning to the school at the end of that period.
- Have been permanently excluded.

No student will be removed from a school roll until all safeguarding checks have been completed or the whereabouts of a student have been established.

## **9. Domestic Abuse**

Domestic violence and abuse refer to any incident or pattern of incidents of controlling, coercive, threatening behaviour, violence or abuse between those aged 16 or over who are, or have been, intimate partners or family members, regardless of gender or sexuality.

All children can witness and be adversely affected by domestic abuse in the context of their home life where domestic abuse occurs between family members. Exposure to domestic abuse and/or violence can have a serious, long lasting emotional and psychological impact on children.

DSLs should endeavour to alert relevant pastoral support staff as soon as possible where information is shared.

## **10. Online Safety**

The Regent Secondary School's Online, E-Safety and Acceptable use of Technology Policies can be found on the school website or upon request. All staff will be made aware of the contents.

Children must be safeguarded from potentially harmful and inappropriate online material. As such, the school ensures appropriate filters and appropriate monitoring systems are in place.

Online safety is included in our curriculum provision and ensures children are taught about safeguarding, including online, through teaching and learning opportunities. This may include covering relevant issues through a variety of lessons and learning opportunities.

Although appropriate blocking is essential, it does not restrict our students' learning or lead to unreasonable restrictions as to what our students can be taught with regards to online teaching and safeguarding. This policy sets out specific measures that ensure students in the school work safely, including protection from terrorist or extremist material, peer abuse, and bullying via online platforms, including sexting.

## **11. Opportunities to teach safeguarding**

The Regent Secondary School will ensure that children are taught about safeguarding. This may include covering relevant topics through learning in general but is covered particularly assemblies and PSHE lessons.

## **12. Children who harm other children (Peer on peer abuse)**

The Regent Secondary School recognises that children are capable of abusing their peers. Examples of this may include when children are violent or cause danger towards other children.

It can also be when children sexually abuse or sexually harass other children – please refer to Appendix 2.

Where a student's behaviour causes significant harm to other students, staff should follow the child protection procedures for the school. The DSL will refer the child in line with the local area safeguarding protocol for these children.

## **13. Confidentiality and Record Keeping**

Staff at The Regent Secondary School have a professional responsibility to share relevant information about the protection of children with the DSL and potentially external investigating agencies, where possible, under the guidance of the DSL.

If a student confides in a member of staff and requests that the information is kept secret, it is important that the member of staff tells the student sensitively that he/she has a responsibility to refer the matter to the DSL.

Accurate, signed, and dated written notes must be kept of all incidents or Child Protection concerns relating to individual students. If a teacher or any other staff have a child protection concern, they should inform the DSL or Deputy DSL as soon as possible. These will be kept on the student's Child Protection file.

Child Protection records must be retained securely. Arrangement for Child Protection documentations must comply with the schools Data Protection Policy together with data protection law and regulation applicable at the time. The DSL will ensure that all Child Protection records are held separately from other student records. Child Protection files and documents will be stored securely, by encryption and/or password protecting electronic files or ensuring that paper records are in a locked cabinet with restricted access. Information from child protection files will only be shared with relevant staff when it is necessary to do so and in a manner that is consistent with data protection law.

If the school receives a request for direct access to, or copies of, school documentation held on a Child Protection file, the Principal and DSL will be informed and a decision taken on the appropriate way forward in accordance with the Data Protection Policy. It may be that the schools Data Protection Officer will be consulted or further legal advice sought.

In the event of a student who is being dealt with under the school's child protection procedures transferring to another school, the school will:

- Find out the name of the receiving school (and, where appropriate, the relevant national authority).
- Contact the relevant member of staff at that school to discuss the transfer.
- Securely send all information relating to the student to the receiving school (and, where relevant, the relevant national authority).
- Check with the receiving school that the student has actually arrived there on the expected day (and inform all relevant agencies of the transfer).

Any external individual or organisation contracted by the school to work with school students must report any child protection incidents or disclosures from students to the Principal or DSL at the earliest opportunity. Such bodies will, as part of their contractual arrangements with the school, be required to work in accordance with the school's child protection and safeguarding policy. The school has in place data sharing agreements and complies with all relevant data sharing protocols.

## **14. Working with parents / individuals with parental responsibility**

The Regent Secondary School recognises the importance of working, where appropriate, in partnership with parents and carers to ensure the welfare and safety of our students.

The school will therefore:

- Make parents aware of the school's statutory role in safeguarding and promoting the welfare of students, including the duty to refer students on, where necessary, by making all policies available on the website and on request.
- Work with parents to support the needs of their child.
- Consider the safety of the student and, should a concern arise, the Designated Safeguarding Lead (DSL) has the responsibility to seek advice prior to contacting parents.
- Aim to help parents understand that the school has a responsibility for the welfare of all students and has a duty to refer cases to the relevant national authority in the interests of the student as appropriate.
- Ensure a robust complaints system is in place to deal with issues raised by parents and carers.
- Provide advice and signpost parents and carers to other services where students need extra support.



## **15. Health and Safety**

The Principal of The Regent Secondary School will ensure that there is a robust, up to date Health and Safety Policy and Procedure to meet the statutory responsibility for the safety of students and staff at the school. The Principal will identify and manage health and safety through the use of risk assessments, which are carried out:

- On an annual basis for the school learning spaces and environment in and outdoors.
- For all school trips and educational visits.
- For students travelling between locations during the school day.
- For all work-based learning on work experience placements.
- When a student returns following an exclusion due to risky or violent behaviour.
- When there are any changes to the premises or practices.
- Following a serious accident in relation to staff and/or students.
- When there is a high-level risk associated with contact with parents.
- To maintain effective security of the premises including protection from intruders, trespassers, and/or criminal damage.

Visitors and contractors will be expected to:

- Report to the school reception on arrival.
- Provide proof of identity.
- Wear a name badge at all times.
- Receive suitable supervision by school staff when on site.
- Be made aware of the arrangements for safeguarding and health and safety.
- Comply with the relevant vetting checks specified through the school's recruitment process.

## **16. Equal Opportunities**

The Regent Secondary School and Board must take into account the Equality, Diversity, and Values Policy when discharging their duties under this policy.

## **17. Monitoring and Review of this Policy**

The Designated Safeguarding Lead (DSL) at The Regent Secondary School will monitor the working of this policy and will report as required to the Principal and the nominated Board Member. It will be reviewed annually.

### **Appendix 1 - Staff Guidance**

#### **A. Procedures in respect of Child Abuse**

Child abuse exists where children have been physically or emotionally abused or severely neglected. Abuse of children is likely to be noticed by the school staff and Health Workers. It is essential, therefore, that all those whose work brings them into contact with children and their families know the signs of child abuse and are aware of the procedures that they must follow to safeguard the child.

Part one of Keeping Children Safe in Education 2020 should be referred to for a list of those children who may be in need of safeguarding support.

The Regent Secondary School has the role of recognising and responding to potential indicators of abuse and neglect. All other action should be taken by those with statutory powers to help the child. Early contact and close liaison with such agencies are therefore regarded as essential by the school.

In the event of an actual or suspected case of child abuse by adults, parents, teachers, or any other adult, it is the responsibility of staff to report this to the Designated Safeguarding Lead (DSL) as soon as possible. The Designated Safeguarding Lead (DSL) is responsible for ensuring that children are identified and the appropriate agency is involved. The Designated Safeguarding Lead (DSL) or Designated Safeguarding Officer (DSO) will attend any reviews called by the Board or relevant national authority, and may call on appropriate members of staff for reports. It is important that if staff overhear children discussing 'abuse' or 'neglect' that this information is relayed for investigation. Staff should not assume that somebody else will take action and must share information which might be critical in keeping children safe.

Staff leading school off-site visits, particularly residential ones, should provide a list of the students taking part in the Designated Safeguarding Lead (DSL), to ensure that they are made aware of all essential information relating to the students in their care. A confidential register will be maintained of all those students known to be at risk. Names will be entered on the register if it is confirmed by the relevant national authority that the child is actually at risk.

## **B. Guidance for all staff on dealing with disclosure / suspected abuse / neglect / sexual harassment, sexual assault, violence, honour based abuse (forced marriage and female genital mutilation), children who are at risk from or involved with violent crime and peer-on-peer abuse**

### I. Dealing with disclosures of abuse

- Always listen carefully and quietly. Do not press for any evidence at all.
- Remain calm and reassuring. Do not dismiss the disclosure and do not show distress or concern.
- Do not refute the allegation.
- Show that you care through open and reassuring facial expressions and body language.
- Do not interrogate or ask leading questions (it could later undermine a case).
- Ensure you take a written verbatim account of the child's disclosure.
- Staff should be aware that written accounts could become part of a statutory assessment or criminal investigation.
- Where there is an online element, the key consideration is for staff not to view or forward illegal images of a child. Where viewing images is unavoidable, the following link provides advice on how to respond: [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/759007/6\\_2939\\_SP\\_NCA\\_Sexting\\_In\\_Schools\\_FINAL\\_Update\\_Jan17.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/759007/6_2939_SP_NCA_Sexting_In_Schools_FINAL_Update_Jan17.pdf)

### II. At this point, staff should take the following steps:

- Explain to the student that the disclosure must be reported – emphasise your trust in them.
- Do not promise to keep the allegation secret or that 'everything will be alright.'
- Reassure the student by telling them that they have done the right thing in telling you. Do not offer physical reassurance.
- Do not admonish in any way e.g. 'I wish you had told me sooner.'
- Inform the DSL initially verbally.

- Under no circumstances discuss the matter with any other person. If the allegations prove to be untrue, any such discussion would be deemed defamatory. Information to staff is on a 'need to know' basis at the discretion of the DSL.
- If the child agrees, and it is appropriate, take them with you to the DSL.
- With the DSL, prepare a detailed report itemising:
  - The information revealed by the student. It should not contain any opinion whatsoever.
  - Actions taken by yourself, including when the suspicions were reported, to whom the suspicions were reported, and follow-up action taken within the school.
  - Date and sign any written record of events and action taken and keep confidential and secure.
- You must keep, in absolute confidence, a copy of the report, as will the DSL.
- The DSL keeps Child Protection records centrally and securely and are not kept in the child's file.
- All staff are under a duty to report all suspicions of abuse to the DSL.
- The DSL is responsible for passing on these concerns to the Principal or Board.
- Accurate records are essential in the event of further investigations.

### III. If you see or hear something that is concerning:

- Don't ignore it or assume that it is someone else's responsibility to report it.
- Upload all information to the school's safeguarding systems and seek advice immediately from your DSL.
- Don't feel silly – if it worries you, someone else needs to know.
- If it is something related to safeguarding, but not a child whose safety is immediately at risk, inform the appropriate Pastoral Leader or safeguarding officer in person and follow up with a one-line email notifying the DSL that there is a safeguarding concern.
- If it is related to a child being at risk, see the DSL or Deputy DSL immediately and definitely before the child goes home that day where possible.
- All staff may raise concerns directly with the Board if they feel an incident is not being dealt with appropriately or they are unable to locate relevant staff.
- Concerns about adults in the school should be made directly to the Principal.

### Child Protection Procedures – Points of action

1. If anyone discovers or suspects child abuse/peer on peer sexual violence or sexual harassment, they must inform the DSL. The DSL will, in the appropriate manner and according to procedures, assess the situation.
2. The DSL will, if appropriate, take the following steps:
  - Where there is a report of peer on peer sexual violence, the DSL will make an immediate risk and needs assessment in accordance with part five of Keeping Children Safe in Education 2020 (guidance for this can be found in Appendix 4). Where there is a report of sexual harassment, the need for a risk assessment will be considered on a case by case basis.
  - Where it is clear that a Child Protection Referral (significant harm) is needed, they will contact the Board.

## **Appendix 2 - Information on child abuse and categories of abuse**

All staff in The Regent Secondary School should be aware that abuse, neglect, and safeguarding issues are rare standalone events that can be covered by one definition or label. In most cases multiple issues will overlap with one another.

### **1. Abuse**

Abuse is a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others (e.g. via the internet). They may be abused by an adult or adults or another child or children (peer on peer abuse).

In a situation where abuse is alleged to have been carried out by another peer, the child protection procedures outlined in this policy should be adhered to for both the victim and the alleged abuser. That is, it should be considered a child care and protection issue for both children.

All abusers must be held accountable for their behaviour and work must be done to ensure that abusers take responsibility for their behaviour and acknowledge that the behaviour is unacceptable. If there is any conflict of interest between the welfare of the alleged abuser and the victim, the victim's welfare is of paramount importance.

Abusive behaviour that is perpetrated by peers must be taken seriously. It is known that some adult abusers begin abusing during childhood and adolescence, that significant numbers will have suffered abuse themselves, and that the abuse is likely to become progressively more serious. Early referral and intervention are therefore essential in line with paragraph 2 of this policy.

## **2. Peer on peer abuse**

Peer on peer can manifest itself in many ways. All staff should be aware that children can abuse other children (referred to as peer on peer). This is most likely to include, but may not be limited to:

- Bullying (including cyberbullying).
- Physical abuse such as hitting, biting, kicking, shaking, hair-pulling, or causing physical harm.
- Sexual violence, such as rape, assault by penetration, and sexual assault.
- Sexual harassment, such as sexual comments, remarks, jokes, and online sexual harassment, which may be stand-alone or part of a broader pattern of abuse.
- Upskirting, which typically involves taking a picture under a person's clothing without them knowing, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress, or alarm.
- Sexting (also known as youth produced sexual imagery).
- Initiation/hazing type violence and rituals.

Please refer to the Department for Education advice:

<https://www.gov.uk/government/publications/sexual-violence-and-sexual-harassment-between-children-in-schools-and-colleges>

It could be through 'sexting' using online communications, text, or image messaging. Please refer to the online safety policy for further information. The Child Exploitation Online Protection Centre (CEOP) also provides further guidance on sexting at <https://www.ceop.police.uk/safety-centre/>.

## **3. Emotional abuse**

Emotional abuse is the persistent emotional maltreatment of a child that causes severe and persistent adverse effects on the child's development. It may involve conveying to children that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the child an opportunity to express their views, deliberately silencing them, or 'making fun' of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children.

These may include interactions that are beyond the child's developmental capability, as well as overprotection and limitation of exploring or learning, or preventing the child participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyberbullying) causing children to frequently feel frightened or in danger, exploitation, or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, though it may occur alone.

#### **4. 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 include 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.

#### **5. Neglect**

Neglect is the persistent failure to meet a child's basic or physical and/or psychological needs, which is 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.

All staff and volunteers should be concerned about a child if he/she presents indicators of possible significant harm. Training will be provided to all staff on the 'signs of abuse.'

#### **6. Signs of Abuse in Children**

The following non-specific, broad signs may indicate something is wrong:

- Significant change in behaviour.
- Extreme anger or sadness.
- Aggressive and attention-seeking behaviour.
- Suspicious bruises with unsatisfactory explanations.
- Lack of self-esteem.
- Self-injury.
- Depression.
- Inappropriate sexual behaviour.
- Child Sexual Exploitation.

#### **7. Risk Indicators**

The factors described in this section are frequently found in cases of child abuse. Their presence is not proof that abuse has occurred, but they:

- Must be regarded as indicators of the possibility of significant harm.
- Justify the need for careful assessment and discussion with the Designated Safeguarding Lead.
- May require consultation with and/or referral to Children's Services.

The absence of such indicators does not mean that abuse or neglect has not occurred.

In an abusive relationship the child may:

- Appear frightened of the parent/carers.
- Act in a way that is inappropriate to her/his age and development (though full account needs to be taken of different patterns of development and different ethnic groups).

The parent or carer may:

- Persistently avoid child health promotion services and treatment of the child's episodic illnesses.
- Have unrealistic expectations of the child, frequently complain about/to the child, and may fail to provide attention or praise (high criticism/low warmth environment).
- Be absent or misusing substances.
- Persistently refuse to allow access on home visits.
- Be involved in domestic abuse.

Staff should be aware of the potential risk to children when individuals, previously known or suspected to have abused children, move into the household.

## **8. Recognising Physical Abuse**

The following are often regarded as indicators of concern:

- An explanation which is inconsistent with an injury.
- Several different explanations provided for an injury.
- Unexplained delay in seeking treatment.
- The parents/carers are uninterested or undisturbed by an accident or injury.
- Parents are absent without good reason when their child is presented for treatment.
- Repeated presentation of minor injuries (which may represent a "cry for help" and if ignored could lead to a more serious injury).
- Family use of different doctors and hospital emergency departments.
- Reluctance to give information or mention previous injuries.

## **9. Bruising**

Children can have accidental bruising, but the following must be considered as non-accidental unless there is evidence or an adequate explanation provided:

- Two simultaneous bruised eyes (rarely accidental, though a single bruised eye can be accidental or abusive).
- Repeated or multiple bruising on the head or on sites unlikely to be injured accidentally.

- Variation in colour possibly indicates injuries caused at different times.
- The outline of an object used e.g. belt marks, handprints, or a hairbrush.
- Bruising or tears around, or behind, the earlobe(s) indicating injury by pulling or twisting.
- Bruising around the face.
- Bruising on the arms, buttocks, and thighs may be an indicator of sexual abuse.

## 10. Bite Marks

Bite marks can leave clear impressions of the teeth. Human bite marks are oval or crescent shaped. Those over 3 cm in diameter are more likely to have been caused by an adult or older child. A medical opinion should be sought where there is any doubt over the origin of the bite.

## 11. Burns and Scalds

It can be difficult to distinguish between accidental and non-accidental burns and scalds, and will always require experienced medical opinion. Any burn with a clear outline may be suspicious e.g.:

- Circular burns from cigarettes (but may be friction burns if along the bony protuberance of the spine).
- Linear burns from hot metal rods or electrical fire elements.
- Burns of uniform depth over a large area.
- Scalds that have a line indicating immersion or poured liquid (a child getting into hot water of his/her own accord will struggle to get out and cause splash marks).
- Old scars indicating previous burns/scalds which did not have appropriate treatment or adequate explanation.

## 11. Fractures

Fractures may cause pain, swelling, and discolouration over a bone or joint. There are grounds for concern if:

- The history provided is vague, non-existent, or inconsistent with the fracture type.
- There are associated old fractures.
- Medical attention is sought after a period of delay when the fracture has caused symptoms such as swelling, pain, or loss of movement.

## 12. Scars

A large number of scars, scars of different sizes or ages, and scars on different parts of the body may suggest abuse.

## 13. Recognising Emotional Abuse

Emotional abuse may be difficult to recognise, as the signs are usually behavioural rather than physical. The manifestations of emotional abuse might also suggest the presence of other kinds of abuse.

The following may be indicators of emotional abuse:

- Developmental delay.
- Abnormal attachment between a child and parent/carer e.g. anxious, indiscriminate, or not appropriate attachment.
- Indiscriminate attachment or failure to attach.
- Aggressive behaviour towards others.
- Scapegoating within the family, such as a parent blaming the child for something bad that happened to them

(e.g. losing a job).

- Frozen watchfulness.
- Low self-esteem and lack of confidence.
- Withdrawn or seen as a “loner” – difficulty relating to others.
- The indicators of emotional abuse are often also associated with other forms of abuse.

#### **14. Recognising Signs of Sexual Abuse**

Boys and girls of all ages may be sexually abused and are frequently scared to say anything due to guilt and/or fear. This is particularly difficult for a child to talk about and full account should be taken of the cultural sensitivities of any individual child/family. Recognition can be difficult, unless the child discloses and is believed. There may be no physical signs and indications are likely to be emotional/behavioural.

Some behavioural indicators associated with this form of abuse are:

- Inappropriate sexualised conduct.
- Sexually explicit behaviour, play, or conversation, inappropriate to the child’s age.
- Continual and inappropriate or excessive masturbation.
- Self-harm (including eating disorder), self-mutilation, and suicide attempts.
- Involvement in prostitution or indiscriminate choice of sexual partners.
- An anxious unwillingness to remove clothes e.g. for sports events (but this may be related to cultural norms or physical difficulties).

Some physical indicators associated with this form of abuse are:

- Pain or itching of genital area.
- Blood on underclothes.
- Pregnancy in a younger girl where the identity of the father is not disclosed.
- Physical symptoms such as injuries to the genital or anal area, bruising to buttocks, abdomen, and thighs, and sexually transmitted disease.

#### **15. Sexual Abuse by Young People**

The boundary between what is abusive and what is part of normal childhood 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. This may also include online sexual harassment. This may be standalone, or part of a wider pattern of sexual harassment and/or sexual violence.

It may include:

- Non-consensual sharing of sexual images and videos.
- Sexualised online bullying.
- Unwanted sexual comments and messages, including on social media.
- Sexual exploitation
- Coercion and threats.

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 child 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 child 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 includes any behaviour involving coercion, threats, or aggression together with secrecy, or where one participant relies on an unequal power base.

## **16. Assessment**

In order to more fully determine the nature of an incident and the presence of exploitation, the following factors should be given consideration:

- Equality – consider differentials of physical, cognitive, and emotional development, power and control and authority, passive and assertive tendencies.
- Consent – consider whether an incident appeared consensual or non-consensual, keeping in mind that consent means willing agreement. This requires consideration of all the following:
  - Understanding that is based on age, maturity, development level, functioning, and experience.
  - 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 – a 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..

## **17. Recognising Neglect**

Evidence of neglect is built up over a period of time and can cover different aspects of parenting. Indicators include:

- Failure by parents or carers to meet the basic essential needs e.g. adequate food, clothes, warmth, hygiene, and medical care.
- A child seen to be listless, apathetic, and unresponsive with no apparent medical cause.
- Failure of child to grow within normal expected pattern, with accompanying weight loss.
- Child thrives away from the home environment.
- Child frequently absent from school.
- Children left with adults who are intoxicated or violent.
- Child abandoned or left alone for excessive periods.

## **Appendix 3 - The School's Statutory Duty and Guidance Documents**

This policy sets out how The Regent Secondary School will meet its statutory duty to safeguard and promote the welfare of our students. It has been developed in accordance with the law and guidance found at <https://www.gov.uk/> that seeks to protect children.

Further guidance in relation to the safeguarding topics covered in this policy include:

- Keeping Children Safe in Education: Statutory Guidance for Schools and Colleges
- Working Together to Safeguard Children
- Multi-agency Statutory Guidance on Female Genital Mutilation
- Teaching Online Safety in Schools
- Information about mandatory reporting of female genital mutilation
- Protecting Children from Radicalisation: the prevent duty
- Prevent Duty Guidance: England and Wales
- Inspecting safeguarding in maintained schools and academies
- Inspecting safeguarding in safeguarding in early years, education and skills settings
- Competence Still Matters: Safeguarding training for all employees and volunteers
- Preventing Youth Violence and Gang Involvement
- Safeguarding in Schools: Best Practice
- Criminal exploitation of children and vulnerable adults: county lines
- Sexual Offences Act
- The Children Act 1989 and 2004 and The Education Act 2002
- Mental Health and Behaviour in Schools: Departmental Advice
- Multi-agency statutory guidance on female genital mutilation
- Sexting in Schools, Aug 2016, UK Council for Internet Safety
- Learning together to be safe - a toolkit to help schools contribute to the prevention of violent extremism
- The Prevent Strategy: A Guide for Local Partners in England

If anyone wishes to seek further information or guidance, they can refer to the above documents.