



The Fernwood School

*High Achievement with Care & Discipline for All"*

# SAFEGUARDING POLICY (INCLUDING CHILD PROTECTION)

This policy will be monitored regularly and evaluated so that it remains responsive to current issues. This will be co-ordinated by the Assistant Headteacher in charge of safeguarding.

Approved: November 2023  
Next review: November 2024  
Status: Statutory



## Contents

Introduction.....	3
School Commitment .....	3
Roles and Responsibilities.....	4
Headteacher.....	5
Governing Body.....	5
Procedures.....	6
Records and Monitoring.....	7
Confidentiality .....	8
Safer Recruitment.....	9
Supporting Students at Risk.....	9
Types of abuse.....	11
Protecting yourself against allegations of abuse.....	14
Allegations of abuse against a person working in a position of trust.....	14
Safeguarding and children with SEND .....	15
Children In Care (CIC).....	16
Child on Child abuse including sexual violence and sexual harassment between children.....	16
Youth Produced Sexual Imagery (Previous term was used 'Sexting').....	17
Upskirting.....	17
Mental Health.....	17
Online safety .....	18
Children Absent from Education.....	19
Private Fostering.....	20
Prevent.....	21
Honour-based Violence and Forced Marriage.....	22
Female Genital Mutilation (FGM).....	22



## Introduction

Fernwood School fully recognises the contribution it can make to protect children and support students in school. The aim of the policy is to safeguard and promote our students' welfare, safety and health by fostering an honest, open, caring and supportive climate. The students' welfare is of paramount importance.

There are four main elements to this Policy:

- ✿ Prevention (e.g., positive school atmosphere, teaching and pastoral support to students)
- ✿ Protection (by following agreed procedures, ensuring staff are trained and supported to respond appropriately and sensitively to Child Protection concerns)
- ✿ Support (to students and school staff and to children who may have been abused)
- ✿ Working with parents (to ensure appropriate communications and actions are undertaken)

This policy applies to **all** staff, governors and visitors to the school.

This policy has been written and is underpinned by the following government guidance:

- ✿ Children's Act 1989 & 2004
- ✿ Education Act 2011
- ✿ Working together to safeguard children 2023
- ✿ Keeping Children Safe in Education 2023

Where the Governing Body provides services or activities directly under the supervision or management of school staff, the school's arrangements for child protection will apply. Where services or activities are provided separately by another body, the Governing Body should seek assurance that the body concerned has appropriate policies and procedures in place to safeguard and protect children and there are arrangements to liaise with the school on these matters where appropriate.

## School Commitment

Fernwood School adopts an open and accepting attitude towards children as part of its responsibility for pastoral care. We hope that children and parents will feel free to talk about any concerns and will see school as a safe place when there are difficulties. Children's worries and fears will be taken seriously and children are encouraged to seek help from members of staff.

Our school will therefore:

- ✿ Establish and maintain an ethos where children feel secure and are encouraged to talk, and are listened to
- ✿ Ensure that children know that there are adults in the school whom they can approach if they are worried or are in difficulty
- ✿ Include in the curriculum activities and opportunities for Personal Development/PSHE/Citizenship which equip children with the skills they need to stay safe from abuse, and which will help children develop realistic attitudes to the responsibilities of adult life, particularly with regard to childcare and parenting skills



- ✿ Ensure every effort is made to establish effective working relationships with parents and colleagues from other agencies
- ✿ Operate safer recruitment procedures and make sure that all appropriate checks are carried out on new staff and volunteers who will work with children
- ✿ Keep and maintain a Single Central Record (SCR) of recruitment and vetting checks of all our employees including supply staff

## Roles and Responsibilities

All adults working with or on behalf of children have a responsibility to safeguard and promote the welfare of children. There are, however, key people within schools and the LA who have specific responsibilities.

The Designated Safeguarding Lead for safeguarding is Amy Cannon, Assistant Headteacher. In her absence, responsibility will be assumed by Jo Green, Deputy Headteacher.

There is a team of Deputy Designated Safeguarding Leads: Adam Campbell (also the school's Mental Health Lead), Minna Morrill, Matt Hughes, Jo Green, Jerome Asumang and Mark Parrott are also Designated Safeguarding Leads. Matt Rothwell, Head of Year, has also completed DSL training and supports with his year group.

The nominated Governor for safeguarding is Mr Steve Deadman-Corsie.

The role of the Designated Safeguarding Lead (DSL) includes:

### A. Referrals

- ✿ To recognise how to identify signs of abuse and when it is appropriate to make a referral
- ✿ Referring cases of suspected abuse allegations to the relevant investigating agencies
- ✿ Ensuring all staff have induction training as required covering safeguarding issues and are able to recognise and report any concerns with urgency as they arise
- ✿ Liaising with the Headteacher to inform them of any issues and ongoing investigations and ensure there is always cover for this role

### B. Training

- ✿ Having a working knowledge of how the Local Safeguarding Children's Board operates, the conduct of a child protection case conference, and be able to attend and contribute to these effectively when required to do so
- ✿ Ensuring that each member of staff has access to and understands the school's safeguarding policy especially new or part-time staff who may work with different educational establishments
- ✿ Ensuring all staff have induction training covering safeguarding issues and are able to recognise and report any concerns with urgency when they arise
- ✿ Keeping detailed, accurate and secure written records of referrals/concerns
- ✿ Obtaining access to resources and attending any relevant or refresher training courses at least every two years



- ✿ Ensuring that the filtering and monitoring systems and processes in place at school are in keeping with KCSIE guidance and that all staff receive annual cyber security training

#### C. Raising Awareness

- ✿ Ensuring that our safeguarding policy is updated and reviewed annually, and working with the Governing Body regarding this
- ✿ Ensuring that parents have access to our safeguarding policy which alerts them to the fact that referrals may be made and the role of the establishment in this to avoid conflict later
- ✿ Ensuring that when children leave our school, their child protection file is copied for the new establishment as soon as possible, but transferred separately from main student file

### Headteacher

The Headteacher will ensure that:

- ✿ The policies and procedures adopted by the Governing Body are fully implemented, and followed by all staff
- ✿ Sufficient resources and time are allocated to enable the designated person and other staff to discharge their responsibilities, including taking part in strategy discussions and other inter-agency meetings, and contributing to the assessment of children
- ✿ All staff and volunteers feel able to raise concerns about poor or unsafe practice with regard to children, and such concerns are addressed sensitively and effectively in a timely manner in accordance with agreed whistle-blowing policies
- ✿ Adequate supervision is in place for the DSL, Mental Health Lead and Well-being Mentors
- ✿ The DSL job description clarifies the role of the DSL and is reviewed regularly to reflect changes in guidance as necessary

### Governing Body

- ✿ Their establishment has effective policies and procedures in place in accordance with this guidance, and monitoring the school's compliance with them
- ✿ Neither the Governing Body, nor individual governors, has a role in dealing with individual cases or a right to know details of cases (except when exercising their disciplinary functions in respect of allegations against a member of staff)
- ✿ There is an individual member of the governing body to champion safeguarding issues within the school, liaise with the Headteacher about them, and provide information and reports to the governing body. However, it is not usually appropriate for that person to take the lead in dealing with allegations of abuse made against the Headteacher. That is more properly the role of the Chair of Governors or, in the absence of a Chair, the vice chair
- ✿ All members of the Governing Body will receive appropriate training regarding the safeguarding of children and children from a member of the school's safeguarding team. This includes online training at induction and every three years as well as regular update training, which is face to face



- ✿ Ensure that the DSL receives training in inter-agency working that is provided by, or to standards agreed by, the Local Safeguarding, Children's Board, and refresher training at two-yearly intervals, to keep his/her knowledge and skills up-to-date, and provides advice and support to other staff
- ✿ The Headteacher, and all other staff who work with children, undertake appropriate training which is kept up-to-date by refresher training that takes place at least annually
- ✿ Temporary staff and volunteers who work with children are made aware of the school's arrangements for safeguarding and their responsibilities
- ✿ They have read the school's safeguarding policy and Annex C of Keeping Children Safe in Education

With specific reference to KCSIE 2023's guidance around filtering and monitoring in schools, Governing Bodies:

- ✿ Are accountable for ensuring that the designated safeguarding lead (DSL) takes responsibility for understanding the filtering and monitoring systems and processes in place as part of their role (paragraph 103)
- ✿ Must make sure all staff understand their expectations, roles and responsibilities around filtering and monitoring as part of their safeguarding training (paragraph 124)
- ✿ Must ensure that the Safeguarding Policy includes how the school approaches filtering and monitoring on school devices and school networks (paragraph 138)
- ✿ Must review the DfE's filtering and monitoring standards and discuss with IT staff and service provider what needs to be done to support the school in meeting the standards (paragraph 142)
- ✿ Must ensure their school or college has appropriate filters and monitoring systems in place and regularly review their effectiveness (KCSIE 2023 Page 37, Paragraphs 141 – 142;) with clear identified role and responsibilities for all involved in this area of safeguarding. Please refer to the IT Policy for procedures in relation to filtering and monitoring systems in the school.

## Procedures

The DSL must make a decision with regards to the safety and welfare of the children and if they are deemed to be at risk of significant harm, intervention must take place. The DSL making a child protection referral under S.47 must therefore provide information which clearly outlines that a child is suffering or likely to suffer significant harm. It is not possible to rely on one absolute criterion when judging what constitutes significant harm. Consideration of the severity of ill-treatment may include the extent of the harm suffered, the context within which it occurred and its duration. Significant harm may also arise from a combination of significant events which are both acute and long standing and which may impair the child's physical, psychological, and social development.

In order to both understand and evidence 'significant harm', it is necessary to consider the family context, together with the child's development within their wider social and cultural environment. It is also necessary to consider any special needs, e.g., medical condition, communication difficulties or disability that may affect the child's development and care within the family. The nature of harm, in terms of ill-treatment or failure to provide adequate care also needs



consideration alongside the impact on the child's health and development and the adequacy of care provided.

All staff are issued with The Fernwood School Safeguarding reminders sheet and comprehensive online training and updates in the form of briefings, meetings and bulletins. This meets the expectations identified by the Local Authority and clearly identifies procedures for reporting incidents where there is a concern about a child. If a member of staff is concerned about a child's welfare, then they must complete a referral via CPOMS or a paper Safeguarding Concern Form. These concerns may include physical abuse, emotional abuse, neglect, sexual abuse, female genital mutilation (FGM), forced marriage, and sexual exploitation. Reports of sexual abuse, physical abuse, self-harm and/or suicidal thoughts must be reported face to face and before the end of the school day. Staff are made aware that they can refer to Children's Services themselves, but that would only be if they had exhausted all avenues of support in school. School concern forms can be found on the safeguarding notice board in the staff room and a copy is given to all staff in September and in a safeguarding pack issued to supply teachers. Information on CPOMS is available in the staff handbook.

At The Fernwood School we recognise the possibility that adults working in the school may harm children. Any concerns about the conduct of other adults in the school should be taken to the Headteacher without delay (or where that is not possible, to the Designated Safeguarding Lead); any concerns about the Headteacher should go to the Chair of Governors who can be contacted via school extension 2090.

This policy will be made available to parents on the school website and is also available on request. Further information for parents is contained within the school's brochure.

## Records and Monitoring

Well-kept records are essential to good child protection practice. All staff are clear about the need to record and report concerns about a child or children within our school. The DSL is responsible for such records and for deciding at what point these records should be passed over to other agencies. The Fernwood School uses CPOMS, which is a secure electronic referral and storage system for safeguarding and child protection. This allows staff to report concerns in a timely way and allows for all of the DSLs to be alerted to concerns. Paper child protection records are held separately from a child's school file and in secure storage. All verbal conversations should be promptly recorded in writing.

When an incident form is submitted on CPOMS, members of the DSL team receive an email alert. The case will be assigned to the most appropriate DSL or Pastoral Leader. Assigning will be undertaken by Amy Cannon, Jo Green or Adam Campbell. CPOMS is monitored on a daily basis and all concerns are dealt with as swiftly as possible. Once an incident has been completed with relevant actions, it will be closed. We will then check active cases weekly to decide if they can be closed or if further action is needed.





Alongside this, staff must report concerns of physical abuse, sexual abuse, self-harm and suicidal ideation face to face, to a DSL, at the earliest possible time, and before the child leaves school for the day. The DSL team meet at least fortnightly, and the first running agenda item is always a CPOMS check, to discuss and share current cases and concerns.

Transfer of files to new schools take place within five working days and this is done either by a CPOMS transfer, encrypted email or hand delivered paper files. Paper files from Primary Schools are read and files are kept in a locked cabinet. After the transfer of files to Post-16 establishments, paper files are archived and stored securely. Any files which contain information about Sexual Abuse/allegations of Sexual Abuse cannot be destroyed (even after retention period) and should be retained and stored by the final establishment where the child attends.

## Confidentiality

Personal information is usually confidential. It should only be shared with the permission of the individual concerned (and/or those with parental responsibility) unless the disclosure of confidential personal information is necessary in order to protect a child or promote their welfare. In all circumstances, information must be confined to those people directly involved in the professional network of each individual child and on a strict "need to know" basis.

Confidentiality is an issue that needs to be understood by all those working with children, particularly in the context of child protection. This is a complex area and involves consideration of a number of pieces of legislation.

You can never guarantee confidentiality to a child as some kinds of information may need to be shared with others. A suggested form of words that may help when talking to children is as follows:

"I will keep our conversation confidential and agree with you what information I can share, unless you tell me something that will affect your personal safety or that is illegal, but I will tell you if I am going to pass information on and who to."

The Fernwood School recognises that not all children will feel ready or able to talk about their experiences. There may be a range of barriers that prevent them from speaking to a member of staff, including shame, being threatened, feeling vulnerable, disabilities, language barriers and sexual orientation, amongst other things. It is important that our staff have professional curiosity and recognise that changes in behaviour may be how some children communicate with us. Staff should always speak with a DSL if they have a concern about a child, or report on CPOMS. The importance of knowing your students is paramount and building relationships that are trusted.

Professionals can only work together to safeguard children if there is an exchange of relevant information between them. This has been recognised in principle by the courts. However, any disclosure of personal information to others, included social service departments, must always have regard to both common and statute law.

Normally, personal information should only be disclosed to third parties (including other agencies) with the consent of the subject of that information (Data Protection Act 1998 European Convention on Human Rights, Article 8). Wherever possible, consent should be obtained before sharing personal information with third parties. In some circumstances, however, consent may not be





possible or desirable, but the safety and welfare of the child dictate that the information should be shared. The Data Protection Act 2018 and GDPR DO NOT prevent or limit the sharing of information for the purposes of keeping children safe. 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 the child.

## Safer Recruitment

The Fernwood School is committed to ensuring that all safer recruitment practices are in place. Members of the Senior Leadership Team and some Governors have completed safer recruitment training and at least one member will always be on a recruitment panel. The majority of our staff are engaged in regulated activity and the following checks are made on appointing new staff:

- ✿ An identity check
- ✿ Two references
- ✿ A barred list check
- ✿ A DBS check
- ✿ A prohibition from teaching check
- ✿ Further checks on people who have lived or worked outside of the UK
- ✿ A check of professional qualifications, where required
- ✿ A check to establish the person's right to work in the UK
- ✿ CVs on their own will not be accepted as an application for a role in school.
- ✿ As per the KCSIE 2023 we will carry out online checks (digital screening) for shortlisted applicants

In addition:

- ✿ A section 128 check for management positions and all Governors
- ✿ A check that the person's position involves relevant activity i.e. being solely in charge of persons aged under 18

## Supporting Students at Risk

Our school recognises that children who are abused or who witness violence may find it difficult to develop a sense of self-worth and to view the world in a positive way. This school may be the only stable, secure and predictable element in the lives of children at risk. Whilst at school, their behaviour may still be challenging and defiant, and there may even be moves to consider suspension or exclusion from school.

It is also recognised that some children who have experienced abuse may in turn abuse others. This requires a considered, sensitive approach in order that the child can receive appropriate help and support.

At The Fernwood School students are taught about safeguarding, including online, through various teaching and learning opportunities, as part of a broad and balanced curriculum.

This school will endeavour to support students through:



- ✿ The curriculum, to encourage self-esteem and self-motivation
- ✿ The school ethos, which promotes a positive, supportive and secure environment, and which gives all students and adults a sense of being respected and valued
- ✿ The implementation of school behaviour management policies
- ✿ A consistent approach, which recognises and separates the course of behaviour from that which the child displays. This is vital to ensure that all children are supported within the school setting
- ✿ Regular liaison with other professionals and agencies who support the students and their families
- ✿ A commitment to develop productive, supportive relationships with parents, whenever it is in the child's interest to do so
- ✿ The development and support of a responsible and knowledgeable staff trained to respond appropriately in child protection situations

Keeping Children Safe in Education 2022 recognised the need for LGBTQ+ students to have a safe place to speak out or share concerns with staff. At The Fernwood School we are committed to ensuring our LGBTQ+ students feel a sense of belonging and feel supported by staff. Alongside the PD curriculum which is inclusive and diverse, an LGBTQ+ club is available for students to attend and the school is working towards the rainbow Flag Award.

The available UK evidence on the extent of abuse among disabled children suggests that some may be especially vulnerable to abuse, for example those who have difficulty communicating. School staff who work, in any capacity, with children with profound and multiple disabilities, sensory impairment and/or emotional and behaviour problems will be particularly sensitive to signs of abuse. Our intention is to ensure that our SENCO is DSL trained to further support these children. It must also be stressed that in a home where there is domestic violence, drug or alcohol abuse, children may also be vulnerable and in need of support.

Our Personal Development curriculum offers a comprehensive education with regards to the risks that all children could face. This includes safety, financial awareness, drugs and alcohol and RSE (relationships and sex education.) The environment in which children grow up is changing dramatically, and so it's important that they are given the right information and guidance regarding safe and healthy relationships. This is why the way children are taught about sex and relationships is changing. The Government has made regulations which will make certain subjects mandatory from September 2020:

Relationships and Sex Education is now compulsory in all primary schools in England.

Relationships and Sex Education is now compulsory in all secondary schools and The Fernwood School has an RSE policy to reflect this.

Health Education is now compulsory in all state-funded schools.

## **Consent**

All professionals are expected to follow consent guidance from the General Data Protection Regulation (GDPR) 2017, the Children Act 1989 and the Crime and Disorder Act 1998. To make a



referral, parents/carers must give their **explicit and informed consent** for information to be shared with other agencies to enable holistic support and access to services. Recorded consent should be gained by the referring agency, with clarity about why and with whom information will be shared. Services cannot accept a referral without consent, unless there are safeguarding concerns whereby there is a statutory duty to intervene and seeking consent may put the child at further risk or cause a delay. In situations where there are concerns that a child is suffering, or is likely to suffer significant harm, information may be shared without consent.

Such circumstances may include

- ✿ Suspicion that a child will be forced into marriage or removed from the country against their will
- ✿ Suspicion that a child is at risk of female genital mutilation
- ✿ A disclosure of sexual or physical abuse putting the child at immediate risk
- ✿ Suspicion that illness is being fabricated

Permission to share information with the Nottingham City MASH should always be sought from an adult with parental responsibility for the child / young person before passing information about them to Children's Social Care, UNLESS seeking permission would place the child at immediate risk of significant harm or may lead to the loss of evidence, for example destroying evidence of a crime or influencing a child about a disclosure made.

## Types of abuse

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

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

**Physical abuse:** a form of abuse which may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm to a child. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child.

**Emotional abuse:** the persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. It may involve conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability as well as overprotection and limitation of exploration and learning or preventing the child participating in normal social



interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyberbullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.

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

**Neglect:** the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to: provide adequate food, clothing and shelter (including exclusion from home or abandonment); protect a child from physical and emotional harm or danger; ensure adequate supervision (including the use of inadequate care-givers); or ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

**Domestic Abuse:** At The Fernwood School, we are aware that there will be children who live in a household where domestic abuse takes place. This can include a range of behaviours including physical, sexual, emotional and financial abuse. This abuse can come from family members, partners, teenage relationships, and child to parent. Children can witness abuse and be adversely affected by this. We recognise that this can have a long lasting, damaging impact on children. For any disclosures in relation to domestic abuse, staff should follow the same protocol as for any concerns and refer via CPOMs. Operation Encompass informs us of any incidents that they are called to which allows us to work with the police to provide practical and emotional support to children at The Fernwood School. We will consider what support the child needs to try to protect them from the long-lasting damage this can cause. The RSE strand of Personal Development curriculum also educates children about unhealthy relationships to further support children in school.

Staff and especially the Designated Safeguarding Leads should consider whether children are at risk of abuser exploitation in situations outside of their families. Extra-familial harm can take a variety of forms and children can be vulnerable to multiple harms including (but not limited to) sexual exploitation, criminal exploitation, and serious youth violence.

**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.

Indicators of child sexual exploitation may include:

- ✿ Acquisition of money, clothes, mobile phones, etc. without plausible explanation
- ✿ Gang-association and/or isolation from peers/social networks
- ✿ Exclusion or unexplained absences from school, college or work
- ✿ Leaving home/care without explanation and persistently going missing or returning late
- ✿ Excessive receipt of texts/phone calls
- ✿ Returning home under the influence of drugs/alcohol
- ✿ Inappropriate sexualised behaviour for age/sexually transmitted infections
- ✿ Evidence of/suspicions of physical or sexual assault
- ✿ Relationships with controlling or significantly older individuals or groups
- ✿ Multiple callers (unknown adults or peers)
- ✿ Frequenting areas known for sex work
- ✿ Concerning use of internet or other social media
- ✿ Increasing secretiveness around behaviours; and
- ✿ Self-harm or significant changes in emotional well-being

Potential vulnerabilities include:

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

- ✿ Having a prior experience of neglect, physical and/or sexual abuse
- ✿ Lack of a safe/stable home environment, now or in the past (domestic violence or parental substance misuse, mental health issues or criminality, for example);
- ✿ Recent bereavement or loss
- ✿ Social isolation or social difficulties
- ✿ Absence of a safe environment to explore sexuality
- ✿ Economic vulnerability
- ✿ Homelessness or insecure accommodation status
- ✿ Connections with other children and children who are being sexually exploited
- ✿ Family members or other connections involved in adult sex work
- ✿ Having a physical or learning disability
- ✿ Being in care (particularly those in residential care and those with interrupted care histories); and
- ✿ Sexual identity

**Child Criminal Exploitation** (County Lines) 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 children to carry drugs and money from urban areas to suburban and rural areas, market and seaside towns. CCE can be a one-off occurrence or a series of incidents over time and this can



take place in the physical or online world. CCE is an abuse of power in the same way as CSE and this can be due to a range of factors including gender, sexual identity, cognitive ability, physical strength, status and access to economic or other resources. The abuse can be by an individual or a group. As a City school, The Fernwood School will be vigilant in ensuring any concerns are reported to the National Referral Mechanism and other relevant agencies. Support would always be sought for children either at risk of or involved in CCE.

### **Contextual Safeguarding**

Safeguarding incidents and/or behaviours can be associated with factors outside the school and can occur between children outside of school. All Designated Safeguarding Leads should consider the context in which such incidents and/or behaviours occur. It is important that we consider whether wider environmental factors are a threat to their welfare and/or safety. This will ensure that all factors are considered when making an assessment and/or referral.

### **Serious Crime**

At The Fernwood School, we are aware that some of our children may become involved in serious crime and violence. Indicators of this may include increased absence from school, a change in friendships or relationships with older individuals or groups, a significant decline in performance, signs of self-harm or a significant change in wellbeing, or signs of assault or unexplained injuries. Unexplained gifts or new possessions could also indicate that children have been approached by, or are involved with, individuals associated with criminal networks or gangs. Staff need to be vigilant and report any concerns about our children and any risks.

## **Protecting yourself against allegations of abuse**

You should seek to keep your personal contact with children under review and seek to minimise the risk of any situation arising in which misunderstandings can occur. The following sensible precautions can be taken when working alone with children:

- ✿ Work in a room where there is a glass panel in the door or leave the door open
- ✿ Make sure that other adults visit the room occasionally
- ✿ Avoid working in isolation with children unless thought has been given to safeguards
- ✿ Never give out personal mobile phone numbers or private e-mail addresses
- ✿ Do not give students lifts home in your car
- ✿ Do not arrange to meet students outside of school hours
- ✿ Never 'befriend' or chat to students on social network sites
- ✿ Where appropriate these points also apply to ex-students under the age of 18

## **Allegations of abuse against a person working in a position of trust**

Children can be the victims of abuse by those who work with them in any setting. All allegations of abuse of children carried out by any staff member or volunteer is therefore taken seriously.

All members of staff have a professional duty to report concerns about the conduct of other adults working in the school (including supply staff) if there are indications that a child or children could be at risk of harm. Adults working in this school are encouraged to raise any concerns about





conduct or practice so that this can be addressed appropriately. If school receives an allegation relating to an incident where an individual or organisation was using the school premises for running an activity for children, we follow the safeguarding policies and procedures and inform the local authority designated officer (LADO), as we would with any safeguarding allegation (paragraph 377 KCSIE 2023).

Allegations of abuse made against adults working in the school, whether historical or current, should be reported to the Headteacher (or, if the allegation is against the Headteacher, it should be reported to the Chair of Governors using the school extension 2090). Adults working in the school are also able to follow the 'Whistle Blowing Policy' if they feel unable to follow standard procedures relating to an allegation against staff.

In line with government guidance and local authority procedures, the Head/Chair of Governors will contact a Local Authority Designated Officer (LADO) to discuss the allegation if the concerns are that an adult in a position of trust has:

- ✿ Behaved in a way that has harmed a child, or may have harmed a child
- ✿ Possibly committed a criminal offence against or related to a child
- ✿ Behaved towards a child or children in a way that indicates he or she would pose a risk of harm if they work regularly or closely with children

Staff training is undertaken by all staff to ensure they are clear about their responsibilities and to ensure they know how to protect themselves against allegations.

Low-level concerns about staff should also be reported to the Headteacher. The Headteacher may delegate the responsibility of investigating this to the Lead or Deputy DSL. A record of this will be stored by the Headteacher. Staff training is undertaken to ensure staff are aware of their responsibility to report any concerns about staff to ensure we can safeguard the whole community.

## Safeguarding and children with SEND

Children and children with special educational needs and disabilities can face additional safeguarding challenges because:

- ✿ There may be assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's disability without further exploration
- ✿ Children with SEND can be disproportionately impacted by things like bullying without outwardly showing any signs; and
- ✿ Difficulties may arise in overcoming communication barriers

At The Fernwood School we identify students who might need more support to be kept safe or to keep themselves safe by: allocating key workers to vulnerable SEND students, having a designated 'safe space' for students, communication with parents, carers and outside agencies (e.g. the Autism Team.), constant reviews of students' needs.





## Children In Care (CIC)

The Designated Teacher for Children in Care is Amy Cannon.

At The Fernwood School, we recognise that looked after children is usually, but not always as a result of abuse and/or neglect, meaning that they are amongst our most vulnerable students. All looked after children at The Fernwood School are allocated a key worker, (with the consent of the carer, social worker and child) and all have access to any appropriate support. This may include counselling, literacy support and numeracy support. All looked after children have an up-to-date Personal Education Plan. This is also available for previously looked after child (usually adopted) should additional support be required. At The Fernwood School, we are committed to ensure that looked after and previously looked after children have access to the same opportunities as all students here.

## Child on Child abuse including sexual violence and sexual harassment between children

Staff should be aware that safeguarding issues can manifest themselves via child-on-child abuse. This is most likely to include, but not limited to: bullying (including cyber bullying), gender-based violence/sexual assaults and sexting.

Abuse is abuse and should never be tolerated or passed off as "banter" or "part of growing up". Different gender issues can be prevalent when dealing with child-on-child abuse. This could for example include girls or children who identify as neither male or female being sexually touched/assaulted or boys and children who identify as neither male or female being subject to initiation-type violence. Sexual violence and sexual harassment can occur between children of any age and also online. Children who are victims will likely find the experience stressful and distressing. This may affect their attainment and may be exacerbated if the perpetrator is in school. It is essential that all victims are reassured that they are taken seriously and will be supported and kept safe.

At The Fernwood School we believe that all children have a right to attend school and learn in a safe environment. Children should be free from harm by adults in the school and other students.

We recognise that some students will sometimes negatively affect the learning and wellbeing of others and their behaviour will be dealt with under the school's Behaviour Policy. There is also a section in the Behaviour Policy on how these matters will be dealt with by the school.

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

The allegation:

- ✿ Is made against an older student and refers to their behaviour towards a younger student or a more vulnerable student



- ✿ Is of a serious nature, possibly including a criminal offence
- ✿ Raises risk factors for other students in the school
- ✿ Indicates that other students may have been affected by this student
- ✿ Indicates that children outside the school may be affected by this student

At The Fernwood School we will support the victims of child-on-child abuse, sexual harassment and sexual violence by issuing relevant sanctions to the perpetrator, communicating with parents/carers, offering school counselling or a key worker for the student to speak with someone, signposting to other support services. We would always refer to any appropriate outside agency such as the police and social care, if appropriate. We will also offer support to the perpetrator, if appropriate and consider the health and safety of the victim and all students in school if the student remains in school and in lessons.

At The Fernwood School, we are committed to continuing to develop an environment and culture in which all children feel safe from sexual harassment and violence. Therefore, members of the Senior Leadership Team, all Pastoral Leaders, all Designated Safeguarding Leads and the Head of Faculty for Personal Development, have undertaken Level 2 training in 'Sexual Harassment and Violence in Schools'. We complete student voice activities to ensure our students have a voice and a place to share their experiences and this forms part of the Personal Development curriculum. In the Personal Development curriculum there is work, as part of the RSE lessons, on consent, to ensure that students are aware of their rights and the complexities of this issue. Awareness and education are the key to breaking the cycle of this type of behaviour and we work together, with the students to ensure that we are proactive and not just reactive.

### Youth Produced Sexual Imagery (Previous term was used 'Sexting')

In cases of 'sexting' we follow guidance given to schools and colleges by the UK Council for Child Internet Safety (UKCCIS) published in August 2016: 'Sexting in schools and colleges, responding to incidents, and safeguarding children'. Parents/carers would always be contacted and relevant support given and sanctions to the perpetrator. Police and social care would be contacted if appropriate.

### Upskirting

'Upskirting' 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. Although this harassment is known as "upskirting", people of any gender can be victims. Photos can be taken under any item of clothing including shorts and trousers. At The Fernwood School we do not tolerate this type of behaviour and incidents of this nature would be dealt by issuing relevant sanctions to the perpetrator and referral to any relevant outside agencies such as the police, if appropriate. We would communicate with parents and support would be offered to the victim.

## Mental Health

At The Fernwood School we are aware that some of our students will suffer with mental health difficulties. We also know that mental health difficulties can be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation. Only appropriately trained professionals



should attempt to make a diagnosis of a mental health problem; however, we have a duty of care to ensure that any concerns about a child's mental health are explored. All mental health concerns should be reported through CPOMs. If the concern is about self-harm or suicidal ideation, then a face to face conversation with one of the Designated Safeguarding Leads need to happen before the end of the school day and should be that staff member's first priority. A range of support is available to students at The Fernwood School;

- ✿ Mental Health Lead (currently undertaking Senior Mental Health Lead Training) – Adam Campbell
- ✿ A Tutor and Head of Year who stay with the students for their five years at Fernwood
- ✿ Well-being Mentors who have completed a range of training to support children's mental health including Mental Health First Aid
- ✿ A weekly drop in from the Public Community Health Team
- ✿ A school counselling service
- ✿ Support from The Mental Health Support Team, including a weekly drop in
- ✿ Well-being champions - members of staff trained in mental health (including Mental Health First Aid) in each faculty
- ✿ Close relationships with B U Notts and CAMHs to support students

Further detailed information can be found in the Mental Health Policy.

## Online safety

### **Keeping children Safe in Education, 2023 Page 35- 38 Paragraphs 135 - 148**

It is essential that children are safeguarded from potentially harmful and inappropriate online material. An effective whole school and college approach to online safety empowers a school or college to protect and educate students, students, and staff in their use of technology and establishes mechanisms to identify, intervene in, and escalate any concerns where appropriate.

When children use the school's network to access the internet, they are protected from inappropriate content by our filtering and monitoring systems, see Online Safety policy. We acknowledge that many students may have access to the internet using their own devices and therefore our wider curriculum and linked policies ensure that students have an awareness and understanding of online risks. Students at Fernwood are not permitted to bring a mobile phone to school unless it is an *exceptional* circumstance that has been agreed by a Head of Year and Senior Leaders.

The best protection is to make students aware of the dangers through curriculum teaching particularly Personal Development and Sex and Relationship Education. Online Safety forms a key part of the Personal Development curriculum and is re-visited throughout their time in school to ensure age-appropriate information is delivered.

### **Protection is Prevention:**

- ✿ Web filters and additional monitoring software is in place to minimise access and to highlight any person accessing inappropriate sites or information



- ✿ Students will be encouraged to discuss openly their use of technology and anything which makes them feel uncomfortable. (If this results in child protection concerns the school's designated child protection person should be informed immediately)
- ✿ Students should not give out their personal details, phone numbers, schools, home address, computer passwords etc.
- ✿ Students should adhere to the school policy on mobile phones
- ✿ Education on online safety will take place through the ICT curriculum, the Personal Development Curriculum and Pastoral support. i.e., assemblies
- ✿ All staff to receive training annually in relation to cyber security so that they understand their expectations, roles and responsibilities around filtering and monitoring systems
- ✿ When students are using computers/devices within a lesson, they are expected to use SENSO to monitor the students' use of the computers. They are also expected to tour the room to visually check that the students are accessing appropriate content
- ✿ Any concerns should be immediately addressed and reported via CPOMS if it is a safeguarding concern

#### **The school monitors ICT in order to;**

- ✿ Obtain information related to school business
- ✿ Investigate compliance with school policies, procedures and standards
- ✿ Ensure effective school and ICT operation
- ✿ Conduct training or quality control exercises
- ✿ Prevent or detect crime
- ✿ Comply with a Subject Access Request, Freedom of Information Act request, or any other legal obligation
- ✿ Safeguard children

The school uses a monitoring system on all devices to aid safeguarding children. This monitoring system automatically takes screenshots of a user's device when a keyword phrase, URL or acronym is accessed/used and matches the system's own keyword libraries and URLs from the Internet Watch Foundation and URLs from the Counter-Terrorism Internet Referral Unit. ICT staff will get additional training and information to aid their ability to recognise concerns for reporting.

Logs are monitored on a weekly basis by a member of the DSL team and ICT Services with any concerns raised. Each time to violation logs are reviewed, a central log will be updated noting the date/time, reviewer, and number of incidents escalated.

## **Children Absent from Education**

Knowing where children are during school hours is an extremely important aspect of safeguarding. Missing school can be an indicator of abuse and neglect and may also raise concerns about child sexual exploitation. Children being absent from education for prolonged periods and/or on repeat occasions can act as a vital warning sign to a range of safeguarding issues including neglect, child



sexual and child criminal exploitation - particularly county lines. Our response to persistently absent students and children missing education supports identifying such abuse, and in the case of absent students, helps prevent the risk of them becoming a child absent from education in the future. This includes when problems are first emerging but also where children are already known to the local authority.

We monitor attendance carefully and address poor or irregular attendance without delay. In keeping with the guidance in Keeping Children Safe in Education (2023) the school:

- ✿ Monitors students' attendance closely through the daily register and addresses poor, irregular or non-attendance
- ✿ Makes reasonable enquiries, jointly with the LA, to establish the whereabouts of the child before deleting them from the register, for example if they;
  - ✿ Leave school to be home educated
  - ✿ Move away from the school's location, (whether abroad or another area of the UK)
  - ✿ remain medically unfit beyond compulsory school age
  - ✿ Are in custody for four months or more (and will not return to school afterwards); or
  - ✿ Are permanently excluded
- ✿ Informs the LA of students who are regularly absent or have missed 10 school days or more without permission
- ✿ Has appropriate policies, procedures and responses for students who go missing from education (especially on repeat occasions).
- ✿ Ensures, through training, that staff know the signs and triggers for travelling to conflict zones, FGM and forced marriage.
- ✿ Ensures that students who are expected to attend the school but fail to take up the place will be referred to the local authority.

When a student leaves the school, we will record the name of the student's new school and their expected start date. Where a new school has not been allocated/identified or the parent has not responded to any contact made by the school, this will be reported appropriately to EWS/CME and the student will not be removed from the school roll until confirmation has been given by the Education Welfare Service.

## Private Fostering

A private fostering arrangement is one that is made privately (without the involvement of a local authority) for the care of a child under the age of 16 years (under 18, if disabled) by someone other than a parent or close relative, in their own home, with the intention that it should last for 28 days or more.

A close family relative is defined as a 'grandparent, brother, sister, uncle or aunt' and includes half-siblings and step-parents; it does not include great-aunts or uncles, great grandparents or cousins.

Parents and private foster carers both have a legal duty to inform the relevant local authority at least six weeks before the arrangement is due to start; not to do so is a criminal offence.



Whilst most privately fostered children are appropriately supported and looked after, they are a potentially vulnerable group who should be monitored by the local authority, particularly when the child has come from another country. In some cases privately fostered children are affected by abuse and neglect, or be involved in trafficking, child sexual exploitation or modern-day slavery.

Schools have a mandatory duty to report to the local authority where they are aware or suspect that a child is subject to a private fostering arrangement. Although schools have a duty to inform the local authority, there is no duty for anyone, including the private foster carer or social workers to inform the school. However, it should be clear to the school who has parental responsibility.

School staff should notify the designated safeguarding lead when they become aware of private fostering arrangements. The designated safeguarding lead will speak to the family of the child involved to check that they are aware of their duty to inform the LA. The school itself has a duty to inform the local authority of the private fostering arrangements.

On admission to the school, we will take steps to verify the relationship of the adults to the child who is being registered.

## Prevent

Fernwood School's Prevent Strategy is in line with government guidance on schools' responsibilities under the Counter-Terrorism and Security Act, which came into effect on 1st July 2015. Under the Act, schools and other authorities have a duty to "have due regard to the need to prevent people from being drawn into terrorism".

Prevent is a government strategy designed to stop people becoming terrorists or supporting terrorist or extremist causes. The Prevent Strategy covers all types of terrorism and extremism, including the extreme right wing, violent groups and other causes.

From July 2015 schools have a duty to safeguard children from radicalisation and extremism. This means the Fernwood School has a responsibility to protect children from extremist and violent views in the same way we protect them from other dangers.

Where staff are concerned that children and children are developing extremist views or show signs of becoming radicalized, they should discuss this with the Designated Safeguarding Lead.

The Designated Safeguarding Lead has received training about the Prevent Duty as part of the DSL Network and tackling extremism and is able to support staff with any concerns they may have. Prevent concerns should be reported through CPOMS as a safeguarding concern.

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

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





## Recognising Extremism

Early indicators of radicalisation or extremism may include:

- ✿ Showing sympathy for extremist causes
- ✿ Glorifying violence, especially to other faiths or cultures
- ✿ Making remarks or comments about being at extremist events or rallies outside school
- ✿ Evidence of possessing illegal or extremist literature
- ✿ Advocating messages similar to illegal organisations or other extremist groups
- ✿ Out of character changes in dress, behaviour and peer relationships (but there are also very powerful narratives, programmes and networks that children can come across online so involvement with particular groups may not be apparent.)
- ✿ Secretive behaviour
- ✿ Online searches or sharing extremist messages or social profiles
- ✿ Intolerance of difference, including faith, culture, gender, race or sexuality
- ✿ Graffiti, art work or writing that displays extremist themes
- ✿ Attempts to impose extremist views or practices on others
- ✿ Verbalising anti-Western or anti-British views
- ✿ Advocating violence towards others

## Honour-based Violence and Forced Marriage

So-called 'honour-based' violence (HBV) encompasses crimes which have been committed to protect or defend the honour of the family and/or the community; this includes forced marriage. All forms of so-called HBV and forced marriage are abuse (regardless of the motivation) and should be handled and escalated as such.

Where staff are concerned that a child might be at risk of HBV, they must contact the Designated Safeguarding Lead as a matter of urgency. The Lead DSL has undertaken training in both of these areas from Karma Nirvana (National Charity) and Karma Nirvana offer a professionals' helpline to support with any concerns or questions. Students are taught about HBV and Forced Marriage in their Personal Development lessons as part of RSE and signposted where to go for help if they need it. The difference between Forced Marriage and Arranged Marriage is also made clear to ensure there are no misconceptions.

Female Genital Mutilation - since February 2023 it has also been a crime to carry out any conduct whose purpose is to cause a child to marry before their 18th birthday, even if violence, threats or another form of coercion are not used. As with the existing forced marriage law, this applies to non-binding, unofficial 'marriages' as well as legal marriages.

## Female Genital Mutilation (FGM)

FGM has been illegal since 1989. National legislation states that this applies to any British citizen or any habitual citizen. The current penalty is 14 years imprisonment.





The FGM mandatory reporting duty is a legal duty provided for in the FGM Act 2003. The legislation requires regulated teachers in England and Wales 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
- ✿ 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

The duty is a personal duty which requires the individual professional who becomes aware of the case to make a report; the responsibility cannot be transferred. The only exception to this is if you know that another individual from your profession has already made a report; there is no requirement to make a second. At The Fernwood School, we would want to support staff with this duty and request that concerns are brought to one of the DSL team immediately and this reporting can be undertaken together. If this is not possible, then staff should report immediately and not wait.

The duty does not apply in relation to at risk or suspected cases or in cases where the woman is over 18. In these cases, you should follow the safeguarding procedures at The Fernwood School.

The Fernwood School recognises that whilst there is no intent to harm a girl/young woman through FGM, the practice directly causes serious short and long term medical and psychological complications. Consequently, it is a physically abusive act.

It is the aim of The Fernwood School to safeguard children from the practice of FGM in a way that is culturally sensitive and with the fullest consultations with Nottingham City Council's Safeguarding Board.

The Lead DSL has completed training in FGM and is trained to train others about it. This forms part of our statutory training for all staff. Other DSLs have also completed specific training in this. FGM forms part of the Relationships and Sex Education in the Personal Development Curriculum. Staff are supported with training when teaching this and the lessons were created by the Lead DSL. We always keep in mind the sensitivity of the subject when teaching this and ensure students feel fully supported by their teacher.

All staff should be alert to the possibility of FGM and should be aware of the following:

- ✿ The safety and welfare of the girl / young woman is paramount
- ✿ All staff, including volunteers, will act in the interest of the rights of the girl / young woman, as stated in the UN Convention on the Rights of the Child (1989)
- ✿ Any concerns about a girl at risk of FGM or having had FGM will be reported immediately to the DSL
- ✿ Attendance will be monitored to ensure that any unusual or unexplained absence from a girl who comes from a country with prevalence of FGM will be reported and acted upon.
- ✿ Any concerns that a girl is at risk will result in an immediate referral to Children's and Families Direct



- ✿ Any concerns that a girl is a victim of FGM will result in an immediate report to the Police through 101
- ✿ Alongside consultation with the PSHE Association and Forward, FGM will become part of the Personal Development curriculum to inform and educate all students on the risks and help available

The World Health Organisation (WHO) states that female genital mutilation (FGM) 'comprises all procedures that involve partial or total removal of the external female genitalia, or other injury to the female genital organs for non-medical reasons'.

FGM typically takes place between birth and around 15 years old; however, it is believed that the majority of cases happen between the ages of 5 and 8.

Risk factors for FGM include:

- ✿ Low level of integration into UK society
- ✿ Mother or a sister who has undergone FGM
- ✿ Girls who are withdrawn from PSHE
- ✿ Visiting female elder from the country of origin
- ✿ Being taken on a long holiday to the country of origin
- ✿ Talk about a 'special' procedure to become a woman

Symptoms of FGM

FGM may be likely if there is a visiting female elder, there is talk of a special procedure or celebration to become a woman, or parents wish to take their daughter out-of-school to visit an 'at-risk' country (especially before the summer holidays), or parents who wish to withdraw their children from learning about FGM.

Indications that FGM may have already taken place may include:

- ✿ Difficulty walking, sitting or standing and may even look uncomfortable
- ✿ Spending longer than normal in the bathroom or toilet due to difficulties urinating
- ✿ Spending long periods of time away from a classroom during the day with bladder or menstrual problems
- ✿ Frequent urinary, menstrual or stomach problems
- ✿ Prolonged or repeated absences from school or college, especially with noticeable behaviour changes (e.g., withdrawal or depression) on the girl's return
- ✿ Reluctance to undergo normal medical examinations
- ✿ Confiding in a professional without being explicit about the problem due to embarrassment or fear
- ✿ Talking about pain or discomfort between her legs

This policy complements and supports a range of other policies adopted by the school, including:

- ✿ Attendance Policy
- ✿ Behaviour for Learning Policy (including anti-bullying)
- ✿ Special Education Needs & Disability Policy



- ✿ Online Safety Policy
- ✿ Health and Safety Policy
- ✿ RSE (Relationships and Sex Education) Policy
- ✿ Whistle Blowing Policy
- ✿ Staff Code of Conduct

All school policies and procedures relating to safeguarding children will be reviewed annually.

## Violation Logs Reviewed



### False/Positive Incident

- No action



### Behavioural Incident

- Tutor/AHoy/HoY contacted



### Safeguarding Concern

- Process followed dependant on incident type