

# Safeguarding Policy, Procedure and Guidance



**Approved by:** Trustee Board

**Date:** 2nd September 2021

**Signed by:** *Ms Minsell-Booth* **Position:** Chair of Trustees

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## Monitoring arrangements

This policy will be reviewed at least annually in line with DfE, HSCP, HCC and any other relevant guidance.

<b>1. Aims</b>	4
<b>2. Legislation and guidance</b>	5
<b>3. Inclusion Hampshire Safeguarding Policy</b>	6
3.1 Principles and values	6
<b>3.2 Definitions and key personnel</b>	8
3.2.1 Definitions	8
3.2.2 Key personnel	9
<b>4. High risk and emerging safeguarding issues</b>	10
4.1 Contextual safeguarding	10
4.2 Preventing radicalisation and extremism	10
4.3 Gender based violence/violence against women and girls	11
4.3.1 Female Genital Mutilation (FGM)	11
4.3.2 Forced Marriage	12
4.3.3 Characteristics that may indicate forced marriage	12
4.4 Honour Based Violence	13
4.5 Allegations of abuse made against other pupils/peer-on-peer abuse	15
4.5.1 Creating a supportive environment in school and minimising the risk of peer-on-peer abuse	16
4.6 Teenage Relationship Abuse	17
4.7 Sexual Violence and Sexual Harassment Between Children	18
4.8 Upskirting	18
4.9 Missing, Exploited and Trafficked Children (MET)	20
4.9.1 Children Missing from Education	20
4.9.2 Children Missing from Home or Care	20
4.10 Child Sexual Exploitation (CSE)	23
4.11 Child Criminal Exploitation (including county lines)	24
4.12 Serious Violence	26
4.15 Trafficked Children and modern slavery	26
4.16 Online Safety and Social Media	28
Cyberbullying	29
Sexting	30
Gaming	30
Online reputation	30
Grooming	31
4.17 The Trigger Trio	31
Domestic Abuse	31
Parental mental health	33
Parental Substance misuse	34

<b>5. Safeguarding issues relating to individual pupil needs</b>	35
5.1 Homelessness	35
5.2 Children & the Court System	35
5.3 Children with family members in prison	35
5.4 Pupils with medical conditions (in Provision)	36
5.5 Special educational needs and disabilities	36
5.6 Intimate and personal care	37
5.7 Fabricated or induced illness	37
5.8 Mental Health	38
<b>6. Other safeguarding issues that may potentially have an impact on pupils</b>	39
6.1 Bullying	39
6.2 Prejudice based and discriminatory abuse	39
6.3 Drugs and substance misuse	40
6.4 Faith Abuse	40
6.5 Gangs and Youth Violence	41
6.6. Private fostering	41
6.7 Parenting	42
<b>7. Safeguarding processes</b>	43
7.1 Safer recruitment	43
7.2 Staff induction	43
7.3 Health and safety	43
7.4 Site Security	44
7.5. Off site visits	44
7.6 First Aid	44
7.7 Physical Intervention (use of reasonable force)	45
7.8 Taking and the use and storage of images	47
7.9 Transporting pupils	47
7.10 Disqualification under the childcare act	48
<b>8. Monitoring arrangements</b>	48
<b>9. Links to other policies</b>	48
<b>Appendix 1: types of abuse</b>	49
<b>Appendix 2: table of changes</b>	50



## 1. Aims

Inclusion Hampshire aims to ensure that:

- Appropriate action is taken in a timely manner to safeguard and promote children's welfare
- All staff are aware of their statutory responsibilities with respect to safeguarding
- Staff are properly training in recognising and reporting safeguarding issues

## 2. Legislation and guidance

This policy is based on the Department for Education's statutory guidance Keeping Children Safe in Education (2021), Working Together to Safeguard Children (2018) and the Governance Handbook. We comply with this guidance and the arrangements agreed and published by our 3 local safeguarding partners.

This policy is also based on the following legislation:

- Section 175 of the Education Act 2002, which places a duty on schools and local authorities to safeguard and promote the welfare of pupils
- The School Staffing (England) Regulations 2009, which set out what must be recorded on the single central record and the requirement for at least one person conducting an interview to be trained in safer recruitment techniques
- The Children Act (2004 amendment), which provides a framework for the care and protection of children
- Section 5B(11) of the Female Genital Mutilation Act 2003, as inserted by section 74 of the Serious Crime Act 2015, which places a statutory duty on teachers to report to the police where they discover that female genital mutilation (FGM) appears to have been carried out on a girl under 18
- Statutory guidance on FGM, which sets out responsibilities with regards to safeguarding and supporting girls affected by FGM
- The Rehabilitation of Offenders Act 1974, which outlines when people with criminal convictions can work with children
- Schedule 4 of the Safeguarding Vulnerable Groups Act 2006, which defines what 'regulated activity' is in relation to children
- Statutory guidance on the Prevent duty, which explains schools' duties under the Counter-Terrorism and Security Act 2015 with respect to protecting people from the risk of radicalisation and extremism

Any links to local or national advice and guidance can be accessed via the safeguarding in education web pages:

[www.hants.gov.uk/educationandlearning/safeguardingchildren/guidance](http://www.hants.gov.uk/educationandlearning/safeguardingchildren/guidance)

Links to online specific advice and guidance can be found at

<https://www.hants.gov.uk/socialcareandhealth/childrenandfamilies/safeguardingchildren/onlinesafety>

Links to other pages from the local authority on safeguarding can be found at

<https://www.hants.gov.uk/socialcareandhealth/childrenandfamilies/safeguardingchildren>

The procedures of the Hampshire Safeguarding Children Partnership can be accessed at <https://www.hampshirescp.org.uk/procedures/4lscb-procedures/>

### 3. Inclusion Hampshire Safeguarding Policy

This policy should be read in conjunction with the Inclusion Hampshire's Child Protection Policy and Staff Code of Conduct

#### Policy Statement

Safeguarding determines the actions that we take to keep children safe and protect them from harm in all aspects of their school life. As an education provider we are committed to safeguarding and promoting the welfare of all our learners.

The actions that we take to prevent harm; to promote wellbeing; to create safe environments; to educate on rights, respect and responsibilities; to respond to specific issues and vulnerabilities all form part of the safeguarding responsibilities of Inclusion Hampshire. As such, this overarching policy will link to other policies which will provide more information and greater detail.

#### Aims

To provide staff with the framework to promote and safeguard the wellbeing of children and in so doing ensure they meet their statutory responsibilities.  
To ensure consistent good practice across Inclusion Hampshire.  
To demonstrate our commitment to protecting children.

#### 3.1 Principles and values

Safeguarding is everyone's responsibility. As such it does not rest solely with the Designated Safeguarding Lead (DSL) and their deputies to take lead responsibility in all the areas covered within this policy.

For example, some areas, such as Health and Safety, are a specialist area of safeguarding and a separate lead for this area is in place at each site:

- Emma Barnard Pre-16 (Inclusion Learning Centre)
- Marie Greenhalgh Post 16 (Inclusion College)

Please see Inclusion Hampshire Health and Safety Policy.

Safeguarding processes are intended to put in place measures that minimise harm to children. There will be situations

where gaps or deficiencies in the policies and processes we have in place will be highlighted. In these situations, a review will be carried out in order to identify learning and inform the policy, practice and culture of the organisation.

All pupils in our provisions are able to talk to any member of staff about situations or to share concerns which are causing them worries. The staff will listen to the pupil, take their worries seriously and share the information with the safeguarding lead.

In addition, we provide learners with information of who they can talk to outside of Inclusion Hampshire both within the community and with local or national organisations who can provide support or help. Information is provided on display boards, on our website and within our leaflets.

As an education provider, we review this policy at least annually in line with DfE, HSCP, HCC and any other relevant guidance.



## 3.2 Definitions and key personnel

Within Keeping Children Safe in Education (2021) and the Ofsted inspection guidance (2019), there are a number of safeguarding areas directly highlighted or implied within the text.

These areas of safeguarding have been separated into issues that are emerging or high risk issues (part 1); those related to the pupils as an individual (part 2); other safeguarding issues affecting pupils (part 3); and those related to the running of the school (part 4).

### 3.2.1 Definitions

Within this document Safeguarding and promoting the welfare of children means:

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

Our safeguarding practice applies to every child.

The term '**staff**' applies to all those working for or on behalf of Inclusion Hampshire, full time or part time, in either a paid or voluntary capacity. This also includes parent volunteers and Trustees.

**Child** refers to all young people who have not yet reached their 18th birthday. On the whole, this will apply to learners at Inclusion Hampshire; however the policy will extend to visiting children and students from other establishments

**Parent** refers to birth parents and other adults in a parenting role for example adoptive parents, guardians, step parents and foster carers.

**Child protection** is part of this definition and refers to activities undertaken to prevent children suffering, or being likely to suffer, significant harm.

**Abuse** is a form of maltreatment of a child, and may involve inflicting harm or failing to act to prevent harm. Appendix 1 explains the different types of abuse.

**Neglect** is a form of abuse and is the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Appendix 1 defines neglect in more detail.

**Sharing of nudes and semi-nudes** (also known as sexting or youth produced sexual imagery) is where children share nude or semi-nude images, videos or live streams.

**Children** include everyone under the age of 18.

The following 3 **safeguarding partners** are identified in Keeping Children Safe in Education (and defined in the Children Act 2004, as amended by chapter 2 of the Children and Social Work Act 2017). They will make arrangements to work together to safeguard and promote the welfare of local children, including identifying and responding to their needs:

- The local authority (LA)
- A clinical commissioning group for an area within the LA
- The chief officer of police for a police area in the LA area

### **3.2.2 Key personnel**

The designated safeguarding leads for Inclusion Hampshire are:

- **Matthew Atkinson, Head of Inclusion Learning Centre (Pre-16 Provision)**
- **Marie Greenhalgh, Head of Inclusion College (Post-16 Provision)**

The deputy designated safeguarding leads are:

- **Ele Murphy, Assistant Head of Pre-16 Provision**
- **Jane Gardner, Pastoral Manager**
- **Cheryl Edwards, Chief Executive**

There is a nominated safeguarding trustee, **Jane Pratt**, who will take leadership responsibility for safeguarding.

## 4. High risk and emerging safeguarding issues

### 4.1 Contextual safeguarding

In KCSiE 2019 the DfE refers to contextual safeguarding as a specific term that has come out of research from the University of Bedfordshire. The definition of contextual safeguarding is:

*“an approach to understanding, and responding to, young people’s experiences of significant harm beyond their families. It recognises that the different relationships that young people form in their neighbourhoods, schools and online can feature violence and abuse. Parents and carers have little influence over these contexts, and young people’s experiences of extra-familial abuse can undermine parent-child relationships. Therefore children’s social care practitioners need to engage with individuals and sectors who do have influence over/within extra- familial contexts, and recognise that assessment of, and intervention with, these spaces are a critical part of safeguarding practices. Contextual safeguarding, therefore, expands the objectives of child protection systems in recognition that young people are vulnerable to abuse in a range of social contexts.”*

For us as an education provision, we will consider the various factors that have an interplay with the life of any learner about whom we have concerns within our provisions and the level of influence that these factors have on their ability to be protected and remain free from harm particularly when it comes to child exploitation or criminal activity.

While this term applies to this specific definition, the notion of considering a child within a specific context is also important. What life is like for a child outside the school gates, within the home, within the family and within the community are key considerations when the DSL is looking at any concerns.

### 4.2 Preventing radicalisation and extremism

The prevent duty requires that all staff are aware of the signs that a child may be vulnerable to radicalisation. The risks will need to be considered for political; environmental; animal rights; or faith based extremism that may lead to a child becoming radicalised. All staff have received e-learning Prevent training at Induction and update awareness at annual INSET training in order that they can identify the signs of children being radicalised.

The organisation lead for Prevent is **Cheryl Edwards, CEO**, who has undertaken the Prevent training for Managers and Leader

As part of the preventative process resilience to radicalisation will be built through the promotion of fundamental British values through the curriculum and through mentoring.

Any child who is considered vulnerable to radicalisation will be referred by the DSL to Hampshire children's social care, where the concerns will be considered in the MASH process. If the police prevent officer considers the information to be indicating a level of risk a "channel panel" will be convened and the school will attend and support this process.

### 4.3 Gender based violence/violence against women and girls

<https://www.gov.uk/government/policies/violence-against-women-and-girls>

The government has a strategy looking at specific issues faced by women and girls. Within the context of this safeguarding policy the following sections are how we respond to violence against girls. Female genital mutilation, forced marriage, honour based violence and teenage relationship abuse all fall under this strategy.

#### 4.3.1 Female Genital Mutilation (FGM)

FGM comprises all procedures involving partial or total removal of the external female genitalia or other injury to the female genital organs for non-medical reasons. It has no health benefits and harms girls and women in many ways. It involves removing and damaging healthy and normal female genital tissue, and hence interferes with the natural function of girls' and women's bodies.

The age at which girls undergo FGM varies enormously according to the community. **The procedure may be carried out when the girl is newborn, during childhood or adolescence, just before marriage or during the first pregnancy.** However, the majority of cases of FGM are thought to take place between the ages of 5 and 8 and therefore girls within that age bracket are at a higher risk.

FGM is illegal in the UK.

On the 31 October 2015, it became mandatory for teachers to report known cases of FGM to the police. 'known' cases are those where either a girl informs the person that an act of FGM – however described – has been carried out on her, or where the person observes physical signs on a girl appearing to show that an act of FGM has been carried out and the person has no reason to believe that the act was, or was part of, a surgical operation within section 1(2)(a) or (b) of the FGM Act. In these situations, the DSL and/or head will be informed and that the member of teaching staff has called the police to report suspicion that FGM has happened.

**Any other member of staff** who discovers that an act of FGM appears to have been carried out must speak to the DSL and follow our safeguarding procedures.

The duty for teachers mentioned above does not apply in cases where a pupil is *at risk* of FGM or FGM is

suspected but is not known to have been carried out.

At no time will staff examine pupils to confirm this.

For cases where it is believed that a girl may be vulnerable to FGM or there is a concern that she may be about to be genitally mutilated, the staff will inform the DSL who will report it as with any other child protection concern.

While FGM has a specific definition, there are other abusive cultural practices which can be considered harmful to women and girls. Breast ironing is one of five UN defined 'forgotten crimes against women'. It is a practice whereby the breasts of girls typically aged 8-16 are pounded using tools such as spatulas, grinding stones, hot stones, and hammers to delay the appearance of puberty. This practice is considered to be abusive and should be referred to children's social care.

### **4.3.2 Forced Marriage**

In the case of children: *'a forced marriage is a marriage in which one or both spouses cannot consent to the marriage and duress is involved. Duress can include physical, psychological, financial, sexual and emotional pressure.'* In developing countries 11% of girls are married before the age of 15. One in 3 victims of forced marriage in the U.K. are under 18.

It is important that all members of staff recognise the presenting symptoms, how to respond if there are concerns and where to turn for advice.

Advice and help can be obtained nationally through the Forced Marriage Unit and locally through the local police safeguarding team or children's social care.

Policies and practices in this organisation reflect the fact that while all members of staff, including tutors, have important responsibilities with regard to pupils who may be at risk of forced marriage, tutors and Provision Managers should not undertake roles in this regard that are most appropriately discharged by other children's services professionals such as police officers or social workers.

### **4.3.3 Characteristics that may indicate forced marriage**

While individual cases of forced marriage, and attempted forced marriage, are often very particular, they are likely to share a number of common and important characteristics, including:

- an extended absence from school/college, including truancy;
- a drop in performance or sudden signs of low motivation;
- excessive parental restriction and control of movements;
- a history of siblings leaving education to marry early;
- poor performance, parental control of income and students being allowed only limited career choices;

- evidence of self-harm, treatment for depression, attempted suicide, social isolation, eating disorders or substance abuse; and/or
- evidence of family disputes/conflict, domestic violence/abuse or running away from home.

On their own, these characteristics may not indicate forced marriage. However, it is important to be satisfied that where these behaviours occur, they are not linked to forced marriage. It is also important to avoid making assumptions about individual pupil's circumstances or act on the basis of stereotyping. For example, an extended holiday may be taken for entirely legitimate reasons and may not necessarily represent a pretext for forced marriage.

#### **4.4 Honour Based Violence**

Honour based violence is a violent crime or incident which may have been committed to protect or defend the honour of the family or community.

It is often linked to family or community members who believe someone has brought shame to their family or community by doing something that is not in keeping with their unwritten rule of conduct. For example, honour based violence might be committed against people who:

- become involved with a boyfriend or girlfriend from a different culture or religion
- want to get out of an arranged marriage
- want to get out of a forced marriage
- wear clothes or take part in activities that might not be considered traditional within a particular culture
- convert to a different faith from the family

Women and girls are the most common victims of honour based violence however it can also affect men and boys. Crimes of 'honour' do not always include violence.

Crimes committed in the name of 'honour' might include:

- domestic abuse
- threats of violence
- sexual or psychological abuse
- forced marriage
- being held against your will or taken somewhere you don't want to go
- assault

If staff believe that a pupil is at risk from honour based violence the DSL will follow the usual safeguarding referral process; however, if it is clear that a crime has been committed or the pupil is at immediate risk, the police will be contacted in the first place. It is important that if honour based violence is known or suspected that communities and family members are NOT spoken to prior to referral to the police or social care as this could increase risk to

the child.

#### **4.5 Allegations of abuse made against other pupils/peer-on-peer abuse**

All staff are aware that children can abuse other children (often referred to as peer on peer abuse). This can happen both inside and outside of school or college and online. We also understand that even if no reports are made, it does not mean it is not happening, it may be the case that it is just not being reported.

All our staff understand the importance of challenging inappropriate behaviours between peers, many of which are listed below, that are actually abusive in nature. Downplaying certain behaviours, for example dismissing sexual harassment as “just banter”, “just having a laugh”, “part of growing up” or “boys being boys” can lead to a culture of unacceptable behaviours, an unsafe environment for children and in worst case scenarios a culture that normalises abuse leading to children accepting it as normal and not coming forward to report it.

Peer on peer abuse is most likely to include, but may not be limited to:

- bullying (including cyberbullying, prejudice-based and discriminatory bullying);
- abuse in intimate personal relationships between peers;
- physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (this may include an online element which facilitates, threatens and/or encourages physical abuse);
- sexual violence, such as rape, assault by penetration and sexual assault; (this may include an online element which facilitates, threatens and/or encourages sexual violence);
- sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment, which may be standalone or part of a broader pattern of abuse; causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party;
- consensual and non-consensual sharing of nudes and semi nudes images and or videos (also known as sexting or youth produced sexual imagery);
- upskirting, which typically involves taking a picture under a person’s clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm; and
- initiation/hazing type violence and rituals (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element)

Technology is a significant component in many safeguarding and wellbeing issues, and that children are at risk of online abuse (as well as face to face)

We are aware that children can abuse their peers online through:

- Abusive, harassing, and misogynistic messages
- Non-consensual sharing of indecent nude and semi-nude images and/or videos, especially around chat groups
- Sharing of abusive images and pornography, to those who don't want to receive such content

Most cases of pupils hurting other pupils will be dealt with under Inclusion Hampshire’s behaviour policy, but this safeguarding policy will apply to any allegations that raise safeguarding concerns. This might include where the alleged



behaviour:

- Is serious, and potentially a criminal offence
- Could put learners at risk
- Is violent
- Involves learners being forced to use drugs or alcohol
- Involves sexual exploitation, sexual abuse or sexual harassment, such as indecent exposure, sexual assault, upskirting or sexually inappropriate pictures or videos (including the sharing of nudes and semi-nudes)

Procedures for dealing with allegations of peer-on-peer abuse

If a learner makes an allegation of abuse against another learner:

- Staff will record the allegation and tell the DSL, but do not investigate it
- The DSL will contact the local authority children's social care team and follow its advice, as well as the police if the allegation involves a potential criminal offence
- The DSL will put a risk assessment and support plan into place for all children involved (including the victim(s), the child(ren) against whom the allegation has been made and any others affected) with a named person they can talk to if needed
- The DSL will contact the children and adolescent mental health services (CAMHS), if appropriate

#### **4.5.1 Creating a supportive environment in school and minimising the risk of peer-on-peer abuse**

We recognise the importance of taking proactive action to minimise the risk of peer-on-peer abuse, and of creating a supportive environment where victims feel confident in reporting incidents.

To achieve this, we will:

- Challenge any form of derogatory or sexualised language or inappropriate behaviour between peers, including requesting or sending sexual images
- Be vigilant to issues that particularly affect different genders – for example, sexualised or aggressive touching or grabbing towards female pupils, and initiation or hazing type violence with respect to boys
- Ensure our curriculum helps to educate learners about appropriate behaviour and consent
- Ensure learners are able to easily and confidently report abuse using our reporting systems
- Ensure staff reassure victims that they are being taken seriously
- Ensure staff are trained to understand:
  - How to recognise the indicators and signs of peer-on-peer abuse, and know how to identify it and respond to reports
  - That even if there are no reports of peer-on-peer abuse in school, it does not mean it is not happening – staff should maintain an attitude of “it could happen here”
  - That if they have any concerns about a child's welfare, they should act on them immediately rather than

wait to be told, and that victims may not always make a direct report. For example:

- Children can show signs or act in ways they hope adults will notice and react to
- A friend may make a report
- A member of staff may overhear a conversation
- A child's behaviour might indicate that something is wrong
- That certain children may face additional barriers to telling someone because of their vulnerability, disability, gender, ethnicity and/or sexual orientation
- That a learner harming a peer could be a sign that the child is being abused themselves, and that this would fall under the scope of this police
- The important role they have to play in preventing peer-on-peer abuse and responding where they believe a child may be at risk from it
- That they should speak to the DSL if they have any concerns

All Inclusion Hampshire staff will:

- Be aware that technology is a significant component in many safeguarding and wellbeing issues, and that children are at risk of online abuse (as well as face to face)
- Be aware that children can abuse their peers online through:
  - Abusive, harassing, and misogynistic messages
  - Non-consensual sharing of indecent nude and semi-nude images and/or videos, especially around chat groups
  - Sharing of abusive images and pornography, to those who don't want to receive such content
- Recognise the indicators of peer-on-peer abuse, know how to identify it and respond to reports
- Recognise that peer-on-peer abuse may be taking place, even if not reported
- Understand their role in preventing it and responding to it if they believe a child may be at risk
- Understand the importance of challenging inappropriate behaviours between peers. If they don't, it can create an unsafe environment and lead to a culture that normalises abuse
- Know that abuse can take place inside and outside of school or online

#### **4.6 Teenage Relationship Abuse**

Research has shown that teenagers do not understand what constitutes abusive behaviours and controlling behaviours which could escalate to physical abuse, e.g. checking someone's 'phone, telling them what to wear, who they can/can't see or speak to; or that this abuse is prevalent within teenage relationships. Further research shows that teenagers are likely not to understand what consent means within their relationships. They often hold the common misconception that rape could only be committed by a stranger down a dark alley and do not understand or recognise that it could happen within their own relationships This can lead to these abusive behaviours feeling 'normal' and therefore left unchallenged as they are not recognised as being abusive.

In response to these research findings, Inclusion Hampshire provides education through its Life and Living curriculum to help prevent teenagers from becoming victims and perpetrators of abusive relationships, by encouraging them to rethink their views of violence, abuse and controlling behaviours, and understand what

consent means within their relationships.

#### **4.7 Sexual Violence and Sexual Harassment Between Children**

Sexual violence and sexual harassment can occur between two children of any age and sex. It can also occur through a group of children sexually assaulting or sexually harassing a single child or group of children.

Within Inclusion Hampshire, all staff are made aware of what sexual violence and sexual harassment might look like and what to do if they have a concern or receive a report. Whilst any report of sexual violence or sexual harassment should be taken seriously, staff are aware it is more likely that girls will be the victims of sexual violence and sexual harassment and more likely it will be perpetrated by boys.

We are clear that sexual violence and sexual harassment is not acceptable, will never be tolerated and is not an inevitable part of growing up. It cannot be described as 'banter', 'having a laugh' or 'boys being boys'.

We will also take seriously any sharing of sexual images (photos, pictures or drawings) and videos; sexual jokes, comments or taunting either in person or on social media; or on-line sexual harassment.

Within the child protection policy, there is a clear procedure for how we deal with situations where sexual assaults or behaviour considered criminal between children has taken place.

We will follow the "*Sexual violence and sexual harassment between children in schools and colleges*" advice provided by the DfE

We will challenge all contact behaviours that have a sexual nature to them such as pushing or rubbing against, grabbing bottoms, breasts or genitals, pinching or flicking bras, lifting skirts or pulling down trousers and impose appropriate levels of disciplinary action, to be clear that these behaviours are not tolerated or acceptable.

#### **4.8 Upskirting**

In 2019 the Voyeurism Offences Act came into force and made the practice of upskirting illegal.

Upskirting is defined as someone taking a picture under another person's clothing without their permission with the intention of viewing their genitals or buttocks, with or without underwear. The intent of upskirting is to gain sexual gratification or to cause the victim humiliation, distress or alarm. If this is between pupils, we will follow the peer on peer abuse procedure.

If staff are made aware that upskirting has occurred, then this will be treated as a sexual offence and reported accordingly.

There are behaviours that would be considered as sexual harassment which may be pre-cursors to upskirting. The use of reflective surfaces or mirrors to view underwear or genitals will not be tolerated and the organisation will

respond to these with appropriate disciplinary action and education.

Pupils who place themselves in positions that could allow them to view underwear, genitals or buttocks, will be moved on. Repeat offenders will be disciplined. These locations could include stairwells, under upper floor walkways, outside changing areas and toilets or sitting on the floor or laying down in corridors.

If technology that is designed for covert placement and could be used to take upskirting or indecent images is discovered in the provision it will be confiscated. If the technology is in location and potentially may have captured images, this will be reported to the police and left in situ so that appropriate forensic measures can be taken to gather evidence.

Any confiscated technology will be passed to the head of provision to make a decision about what happens to the items and will be carried out under the principles set out in the government guidance on searching, screening and confiscation [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/674416/Searching\\_screening\\_and\\_confiscation.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/674416/Searching_screening_and_confiscation.pdf)

If the image is taken on a mobile phone, the phone will be confiscated under the same principles. This may need to be passed to the police for them to investigate, if there is evidence that a crime has been committed

## **4.9 Missing, Exploited and Trafficked Children (MET)**

Within Hampshire, the acronym MET is used to identify all children who are missing; believed to be at risk of or being exploited; or who are at risk of or are being trafficked. Given the close links between all of these issues, there has been a considered response to join all these issues, so that cross over of risk is not missed.

### **4.9.1 Children Missing from Education**

Patterns of children missing education can be an indicator of either abuse or safeguarding risks. A relatively short length of time a child is missing does not reduce risk of harm to that child, and all absence or non-attendance should be considered with other known factors or concerns.

DSL's and staff should consider:

Missing lessons: Are there patterns in the lessons that are being missed? Is this more than avoidance of a subject or a teacher? Does the child remain on the school site or are they absent from the site?

- Is the child being exploited during this time?
- Are they late because of a caring responsibility?
- Have they been directly or indirectly affected by substance misuse?
- Are other pupils routinely missing the same lessons and does this raise other risks or concerns?
- Is the lesson being missed one that would cause bruising or injuries to become visible?

Single missing days: Is there a pattern in the day missed? Is it before or after the weekend suggesting the child is away from the area? Are there specific lessons or members of staff on these days? Is the parent informing the school of the absence on the day? Are missing days reported back to parents to confirm their awareness?

- Is the child being sexually exploited during this day?
- Do the parents appear to be aware and are they condoning the behaviour?
- Are the pupil's peers making comments or suggestions as to where the pupil is at?
- Can the parent be contacted and made aware?

Continuous missing days: Has the school been able to make contact with the parent? Is medical evidence being provided? Are siblings attending school (either our provision or local schools)?

- Did we have any concerns about radicalisation, FGM, forced marriage, honour based violence, sexual exploitation?
- Have we had any concerns about physical or sexual abuse?
- Does the parent have any known medical needs? Is the child safe?

The Head of Provision and Pastoral Manager will view absence as both a safeguarding issue and an educational outcomes issue. The referring school will be updated by the Head of Provision and the School may then take steps that could result in legal action for attendance, or a referral to children's social care, or both.

### **4.9.2 Children Missing from Home or Care**

Children who run away from home or from care, provide a clear behavioural indication that they are either unhappy or do not feel safe in the place of residence.

Research shows that children run away from conflict or problems at home or school, neglect or abuse, or because children are being groomed by predatory individuals who seek to exploit them. Many run away on numerous occasions.

The Association of Chief Police Officers has provided the following definitions and guidance:-

*“Missing person is: ‘Anyone whose whereabouts cannot be established and where the circumstances are out of character or the context suggests the person may be the subject of crime or at risk of harm to themselves or another.’*

*An absent person is: ‘A person not at a place where they are expected or required to be.’*

*All cases classified as ‘missing’ by the police will receive an active police response – such as deployment of police officers to locate a child. Cases where the child was classified as ‘absent’ will be recorded by the police and risk assessed regularly but no active response will be deployed. The absent case will be resolved when a young person returns or new information comes to light suggesting that he/she is at risk. In the latter instance, the case is upgraded to ‘missing’.*

Within any case of children who are missing both push and pull factors will need to be considered.

Push factors include:

- Conflict with parents/carers
- Feeling powerless
- Being bullied/abused
- Being unhappy/not being listened to
- The Trigger Trio

Pull factors include:

- Wanting to be with family/friends
- Drugs, money and any exchangeable item
- Peer pressure
- For those who have been trafficked into the United Kingdom as unaccompanied asylum seeking children there will be pressure to make contact with their trafficker.

Inclusion Hampshire will inform all parents of children who are absent (unless the parent has informed us). If the parent is also unaware of the location of their child, and the definition of missing is met, we will either support the parent to contact the police to inform them or do so ourselves

#### 4.10 Child Sexual Exploitation (CSE)

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 (*Definition and a guide for practitioners, local leaders and decision makers working to protect children from child sexual exploitation*, February 2017).

- Exploitation can be isolated (one-on-one) or organised group/criminal activity
- There can be a big age gap between victim and perpetrator, but it can also be peer-on-peer
- Boys can be targeted just as easily as girls – this is not gender specific
- Perpetrators can be women and not just men
- Exploitation can be between males and females or between the same genders
- Children with learning difficulties can be particularly vulnerable to exploitation as can children from particular groups, e.g. looked after children, young carers, children who have a history of physical, sexual emotional abuse or neglect or mental health problems; children who use drugs or alcohol, children who go missing from home or school, children involved in crime, children with parents/carers who have mental health problems, learning difficulties/other issues, children who associate with other children involved in exploitation. However, it is important to recognise that any child can be targeted

Indicators a child may be at risk of CSE include:

- going missing for periods of time or regularly coming home late;
- regularly missing school or education or not taking part in education;
- appearing with unexplained gifts or new possessions;
- associating with other young people involved in exploitation;
- having older boyfriends or girlfriends;
- suffering from sexually transmitted infections;
- mood swings or changes in emotional wellbeing;
- drug and alcohol misuse;
- displaying inappropriate sexualised behaviour.



CSE can happen to a child of any age, gender, ability or social status. Often the victim of CSE is not aware that they are being exploited and do not see themselves as a victim. Some children may not realise they've been exploited and believe they're in a romantic relationship.

Inclusion Hampshire ensures all staff receive training in the signs and indicators of sexual exploitation. We use the sexual exploitation risk assessment form (SERAF) and associated guidance to identify pupils who are at risk and the DSL will share this information as appropriate with children's social care.

We recognise that we may have information or intelligence that could be used to both protect children and prevent risk. Any relevant information that we have will be shared on the community partnership information (CPI) form which can be downloaded from <https://www.safe4me.co.uk/portfolio/sharing-information/>

#### 4.11 Child Criminal Exploitation (including county lines)

Child Criminal Exploitation (CCE) is defined as:-

*'where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child or young person under the age of 18 into any criminal activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial or other advantage of the perpetrator or facilitator and/or (c) through violence or threat of violence. The victim may have been criminally exploited even if the activity appears consensual. Child Criminal Exploitation does not always involve physical contact, it can occur through the use of technology'*

The exploitation of children and young people for crime is not a new phenomenon as evidenced by Fagan's gang in Charles Dickens book, Oliver Twist. Children under the age of criminal responsibility, or young people who have increased vulnerability due to push:pull factors who are manipulated, coerced or forced into criminal activity provide opportunity for criminals to distance themselves from crime.

A current trend in criminal exploitation of children and young people are 'county lines' which refer to a 'phone line through which drug deals can be made. An order is placed on the number and typically a young person will deliver the drugs to the specified address and collect the money for the deal. These lines are owned and managed by organised crime gangs, often from larger cities, who are expanding their markets into rural areas.

- It can include vehicle crime and threatening/committing serious violence
- Children may become trapped as they or their families may be threatened with violence and they may be coerced or entrapped into debt or into carrying weapons. They may carry weapons as a form of protection
- Children involved in criminal exploitation need to be treated as victims themselves (particularly older children), even though they may commit crimes themselves
- We are aware that girls are at risk of criminal exploitation too, even though their experience may be different

Indicators that a child may be criminally exploited include:

- Increase in **Missing episodes** – particular key as children can be missing for days and drug run in other Counties
- Having unexplained amounts of money, **new high cost items** and multiple mobile phones
- Increased social media and phone/text use, almost always secretly
- **Older males** in particular seen to be hanging around and driving
- Having injuries that are unexplained and unwilling to be looked at
- Increase in **aggression, violence and fighting**
- Carrying **weapons** – knives, baseball bats, hammers, acid
- Travel receipts that are unexplained
- **Significant missing** from education and disengaging from previous positive peer groups
- Parent concerns and significant changes in behaviour that affect emotional wellbeing

We will treat any child who may be criminally exploited as a victim in the first instance and refer to children's social care in the first instance. If a referral to the police is also required as crimes have been committed on Inclusion Hampshire premises, these will also be made.

If there is information or intelligence about child criminal exploitation, we will report this to the police via the community partnership information form. <https://www.safe4me.co.uk/portfolio/sharing-information/>

## 4.12 Serious Violence

Serious violence is becoming a factor for those who are involved in criminal exploitation. It can also be an indication of gang involvement and criminal activity. All staff will be made aware of indicators, which may signal that pupils, or members of their families, are at risk from or involved with serious violent crime.

These indications can include but are not limited to: increased absence from provision; a change in friendships or 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 and/or new possessions; possession of weapons.

Inclusion Hampshire has a duty to not only prevent the individual from engaging in criminal activity, but also to safeguard others who may be harmed by their actions. We will report concerns of serious violence to police and social care.

If there is information or intelligence about potential serious violence, we will report this to the police via the community partnership information form.

<https://www.safe4me.co.uk/portfolio/sharing-information/>

## 4.15 Trafficked Children and modern slavery

Human trafficking is defined by the UNHCR in respect of children as a process that is a combination of:

- Movement (including within the UK);
- Control, through harm / threat of harm or fraud
- For the purpose of exploitation

Any child transported for exploitative reasons is considered to be a trafficking victim.

There is significant evidence that children (both of UK and other citizenship) are being trafficked internally within the UK and this is regarded as a more common form of trafficking in the UK.

There are a number of indicators which suggest that a child may have been trafficked into the UK, and may still be controlled by the traffickers or receiving adults. These are as follows:

- Shows signs of physical or sexual abuse, and/or has contracted a sexually transmitted infection or has an unwanted pregnancy
- Has a history with missing links and unexplained moves
- Is required to earn a minimum amount of money every day
- Works in various locations
- Has limited freedom of movement
- Appears to be missing for periods
- Is known to beg for money

- Is being cared for by adult/s who are not their parents and the quality of the relationship between the child and their adult carers is not good
- Is one among a number of unrelated children found at one address
- Has not been registered with or attended a GP practice
- Is excessively afraid of being deported.

For those children who are internally trafficked within the UK indicators include:

- Physical symptoms (bruising indicating either physical or sexual assault)
- Prevalence of a sexually transmitted infection or unwanted pregnancy
- Reports from reliable sources suggesting the likelihood of involvement in sexual exploitation / the child has been seen in places known to be used for sexual exploitation
- Evidence of drug, alcohol or substance misuse
- Being in the community in clothing unusual for a child i.e. inappropriate for age, or borrowing clothing from older people
- Relationship with a significantly older partner
- Accounts of social activities, expensive clothes, mobile phones or other possessions with no plausible explanation of the source of necessary funding
- Persistently missing, staying out overnight or returning late with no plausible explanation
- Returning after having been missing, looking well cared for despite having not been at home
- Having keys to premises other than those known about
- Low self- image, low self-esteem, self-harming behaviour including cutting, overdosing, eating disorder, promiscuity
- Truancy / disengagement with education
- Entering or leaving vehicles driven by unknown adults
- Going missing and being found in areas where the child or young person has no known links; and/or possible inappropriate use of the internet and forming on-line relationships, particularly with adults

These behaviours themselves do not indicate that a child is being trafficked, but should be considered as indicators that this may be the case.

When considering modern slavery, there is a perception that this is taking place overseas. The government estimates that tens of thousands of slaves are in the UK today.

Young people being forced to work in restaurants, nail bars, car washes and harvesting fruit, vegetables or other foods have all been slaves 'hiding in plain sight' within the U.K and rescued from slavery. Other forms of slavery such as sex slaves or household slaves are more hidden but have also been rescued within the UK.

If staff believe that a child is being trafficked or is a slave, this will be reported to the designated safeguarding lead for referral to be considered to children's social care.

## 4.16 Online Safety and Social Media

Technological hardware and software is developing continuously with an increase in functionality of devices that people use. The majority of children use online tools to communicate with others locally, nationally and internationally. Access to the Internet and other tools that technology provides is an invaluable way of finding, sharing and communicating information. While technology itself is not harmful, it can be used by others to make children vulnerable and to abuse them.

The 4 key categories of risk

Our approach to online safety is based on addressing the following categories of risk:

Content – being exposed to illegal, inappropriate or harmful content, such as pornography, fake news, racism, misogyny, self-harm, suicide, anti-Semitism, radicalisation and extremism

Contact – being subjected to harmful online interaction with other users, such as peer-to-peer pressure, commercial advertising and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes

Conduct – personal online behaviour that increases the likelihood of, or causes, harm, such as making, sending and receiving explicit images (e.g. consensual and non-consensual sharing of nudes and semi-nudes and/or pornography), sharing other explicit images and online bullying; and

Commerce – risks such as online gambling, inappropriate advertising, phishing and/or financial scams

With the current speed of on-line change, some parents and carers have only a limited understanding of online risks and issues. Parents may underestimate how often their children come across potentially harmful and inappropriate material on the internet and may be unsure about how to respond. Some of the risks could be:

- unwanted contact
- grooming
- online bullying including sexting
- digital footprint

Inclusion Hampshire will therefore seek to provide information and awareness to both pupils and their parents through:

- Acceptable use information provided for learners and staff at induction
- Curriculum activities involving raising awareness around staying safe online including the safe use of social media, the internet and technology, keeping personal information private, how to recognise, unacceptable behaviour online and how to report any incidents of cyber-bullying
- Information included in letters, newsletters and web site
- Parents evenings / sessions
- Letters to parents/carers
- High profile events / campaigns e.g. Safer Internet Day
- Building awareness around information that is held on relevant web sites and or publications

- Social media policy
- Train staff, as part of their induction, on safe internet use and online safeguarding issues including cyber-bullying and the risks of online radicalisation.

Inclusion Hampshire ensures we have an appropriate level of security to protect users and their data.

## Cyberbullying

Central to Inclusion Hampshire's anti-bullying policy is the principle that '*bullying is always unacceptable*' and that '*all pupils have a right not to be bullied*'.

Inclusion Hampshire also recognises that it must take note of bullying perpetrated outside provision which spills over into the provision; therefore once aware we will respond to any cyber-bullying we become aware of carried out by pupils when they are away from the site.

Cyber-bullying is defined as 'an aggressive, intentional act carried out by a group or individual using electronic forms of contact repeatedly over time against a victim who cannot easily defend himself/herself.'

By cyber-bullying, we mean bullying by electronic media:

- Bullying by texts or messages or calls on mobile 'phones
- The use of mobile 'phone cameras to cause distress, fear or humiliation
- Posting threatening, abusive, defamatory or humiliating material on websites, to include blogs, personal websites, social networking sites
- Using e-mail to message others
- Hijacking/cloning email accounts
- Making threatening, abusive, defamatory or humiliating remarks in on-line forums

Cyber-bullying may be at a level where it is criminal in character. It is unlawful to disseminate defamatory information in any media including internet sites.

Section 127 of the Communications Act 2003 makes it an offence to send, by public means of a public electronic communications network, a message or other matter that is grossly offensive or one of an indecent, obscene or menacing character.

The Protection from Harassment Act 1997 makes it an offence to knowingly pursue any course of conduct amounting to harassment.

If we become aware of any incidents of cyberbullying, we will need to consider each case individually as to any criminal act that may have been committed. Inclusion Hampshire will pass on information to the police if it feels that it is appropriate or is required to do so.

## Sexting

'Sexting' often refers to the consensual and non-consensual sharing of nude and semi-nude images and/or videos through mobile phones and/or the internet. It also includes underwear shots, sexual poses and explicit text messaging.

While sexting often takes place in a consensual relationship between two young people, the use of sexted images in revenge following a relationship breakdown is becoming more commonplace. Sexting can also be used as a form of sexual exploitation and take place between strangers.

As the average age of first smartphone or camera enabled tablet is 6 years old, sexting is an issue that requires awareness raising across all ages.

The Inclusion Hampshire will use age appropriate educational material to raise awareness, to promote safety and deal with pressure. Parents should be aware that they can come to the school for advice.

## Gaming

Online gaming is an activity in which the majority of children and many adults get involved. Inclusion Hampshire will raise awareness:

- By talking to parents and carers about the games their children play and help them identify whether they are appropriate
- By supporting parents in identifying the most effective way to safeguard their children by using parental controls and child safety mode
- By talking to parents about setting boundaries and time limits when games are played
- By highlighting relevant resources

## Online reputation

Online reputation is the opinion others get of a person when they encounter them on-line. It is formed by posts, photos that have been uploaded and comments made by others on people's profiles. It is important that children and staff are aware that anything that is posted could influence their future professional reputation. The majority of organisations and work establishments now check digital footprint before considering applications for positions or places on courses.

## Grooming

On-line grooming is the process by which one person with an inappropriate sexual interest in children will approach a child on-line, with the intention of developing a relationship with that child, to be able to meet them in person and intentionally cause harm.

Inclusion Hampshire will build awareness amongst children and parents about ensuring that the child:

- Only has friends on-line that they know in real life
- Is aware that if they communicate with somebody that they have met on-line, that relationship should stay on-line.

We will support parents to:

- Recognise the signs of grooming
- Have regular conversations with their children about on-line activity and how to stay safe on-line

We will raise awareness by:

- Talking to parents
- Include awareness around grooming as part of their curriculum
- Identifying with parents and children how they can be safeguarded against grooming.

## **4.17 The Trigger Trio**

The term 'Trigger Trio' has replaced the previous phrase 'Toxic Trio' which was used to describe the issues of domestic violence, mental ill-health and substance misuse which have been identified as common features of families where harm to women and children has occurred.

The above are viewed as indicators of increased risk of harm to children and young people. In an analysis of Serious Cases Reviews undertaken by Ofsted in 2011, they found that in nearly 75% of these cases two or more of the issues were present.

These factors will have a contextual impact on the safeguarding of children and young people.

## Domestic Abuse

Domestic abuse is any incident or pattern of incidents of controlling, coercive or 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.

This can encompass, but is not limited to, the following types of abuse:

- Psychological
- Physical



- Sexual
- Financial
- Emotional

Controlling behaviour is a range of acts designed to make a person subordinate and/or dependent by isolating them from sources of support, exploiting their resources and capacities for personal gain, depriving them of the means needed for independence, resistance and escape and regulating their everyday behaviour.

Coercive behaviour is an act or a pattern of acts of assault, threats, humiliation and intimidation or other abuse that is used to harm, punish, or frighten their victim.

Research indicates that living within a home where domestic abuse takes place is harmful to children and can have a serious impact on their behaviour, wellbeing and understanding of what constitutes a normal relationship.

Children witnessing domestic abuse is recognised as 'significant harm' in law. These children may become aggressive; display anti-social behaviours; suffer from depression or anxiety; or fail to reach their educational potential.

Indicators that a child is living within a relationship with domestic abuse may include:

- being withdrawn
- suddenly behaving differently
- anxiety
- being clingy
- depression
- aggression
- problems sleeping
- eating disorders
- bed wetting
- soiling clothes
- excessive risk taking
- missing school
- changes in eating habits
- obsessive behaviour
- experiencing nightmares
- taking drugs
- use of alcohol
- self-harm
- thoughts about suicide

These behaviours themselves do not indicate that a child is living with domestic abuse, but should be considered as indicators that this may be the case.

If staff believe that a child is living with domestic abuse, this will be reported to the designated safeguarding lead

for referral to be considered to children's social care.

### Parental mental health

The term 'mental ill health' is used to cover a wide range of conditions, from eating disorders, mild depression and anxiety to psychotic illnesses such as schizophrenia or bipolar disorder. Parental mental illness does not necessarily have an adverse impact on a child's developmental needs, but it is essential to always assess its implications for each child in the family. It is essential that the diagnosis of a parent/carer's mental health is not seen as defining the level of risk. Similarly, the absence of a diagnosis does not equate to there being little or no risk.

For children the impact of parental mental health can include:

- The parent / carer's needs or illnesses taking precedence over the child's needs
- Child's physical and emotional needs neglected
- A child acting as a young carer for a parent or a sibling
- Child having restricted social and recreational activities
- Child finds it difficult to concentrate- impacting on educational achievement
- A child missing school regularly as (s)he is being kept home as a companion for a parent / carer
- A child adopts paranoid or suspicious behaviour as they believe their parent's delusions.
- Witnessing self-harming behaviour and suicide attempts (including attempts that involve the child)
- Obsessional compulsive behaviours involving the child

If staff become aware of any of the above indicators, or others that suggest a child is suffering due to parental mental health, the information will be shared with the DSL to consider a referral to children's social care.

## Parental Substance misuse

Substance misuse applies to the misuse of alcohol as well as 'problem drug use', defined by the Advisory Council on the Misuse of Drugs as drug use which has: 'serious negative consequences of a physical, psychological, social and interpersonal, financial or legal nature for users and those around them.

Parental substance misuse of drugs or alcohol becomes relevant to child protection when substance misuse and personal circumstances indicate that their parenting capacity is likely to be seriously impaired or that undue caring responsibilities are likely to be falling on a child in the family.

For children the impact of parental substance misuse can include:

- Inadequate food, heat and clothing for children (family finances used to fund adult's dependency)
- Lack of engagement or interest from parents in their development, education or wellbeing
- Behavioural difficulties- inappropriate display of sexual and/or aggressive behaviour
- Bullying (including due to poor physical appearance)
- Isolation – finding it hard to socialise, make friends or invite them home
- Tiredness or lack of concentration
- Child talking of or bringing into school drugs or related paraphernalia
- Injuries /accidents (due to inadequate adult supervision )
- Taking on a caring role
- Continued poor academic performance including difficulties completing homework on time
- Poor attendance or late arrival.

These behaviours themselves do not indicate that a child's parent is misusing substances, but should be considered as indicators that this may be the case.

If staff believe that a child is living with parental substance misuse, this will be reported to the designated safeguarding lead for referral to be considered for children's social care.

## **5. Safeguarding issues relating to individual pupil needs**

### **5.1 Homelessness**

Inclusion Hampshire recognises that being homeless or being at risk of becoming homeless presents a real risk to a child's welfare. The impact of losing a place of safety and security can affect a child's behaviour and attachments.

In line with the Homelessness Reduction Act 2017 this organisation will promote links into the Local Housing Authority for the parent or caregiver in order to raise/progress concerns at the earliest opportunity.

We recognise that whilst referrals and/or discussion with the Local Housing Authority should be progressed as appropriate, this does not, and should not, replace a referral into children's social care where a child has been harmed or is at risk of harm.

### **5.2 Children & the Court System**

Inclusion Hampshire recognises that children are sometimes required to give evidence in criminal courts, either for crimes committed against them or for crimes they have witnessed. We know that this can be a stressful experience and therefore we will aim to support children through this process.

Along with pastoral support, we will use age-appropriate materials published by HM Courts and Tribunals Services (2017) that explain to children what it means to be a witness, how to give evidence and the help they can access.

We recognise that making child arrangements via the family courts following separation can be stressful and entrench conflict in families. This can be stressful for children. This school will support children going through this process.

Alongside pastoral support we will use online materials published by The Ministry of Justice (2018) which offers children information & advice on the dispute resolution service.

These materials will also be offered to parents and carers if appropriate.

### **5.3 Children with family members in prison**

Children who have a family member in prison are at greater risk of poor outcomes including poverty, stigma, isolation and poor mental health.

Inclusion Hampshire aims to:

- Understand and Respect the Child's Wishes

- We will respect the child's wishes about sharing information. If other children become aware we will be vigilante to potential bullying or harassment
- Keep as Much Contact as Possible with the Parent and Caregiver
- We will maintain good links with the remaining caregiver in order to foresee and manage any developing problems. Following discussions we will develop appropriate systems for keeping the imprisoned caregiver updates about their child's education.
- Be Sensitive in Lessons
- We will consider the needs of any child with an imprisoned parent during lesson planning.
- Provide Extra Support
- We recognise that having a parent in prison can attach a real stigma to a child, particularly if the crime is known and particularly serious. We will provide support and mentoring to help a child work through their feelings on the issue.
- Alongside pastoral care we will use the resources provided by the National Information Centre on Children of Offender in order to support and mentor children in these circumstances.

#### **5.4 Pupils with medical conditions (in Provision)**

Inclusion Hampshire will make sure that sufficient staff are trained to support any pupil with a medical condition that is referred to us who we believe we can support and offer a placement to.

All relevant staff will be made aware of the condition to support the child and be aware of medical needs and risks to the child.

An individual healthcare plan may be in place to support the child and their medical needs.

#### **5.5 Special educational needs and disabilities**

Children who have special educational needs and/or disabilities can have additional vulnerabilities when recognising abuse and neglect. These can include:

- Assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's disability without further exploration
- The potential for children with SEN and disabilities being disproportionately impacted by behaviours such as bullying, without outwardly showing any signs
- Communication barriers and difficulties in overcoming these barriers
- Have fewer outside contacts than other children
- Receive intimate care from a considerable number of carers, which may increase the risk of exposure to abusive behaviour and make it more difficult to set and maintain physical boundaries

- Have an impaired capacity to resist or avoid abuse
- Have communication difficulties that may make it difficult to tell others what is happening
- Be inhibited about complaining for fear of losing services
- Be especially vulnerable to bullying and intimidation
- Be more vulnerable than other children to abuse by their peers.

Inclusion Hampshire will respond to this by:

- Making it common practice to enable disabled children to make their wishes and feelings known in respect of their care and treatment
- Ensuring that disabled children receive appropriate personal, health and social education (including sex education)
- Making sure that all disabled children know how to raise concerns and give them access to a range of adults with whom they can communicate. This could mean using interpreters and facilitators who are skilled in using the child's preferred method of communication
- Recognising and utilising key sources of support including staff within the provision, friends and family members where appropriate
- Developing the safe support services that families want, and a culture of openness and joint working with parents and carers on the part of services
- Ensuring that guidance on good practice is in place and being followed in relation to: intimate care; working with children of the opposite sex; managing behaviour that challenges families and services; issues around consent to treatment; anti-bullying and inclusion strategies; sexuality and safe sexual behaviour among young people; monitoring and challenging placement arrangements for young people living away from home.

## **5.6 Intimate and personal care**

'Intimate Care' can be defined as care tasks of an intimate nature, associated with bodily functions, bodily products and personal hygiene, which demand direct or indirect contact with, or exposure of, the sexual parts of the body.

Inclusion Hampshire does not have the facilities or staff capacity/specific training to accept referrals which require intimate care.

## **5.7 Fabricated or induced illness**

There are three main ways that a carer could fabricate or induce illness in a child. These are not mutually exclusive and include:

- fabrication of signs and symptoms. This may include fabrication of past medical history

- fabrication of signs and symptoms and falsification of hospital charts and records, and specimens of bodily fluids. This may also include falsification of letters and documents
- induction of illness by a variety of means.

If we are concerned that a child may be suffering from fabricated or induced illness we will inform children's social care.

## 5.8 Mental Health

Mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation.

Staff will be alert to behavioural signs that suggest a child may be experiencing a mental health problem or be at risk of developing one.

Staff see pupils day in, day out. They know them well and are well placed to spot changes in behaviour that might indicate an emerging problem with the mental health and emotional wellbeing of pupils.

The balance between the risk and protective factors are most likely to be disrupted when difficult events happen in pupils' lives. These include:

- **loss or separation** – resulting from death, parental separation, divorce, hospitalisation, loss of friendships (especially in adolescence), family conflict or breakdown that results in the child having to live elsewhere, being taken into care or adopted
- **life changes** – such as the birth of a sibling, moving house or changing schools or during transition from primary to secondary school, or secondary school to sixth form
- **traumatic events** such as abuse, domestic violence, bullying, violence, accidents, injuries or natural disaster.

When concerns are identified, staff will provide opportunities for the child to talk or receive support within our provision environment. Parents will be informed of the concerns if necessary and a shared way to support the child will be discussed.

Where the needs require additional professional support referrals will be made to the appropriate team or service with the parent's agreement or child's if they are considered to be competent.

If staff have a mental health concern about a child that is also a safeguarding concern, we will take immediate action. If we have a mental health concern that is not also a safeguarding concern, speak to the DSL to agree on a course of action

## 6. Other safeguarding issues that may potentially have an impact on pupils

### 6.1 Bullying

Inclusion Hampshire has a separate bullying policy that can be found in the main policy folder located on Inclusion Hampshire secure staff drive.

### 6.2 Prejudice based and discriminatory abuse

Prejudice based abuse or hate crime is any criminal offence which is perceived by the victim or any other person to be motivated by a hostility or prejudice based on a person's real or perceived:

- Disability
- Race
- Religion
- Gender identity
- Sexual orientation

Although this sort of crime is collectively known as 'Hate Crime' the offender doesn't have to go as far as being motivated by 'hate', they only have to exhibit 'hostility'.

This can be evidenced by:

- threatened or actual physical assault
- derogatory name calling, insults, for example racist jokes or homophobic language
- hate graffiti (e.g. on school furniture, walls or books)
- provocative behaviour e.g. wearing of badges or symbols belonging to known right wing, or extremist organisations
- distributing literature that may be offensive in relation to a protected characteristic
- verbal abuse
- inciting hatred or bullying against pupils who share a protected characteristic
- prejudiced or hostile comments in the course of discussions within lessons
- teasing in relation to any protected characteristic e.g. sexuality, language, religion or cultural background
- refusal to co-operate with others because of their protected characteristic, whether real or perceived
- expressions of prejudice calculated to offend or influence the behaviour of others
- attempts to recruit other pupils to organisations and groups that sanction violence, terrorism or hatred



Inclusion Hampshire will respond by:

- clearly identifying prejudice based incidents and hate crimes and monitor the frequency and nature of them within the provision.
- taking preventative action to reduce the likelihood of such incidents occurring
- recognising the wider implications of such incidents for the provision and local community
- providing regular reports of these incidents to the Trustees
- ensuring that staff are familiar with formal procedures for recording and dealing with prejudice based incidents and hate crimes
- dealing with perpetrators of prejudice based abuse effectively
- supporting victims of prejudice based incidents and hate crimes
- ensuring that staff are familiar with a range of restorative practices to address bullying and prevent it happening again

### **6.3 Drugs and substance misuse**

Inclusion Hampshire has a separate Smoking, Drugs & Alcohol Policy that can be found in the main policy folder located on Inclusion Hampshire secure staff drive.

### **6.4 Faith Abuse**

The number of known cases of child abuse linked to accusations of 'possession' or 'witchcraft' is small, but children involved can suffer damage to their physical and mental health, their capacity to learn, their ability to form relationships and to their self-esteem.

Such abuse generally occurs when a carer views a child as being 'different', attributes this difference to the child being 'possessed' or involved in 'witchcraft' and attempts to exorcise him or her.

A child could be viewed as 'different' for a variety of reasons such as, disobedience; independence; bed-wetting; nightmares; illness; or disability. There is often a weak bond of attachment between the carer and the child.

There are various social reasons that make a child more vulnerable to an accusation of 'possession' or 'witchcraft'. These include family stress and/or a change in the family structure.

The attempt to 'exorcise' may involve severe beating, burning, starvation, cutting or stabbing and isolation, and usually occurs in the household where the child lives.

If the organisation becomes aware of a child who is being abused in this context, the DSL will follow the normal referral route into children's social care

## **6.5 Gangs and Youth Violence**

The vast majority of young people will not be affected by serious violence or gangs. However, where these problems do occur, even at low levels there will almost certainly be a significant impact.

Inclusion Hampshire has a duty and a responsibility to protect our pupils. It is also well established that success in learning is one of the most powerful indicators in the prevention of youth crime. Dealing with violence also helps attainment. While pupils generally see educational establishments as safe places, even low levels of youth violence can have a disproportionate impact on any education.

Crucial preventive work can be done within school to prevent negative behaviour from escalating and becoming entrenched.

Inclusion Hampshire will:

- develop skills and knowledge to resolve conflict as part of the curriculum
- challenge aggressive behaviour in ways that prevent the recurrence of such behaviour
- understand risks for specific groups, including those that are gender-based, and target interventions
- safeguard, and specifically organise child protection, when needed
- make referrals to appropriate external agencies
- carefully manage individual transitions between educational establishments
- work with local partners to prevent anti-social behaviour or crime.

## **6.6. Private fostering**

Private fostering is an arrangement by a child's parents for their child (under 16 or 18 if disabled) to be cared for by another adult who is not closely related and is not a legal guardian with parental responsibility for 28 days or more.

It is not private fostering if the carer is a close relative to the child such as grandparent, brother, sister, uncle or aunt.

The Law requires that the carers and parents must notify the Children's Services Department of any private fostering arrangement.

If Inclusion Hampshire becomes aware that a pupil is being privately fostered we will inform the Children's Services Department and inform both the parents and carers that we have done so.

## 6.7 Parenting

All parents will struggle with the behaviour of their child(ren) at some point. This does not make them poor parents or generate safeguarding concerns. Rather it makes them human and provides them with opportunities to learn and develop new skills and approaches to deal with their child(ren).

Some children have medical conditions and/or needs e.g. Tourette's Syndrome, some conditions associated with autism or ADHD that have a direct impact on behaviour and can cause challenges for parents in dealing with behaviours. This does not highlight poor parenting either.

Parenting becomes a safeguarding concern when the repeated lack of supervision, boundaries, basic care or medical treatment places the child(ren) in situations of risk or harm.

In situations where parents struggle with tasks such as setting boundaries and providing appropriate supervision, timely interventions can make drastic changes to the wellbeing and life experiences of the child(ren) without the requirement for a social work assessment or plan being in place.

Inclusion Hampshire will support parents in understanding the parenting role and provide them with strategies to make a difference by:

- providing pastoral support from our experienced parenting support lead
- providing details of community based parenting courses <http://www3.hants.gov.uk/childrens-services/familyinformationdirectory.htm>
- linking to web based parenting resources (for example <http://www.familylives.org.uk/>)
- discussing the issue with the parent and supporting them in making their own plans of how to respond differently (using evidence based parenting programmes)
- Considering appropriate early help services <http://www3.hants.gov.uk/childrens-services/childrens-trust/earlyhelp.htm>

## **7. Safeguarding processes**

### **7.1 Safer recruitment**

Inclusion Hampshire operates a separate safer recruitment process as part of its Recruitment Policy, a copy of this can be found in the Inclusion Hampshire secure staff drive.

On all recruitment panels there is at least one member who has undertaken safer recruitment training.

The recruitment process checks the identity, criminal record (enhanced DBS), mental and physical capacity, right to work in the U.K., professional qualification and seeks confirmation of the applicant's experience and history through references.

### **7.2 Staff induction**

The DSL or their deputy will provide all new staff with training to enable them to both fulfil their role and also to understand the child protection policy, the safeguarding policy, the staff behaviour policy/code of conduct, and part one of Keeping Children Safe in Education.

This induction may be covered within the annual training if this falls at the same time; otherwise it will be carried out separately during the initial starting period.

### **7.3 Health and safety**

Inclusion Hampshire has a separate Health and Safety policy that can be found in the main policy folder located on Inclusion Hampshire secure staff drive.

The site, the equipment and the activities carried out as part of the curriculum are all required to comply with the Health and Safety at Work act 1974 and regulations made under the act.

All risks are required to be assessed and recorded plans of how to manage the risk are in place. The plans should always take a common sense and proportionate approach to allow activities to be safe rather than preventing them from taking place. Inclusion Hampshire has a Health and Safety policy which details the actions that we take in more detail, a copy of this can be found in the Inclusion Hampshire secure staff drive.

## **7.4 Site Security**

We aim to provide a secure site, but recognise that the site is only as secure as the people who use it. Therefore all people on the site have to adhere to the rules which govern it. These are:

### Inclusion Learning Centre

- The main entrance door is code access only, so pupils are required to press an entry button to speak to reception to be let in, they must sign in when they enter the building.
- Visitors and volunteers must also press an entry button to speak to reception and must sign in when they enter the building.
- Visitors and volunteers are identified by recognised and legitimate ID
- Children are only allowed home during provision hours with adults/carers with parental responsibility or permission being given
- All children leaving or returning during the provision hours have to sign out and in
- Empty classrooms have windows closed.
- All external doors apart from fire exits are locked.

### Inclusion College

- Main entrance doors is code access only and requires pupils and visitors to buzz in
- Visitors and volunteers are identified by recognised and legitimate ID
- Empty classrooms have windows closed.

## **7.5. Off site visits**

A particular strand of health and safety is looking at risks when undertaking off site visits. Some activities, especially those happening away from the provision and residential visits, can involve higher levels of risk. If these are annual or infrequent activities, a review of an existing assessment may be all that is needed. If it is a new activity, a visit involving adventure activities, residential, overseas or an 'Open Country' visit, a specific assessment of significant risks must be carried out.

## **7.6 First Aid**

There is a separate First Aid policy which can be found at reception at both sites, and in the Inclusion Hampshire secure staff folder.

## **7.7 Physical Intervention (use of reasonable force)**

Every child and young person has a right to be treated with respect and dignity, and deserves to have their needs recognised and be given the right support. Some children and young people with learning disabilities, autistic spectrum conditions, trauma or mental health difficulties may react to distressing or confusing situations by displaying behaviours which may be harmful to themselves and others and may have been at heightened risk of restrictive intervention to minimise the impact of their behaviour, on them and on other people.

Research has shown that children and young people, their families and carers have said that restraint and restrictive intervention are traumatising. We also know that use of restraint and restrictive intervention can have long-term consequences on the health and wellbeing of children and young people, and that it can have a negative impact on staff who carry out such intervention. The personal costs to children and young people's development and welfare and to staff from the use of restraint are well documented. These include damage to physical, psychological, social and emotional wellbeing and to their neuro-cognitive, behavioural and emotional development. Restraint can be traumatising for children and repeated use of restraint can have damaging, re-traumatising effects

Young people who have experienced trauma in the past are especially at risk of experiencing psychological harm from restrictive interventions. For example: exclusion and seclusion can echo relational trauma and systemic trauma; physical restraint can echo physical and sexual abuse. As a result, these interventions may cause re-traumatisation which, in turn, may drive even more challenging behaviour

Children and young people with learning disabilities, autistic spectrum conditions and mental health difficulties may often respond with behaviour that challenges (verbal or non-verbal) when they are in pain, or experiencing sensory overload, or when confronted with situations they do not understand or environments in which they cannot easily cope, which cause anxiety or fear, and for which they are unprepared. Such behaviour may be perceived as 'naughty' or 'bad' if the child or young person is unable to follow instructions or fit in with existing rules and structures and it can be a form of communication for children and young people who are unable to communicate verbally.

Young people who have been exposed to trauma are more likely to have psychological and behavioural problems, and there is evidence that greater trauma exposure is associated with more severe and diverse behaviour problems. In addition, young people with behavioural issues and mental health conditions may be at higher risk of abuse and neglect than children without these conditions. These findings taken together suggest the possibility of a feedback cycle in which young people who have experienced trauma and who have mental health conditions and behavioural issues are at the highest risk of further trauma, mental health conditions and behavioural issues

Inclusion Hampshire promotes a learner centred approach with trauma- informed practices and, as such, does not operate a system of using restraint punitively or as a behaviour management tool. Learning groups within our centres at any one time rarely exceed 12 learners at any one time and the staff/learner ratio is high, always 1:2 or above. Staff are trained to use positive behaviour support and other alternatives which can de-escalate challenging behaviour, and tackle the reasons for it at source. This is our primary approach. We believe in relationships built on respect, trust and nurture and to break this by using restraint on a young person would be both wrong and potentially damaging.

The likelihood of challenging behaviour can often be anticipated by those who know the learner well. Measures to understand the range of communication used by young people to express emotions, including distressed behaviour, are put in place. Measures to identify triggers of distressed behaviour and to prevent or address it are also developed with the involvement of the child or young person and their family, and with careful assessment, planning and support we create the right environment for education, care and support.

#### Primary strategies

We put in place strategies for each individual learner to reduce the likelihood of the behaviour happening; for example, managing situations that we know will trigger a behaviour, changing environments, changing grouping and timetabling and providing opportunities for new experiences and acquiring new skills.

#### Secondary strategies

These are our plans for what to do if the primary strategies do not work and behaviour starts to escalate. These include using calming approaches, changing the environment, and diverting the young person's attention to an activity they enjoy.

#### Reactive strategies

These are planned, robust strategies that are put in place to be used as a response to an incident of challenging behaviour. They aim to take control of a situation and minimise the risk to the person and others.

These include:

- Continued use of proven and evidence based de-escalation strategies and calming techniques
- Alerting staff for example Head of Provision, SLT and/ or Counsellors of escalating situation for support and intervention
- Removal and supervision of other learners in a safe place
- Learner to leave site (under the care of staff, parent/ carer or other appropriate professional)
- In cases of violence, extreme destruction, risk to self or others the police may be called
- In extreme cases of violence towards other learners, self or staff, non violent intervention may be necessary such as standing between learners or standing at a door to protect others

After any incident a full incident report is written and submitted to CEO and SLT within 2 days for discussion and actions.

Please refer to relevant Inclusion Hampshire policies to support this document, which can be found on the Inclusion Hampshire secure staff drive:

- Behaviour Policy
- Violence at Work
- Special Educational Needs and Disabilities Policy

## **7.8 Taking and the use and storage of images**

Inclusion Hampshire seeks consent from the parent of a pupil and from teachers and other adults before taking and publishing photographs or videos that contain images that are sufficiently detailed to identify the individual in school publications, printed media or on electronic publications.

We will not seek consent for photos where you would not be able to identify the individual.

We will seek consent for the period the pupil remains registered with us and, unless we have specific written permission we will remove photographs after a child (or teacher) appearing in them leaves the school or if consent is withdrawn.

Photographs will only be taken and stored on the inclusion Hampshire secure G Drive. No images of pupils will be taken or stored on privately owned equipment by staff members.

## **7.9 Transporting pupils**

On occasions staff support with the task of transporting children to visits and off-site activities arranged by Inclusion Hampshire.

In managing these arrangements, we will put in place measures to ensure the safety and welfare of young people carried in staff or volunteers' cars. This is based on guidance from the local authority for school staff using their cars on school business.

Inclusion Hampshire will notify staff and volunteers of their responsibilities for the safety of pupils, to maintain suitable insurance cover and to ensure their vehicle is roadworthy. All staff are directed to have read and adhere to the Staff Travel policy which can be found in the Inclusion Hampshire secure staff folder.

Inclusion Hampshire contracts the services of a community transport provider to provide services for some learners, relevant compliance documents are held at the head office.



## **7.10 Disqualification under the childcare act**

The Childcare Act of 2006 was put in place to prevent adults who have been cautioned or convicted of a number of specific offences from working within childcare. Previously this disqualification also extended to risk by association of anyone living within the same household and required us to carry out a self disclosure process with staff.

The risk by association element of the Act has now been refocused by the DfE and no longer applies to staff.

We will continue to check for disqualification under the Childcare Act as part of our safer recruitment processes for any offences committed by staff members or volunteers.

## **8. Monitoring arrangements**

This policy will be reviewed **annually** by the Designated Safeguarding Leads, Heads of Centre and CEO. At every review, it will be approved by the full governing board.

## **9. Links to other policies**

This policy links to the following policies and procedures:

- Child Protection Policy
- Behaviour Policy
- Staff Code of Conduct
- Complaints
- Health and safety

These appendices are based on the Department for Education's statutory guidance, Keeping Children Safe in Education.

## **Appendix 1: types of abuse**

Abuse, including neglect, and safeguarding issues are rarely standalone events that can be covered by one definition or label. In most cases, multiple issues will overlap.

Physical abuse 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 is the persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.

Emotional abuse 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
- Not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate
- 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
- Seeing or hearing the ill-treatment of another
- Serious bullying (including cyber-bullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children

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

Once a child is born, neglect may involve a parent or carer failing to:

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

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

## **Appendix 2: table of changes**

Changes to grammar, punctuation, spelling and sentence structure have been made throughout the document. In addition to these minor changes the following have been made.

Page	Section	Changes
		Aug 21- Full Document updated to refer to KCSiE 2021