

# ACS Safeguarding & Child Protection Policy

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Please note:

In countries where ACS International Schools is operating outside of the United Kingdom the UK regulatory framework will provide the foundation for best practice as far as this policy is concerned. All ACS schools will operate in compliance with the relevant legislation of the country in which they are operating.

ACS International Schools is committed to protecting individual's personal data, and aims to remain at all times fully compliant with data protection laws and guidance from the relevant regulators. ACS further commits to ensuring that the planning and writing of all policies and procedures that involve the handling of personal data are guided by the principle of privacy by design, and that individuals' rights to have their data safeguarded are a paramount consideration in ACS' pursuit of all its operational and strategic practices.

## *Document Status*

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## *Policy Oversight*

ACS Board Lead: Chair – Mr. Bob Macnaughton  
 ACS Board Deputy: Chief Executive – Mr. Tim Cagney  
 Designated Safeguarding Lead: Mrs. Mel Nicholls  
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## *Change Control*

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## 1. Introduction

- 1.1 This policy has been developed in accordance with the principles established by a number of publications that inform best practice in safeguarding and child protection. These are listed below. They include some that are statutory guidance in the UK.
- 1.2 In Qatar, the advice in these publications should be followed where there is no equivalent national guidance.

[\*Keeping Children Safe in Education \(September, 2020\)\*](#)

[\*Working Together to Safeguard Children \(July, 2018\)\*](#)

[\*What to Do if You Are Worried a Child is Being Abused \(March, 2015\)\*](#)

[\*Child Sexual Exploitation: Definition and guide for practitioners, local leaders and decision makers working to protect children from child sexual exploitation \(February, 2017\)\*](#)

[\*Surrey Safeguarding Children Partnership Procedures Manual \(2020\) \(for ACS Cobham and ACS Egham\)\*](#)

[\*London Safeguarding Children Partnership London Child Protection Procedures \(5<sup>th</sup> Edition, 2020\) \(for ACS Hillingdon\)\*](#)

[\*Children Missing Education \(September 2016\)\*](#)

[\*The Prevent Duty Guidance: for England and Wales \(July, 2015\) \(Prevent\)\*](#)

[\*The Counter-Terrorism and Security Act 2015 \(The Prevent Duty\), \(September, 2015\).\*](#)

[\*Framework for the Assessment of Children in Need and their Families \(2000\)\*](#)

[\*When to Call the Police: guidance for schools and colleges \(2019\)\*](#)

[\*Information Sharing: Advice for Practitioners Providing Safeguarding Services to Children, Young People, Parents and Carers \(2018\) .\*](#)

[\*Sexual Violence and Sexual Harassment between Children in Schools and Colleges: Advice for governing bodies, proprietors, headteachers, principals, senior leadership teams and designated safeguarding leads \(2018\)\*](#)



[The Children Acts \(1989 and 2004\)](#)

[The Education Act \(2002\)](#)

[The Education \(Independent School Standards\) Regulations \(2014\)](#)

[National Minimum Standards \(March, 2015\)](#)

[The Education \(Child Information\) \(England\) Regulations \(2005\)](#)

## 2. Terminology Used in this Policy

- 2.1 The policy is applicable to ACS International Schools as an organisation and to each of its schools. In this document the term ACS is used to encompass the whole organisation and each of its schools. Information relevant solely to specific campuses within the organisation is contained in appendices at the end of this policy document.
- 2.2 The terms in the table below are specifically defined for the purpose of clarity in this policy

**Child** includes everyone under the age of 18, or older if still an ACS student.

**Child protection** refers to the processes undertaken to protect children who have been identified as suffering, or at risk of suffering significant harm.

**Parent** includes birth parents and other adults who are in a parenting role, for example step-parents, foster carers and adoptive parents.

**Safeguarding** and promoting the welfare of children is defined as: protecting children from maltreatment; preventing impairment of children's mental and physical health and development; ensuring children grow up in circumstances consistent with the provision of safe and effective care; and taking action to enable all children to have the best outcomes.

**Staff** refers to all those working for or on behalf of the schools, full time or



part time, temporary or permanent, in either a paid or voluntary capacity.

### **Types of Abuse and Neglect**

ACS recognises that there are multiple types of abuse and neglect. ACS draws its understanding of the terminology used to describe these from [Keeping Children Safe in Education \(September, 2020\)](#)

## **3. Aims of the Policy**

### 3.1 The aims of this policy are:

- 3.1.1 To support the child's development in ways that will foster security, confidence, independence and sound mental health and wellbeing.
- 3.1.2 To provide an environment in which children and young people feel safe, secure, valued and respected, and in which they can feel confident, and know how to approach adults if they are in difficulties, knowing they will be effectively listened to.
- 3.1.3 To raise the awareness of all teaching and non-teaching staff of the need to safeguard children and of their responsibilities in identifying and reporting possible cases of abuse (see Appendices 5, 6 and 7).
- 3.1.4 To provide a systematic means of monitoring children known or thought to be in need or at risk of harm, and to ensure ACS contributes to assessments of need and support packages for those children.
- 3.1.5 To emphasise the need for good levels of communication between all members of staff.
- 3.1.6 To maintain a structured procedure within ACS which will be followed by all members of the school community in cases of suspected abuse.
- 3.1.7 To develop and promote effective working relationships with other agencies that are responsible for the social care of children and families.
- 3.1.8 To ensure that all staff working within ACS who have access to children and who undertake regulated activity have been checked for suitability, including verification of their identity and qualifications, and other checks including, but not limited to, DBS check and Sterling Backcheck, and that a single central register of appointments is kept for audit.

## 4. Safe School, Safe Staff

- 4.1 ACS recognises that all adults, staff (including temporary staff)<sup>1</sup>, volunteers and directors, have a full and active part to play in protecting our students from harm, and that the child's welfare is our paramount concern.
- 4.2 ACS believes that the education setting should provide a caring, safe and stimulating environment that promotes the social, physical and moral development of the individual child. In its approach to child protection and safeguarding, and in its discharge of its duties and responsibilities, ACS commits to acting in the best interests of the child.
- 4.3 The Board of ACS takes seriously its responsibility under section 175 of *The Education Act 2002* to safeguard and promote the welfare of children, and to work together with other agencies to ensure adequate arrangements within our school to identify, assess, and support those children who are suffering harm.
- 4.4 ACS recognises that the schools play a significant part in the prevention of harm to our children by providing children with good lines of communication with trusted adults, supportive friends and an ethos of protection. The ACS community will therefore:
- 4.4.1 Work to establish and maintain an ethos where children feel secure and are encouraged to talk and are always listened to.
  - 4.4.2 Include regular consultation with children, e.g. through safety questionnaires, participation in anti-bullying week, asking children to report whether they have had happy/sad lunchtimes/playtimes.
  - 4.4.3 Ensure that all children know there is an adult in the school whom they can approach if they are worried or in difficulty.
  - 4.4.4 Include across the curriculum opportunities that equip children with the skills they need to stay safe from harm and to know to whom they should turn for help. In particular this will include anti-bullying work, eSafety, road safety, and pedestrian and cycle training.
- 4.5 ACS commits to ensure that all members of the ACS Board understand and fulfil their responsibilities. These are, namely to:

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<sup>1</sup> See Terminology section of this document



- Recognise ACS's duty to safeguard and protect all children in the schools, including children in need and children at risk of harm;
- Ensure that there is a Safeguarding and Child Protection policy that is reviewed annually, and more frequently if required, and that is published internally and externally;
- Ensure that ACS operates safer recruitment procedures;
- Ensure that ACS has procedures for dealing with allegations of abuse against staff;
- Ensuring robust safeguarding supervision is in place to improve outcomes for all students who require monitoring
- Ensure that Designated Safeguarding Lead (DSL) responsibilities are in place;
- Ensure that DSLs undertake inter-agency training and DSL training updates at least every 2 years;
- Ensure that all other staff have safeguarding training at least every 3 years;
- Ensure that named representatives from the board meet regularly with the DSL(s) and stay up to date with safeguarding trends and needs at ACS in order to report back to the board;
- Ensure that these representatives, who are currently Sheridan Swallow, Tim Cagney and Bob Macnaughton, receive regular, approved safeguarding training;
- Ensure that all staff read Part 1 of [Keeping Children Safe in Education \(September, 2020\)](#), Annex A of the same document, and [The Prevent Duty](#);
- In addition to that, read and understood themselves the information for board members set out in Part 2 of [Keeping Children Safe in Education \(September, 2020\)](#);
- Ensure that any weaknesses in Safeguarding or Child Protection are remedied as soon as possible.
- Ensure that staff are aware of the risks (see below) associated with honour-based violence and radicalisation, and understand both their statutory duties to report, and the procedures ACS has to support such reporting and referral via the MyConcern portal and the Designated Safeguarding Lead structure.
- Specifically, ACS commits to keeping staff updated on visible and behavioural signs that children are at risk of honour-based violence such as FGM and forced marriage. These may include physical signs such as bruising or more anecdotal cues such as children talking about a special ceremony or event or a special trip for a purpose that an adult may find concerning. Further details are obtainable from [Working Together to Safeguard Children](#) and in



[Keeping Children Safe in Education \(September, 2020\).](#)

These two documents are made available to ACS staff in the Required Reading section on Safety Cloud. Appendix 5 of this policy also contains information about the indicators that staff may bear in mind as potential signs that a child is experiencing or is at risk from honour-based violence.

- 4.6 The named safeguarding representatives on the board may be contacted via the following e-mail addresses:
- Bob Macnaughton (Chair of Board): [bmacnaughton@acs-schools.com](mailto:bmacnaughton@acs-schools.com)  
Tim Cagney (Chief Executive Officer): [tcagney@acs-schools.com](mailto:tcagney@acs-schools.com)  
Sheridan Swallow (board member): [sheridanswallow@hotmail.com](mailto:sheridanswallow@hotmail.com)
- 4.7 The DSLs (senior members of staff within the schools) are listed in Appendices 1-4 of this policy and on the ACS website. All DSLs have undertaken the compulsory training delivered through an approved external training provider, and will undertake other training as required, at least every 2 years.
- 4.8 The DSLs who are involved in recruitment, other staff as required, and at least one member of the ACS Board will complete Safer Recruitment training (currently on-line via Safety Cloud) to be renewed at least every 3 years.
- 4.9 All members of staff and volunteers are provided with induction training that includes: the ACS Safeguarding and Child Protection Policy; the School Behaviour policy; the school's procedures for managing children who are missing education; the ACS employee handbook, *Working at ACS*, which includes guidance for staff on staff/student relationships and guidance on communications including social media; the names and photographs of DSLs; and copies of [Keeping Children Safe in Education \(September, 2020\)](#) and [The Prevent Duty](#).
- 4.10 All members of staff are trained in Online Safety annually, and receive regular updates in online safety matters and reporting concerns.
- 4.11 All parents/carers are made aware of the responsibilities of staff members with regard to safeguarding and child protection procedures through publication of the ACS Safeguarding and Child Protection Policy on the website and intranet.
- 4.12 ACS policies and practices such as ongoing supervision are designed to ensure the suitability of adults working with children on school sites at any time.

- 4.13 Community members organising activities for children are aware of the school's safeguarding and child protection guidelines and procedures.
- 4.14 Safeguarding and child protection concerns or allegations against adults working in the school, including concerns arising from transferrable risk, are referred to the appropriate statutory and regulatory bodies. Any member of staff found not suitable to work with children will be notified as required for consideration for prohibition, and/or barring, following resignation, dismissal, or when ACS ceases to use their services.
- 4.15 Appropriate checks are made that no prohibition from management of independent schools order exists for candidates to management positions.
- 4.16 Procedures are in place to be followed if a child harms another child or if a member of staff is accused of abuse or suspected of abuse.
- 4.17 Where it is suspected that a crime has been committed, the school will notify the police. ACS has regard to the guidance issued by the National Police Chiefs Counsel [When to Call the Police: guidance for schools and colleges \(2019\)](#)
- 4.18 ACS acknowledges its responsibilities under *The Counter Terrorism and Security Act 2015* to have "due regard to the need to prevent people from being drawn into terrorism". ACS discharges this duty by requiring every staff member to read and indicate that they have read and understood [The Prevent Duty](#), and by requiring staff to complete the online training course hosted on Safety Cloud.
- Staff whose Safety Cloud training is about to fall due for renewal will receive reminders from an appropriate administrator or line manager in time to complete an updated training. Additional training in the Prevent Duty is available from the Department for Education and has been introduced at ACS. ACS also encourages, and makes provision for, staff to attend courses in addressing radicalisation from external services including Inside Government and Optimus Education.
- 4.19 ACS's procedures will be regularly reviewed and updated.
- 4.20 The name of the designated members of staff for safeguarding and child protection, the DSLs and Deputy DSLs, will be clearly advertised in the school, with a statement explaining the school's role in referring and monitoring cases of suspected abuse.

## 5. Roles and Responsibilities

- 5.1 ACS recognises that safeguarding and child protection are every community member's responsibility. ACS ensures that all staff are alert to the signs of abuse and know to whom they should report any concerns or suspicions. The DSL and deputies are available for this purpose. However, staff members with concerns about safeguarding and child protection are advised to speak directly to children's social care services.
- 5.2 The Head of School at each campus is responsible for the implementation of this policy and other associated policies at their campus. This responsibility includes:
- Allocating sufficient time, training, support and resources, including cover arrangements when necessary, to enable the DSL and deputies to carry out their roles effectively, including the assessment of students and attendance at strategy discussions and other meetings.
  - Ensuring that all staff feel able to raise concerns about poor or unsafe practice and that such concerns are handled sensitively and in accordance with the whistleblowing procedures.
  - Ensuring that students are provided with opportunities throughout the curriculum to learn about safeguarding, including keeping themselves safe online.
  - Liaising with the appropriate Local Authorities where an allegation is made against a member of staff.
  - Ensuring that anyone who has harmed a child or who may pose a risk to a child is referred to the appropriate authorities, (for example the Disclosure and Barring Service and the Teacher Regulation Agency).
- 5.3 Designated safeguarding leads (DSLs) have the ultimate lead responsibility for child protection. This lead responsibility is not delegated. Deputy DSLs, trained to the same standard as DSLs, support the DSL in his/her role, and form part of the dedicated safeguarding team at all ACS campuses.
- 5.3.1 ACS follows the guidance provided in Annex B of [\*Keeping Children Safe in Education \(September, 2020\)\*](#), with regard to the description of the role and duties associated with DSLs and their deputies. These duties are summarised under the following four general headings:

### 5.3.1a Manage referrals

The designated safeguarding lead is expected to:

- refer cases of suspected abuse to the local authority children's social care as required;
- support staff who make referrals to local authority children's social care;
- refer cases to the Channel programme where there is a radicalisation concern as required;
- support staff who make referrals to the Channel programme;
- refer cases where a person is dismissed or left due to risk/harm to a child to the Disclosure and Barring Service as required; and
- refer cases where a crime may have been committed to the Police as required.

#### 5.3.1b Work with others

The designated safeguarding lead is expected to:

- act as a point of contact with the three safeguarding partners;
- liaise with the head of school or principal to inform him or her of issues, especially ongoing enquiries under section 47 of the Children Act 1989 and police investigations;
- as required, liaise with the "case manager" (as per Part Four of [Keeping Children Safe in Education \(September, 2020\)](#)), and the designated officer(s) at the local authority for child protection concerns in cases which concern a staff member;
- liaise with staff (especially pastoral support staff, school nurses, IT Technicians, and SENCOs) on matters of safety and safeguarding (including online and digital safety) and when deciding whether to make a referral by liaising with relevant agencies; and
- act as a source of support, advice and expertise for all staff.

#### 5.3.1c Training

The designated safeguarding lead (and any deputies) should undergo training to provide them with the knowledge and skills required to carry out the role. This training should be updated at least every two years. The designated safeguarding lead should undertake Prevent awareness training.

In addition to the formal training set out above, their knowledge and skills should be refreshed (this might be via e-bulletins, meeting other designated safeguarding leads, or simply taking time to read and digest safeguarding developments) at regular intervals, as required, and at least annually, to allow them to understand and keep up with any developments relevant to their role so they:



- understand the assessment process for providing early help and statutory intervention, including local criteria for action and local authority children's social care referral arrangements;
- have a working knowledge of how local authorities conduct a child protection case conference and a child protection review conference and be able to attend and contribute to these effectively when required to do so;
- ensure each member of staff has access to, and understands, the school's child protection policy and procedures, especially new and part time staff;
- are alert to the specific needs of children in need, those with special educational needs and young carers;
- understand relevant data protection legislation and regulations, especially the Data Protection Act, 2018 and the General Data Protection Regulations (GDPR);
- understand the importance of information sharing, both within the school and college, and with the three safeguarding partners, other agencies, organisations and practitioners;
- are able to keep detailed, accurate, secure written records of concerns and referrals;
- understand and support the school with regards to the requirements of the Prevent duty and are able to provide advice and support to staff on protecting children from the risk of radicalisation;
- are able to understand the unique risks associated with online safety and be confident that they have the relevant knowledge and up to date capability required to keep children safe whilst they are online at school;
- can recognise the potential risk of online bullying, including the specific risks posed to children's wellbeing by bullying, grooming and radicalisation that takes place in the ever-present online world outside of school hours;
- understand that it is possible for bullying, grooming and radicalisation to take place solely online and not involve personal face-to-face contact;
- can recognise the additional risks that children with SEN and disabilities (SEND) face online, for example, from online bullying, grooming and radicalisation, and are confident that they have the capability to support SEND children to stay safe online;
- obtain access to resources and attend any relevant or refresher training courses; and
- encourage a culture of listening to children and taking account of their wishes and feelings, among all staff, in any measures the school or college may put in place to protect them.
- Recognise and be alert to the potential threat that peer-on-peer incidents may pose to students.

#### 5.3.1d Raise Awareness

The designated safeguarding lead should:

- ensure the school or college's safeguarding and child protection-related policies are known, understood and used appropriately;
- ensure the school or college's Safeguarding & Child Protection policy is reviewed annually (as a minimum) and the procedures and implementation are updated and reviewed regularly, and work with governing bodies or proprietors regarding this;
- ensure the Safeguarding & Child Protection policy is available publicly and parents are aware of the fact that referrals about suspected abuse or neglect may be made and the role of the school or college in this; and
- link with the safeguarding partner arrangements to make sure staff are aware of training opportunities and the latest local policies and thresholds on safeguarding arrangements.

5.3.2 In addition, the DSL is responsible for ensuring that when students leave ACS any child protection file is transferred to their new school or college as soon as possible and separately from the main student file. At such times the DSL will ensure that the transit of the file is secure and that confirmation of receipt is obtained from the receiving institution.

5.3.3 In accordance with the recommendations and requirements described in Annex B of [Keeping Children Safe in Education \(September, 2020\)](#), during term time and during school hours, the DSL or a deputy will always be available for staff at ACS to discuss any safeguarding concerns.

5.4 In addition to the duties described in Annex B of [Keeping Children Safe in Education \(September, 2020\)](#), DSLs at ACS are required to:

- Understand the assessment process for providing early help and intervention, for example through locally agreed common and shared assessment processes such as early help assessments.
- Be alert to those children within the school who are at risk of: domestic violence; female genital mutilation; being missing from education; child trafficking; radicalisation; and bullying (which includes race/hate or homophobic behaviour).
- Have a working knowledge of how the local authority conducts a child protection case conference and a child protection review conference and be able to attend and contribute to these effectively when required to do so.
- Be alert to the specific needs of children in need, those with special educational needs, and young carers.

- Be able to keep detailed, accurate, secure written records of concerns and referrals.
- Obtain access to resources and attend any relevant or refresher training courses.
- In any protection measures taken, encourage a staff culture of listening to children, to take account of their wishes and feelings
- Link with the Local Safeguarding Partners to make sure staff are aware of training opportunities and the latest local policies on safeguarding.

#### 5.5 DSLs' responsibilities include:

- Making prompt contact with the responsible authorities to refer a child where there are concerns that a child may be in need of help or at risk (including possible abuse).
- Remaining aware of, and updated about changes to, local threshold criteria above which referrals must be made to the appropriate authorities.
- Making all referrals in writing following a telephone call to the appropriate agencies.
- Keeping written records of concerns about a child even if there is no need to make an immediate referral.
- Ensuring that all such records are kept confidentially and securely and are separate from student records, and that they are copied on to the child's next school or college as soon as possible but separately from the main file.
- Ensuring that where such records are stored electronically, they are protected with a different password from the child's other files and accessible only by the DSLs and Head of School.
- Ensuring that an indication of the existence of the additional file in referenced above is marked on the student records.
- Liaising with other agencies and professionals.
- Liaising with the Head of School or principal to inform him or her of issues, especially new or ongoing child protection investigation enquiries and police investigations.
- Acting as a source of support, advice and expertise to staff on matters of safety and safeguarding and when deciding whether to make a referral by liaising with relevant agencies.
- Ensuring that any student with a current Child Protection Plan who is absent from the educational setting without explanation for 2 days is referred to their key worker's Social Care Team (in some cases any absence may be a cause for concern and warrant immediate reporting).
- Providing, with the Heads of School, an annual report for the ACS Board, detailing any changes to the policy and procedures; training undertaken by the DSL, deputies and/or by all staff and members of

the ACS Board; the number and type of incidents/cases, and the number of children on the Child Protection register (anonymised).

- Ensuring that they (or in some cases the class teacher or residential key worker) attend safeguarding and child protection conferences, core groups or other multi-agency planning meetings, contribute to assessments, and provide reports that will normally have been shared with the parents (in some circumstances it may not be appropriate to share a report with parents; if the DSL is uncertain on this point, advice can be obtained from the allocated social worker).
- Ensuring that Deputy DSLs receive relevant training and have relevant status.

## **6 Supporting Children**

- 6.1 ACS recognises that a child who is abused or who witnesses violence may feel helpless and humiliated, may blame themselves, and may find it difficult to develop and maintain a sense of self-worth.
- 6.2 ACS recognises that the school setting may be the only stability in the lives of children who have been abused or who are in need or at risk of harm.
- 6.3 ACS recognises that research shows that the behaviour of a child in these circumstances may range from that which is perceived to be normal to aggressive or withdrawn.
- 6.4 DSLs and their deputies are cognizant of the need for uniform approaches to dealing with children in need or who have been abused, and with children who are suspected of being in need or having been abused. ACS will support all children by:
- Encouraging self-esteem and self-assertiveness, through the curriculum as well as our relationships, whilst not condoning aggression or bullying.
  - Promoting a caring, safe and positive environment within the school.
  - Liaising and working together with all other support services and those agencies involved in the safeguarding of children.
  - Notifying the appropriate social care providers as soon as there is a significant concern.
  - Providing continuing support to a child about whom there have been concerns who leaves the school, by ensuring that appropriate information is copied under confidential cover to the child's new

setting and ensuring the school medical records are forwarded as a matter of priority.

## 7 Monitoring of Children

- 7.1 ACS will provide systematic means of monitoring children known or thought to be at risk of harm, and will ensure the school contributes to the assessment of need and to the support packages for those children. The school is committed to inter-agency working, which includes providing a coordinated offer of early help when the additional needs of children are identified.
- 7.2 ACS recognises the need for good communication between all members of staff and between the school and other agencies.

## 8 Confidentiality

- 8.1 ACS is committed to protecting and respecting the privacy of our students and families. Under Data Protection law, ACS is a Data Controller, and is responsible for collecting and processing personal information to meet our statutory obligation to safeguard.

ACS recognises that all matters relating to Safeguarding and Child Protection are confidential. Where staff are concerned that a student or a close associate of that student (e.g. a member of their family) is at risk they are required to make a confidential safeguarding referral through MyConcern. All information provided for the purposes safeguarding is sensitive, and we respect confidentiality at all times.

- 8.2 The Head of School or DSL will disclose any information about a child to other members of staff on a need-to-know basis in accordance with the guidance [Information Sharing: Advice for Practitioners Providing Safeguarding Services to Children, Young People, Parents and Carers \(2018\)](#).
- 8.3 Where a social worker has been allocated to work with a child or family, DSLs will promote best educational outcomes by sharing information with relevant staff about any welfare, safeguarding and child protection issues that are pertinent to the child.
- 8.4 All staff must be aware that they have a professional responsibility to listen to children who are disclosing information associated with child protection and safeguarding matters, and to share information with other agencies in order to safeguard children. Specifically, the person



to whom an allegation is first reported should take the matter seriously and keep an open mind. S/he should not investigate or ask leading questions if seeking clarification, and should recognise the importance of not making assumptions.

- 8.5 If a child discloses information to a staff member, the staff member should ensure that they do not promise to keep the disclosure confidential, and the child should be advised that the concern will be shared on a 'need to know' basis only. Actions to be taken include: making an immediate written record of the allegation on MyConcern using the informant's words - including time, date and place where the alleged incident took place, brief details of what happened, what was said and who was present. The system will ensure that this record will be dated and immediately passed on to the DSL.
- 8.6 All staff must be aware that they cannot promise confidentiality to a child that might compromise the child's safety or wellbeing.
- 8.7 ACS undertakes to share our intention to refer a child to the appropriate authority with their parents/carers unless to do so could put the child at greater risk of harm, or impede a criminal investigation. If in doubt, ACS will consult with the appropriate safeguarding authorities.

## **9 Supporting Staff**

- 9.1 ACS recognises that staff who have become involved with a child who has suffered harm, or appears to be likely to suffer harm, may find the situation stressful and upsetting.
- 9.2 ACS will support such staff by providing an opportunity to talk through their anxieties with the DSL and to seek further support as appropriate.

## **10 Peer on Peer Abuse**

- 10.1 ACS recognises that students will on occasion behave in a way that causes concern to other students, or act in ways that cause harm to other students. In most instances, the behaviour of students towards each other will be covered by ACS' behaviour policy or anti-bullying policy. However, some behaviour or allegations may be of such a serious nature that they may raise safeguarding concerns. ACS recognises that children are capable of abusing their peers. Such abuse is regarded as unacceptable at ACS and will not be passed off as "banter" or "part of growing up". Some examples of forms of peer on

peer abuse are outlined below. This outline is not intended to represent an exhaustive list, and future behaviour trends may inform the list's expansion or modification.

- Grooming (where an individual seeks to gain the trust of a child in order to carry out harmful behaviour).
- Sexting and sending Youth Produced Sexual Images (the act of sending explicit photographs or messages often via social media or via mobile devices).
- Verbal insults intended to intimidate others or make them feel worthless, and comments of a sexually explicit nature intended to insult or subjugate others.
- Distribution of sexually harmful or violent literature.
- Bullying, as defined in the ACS anti-bullying policy.
- Upskirting (as defined in [Keeping Children Safe in Education \(September, 2020\)](#), or similarly invasive and antisocial behaviours intended to denigrate another student or provide sexual gratification to the perpetrator
- Radicalisation (the process by which an individual or group comes to adopt increasingly extreme political, social, or religious ideals and/or rejects the freedom of speech of others).
- Coercion or intimidation.
- Domestic abuse – an incident or pattern of actual or threatened acts of physical, sexual, financial and/or emotional abuse, perpetrated by an adolescent against a current or former dating partner regardless of gender or sexuality.
- Child Sexual Exploitation – children under the age of 18 may be sexually abused in the context of exploitative relationships, contexts and situations by peers who are also under 18. Child sexual exploitation is defined as a form of child sexual abuse that 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.
- Harmful Sexual Behaviour – children and young people presenting with sexual behaviours that are outside of developmentally 'normative' parameters and harmful to themselves and others.
- Serious Youth Violence – any offence of serious violence or weapon-enabled crime where the victim is aged 1-19 ('Youth Violence' is defined in the same way, but also includes assault with injury offence).
- Initiation ceremonies or ritual misconduct.

- 10.2 ACS recognises its responsibilities with regard to the thresholds of concern associated with these behaviours, and others like them, including a recognition of the legal thresholds, and will address allegations of any such concerns with the appropriate agencies.
- 10.3 Specifically, ACS notes and follows the updated guidance on thresholds and levels of need for referral to social care published by Surrey Safeguarding Partnership and the London Safeguarding Partnership. These documents are linked in respectively Appendices 1 and 2 and Appendix 3 of this policy.
- 10.4 ACS recognises that 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.
- 10.5 ACS recognises the advice received from safeguarding authorities that peer on peer abuse, including sexual violence and sexual harassment, tends to be gendered in nature and there is a greater likelihood of boys perpetrating peer-on-peer abuse against girls than vice versa. However, all students are deserving of the same level of protection from potential abuse, harassment and violence, and ACS accepts that boys can also be victims. Consequently, ACS commits to providing appropriate protection for all students regardless of gender, age and identity.
- 10.6 Children who are victims of sexual violence and sexual harassment will likely find the experience stressful and distressing. This will, in all likelihood, adversely affect their education attainment as well as their emotional well-being. Sexual violence and sexual harassment exist on a continuum and may overlap; they can occur online and offline (both physically and verbally) and are never acceptable. It is important that all victims are taken seriously and offered appropriate support.
- 10.7 Reports of sexual violence and sexual harassment are extremely complex to manage. It is essential that victims are protected, offered appropriate support and every effort is made to ensure their education is not disrupted. It is also important that other children, adult students and school and college staff are supported and protected as appropriate.

In accordance with the guidance given by Surrey Safeguarding, children making a report of sexual violence or sexual harassment will be taken seriously, kept safe and be well supported.

If the report includes an online element staff will be mindful of the Searching, Screening and Confiscation: advice for schools (DfE 2018) guidance.

Staff taking the report will inform the DSL or the Deputy DSL immediately.

Staff taking a report will never promise confidentiality.

Parents or carers should usually be informed (unless this would put the child at greater risk).

If a child is at risk of harm, is in immediate danger, or has been harmed, a referral (MARF) will be made to the MASH email:

[csmash@surreycc.gov.uk](mailto:csmash@surreycc.gov.uk) or telephone 0300 470 9100, as appropriate.

- 10.8 ACS is mindful of the new responsibilities outlined in [Keeping Children Safe in Education \(September, 2020\)](#) to ensure that all staff, especially the DSLs are alert to indicators that may signal that children are at risk from, or involved with, Child Sexual Exploitation, Child Criminal Exploitation, and serious violent youth crime. Separate definitions of these can be found in Annexe A of [Keeping Children Safe in Education \(September, 2020\)](#)

ACS commits to ensuring staff familiarise themselves with the Home Office County Lines guidance, [Criminal Exploitation of children and vulnerable adults: County Lines guidance](#) which contains information on combatting gangs and organised criminal networks who may be exploiting children to move and store drugs.

- 10.9 ACS believes that all children have a right to attend school and learn in a safe environment. Children should be free from harm by adults and other children in school.
- 10.10 ACS recognises that children are capable of abusing their peers. ACS is clear that sexual violence and sexual harassment is not acceptable, will never be tolerated and is not an inevitable part of growing up.

ACS commits to minimising the risk of peer on peer abuse by:

- Prevention
- Taking a whole school approach to safeguarding & child protection
- Providing training to staff
- Providing a clear set of values and standards, underpinned by the school's behaviour policy and pastoral support; and by a planned programme of evidence-based content delivered through the curriculum.
- Engaging with specialist support and interventions.
- Responding to reports of sexual violence and sexual harassment
- Children making a report of sexual violence or sexual

harassment will be taken seriously, kept safe and be well supported.

- If the report includes an online element staff will be mindful of the Searching, Screening and Confiscation: advice for schools (DfE 2018) guidance.
- Staff taking the report will inform the DSL or a Deputy DSL immediately.
- Staff taking a report will never promise confidentiality.
- Parents or carers should usually be informed (unless this would put the child at greater risk).
- If a child is at risk of harm, is in immediate danger, or has been harmed, a referral (MARF) will be made to the multi-agency partnership (MAP) whose contact details are included in the appendices.

10.11 Following a report the DSL will make an immediate risk and needs assessment on a case-by-case basis.

The Risk assessment will consider:

- The victim, especially their protection and support.
- The alleged perpetrator, their support needs and any discipline action.
- All other children at the school.
- The victim and the alleged perpetrator sharing classes and space at school.
- The risk assessment will be recorded and kept under review.

Where there has been other professional intervention and/or other specialist risk assessments, these professional assessments will be used to inform the school's approach to supporting and protecting pupils.

10.12 When taking action, the DSL will consider:

- The wishes of the victim;
- The nature of the incident including whether a crime has been committed and the harm caused;
- Ages of the children involved;
- Developmental stages of the children;
- Any power imbalance between the children;
- Any previous incidents;
- Ongoing risks;
- Other related issues or wider context.

Options: The DSL's decision-making will have regard for the following possible options:

- Manage internally;
- Early Help intervention;
- Referral to the Local Safeguarding Partnership;
- Report to the police (generally in parallel with a referral to the Local Safeguarding Partnership).

#### 10.13 Ongoing Response:

The DSL will manage each case individually and will ensure the risk assessment is reviewed regularly with relevant partner agencies, for example the Police and Children's Social Care.

Where there is a criminal investigation into a rape, assault by penetration or sexual assault, the starting point is that the case should be passed on to the police. The school will risk assess the situation and take any necessary measures to ensure the separation of the alleged perpetrator from the alleged victim.

The DSL will consider how best to keep the alleged victim and alleged perpetrator a reasonable distance apart on school premises and on transport where appropriate.

Where a criminal investigation into a rape or assault by penetration leads to a conviction or caution, the school will take suitable action, which may lead to the view that allowing the perpetrator to remain in the same school would seriously harm the education or welfare of the victim (and potentially the perpetrator and other students).

Where a criminal investigation into sexual assault leads to a conviction or caution, the school will, if it has not already, consider any suitable sanctions in light of the behaviour policy, which may include consideration of permanent exclusion. Where the perpetrator is going to remain at the school, the Head of School should continue keeping the victim and perpetrator in separate classes and continue to consider the most appropriate way to manage potential contact on school premises and transport. The nature of the conviction or caution and wishes of the victim will be especially important in determining how to proceed in such cases.

The victim, alleged perpetrator and any other affected children and adults will receive appropriate support and safeguards on a case-by-case basis.

The school will take any disciplinary action against the alleged perpetrator in accordance with the school behaviour policy.

The school recognises that taking disciplinary action and providing appropriate support are not mutually exclusive actions and will occur at the same time if necessary.

- 10.14 ACS notes that research indicates that young people rarely disclose peer on peer abuse and that if they do, it is likely to be to their friends. Therefore, ACS will also educate students in how to support their friends if they are concerned about them, that they should talk to a trusted adult in the school, and what services they can contact for further advice.

## 11 Allegations against Staff

- 11.1 An allegation is any information that indicates that a member of staff/volunteer may have:
- Behaved in a way that has, or may have harmed a child.
  - Possibly committed a criminal offence against or related to a child.
  - Behaved towards a child or children in a way which indicates s/he would pose a risk of harm if they work regularly or closely with children.
  - Behaved or may have behaved in a way which indicates they may not be suitable to work with children.
- 11.2 This applies to any child with whom the member of staff/volunteer has contact in their personal, professional or community life.
- 11.3 To reduce the risk of allegations, all staff should be aware of safer working practice and should be familiar with the guidance contained in the Government document, [Guidance for Safer Working Practice for Adults who Work with Children and Young People in Education Settings](#) and in part four of [Keeping Children Safe in Education \(September, 2020\)](#).
- 11.4 The person to whom an allegation is first reported should take the matter seriously and keep an open mind. S/he should not investigate or ask leading questions if seeking clarification. It is important not to make assumptions. Confidentiality should not be promised and the person should be advised that the concern will be shared on a 'need to know' basis only. Actions to be taken include: making an immediate written record of the allegation using the informant's words - including time, date and place where the alleged incident took place, brief details of what happened, what was said and who was present. This record should be signed, dated and immediately passed on to the Head of School.

- 11.5 If staff members have concerns about another staff member, including the DSL, then this should be referred to the Head of School. Where there are concerns about the Head of School they should be referred to the Chief Executive, Tim Cagney, or, in the absence of the Chief Executive, the Chair of the Board of ACS International Schools Ltd., Bob Macnaughton, ([bmacnaughton@acs-schools.com](mailto:bmacnaughton@acs-schools.com)) without informing the Head of School.
- 11.6 If an allegation is made that meets any of the four criteria set out in 11.1, contact will always be made with the appropriate authority without delay. If it is decided that the allegation meets the threshold for safeguarding, the case will be progressed in accordance with the advice and counsel of the appropriate local safeguarding team.
- 11.7 If, at the completion of the allegations management process, an individual is dismissed (or would have been dismissed had the individual not left first) because of the risk of harm posed by that individual to children, ACS will make a referral to the Disclosure and Barring Service and/or to the Teaching Regulation Agency or Department for Education in line with its legal duties, as well as the Charity Commission where an incident meets the threshold for reporting.
- 11.8 All staff should be aware of ACS' behaviour management procedures described in the Employee Handbook and the divisional handbooks at the individual school campuses and reviewed annually during induction and pre-planning.
- 11.9 Guidance about conduct and safe practice, including safe use of mobile devices by staff and volunteers, will be given at induction.
- 11.10 ACS recognises that a student may make an allegation against a member of staff.
- 11.11 ACS will follow local procedures for managing allegations against staff. Under no circumstances will ACS send a child home, pending such an investigation, unless this advice is given exceptionally, as a result of a consultation with the local authorities.
- 11.12 ACS recognises that suspension of the member of staff against whom an allegation has been made, deserves and requires careful consideration. The Head of School will seek the advice of the Local Authorities and ACS HR Department staff in making this decision. In the event of an allegation against the Head of School, the decision to suspend will be made by the Chair of the ACS Board.

## 12 Whistleblowing

- 12.1 ACS recognises that children cannot be expected to raise concerns in an environment where staff fail to do so.
- 12.2 All staff should be aware of their duty to raise concerns, where they exist, about the management of child protection, which may include the attitude or actions of colleagues. Staff are referred to ACS' separate whistleblowing policy.
- 12.3 Any staff member who is dissatisfied with the response following a whistleblowing procedure, they may also call the local authority's designated safeguarding officer. The relevant contact information for each ACS campus is given in the appendices to this policy.

Alternatively, staff working in the UK may contact the NSPCC's Whistleblowing Advice Line on 0800 028 0285. This is a free and anonymous service.

## 13 Physical Intervention

- 13.1 ACS acknowledges that staff must only ever use physical intervention as a last resort, when a child is endangering him/herself or others, and that at all times it must be the minimal force necessary to prevent injury to another person. ACS is guided in its practices on physical restraint by the document [Use of reasonable force, advice for head teachers, staff and governing bodies \(July 2013\).](#)
- 13.2 Such events should be recorded and signed by a witness. These records will be retained in the log of incidents of physical restraint kept in the Head of School's office.
- 13.3 ACS recognises that physical intervention of a nature which causes injury or distress to a child may be considered under child protection or disciplinary procedures.
- 13.4 ACS recognises that touch can be appropriate in the context of working with children, and all staff have been given guidance to ensure they are clear about the professional boundaries associated with this recognition.
- 13.5 ACS recognises that the use of physical restraint or reasonable force with students who have special education needs or disabilities calls for additional care and consideration. Staff who teach or are in regular contact with students in a vulnerable category are required to consult the student's care plan. Any physical restraint used with such students

should take account of information disclosed in the care plan. All care plan reviews should have the goal of minimising the likelihood of recurrence.

## 14 Anti-Bullying

- 14.1 The ACS policy on anti-bullying is set out in a separate document and acknowledges that bullying behaviour may be considered to contravene safeguarding and child protection procedures as well as anti-bullying procedures. ACS recognises that bullying may take numerous forms including, but not restricted to, cyber, racist, homophobic and gender-related bullying. The individual schools within the ACS organisation maintain records of known bullying incidents.
- 14.2 ACS staff are aware that children with Special Educational Needs or Disability (SEND) and/or differences/perceived differences are more susceptible to being bullied/victims of child abuse.

## 15 Health & Safety

- 15.1 The ACS Health & Safety Policy is set out in a separate policy document hosted on the ACS intranet and on Safety Cloud. Other policies addressing health, safety and wellbeing are hosted in the same location.

## 16 Types and Signs and Definitions of Abuse and Neglect

- 16.1 ACS commits to remaining informed about and proactive in safeguarding against types of abuse and neglect. To this end all staff are provided with safeguarding training during their induction which includes an introduction to abuse and neglect concerns, information about safeguarding practices at ACS (including contact details for the DSL and the referral process), and copies of [Keeping Children Safe in Education \(September, 2020\)](#) and [The Prevent Duty](#). ACS provides ongoing training for all staff to increase capacity for safeguarding.
- 16.2 ACS's understanding of types of abuse and neglect is informed by the definitions and guidance contained in Part One of [Keeping Children Safe in Education \(September, 2020\)](#) and the outlines and descriptions provided in [What to do if you're worried a child is being abused: advice for practitioners \(March, 2015\)](#). Specifically, ACS recognises the definitions of physical, sexual and emotional abuse and neglect laid down in [Keeping Children Safe in Education \(September, 2020\)](#) listed below.

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

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

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

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

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

Neglect is defined as 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 involve a parent or carer failing to: provide adequate food, clothing and shelter (including exclusion from home or abandonment); protect a child from physical and emotional harm or danger; ensure adequate supervision (including the use of inadequate care-givers); or ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

Further types of abuse and neglect are listed in Appendix 5 of this policy together with advice from the UK's National Society for the Prevention of Cruelty to children on how to recognise signs of abuse and advice on assessment of need.

## **17 Boarding**

- 17.1 ACS acknowledges that boarding students can be particularly vulnerable to abuse within residential settings and where boarding operations are undertaken additional procedures are in place to safeguard children in these settings.
- 17.2 A boarding DSL is trained to meet the specific needs of boarders and boarding staff outside of school hours.

## **18 Early Childhood**

- 18.1 The Safeguarding & Child Protection policy also applies to the Early Childhood divisions of all ACS schools. Each campus will designate a practitioner to take lead responsibility for safeguarding children within the Early Childhood setting and liaising with the appropriate ACS and external personnel.
- 18.2 ACS will inform the appropriate government inspection authorities of any allegations of serious harm or abuse by any person living, working, or looking after children at the premises as soon as practicable and within 14 days at the latest.

## **19 Mobile Phones and Photography**

- 19.1 ACS recognises the ubiquity of mobile phones and similar mobile devices and acknowledges such devices have a place in education settings, especially where landline access is difficult and during outdoor learning activities and external visits. ACS acknowledges that such devices can sometimes be the most convenient or the only means of contact available in settings and can be helpful in ensuring children are kept safe.

19.2 ACS recognises that such devices may be misused, and requires staff and community members to abide by the following safeguards:

- Use mobile phones appropriately, and ensure staff have a clear understanding of what constitutes misuse (for example taking personal calls during child supervision time).
- Ensure the use of a mobile phone does not detract from the quality of supervision and care of children.
- Ensure all mobile phone use is open to scrutiny.
- Ensure staff pay regard to parental requests to exclude their children from class photographs on webpages and other forums that may be used to promote school activities.
- Ensure visitors to the school obtain permission from admissions staff, administration or the classroom teacher before taking photographs.
- Ensure the use of mobile phones on outings is included in risk assessments.
- Ensure mobile phone content (for example personal telephone numbers) is kept secure.
- Abide by the terms of the ACS Acceptable Use Policy.

19.3 ACS recognises that those in charge of children will sometimes need to use cameras and video in their daily practice. ACS acknowledges that although the vast majority of people who take or view photographs or videos of children do so for entirely innocent, understandable and acceptable reasons, some people abuse children through taking or using images. ACS commits to the following safeguards with regard to photography, video and all image capturing technology:

- The school will obtain parents' and carers' consent for photographs to be taken or published (for example, on the school website or in newspapers or publications).
- The school will never combine a child's full name with his or her image in any external publications.
- The school will ensure that children in photographs, video and images are appropriately dressed.
- The school will ensure that photographs, video and images of children are not transmitted by e-mail.
- The school will ensure that where official photographs are taken for school publicity purposes, the school's own equipment is used.
- The school will ensure that all cameras used for official photographs of the children for publicity and similar purposes are open to scrutiny.
- In EYFS settings (grades Pre-K and below) personal portable electronic equipment should not be seen or used unless there are

exceptional circumstances approved by the divisional principal. Further information on the use of cameras, mobile phones and video equipment in EYFS settings is provided in the divisional handbook.

## 20 Information Sharing

- 20.1 ACS acknowledges its responsibilities under the Data Protection Act (2018), the General Data Protection Regulations (2016), [\*Keeping Children Safe in Education \(September, 2020\)\*](#) and [\*Information Sharing: Advice for Practitioners Providing Safeguarding Services to Children, Young People, Parents and Carers \(2018\)\*](#) when considering information sharing.
- 20.2 ACS will not provide pupils' education or safeguarding-related data in response to subject access requests where the serious harm test is met.

## 21 Monitoring and Evaluation of the Policy

- 21.1 ACS commits to ensuring that an effective Safeguarding & Child Protection policy is in place and is reviewed annually, together with the staff behaviour policy (code of conduct) outlined in the handbook *Working at ACS*. ACS commits to providing these policies to all staff - including temporary staff and volunteers on induction and to ensuring that staff are kept up to date with changes. All staff are obligated to seek support and advice from either the DSL or appointed deputies if they have concern about the welfare of a child.
- 21.2 The monitoring and evaluation of the ACS Safeguarding & Child Protection policy and of ACS' safeguarding and child protection procedures will be guided by practices including but not limited to:
- ACS Board visits to the school
  - Scrutiny of ACS Board minutes
  - Scrutiny of school Leadership Team agenda and minutes
  - School Leadership Team discussions with children and staff
  - Scrutiny of attendance data
  - Scrutiny of risk assessments
  - Logs of major incidents for school Leadership Team and ACS Board to monitor
  - Review of parental concerns and parent questionnaires

## 22 COVID-19

### 22.1 COVID-19 has prompted ACS to take additional safeguarding

measures, some of which are described in the addenda below. Because of the fast-changing nature of the situation, it is not possible to outline these measures in detail in this policy. Details about measures taken at specific campuses, and requirements for those visiting the campus can be obtained by contacting the administration at the relevant campus.

## 23 Other Information and Procedures supporting this policy

This policy is linked to ACS policies on:

*Health, Safety & Wellbeing*  
*Complaints*

*Behaviour*

*Whistleblowing*  
*Anti-bullying*  
*Online Safety*  
*Acceptable Use (of Information Technology)*  
*Attendance*  
*Risk Assessment*  
*Recruitment*  
*School Trips*  
*Boarding*

These policies are available on our website and PowerSchool Learning or may be obtained on request for parents and statutory bodies.

## **Addenda: COVID-19**

During the period of school closure, that ran from 23<sup>rd</sup> March to 24<sup>th</sup> June, 2020 in both the UK and Qatar, ACS recognised that there are extra considerations for child protection and safeguarding practice when a significant part of the curriculum is delivered via distance learning.

ACS recognises that notwithstanding the return to on-campus learning from the beginning of the 2020-21 school year, students who are in quarantine or self-isolating for COVID-related reasons will continue to depend on distance learning for part of their studies. In ensuring that the extra responsibilities associated with our duty of care are fully met.

Please refer to this section for information regarding child protection and safeguarding in a distance learning environment. It will be updated regularly in line with the statutory guidance issued by the relevant authorities.

A second addendum has been added to address safeguarding and child protection considerations associated with the return to on-campus learning.

## **Addendum 1: COVID-19 and the School Closure Period in the UK and Qatar**

During the period of school closure that ran from March to June, 2020, ACS took extra measures to meet the additional challenges associated with safeguarding and promoting the welfare of children. These included daily consultation with the relevant authorities and the monitoring of additional statutory guidance such as the updates from the Department for Education in the UK and the Ministry of Education in Qatar.

In March 2020, parents in both the UK and Qatar were asked to keep their children at home, wherever possible. UK schools remained open only for those children of workers critical to the COVID-19 response and those students who are identified as vulnerable. ACS continued to provide care for children identified as being in either of these categories.

This addendum of the ACS Safeguarding and Child Protection policy was added to bring together in a single place details of our individual safeguarding arrangements in the following areas:

- Vulnerable children
- Attendance Monitoring
- Designated Safeguarding Lead
- Reporting a Concern
- Safeguarding Training and Induction
- Safer recruitment, Volunteers and Movement of Staff
- Online Safety in School
- Online Safety away from School



- Supporting Children Not in School
- Supporting Children in School
- Peer-on-Peer Abuse

## Key contacts

### Cobham Campus

Role	Name	Contact number	E-mail
Designated Safeguarding Lead	Melanie Nicholls	07860-272-953	<a href="mailto:mnicholls@acs-schools.com">mnicholls@acs-schools.com</a>
Deputy Designated Safeguarding Leads	Anneke Theron (Early Childhood/Lower School)	Contact via ACS Cobham switchboard on 01932 867 251	<a href="mailto:atheron@acs-schools.com">atheron@acs-schools.com</a>
	Maritsa Kloke Lower School/Middle School)		<a href="mailto:mkloke@acs-schools.com">mkloke@acs-schools.com</a>
	Shannon Walters (Middle School)		<a href="mailto:swalters@acs-schools.com">swalters@acs-schools.com</a>
	Anne Ferrara (High School)		<a href="mailto:aferrara@acs-schools.com">aferrara@acs-schools.com</a>
	Patricia Shea (High School)		<a href="mailto:pshea@acs-schools.com">pshea@acs-schools.com</a>
Heads of School	Barnaby Sandow		<a href="mailto:bsandow@acs-schools.com">bsandow@acs-schools.com</a>
Safeguarding Governors	Bob MacNaughton		<a href="mailto:bmacnaughton@acs-schools.com">bmacnaughton@acs-schools.com</a>
	Tim Cagney		<a href="mailto:tcagney@acs-schools.com">tcagney@acs-schools.com</a>
	Sheridan Swallow		<a href="mailto:sheridanswallow@hotmail.com">sheridanswallow@hotmail.com</a>



### Egham Campus

Role	Name	Contact number	E-mail
Designated Safeguarding Lead	Cindy Blanes	07854-195-477	<a href="mailto:cblanes@acs-schools.com">cblanes@acs-schools.com</a>
Deputy Designated Safeguarding Leads	Savita Choudhary (Lower School) Sinead Dunphy Debbie Stanton (High School): Tania Coffey Allan Bruce (Middle School Assistant Principal):	Contact via ACS Egham switchboard on 01784 430 800	<a href="mailto:schoudhary@acs-schools.com">schoudhary@acs-schools.com</a>  <a href="mailto:dstanton@acs-schools.com">dstanton@acs-schools.com</a>  <a href="mailto:abruce@acs-schools.com">abruce@acs-schools.com</a>
Heads of School	Jeremy Lewis		<a href="mailto:jlewis@acs-schools.com">jlewis@acs-schools.com</a>
Safeguarding Governors	Bob MacNaughton Tim Cagney Sheridan Swallow		<a href="mailto:bmacnaughton@acs-schools.com">bmacnaughton@acs-schools.com</a> <a href="mailto:tcagney@acs-schools.com">tcagney@acs-schools.com</a> <a href="mailto:sheridanswallow@hotmail.com">sheridanswallow@hotmail.com</a>

### Hillingdon Campus

Role	Name	Contact number	E-mail
Designated Safeguarding Lead	Jean Glover	07522-945-676	<a href="mailto:jglover@acs-schools.com">jglover@acs-schools.com</a>



Deputy Designated Safeguarding Leads	Eileen Keane (Lower School)	Contact via ACS Hillingdon switchboard on 01895 818 402	<a href="mailto:ekeane@acs-schools.com">ekeane@acs-schools.com</a>
	Andrea Allan		
	Martin Hall		<a href="mailto:mhall@acs-schools.com">mhall@acs-schools.com</a>
Safeguarding Governors	Bob MacNaughton		<a href="mailto:bmacnaughton@acs-schools.com">bmacnaughton@acs-schools.com</a>
	Tim Cagney		<a href="mailto:tcagney@acs-schools.com">tcagney@acs-schools.com</a>
	Sheridan Swallow		<a href="mailto:sheridanswallow@hotmail.com">sheridanswallow@hotmail.com</a>

#### Doha Campus

Role	Name	Contact number	E-mail
Designated Safeguarding Lead	Caroline Rennie	50981004	<a href="mailto:crennie@acs-schools.com">crennie@acs-schools.com</a>
Deputy Designated Safeguarding Leads	Rachel McLeod (Dep DSL) Carole Nemhe (Dep DSL) Alka Maher (Dep DSL) Dimple Chopra (Dep DSL) Nathalie Rachid (Dep DSL) Nikiesha Thomas (Dep DSL)	Contact via ACS Doha switchboard on +974 4474 9000	<a href="mailto:dchopra@acs-schools.com">dchopra@acs-schools.com</a>
	Heads of School		
Safeguarding Governors	Bob MacNaughton	Contact via ACS Cobham switchboard on 01932 867 251	<a href="mailto:bmacnaughton@acs-schools.com">bmacnaughton@acs-schools.com</a>



	Tim Cagney		<a href="mailto:tcagney@acs-schools.com">tcagney@acs-schools.com</a>
	Sheridan Swallow		<a href="mailto:sheridanswallow@hotmail.com">sheridanswallow@hotmail.com</a>

## Vulnerable children

Vulnerable children include those who have a social worker and those children and young people up to the age of 25 with education, health and care (EHC) plans.

Those who have a social worker include children who have a Child Protection Plan and those who are looked after by the Local Authority. A child may also be deemed to be vulnerable if they have been assessed as being in need or otherwise meet the definition in section 17 of the Children Act 1989.

Those with an EHC plan were risk-assessed in consultation with the Local Authority and parents, to decide whether they needed to continue to be offered a school or college place in order to meet their needs, or whether they could safely have their needs met at home. This could include, if necessary, carers, therapists or clinicians visiting the home to provide any essential services. Many children and young people with EHC plans were able safely to remain at home.

Eligibility for free school meals in and of itself was not a determining factor in assessing vulnerability.

Senior leaders, especially the Designated Safeguarding Lead (and deputy) identified who our most vulnerable children were. They were able to extend some flexibility to offer a place to those on the edge of receiving children's social care support.

ACS continues to work with and support children's social workers to help protect vulnerable children. This includes working with and supporting children's social workers and the local authority virtual school head (VSH) for looked-after and previously looked-after children. The lead person for this process is Melanie Nicholls.

Vulnerable children who have a social worker are expected to attend an education setting, so long as they do not have underlying health conditions that put them at increased risk. In circumstances where a parent does not want to bring their child to an education setting, and their child is considered vulnerable, the social worker and ACS will explore the reasons for this directly with the parent.

Where parents are concerned about the risk of the child contracting COVID-19, ACS or the social worker will talk through these anxieties with the parent/carer following the advice set out by Public Health England.

ACS will support our vulnerable children and young people in attending a school, including remotely if needed.

## Attendance monitoring

The suspension of the requirement for local authorities and education settings to complete their usual day-to-day attendance processes to follow up on non-attendance ended on August 24<sup>th</sup> 2020. From that date attendance became once more a legal requirement and attendance procedures were restored to their pre-COVID-19 status.

Students who are in quarantine following foreign travel, or who are self-isolating for COVID-related reasons as defined in the government guidance, will continue to be offered distance learning and their absence from campus-based learning will not be considered a breach of attendance requirements.

## Online safety in school

ACS will continue to provide a safe environment, including online. This includes the use of an online filtering and monitoring system for any student remaining in school. Parents and carers have been advised to review and update their home internet filtering settings to promote safer distance learning while school is closed.

## Children and online safety away from school

It is important that all staff who interact with children, including online, continue to look out for signs a child may be at risk. Any such concerns should be dealt with as per this policy and, where appropriate, referrals will still be made to children's social care and as required, the police.

Online teaching should follow the same principles as set out in the Staff Code of Conduct and adhere to the [Online Learning Safer Practice Expectations](#)

ACS will ensure any use of online learning tools and systems is in line with privacy and data protection requirements.

Below are some things to consider when delivering virtual lessons, especially where webcams are involved:

- No one-to-one lessons unless appropriately risk assessed and approved by the relevant administrator.
- Staff and children must wear suitable clothing, as should anyone else in the household.

- Any computers used should be in appropriate areas, for example, not in bedrooms; and the background should be arranged so that personal information is not inadvertently disclosed (for example via a corkboard on which private information is pinned etc.)
- On occasion live classes may be recorded. Where that is the case, please refer to the Data Retention policy guidance. All participants must be aware that the class is being recorded.
- Live classes should be kept to a reasonable, agreed length of time, to avoid the streaming preventing families 'getting on' with their day.
- Language must be professional and appropriate, including that of any family members in the background.
- Staff must only use platforms specified by senior managers and approved by ACS's Central IT to communicate with pupils.

### **Supporting children not in school**

ACS is committed to ensuring the safety and wellbeing of all its children and young people.

Where the DSL has identified a child to be on the edge of social care support, or who would normally receive pastoral-type support in school, they should ensure that a robust care plan is in place for that child or young person.

Details of this plan must be recorded on MyConcern, as should a record of any interventions and contact made with the child, young person or family.

The care plans can include; remote contact, phone contact, door-step visits. Other individualised contact methods should be considered and recorded.

ACS and its DSLs will work closely with all stakeholders to maximise the effectiveness of any care plan.

This plan must be reviewed regularly (at least once a fortnight) and where concerns arise, the DSL will consider any referrals as appropriate.

The school will share safeguarding messages on its website and social media pages.

ACS recognises that school is a protective factor for children and young people, and the current circumstances, can affect the mental health of pupils and their parents/carers. Teachers at ACS are aware of this in setting expectations of pupils' work where they are at home.

### **Supporting children in school**

ACS is committed to ensuring the safety and wellbeing of all its students.

ACS will continue to be a safe space for all children to attend and flourish. The Head of School will ensure that staff are on site and staff to pupil ratio numbers are appropriate, to maximise safety.

ACS will refer to the Government guidance for education and childcare settings on how to implement social distancing and continue to follow the advice from Public Health England and the National Institute for Health Protection on handwashing and other measures to limit the risk of spread of COVID19.

Where ACS has concerns about the impact of staff absence – such as our Designated Safeguarding Lead or first aiders, the CEO and board will be informed.

### Reporting A Safeguarding Concern in an Online Learning Situation

If a teacher is concerned or worried about the safety or welfare of a student while delivering online learning they should act by following the guidance outlined in this policy and report any concern to the DSL at the earliest opportunity:

<p>Cobham Campus DSL: Melanie Nicholls +44 7860-272-953 <a href="mailto:mnicholls@acs-schools.com">mnicholls@acs-schools.com</a></p>	<p>Doha Campus DSL: Caroline Rennie +974-5098-1004 <a href="mailto:crennie@acs-schools.com">crennie@acs-schools.com</a></p>
<p>Egham Campus DSL: Cindy Blanes +44 7854-195-477 <a href="mailto:cblanes@acs-schools.com">cblanes@acs-schools.com</a></p>	<p>Hillingdon Campus DSL: Jean Glover +44 7522-945-676 <a href="mailto:jglover@acs-schools.com">jglover@acs-schools.com</a></p>

It is essential that a written account of the concern is submitted to the DSL as soon as possible. Information to document would be:

- Who is involved
- What has happened
- When did it happen
- Where did it happen (what class) and any other details (including screenshots if appropriate) that are relevant to document the concern.

Should a teacher become aware that a student is sharing inappropriate or illegal material or behaving in a way that puts others at risk, they should immediately ask the student to leave the group and report the concern to the Divisional Principal and the DSL and provide the information outlined above.

If a teacher is concerned about the behaviour or conduct of a staff member, they should contact their Head of School directly and without delay.

## **Addendum 2: COVID-19 and the Return to On-Campus Learning for All Grades**

The return to on-campus learning at all ACS campuses for the 2020-21 school year called for significant safeguarding-related and health, safety and wellbeing-related activity on the part of the ACS leadership. ACS continues to take extra measures to meet the additional challenges associated with safeguarding and promoting the welfare of children. These include daily consultation with the relevant authorities and the monitoring of additional statutory guidance such as the updates from the Department for Education in the UK and the Ministry of Education in Qatar, as well as updated advice received from local safeguarding partners.

ACS recognises that there are inevitably concerns for student wellbeing and safety associated with the return to on-campus learning. However, schools are a protective factor for children and young people. For younger students school is the best place for them to learn, and essential for their mental wellbeing, providing social and learning interactions with their peers and teachers. The recent extended closure of schools is likely to have affected the mental health of children and their parents/carers. It is probable that children and families have faced a sharp increase in anxiety due to concerns related to COVID 19, the varied and significant impacts of extended school closure; and their preparation for a return to school.

Schools provide an essential source of support to children experiencing distress and anxiety, and we will ensure that we continue to work in partnership with families to support all children appropriately. Parents and carers are requested to advise their identified counsellor of any changes regarding welfare, health and wellbeing that the school should be aware of before their child returns to school. All staff at ACS are acutely aware of the need for increased vigilance and sensitivity to a student or family exhibiting any signs of distress during this period.

### **Reporting Concerns**

ACS acknowledges that given the extended and challenging period of school closure it is likely that staff may identify new safeguarding or welfare concerns about individual children as they see them in person once more.

Where staff have a concern about a student they should continue to follow the referral process outlined in the ACS Safeguarding and Child Protection policy. Staff are required to report any concern immediately to the onsite DSL or Deputy DSL and follow up by making a report via MyConcern.

Where staff are concerned about an adult working with children in the school, they should report the concern to the Head of School immediately.

If an allegation is made against the Head of School, the concerns need to be raised with the Chair of Trustees as soon as possible. If the Chair of Trustees is not available, then the LADO (in the UK) or the local authorities (in Qatar) should be contacted directly.

There may be situations when the Head of School or Chair of Trustees will want to involve the police immediately if the person is deemed to be an immediate risk to children or there is evidence of a possible criminal offence.

Once an allegation has been received by the Head of School or Chair of Trustees they will contact the LADO or local authority identified in the relevant campus appendix in this policy immediately and before taking any action or investigation.

Following consultation and advice from the LADO/local authority the parents of the child concerned will be notified of the allegation unless there is a good reason not to do so.

In liaison the LADO/local authority, the school will determine how to proceed and if necessary, the LADO/local authority will refer the matter to the relevant safeguarding body such as Children's Social Care and/or the police.

If the matter is investigated internally, the LADO will advise the school to seek guidance from local authority colleagues in following procedures set out in part 4 of *KCSIE* and the SSCP procedures. Procedures in Qatar will differ but will be completed in compliance with local laws and statutory guidance.

### **Supporting Vulnerable Children and those children with emerging concerns**

The following section is statutory guidance in the UK and is suggested good practice in Qatar.

Where children about whom there are known previous concerns the school will ensure that an appropriate updated assessment of risk and an accompanying care plan is developed to meet the individual needs of the student. This includes children classified as vulnerable. Vulnerable children and young people in this context include those who:

- are assessed as being in need under section 17 of the Children Act 1989, including children who have a child in need plan, a child protection plan or who are a looked-after child. Attendance is expected, unless their social worker decides that they are at less risk at home or in their placement. The educational provider should notify the social worker in cases where these children or young people do not take up their place at school or college
- have an education, health and care (EHC) plan and it is determined, following a risk assessment, carried out with educational providers and parents, that their needs can be as safely or more safely met in the educational environment
- have been assessed as otherwise vulnerable by educational providers or local authorities (including children's social care services), and who are therefore in need of continued education provision - this might include children on the

edge of receiving support from children's social care services, adopted children, those at risk of becoming NEET ('not in employment, education or training'), those who are young carers and others at the provider and local authority's discretion

ACS will continue to work with and support children's social workers to help protect vulnerable children. This includes working with and supporting children's social workers and the local authority virtual school head (VSH) for looked-after and previously looked-after children. The lead person for this will be Melanie Nicholls.

There is an expectation that vulnerable children who have a social worker will attend an education setting, so long as they do not have underlying health conditions that put them at increased risk. In circumstances where a parent does not want to bring their child to an education setting, and their child is considered vulnerable, the social worker and ACS will explore the reasons for this directly with the parent.

Where parents are concerned about the risk of the child contracting COVID-19, ACS or the social worker will talk through these anxieties with the parent/carer following the advice set out by Public Health England.

ACS will prioritise vulnerable children and young people across all year groups for on-site provision. Children and young people who are considered to be vulnerable - as per the definition in section above will be encouraged to attend provision regardless of their grade, and where attendance is deemed safe and appropriate. This onsite provision will be available for the full number of hours when school is reopened.

ACS will continue to support our vulnerable children and young people in attending a school, in accordance with their specific needs, including remotely if needed.

ACS recognises that it may be necessary to develop care plans and assessments of risk for students who when schools closed did not require these actions. DSLs, Nurses and Counsellors will work closely with parents and carers to meet the welfare, health and wellbeing needs of children requiring this support.

ACS recognises that guidance relating to vulnerable children, including but not limited to the recording of attendance, is especially likely to change as the situation develops and as plans for the return to on-campus learning at all schools in the UK are formalised. ACS will continue to heed advice received from the government and the local authority of each ACS campus in all matters concerning vulnerable children enrolled at ACS.

### **Designated Safeguarding Leads**

ACS has a Designated Safeguarding Lead (DSL) and Deputy DSLs for each campus.

These persons are identified and their contact details listed in the appendices associated with each individual ACS campus (appendices 1-4 of the Safeguarding and Child Protection policy).

Upon reopening, all DSLs and deputy DSLs will be available on site. If in the exceptional circumstance that a DSL or Deputy is not onsite, a senior leader will assume responsibility for coordinating safeguarding on site. This might include updating and managing access to our child protection online management system, MyConcern, and liaising with the offsite DSL (or deputy) and as required liaising with children's social workers where they require access to children in need and/or to carry out statutory assessments at the school or college.

The DSL will continue to engage with social workers, and attend all multi-agency meetings remotely while onsite.

### **Peer on Peer Abuse**

ACS recognises that staff should remain highly alert at all times to the signs of peer on peer abuse. It is possible given the extended period out of school that children may need additional reminders to ensure that they understand that disrespectful behaviour or prejudicial behaviour will not be tolerated and immediately acted upon. Staff will ensure that healthy and respectful behaviour is required at all times.

Where a school receives a report of peer on peer abuse, they will follow the principles as set out in part 5 of *KCS/E* and this policy. The ACS School Behaviour policy is among the policies that have been revised to accommodate additional considerations and procedures during the school closure period. This policy is published on the public ACS website, as well as on the staff Policies Page of PowerSchool Learning and Safety Cloud.

The school will listen and work with the student, parents/carers and any multi-agency partner required to ensure the safety and security of that student and any associated children.

Staff should be alert to children who may be at greater risk of peer on peer abuse due to additional vulnerabilities due to protected characteristics or other known factors. Staff must consider how they are supporting their children with regard to their sex, sexuality, and if relevant, gender reassignment, SEN, EAL or any provision that may involve age disparity that could pose additional risk to the child.

Any concerns relating to potential or actual peer on peer abuse must be immediately referred to the DSL. Concerns and actions must be recorded on MyConcern and if appropriate, referrals made to partner agencies.

### **Online safety in school**

ACS will continue to provide a safe environment, including online. This includes the use of an online filtering and monitoring system for any student remaining in school. Parents and carers have been advised to review and update their home internet filtering settings to promote safer distance learning while school is closed.

Where students are using computers in school, appropriate supervision will be in place.

### **Local and National Statutory Guidance**

ACS will abide by all updated advice received from the government as well as local authorities regarding children with education, health and care (EHC) plans, the local authority designated officer and children's social care, reporting mechanisms, referral thresholds and children in need.

## **Appendix 1 – Details for ACS Cobham**

### Designated Safeguarding Leads and Deputies

Melanie Nicholls Designated Safeguarding Lead (DSL)/EYFS

Tel: (0)7860 272953 (mobile)  
(01932) 867 251 (switchboard)  
E-mail: [mnicholls@acs-schools.com](mailto:mnicholls@acs-schools.com)

Patricia Shea (high school counsellor): Deputy Designated Safeguarding Lead (DDSL)

Tel: (01932) 588 333 (direct office line)  
(01932) 867 251 (switchboard)  
E-mail: [pshea@acs-schools.com](mailto:pshea@acs-schools.com)

Shannon Walters (middle school counsellor): Deputy Designated Safeguarding Lead (DDSL)

Tel: 01932 869 767 (extension 2567)  
(01932) 867 251 (switchboard)  
E-mail: [swalters@acs-schools.com](mailto:swalters@acs-schools.com)

Anneke Theron (lower school and Early Childhood counsellor): Deputy Designated Safeguarding Lead (DDSL)/EYFS

Tel: (01932) 867 251 (switchboard) Ext. 2611  
E-mail: [atheron@acs-schools.com](mailto:atheron@acs-schools.com)

Maritsa Kloke (lower school and Grade 5 counsellor): Deputy Designated Safeguarding Lead (DDSL)

Tel: (01932) 867 251 (switchboard) Ext. 2524  
E-mail: [mkloke@acs-schools.com](mailto:mkloke@acs-schools.com)

Anne Ferrara (high school counsellor):

Tel: (01932) 588300 (direct line)  
(01932) 867251 (switchboard) Ext. 2484  
E-mail: [aferrara@acs-schools.com](mailto:aferrara@acs-schools.com)

Jenny Overton (Head of Boarding): Deputy Designated Safeguarding Lead (DDSL)

Tel: (01932) 866 733 (direct line)  
Mobile - 07522 945618

E-mail: [joverton@acs-schools.com](mailto:joverton@acs-schools.com)

Gail Devereux (Group Lead School Nurse): Deputy Designated Safeguarding Lead (DDSL)

Tel: 01932 584 263  
Mobile: 07513 121 215  
E-mail [gdevereux@acs-schools.com](mailto:gdevereux@acs-schools.com)

Richard Harrold (Compliance, Accreditation & Policies Officer, and Data Protection Officer): Deputy Designated Safeguarding Lead (DDSL)

Tel: (0)1932 588 350 (direct line)  
E-mail: [rharrold@acs-schools.com](mailto:rharrold@acs-schools.com)

Local Children's Services contact details:

Local Children's Safeguarding Partnership – Single Point of Access for a consultation or to make a referral

Tel: 0300 470 9100  
E-mail: [mash@surreycc.gov.uk](mailto:mash@surreycc.gov.uk)  
Secure e-mail: [mash@surreycc.gcsx.gov.uk](mailto:mash@surreycc.gcsx.gov.uk) (or use Egress encrypted e-mail)  
Emergency Duty Team (EDT) – 01483 517898  
Surrey Police – 101 or 999 in an emergency

For concerns that already have an allocated social worker/ professional please contact them directly or via your relevant area referral hub:

North East Referral Hub 0300 123 1610 (Elmbridge/ Epsom & Ewell/ Spelthorne)

If in the professional opinion of the DSL or DDSL it is felt that the child's needs can be met through an Early Help Assessment, then the area Early Help Hub should be contacted directly at 01372 833133

Surrey LADO (Allegations against adults working with children and young people)

Tel: 0300 123 1650 option 3  
E-mail: [LADO@surreycc.gov.uk](mailto:LADO@surreycc.gov.uk)

Supporting Children Team named person (allegations against adults working with children and young people)

Tel: 01372 833826



E-mail: [sue.monk@surreycc.gov.uk](mailto:sue.monk@surreycc.gov.uk) (please use Egress encrypted e-mail for any confidential information)

Public concern at work (PCaW Whistleblowing charity)

Tel: 0207404 6609 [helpline@pcaw.co.uk](mailto:helpline@pcaw.co.uk)

Disclosure and Barring Service

Tel: 0870 90 80 81

Website: [www.gov.uk/dbs](http://www.gov.uk/dbs)

E-mail: [customerservices@dbs.gsi.gov.uk](mailto:customerservices@dbs.gsi.gov.uk)

Information Commissioners Office

Tel: 0303 123 1113 or local rate 01625 545 745

E-mail [casework@ico.or.uk](mailto:casework@ico.or.uk) (please include your telephone number)

Website: [www.ico.gov.uk](http://www.ico.gov.uk)

#### **Useful resources and websites:**

Tri.x (Information on parental responsibility)

<http://trixresources.proceduresonline.com/>

[Working Together to Safeguard Children 2018](https://www.gov.uk/government/publications/working-together-to-safeguard-children-2) Available to download from <https://www.gov.uk/government/publications/working-together-to-safeguard-children-2>

Surrey Safeguarding Children Partnership (Safeguarding Partnership member) manual of child protection guidelines available online at

<http://surreyscb.procedures.org.uk/>

SSCB register for updates <http://surreyscb.procedures.org.uk/page/contact>

SSCB Bruising in NIM infants leaflet <http://www.surreycc.gov.uk/bruising-NIM-infants.pdf>

Surrey Safeguarding Children Partnership (Safeguarding Partnership member) information on bruising in infants who are not yet mobile

<http://surreyscb.procedures.org.uk/hkpzh/procedures-forspecific-circumstances/a-multi-agency-protocol-for-the-management-of-actual-or-suspectedbruising-in-infants-who-are-not-independently-mobile>

Safeguarding Priorities <http://www.surreyscb.org.uk/professionals/sscb-newsletters/>

Surrey Safeguarding Children Partnership <http://www.surreyscb.org.uk/>

Advisory, Conciliation and Arbitration Service (ACAS) [www.acas.org.uk](http://www.acas.org.uk)

NSPCC [www.nspcc.org.uk](http://www.nspcc.org.uk)

Hotline: 0808 800 5000

[The Prevent Duty: Departmental advice for schools and childcare providers](#) Available to download from [www.gov.uk/government/publications](http://www.gov.uk/government/publications) - DFE-00174-2015

Safeguarding and child protection concerns or allegations against adults working in the school are referred to the appropriate statutory and regulatory bodies. Any member of staff found not suitable to work with children will be notified as required for consideration for barring, following resignation, dismissal, or when ACS ceases to use their service, as a result of a substantiated allegation. This would include notification to the Disclosure and Barring Service, henceforth referred to in this policy as the DBS.

Furthermore, ACS will consider making a referral to the Teaching Regulation Agency or Department for Education where a teacher has been dismissed (or would have been dismissed had he/she not resigned) and a prohibition order may be appropriate.

Appropriate checks are made that no prohibition from management of independent schools order exists for candidates to management positions, in accordance with section 128 of the Education and Skills Act 2008.

DSL responsibilities include making prompt contact with the responsible authorities to refer a child where there are concerns that a child may be in need of help or at risk (including possible abuse). The relevant authorities may include Children's Services Area Team and the police if a criminal offence is suspected. The school refers all cases of suspected abuse in writing to the LSCB hub in accordance with the guidance provided by the LSCB. All referrals will be made in writing following a telephone call using the Multi Agency Referral Form (MARF).

ACS recognises that the thresholds of concern in regard to any child's concerning behaviours, may require inter-agency support from authorities such as the police, the Local Safeguarding Partnership, CEOP, CAMHS and Channel. ACS Cobham is guided by the threshold information and definitions of levels of need outlined in *Levels of need when working with children, young people and their families in Surrey: SSCB Guidance for professionals on Early Help and use of thresholds across Surrey* published by Surrey Safeguarding Children Board, October 2016.

If an allegation is made that meets any of the three criteria set out in section 9.1 of this policy, contact will always be made with the Local Authority Designated Officer without delay. If it is decided that the allegation meets the threshold for safeguarding, the next steps will take place in accordance with the appropriate Local Safeguarding Children Board.

All staff should be aware that their duty to raise concerns, where they exist, about the management of Child Protection, may necessitate consultation with bodies outside of ACS. In this instance, staff members should first speak to the Area Education Officer/LADO following the Whistleblowing Policy.

The Safeguarding & Child Protection policy also applies to the school's Early Years Foundation Stage (EYFS) at the school. The campus will designate a practitioner to take lead responsibility for safeguarding children within the EYFS setting and liaising with Local Statutory Children Agencies as appropriate.

ACS will inform the Independent Schools Inspectorate (ISI) and Ofsted of any allegations of serious harm or abuse by any person living, working, or looking after children at the premises (whether the allegation relates to harm or abuse committed on the premises or elsewhere), or any other abuse which is alleged to have taken place on the premises, and of the action taken in respect of these allegations as soon as is reasonably practicable, but at the latest within 14 days.

## **Boarding**

ACS acknowledges that boarding students can be particularly vulnerable to abuse within residential settings.

Senior students given positions of responsibility over other students should be briefed on appropriate action to take, should they receive any allegations of abuse.

The Boarding staff has a procedure to follow for Missing or Absconding Students.

ACS ensures that students have immunity from retribution and disciplinary action for "whistle blowing" in good faith.

In the event of an allegation against a member of staff in the Dormitory, alternative accommodation (away from the children) will be sought whilst the investigation takes place.

ACS ensures Boarders have access to an independent listener and are provided with a range of helplines and contact numbers, including the Children's Commissioner (Tel: 020 7783 8330) to support them if they need to discuss a concern with an outside agency. Boarders and their parents also have access to the contact details of ISI (<http://www.isi.net/contact/>) and the LADO (Tel: 0300 200 1006 Email: [LADO@surreycc.gov.uk](mailto:LADO@surreycc.gov.uk)) should they have concerns about a Boarder's welfare.

All Boarders are encouraged to discuss any concerns they may have in regard to their guardian arrangements. The Head of Boarding will formally address this at the start of the academic year. He will discuss their rights and his expectation for them to feel safe and well cared for within their host environments, including when visitors are present.

ACS ensures that its boarding facilities comply with the National Minimum Standards



<https://www.gov.uk/government/publications/boarding-schools-national-minimum-standards> and is committed to best boarding practice. All staff working in the boarding environment have clearly defined performance standards, a thorough training programme and their practice is regularly monitored to ensure the highest standards of pastoral care and professional conduct.

### **Surrey Children's Services Multi-Agency Partnership Advice on How to share a concern**

If you have a safeguarding concern about a student, you should immediately report it to a member of the safeguarding team (names and contact details listed above).

Any member of staff can contact the Children's Services Multi-Agency Partnership (MAP) directly to share a concern about a student if they feel that the concern is significant, and the DSL or Deputy is not available.

**Surrey MAP can be contacted on Phone:** 0300 470 9100

**Out of hours phone:** 01483 517898 to speak to the [emergency duty team](#).

**IF YOU THINK THE CHILD IS AT IMMEDIATE RISK, YOU CAN ALSO CONTACT THE POLICE**

All staff should then inform the DSL of their actions and provide a written report ASAP to the DSL.

**Immediately** report allegations and/or any concerns about the conduct of any member of staff or volunteer to the Head of School.

If an allegation is made against the Headteacher, the concerns need to be raised with the **Chair of Governors immediately**. If the Chair of Governors (Bob McNaughton - [bmcnaughton@acs-schools.com](mailto:bmcnaughton@acs-schools.com)) is not available, then the Local Authority Designated Officer (LADO) should be contacted directly.

**LADO on 0300 470 9100 option 3 LADO**

**Email:** [LADO@surreycc.gov.uk](mailto:LADO@surreycc.gov.uk)

**All documents related to Safeguarding are contained on:**

[https://acscobham.learning.powerschool.com/ofunnell/cobhamstaff1/cms\\_page/view/43745816](https://acscobham.learning.powerschool.com/ofunnell/cobhamstaff1/cms_page/view/43745816)

**CLICK [SAFEGUARDING](#)**

You can access the following here:

- Record of Concern Form



- All Current Legislation
- Sexting – How to respond to an incident
- All Safeguarding Information for staff

**In addition to our EduCare Training we have had/plan to provide *Face to Face* Training for Staff:**

Full Surrey Approved Induction Training for new staff	August 2019
Whole School KCSIE Update – Welcome Back Meeting	August 2020
Divisional Training EC/LS/MS/HS/Facilities/Sports Centre	Sept/Oct 2019
Reasonable Force Update – Whole School Meeting	November 2019
PREVENT Whole School Update Training (DofE)	February 2020

**Recent Student Safeguarding Training – How to keep safe...**

Traffic Light Learning (appropriate touch/secrets), Lower School	September 2018
Loudmouth - Working for Marcus – Grooming, CSE, Online Exploitation 8 <sup>th</sup> /9 <sup>th</sup> /10 <sup>th</sup> Grade	March 2019
NSPCC “Speak Out – Stay Safe” Primary Assemblies	March 2019
Brecks Last Game – Essex/Surrey Police/Breck Foundation, 8 <sup>th</sup> Grade	March 2019

**KEY New Documents: (All accessible under Safeguarding on PowerSchool Learning, Safety Cloud)**

[KCSIE](#), ([Keeping Children Safe in Education \(September, 2020\)](#))  
[Working Together to Safeguard Children, 2018](#)

Sexual violence and sexual harassment between children in schools and colleges, 2018

**ACS New Documents: (All accessible under Safeguarding on PowerSchool Learning, Safety Cloud)**

Safer Working Practice Reminder Cobham	Sept 2018
<a href="#">KCSIE</a> 2020 Update	Aug 2020
Visiting Speaker Risk Assessment	Sept 2018
Volunteer Risk Assessment	Sept 2018

## Appendix 2 – Details for ACS Egham

### Designated Safeguarding Leads and Deputies

Cindy Blanes (lower school principal): Designated Safeguarding Lead (DSL)/EYFS

Tel: (01784) 742 001 (office direct line)  
(01784) 430 800 (switchboard)

E-mail: [cblanes@acs-schools.com](mailto:cblanes@acs-schools.com)

Savita Choudhary (lower school counsellor): Deputy Designated Safeguarding Lead (DDSL)

Tel: (01784) 430 800 (switchboard)

E-mail: [schoudhary@acs-schools.com](mailto:schoudhary@acs-schools.com)

Debbie Stanton (upper school counsellor): Deputy Designated Safeguarding Lead (DDSL)

Tel: (01784) 742138 (office direct line)  
(01784) 430 800 (switchboard)

E-mail: [dstanton@acs-schools.com](mailto:dstanton@acs-schools.com)

Allan Bruce (middle school assistant principal): Deputy Designated Safeguarding Lead (DDSL)

Tel: (01784) 430 800 (switchboard – ask for extension 5137)

E-mail: [abruce@acs-aschools.com](mailto:abruce@acs-aschools.com)

Local Children's Services contact details:

Local Children's Safeguarding Partnership – Single Point of Access for a consultation or to make a referral

Tel: **0300 470 9100**

E-mail: [mash@surreycc.gov.uk](mailto:mash@surreycc.gov.uk)

Secure e-mail: [mash@surreycc.gcsx.gov.uk](mailto:mash@surreycc.gcsx.gov.uk) or Egress

Emergency Duty Team (EDT) – 01483 517898

Surrey Police – 101 or 999 in an emergency

For concerns that already have an allocated social worker/ professional please contact them directly or via your relevant area referral hub:

North West Referral Hub 0300 123 1630 (Runnymede/ Surrey Heath/ Woking)

If in the professional opinion of the DSL or DDSL it is felt that the child's needs can be met through an Early Help Assessment, then the area Early Help Hub should be contacted directly at 01932 795522

Surrey LADO (Allegations against adults working with children and young people)  
Tel: 0300 123 1650 option 3  
E-mail: [LADO@surreycc.gov.uk](mailto:LADO@surreycc.gov.uk)

Supporting Children Team named person (allegations against adults working with children and young people)  
Tel: 01372 833826  
E-mail: [sue.monk@surreycc.gov.uk](mailto:sue.monk@surreycc.gov.uk) (please use Egress encrypted e-mail for any confidential information)

Public concern at work (PCaW Whistleblowing charity)  
Tel: 0207404 6609 [helpline@pcaw.co.uk](mailto:helpline@pcaw.co.uk)

Disclosure and Barring Service  
Tel: 0870 90 80 81  
Website: [www.gov.uk/dbs](http://www.gov.uk/dbs)  
E-mail: [customerservices@dbs.qsi.gov.uk](mailto:customerservices@dbs.qsi.gov.uk)

Information Commissioners Office  
Tel: 0303 123 1113 or local rate 01625 545 745  
E-mail [casework@ico.or.uk](mailto:casework@ico.or.uk) (please include your telephone number)  
Website: [www.ico.gov.uk](http://www.ico.gov.uk)

### **Useful resources and websites:**

Tri.x (Information on parental responsibility)  
<http://trixresources.proceduresonline.com/>

[Working Together to Safeguard Children 2018](https://www.gov.uk/government/publications/working-together-to-safeguard-children-2) Available to download from  
<https://www.gov.uk/government/publications/working-together-to-safeguard-children-2>

Surrey Safeguarding Children Partnership (Safeguarding Partnership member)  
manual of child protection guidelines available online at  
<http://surreyscb.procedures.org.uk/>

SSCB register for updates <http://surreyscb.procedures.org.uk/page/contact>

SSCB Bruising in NIM infants leaflet <http://www.surreycc.gov.uk/bruising-NIM-infants.pdf>



Surrey Safeguarding Children Partnership (Safeguarding Partnership member)  
information on bruising in infants who are not yet mobile

<http://surreyscb.procedures.org.uk/hkpzh/procedures-forspecific-circumstances/a-multi-agency-protocol-for-the-management-of-actual-or-suspectedbruising-in-infants-who-are-not-independently-mobile>

Safeguarding Priorities <http://www.surreyscb.org.uk/professionals/sscb-newsletters/>

Surrey Safeguarding Children Partnership <http://www.surreyscb.org.uk/>

Advisory, Conciliation and Arbitration Service (ACAS) [www.acas.org.uk](http://www.acas.org.uk)

NSPCC [www.nspcc.org.uk](http://www.nspcc.org.uk)

Hotline: 0808 800 5000

[The Prevent Duty: Departmental advice for schools and childcare providers](#) Available to download from [www.gov.uk/government/publications](http://www.gov.uk/government/publications) - DFE-00174-2015

Safeguarding and child protection concerns or allegations against adults working in the school are referred to the appropriate statutory and regulatory bodies. Any member of staff found not suitable to work with children will be notified as required for consideration for barring, following resignation, dismissal, or when ACS ceases to use their service, as a result of a substantiated allegation. This would include notification to the Disclosure and Barring Service, henceforth referred to in this policy as the DBS.

Furthermore, ACS will consider making a referral to the Teaching Regulation Agency or Department for Education where a teacher has been dismissed (or would have been dismissed had he/she not resigned) and a prohibition order may be appropriate.

Appropriate checks are made that no prohibition from management of independent schools order exists for candidates to management positions, in accordance with section 128 of the Education and Skills Act 2008.

DSL responsibilities include making prompt contact with the responsible authorities to refer a child where there are concerns that a child may be in need of help or at risk (including possible abuse). The relevant authorities may include Children's Services Area Team and the police if a criminal offence is suspected. The school refers all cases of suspected abuse in writing to the LSCB hub in accordance with the guidance provided by the LSCB. All referrals will be made in writing following a telephone call using the Multi Agency Referral Form (MARF).

ACS recognises that the thresholds of concern in regard to any child's concerning behaviours, may require inter-agency support from authorities such as the police, the Local Safeguarding Partnership, CEOP, CAMHS and Channel. ACS Cobham is guided by the threshold information and definitions of levels of need outlined in

*Levels of need when working with children, young people and their families in Surrey: SSCB Guidance for professionals on Early Help and use of thresholds across Surrey* published by Surrey Safeguarding Children Board, October 2016.

If an allegation is made that meets any of the three criteria set out in section 9.1 of this policy, contact will always be made with the Local Authority Designated Officer without delay. If it is decided that the allegation meets the threshold for safeguarding, the next steps will take place in accordance with the appropriate Local Safeguarding Children Board.

All staff should be aware that their duty to raise concerns, where they exist, about the management of Child Protection, may necessitate consultation with bodies outside of ACS. In this instance, staff members should first speak to the Area Education Officer/LADO following the Whistleblowing Policy.

The Safeguarding & Child Protection policy also applies to the school's Early Years Foundation Stage (EYFS) at the school. The campus will designate a practitioner to take lead responsibility for safeguarding children within the EYFS setting and liaising with Local Statutory Children Agencies as appropriate.

ACS will inform the Independent Schools Inspectorate (ISI) and Ofsted of any allegations of serious harm or abuse by any person living, working, or looking after children at the premises (whether the allegation relates to harm or abuse committed on the premises or elsewhere), or any other abuse which is alleged to have taken place on the premises, and of the action taken in respect of these allegations as soon as is reasonably practicable, but at the latest within 14 days.

### **Appendix 3 – Details for ACS Hillingdon**

#### Designated Safeguarding Leads and Deputies

Jean Glover (Lower and Upper School Assistant Principal): Designated Safeguarding Lead (DSL/EYFS).

Tel: (01895) 2596511 (direct line)  
(01895) 259771 (switchboard)  
07522 945 676 (Mobile)

E-mail: [jqlover@acs-schools.com](mailto:jqlover@acs-schools.com)

Andrea Allan (School Counsellor Grades 7-12)  
6526

Eileen Keane (School Counsellor Grades Pre-K to Grade 6)  
6411

Contact details for London Borough of Hillingdon Triage Team/Local Safeguarding Partnership:

Tel: (01895) 556 644.

Contact details for London Borough of Hillingdon LADO (Rob Wratten)

Tel: (01895) 250 975

E-mail [rwratten@hillingsdon.gov.uk](mailto:rwratten@hillingsdon.gov.uk)

Contact details for London Borough of Hillingdon Deputy LADO (Hannah Ives)

Tel: 01895 250010

Mobile: 07753 431 285

E-mail: [hives@hillingsdon.gov.uk](mailto:hives@hillingsdon.gov.uk)

Contact details for London Borough of Hillingdon Prevent coordinator: Fiona Gibbs

Tel: (01895) 277035

E-mail: [fgibbs@hillingsdon.gov.uk](mailto:fgibbs@hillingsdon.gov.uk)

[NSPCC Hotline](#)

[0800 800 5000](#)

Safeguarding and child protection concerns or allegations against adults working in the school are referred to the appropriate statutory and regulatory bodies. Any member of staff found not suitable to work with children will be notified as required for consideration for barring, following resignation, dismissal, or when ACS ceases to

use their service, as a result of a substantiated allegation. This would include notification to the Disclosure and Barring Service, henceforth referred to in this policy as the DBS.

Furthermore, ACS will consider making a referral to the Teaching Regulation Agency or Department for Education where a teacher has been dismissed (or would have been dismissed had he/she not resigned) and a prohibition order may be appropriate.

Appropriate checks are made that no prohibition from management of independent schools order exists for candidates to management positions, in accordance with section 128 of the Education and Skills Act 2008.

DSL responsibilities include making prompt contact with the responsible authorities to refer a child where there are concerns that a child may be in need of help or at risk (including possible abuse). The relevant authorities may include Children's Services Area Team and the police if a criminal offence is suspected. The school refers all cases of suspected abuse in writing to the LSCB hub in accordance with the guidance provided by the LSCB. All referrals will be made in writing following a telephone call using the Multi Agency Referral Form (MARF).

The telephone number for the LSCB hub at the London Borough of Hillingdon is (01895) 277 930 (24 hours a day)

ACS recognises that the thresholds of concern in regard to any child's concerning behaviours, may require inter-agency support from authorities such as the police, the Local Safeguarding Partnership, CEOP, CAMHS and Channel. ACS Hillingdon is guided by the threshold information and definitions of levels of need outlined in *London Child Protection Procedures (5<sup>th</sup> Edition)* updated by London Safeguarding Children Board, March, 2020.

If an allegation is made that meets any of the three criteria set out in section 9.1 of this policy, contact will always be made with the Local Authority Designated Officer without delay. If it is decided that the allegation meets the threshold for safeguarding, the next steps will take place in accordance with the appropriate Local Safeguarding Children Board.

All staff should be aware that their duty to raise concerns, where they exist, about the management of Child Protection, may necessitate consultation with bodies outside of ACS. In this instance, staff members should first speak to the Area Education Officer/LADO following the Whistleblowing Policy.

The Safeguarding & Child Protection policy also applies to the school's Early Years Foundation Stage (EYFS) at the school. The campus will designate a practitioner to take lead responsibility for safeguarding children within the EYFS setting and liaising with Local Statutory Children Agencies as appropriate.

ACS will inform the Independent Schools Inspectorate (ISI) and Ofsted of any allegations of serious harm or abuse by any person living, working, or looking after children at the premises (whether the allegation relates to harm or abuse committed on the premises or elsewhere), or any other abuse which is alleged to have taken place on the premises, and of the action taken in respect of these allegations as soon as is reasonably practicable, but at the latest within 14 days.

## **Appendix 4 – Details for ACS Doha**

### Designated Safeguarding Leads and Deputies

In Doha the designated persons are:

Caroline Rennie, Deputy Head of School and Designated Safeguarding Lead (DSL)/Child Protection Officer

Tel: 50981004

E-mail: [crennie@acs-schools.com](mailto:crennie@acs-schools.com)

Rachel Mcleod, Early Childhood Principal DDSL/safeguarding Team

Tel: 50981005

E-mail: [rmcleod@acs-schools.com](mailto:rmcleod@acs-schools.com)

Nickeisha Thomas, High Childhood Counsellor and DDSL/safeguarding Team

Tel: 50981053

E-mail: [nthomas@acs-schools.com](mailto:nthomas@acs-schools.com)

Alka Maher, MHS Counsellor and DDSL/safeguarding Team

Tel: 50981035

E-mail: [amaher@acs-schools.com](mailto:amaher@acs-schools.com)

Nathalie Rachid DDSL/safeguarding Team

E-mail: [nrachid@acs-schools.com](mailto:nrachid@acs-schools.com)

Carole Nehme

Tel: 50981088

E-mail: [cnehme2@acs-schools.com](mailto:cnehme2@acs-schools.com)

Dimple Chopra, Human Resources and safeguarding Team

Tel: 30266776

E-mail: [dchopra@acs-schools.com](mailto:dchopra@acs-schools.com)

## Appendix 5

### Terms Associated with Safeguarding and Child Protection:

ACS is guided in its policy and procedures by a common understanding of terms associated with safeguarding and child protection which are outlined by Surrey Education Safeguarding and included in the list and guidance reproduced below.

ACS's understanding of and approach to abuse and other serious safeguarding situations is informed by [Keeping Children Safe in Education \(September, 2020\)](#) and other official publications. ACS acknowledges its duty to ensure staff are aware of the specific safeguarding issues listed in Part One of [Keeping Children Safe in Education \(September, 2020\)](#), in particular those related to physical, emotional and sexual abuse and to neglect.

ACS commits to providing staff with up to date information on current safeguarding risks and current safeguarding terminology. The following list of terms and the accompanying descriptions form a non-exhaustive resource for staff addressing some of the most common safeguarding needs.

- Bullying, including cyberbullying
- Child Criminal Exploitation (CCE)
- Children who are Looked After (CLA)
- Children Missing Education (CME)
- Child Missing from Home or Care
- Child Exploitation (including County Lines)
- Child Sexual Exploitation (CSE)
- Domestic Abuse (including Domestic Violence)
- Fabricated or Induced Illness
- Faith Abuse
- Female Genital Mutilation (FGM)
- Forced Marriage
- Gangs and Youth Violence
- Gender-based Violence/Violence Against Women and Girls (VAWG)
- Hate Crimes
- Honour-based Violence
- Mental Health
- Missing Children and Adults
- Online Safety
- Private Fostering
- Preventing Radicalization
- Racist Incidents
- Radicalisation and Extremism
- Relationship Abuse
- Sexting
- Sexually Harmful Behaviour
- Trafficking

## Youth Produced Sexual Imagery (YPSI)

### **What is child abuse?**

The following definitions are taken from [Working Together to Safeguard Children](#) HM Government (2018). In addition to these definitions, it should be understood that children can also be abused by being sexually exploited, honour based violence, forced marriage or female genital mutilation. To support the local context, all staff have access to the [Surrey Safeguarding Children Partnership Levels of Need Threshold Document](#).

### **What is abuse and neglect?**

Abuse and neglect are forms of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm, or by failing to act to prevent harm. Children may be abused in a family or in an institutional or community setting, by those known to them or, more rarely, by a stranger. They may be abused by an adult or adults, or another child or children.

#### **Physical abuse**

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**

The persistent emotional maltreatment of a child such as to cause severe and persistent adverse effects on the child's emotional development.

It may involve conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children.

These may include interactions that are beyond a child's developmental capability, as well as overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another.

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

## **Sexual abuse**

Involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening.

The activities may involve physical contact, including assault by penetration (for example, rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (including online).

Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.

## **Neglect**

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

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

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

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

[The SSCB Neglect Strategy](#) and the [Neglect Risk Assessment Tool](#) is available to provide a more detailed information regarding neglect.

## **Indicators of abuse**

### **Neglect**

The nature of neglect

Neglect is a lack of parental care but poverty and lack of information or adequate services can be contributory factors.

Far more children are registered to the category of neglect on Child in Need and

Child Protection plans than to the other categories. As with abuse, the number of children experiencing neglect is likely to be much higher than the numbers on the plans.

Neglect can include parents or carers failing to:

- provide adequate food, clothing and shelter
- protect a child from physical and emotional harm or danger
- ensure adequate supervision or stimulation
- ensure access to appropriate medical care or treatment

NSPCC research has highlighted the following examples of the neglect of children under 12 years old:

- frequently going hungry
- frequently having to go to school in dirty clothes
- regularly having to look after themselves because of parents being away or having problems such as drug or alcohol misuse
- being abandoned or deserted
- living at home in dangerous physical conditions
- not being taken to the doctor when ill
- not receiving dental care.

Neglect is a difficult form of abuse to recognise and is often seen as less serious than other categories. It is, however, very damaging: children who are neglected often develop more slowly than others and may find it hard to make friends and fit in with their peer group.

Neglect is often noticed at a stage when it does not pose a risk to the child. The duty to safeguard and promote the welfare of children ([What to do if You're Worried a Child is Being Abused, DfE, 2015](#)), would suggest that an appropriate intervention or conversation at this early stage can address the issue and prevent a child continuing to suffer until it reaches a point when they are at risk of harm or in significant need.

Neglect is often linked to other forms of abuse, so any concerns school staff should be discussed with the DSL.

## Indicators of neglect

The following is a summary of some of the indicators that may suggest a child is being abused or is at risk of harm.

It is important to recognise that indicators alone cannot confirm whether a child is being abused. Each child should be seen in the context of their family and wider community and a proper assessment carried out by appropriate persons. What is important to keep in mind is that if you feel unsure or concerned, do something about it. Don't keep it to yourself. The [Neglect Risk Assessment Tool](#) provides staff with a resource to identify and act on concerns regarding neglect.

### Physical indicators of neglect

- Constant hunger and stealing food
- Poor personal hygiene - unkempt, dirty or smelly
- Underweight
- Dress unsuitable for weather
- Poor state of clothing
- Illness or injury untreated

### Behavioural indicators of neglect

- Constant tiredness
- Frequent absence from school or lateness
- Missing medical appointments
- Isolated among peers
- Frequently unsupervised
- Stealing or scavenging, especially food
- Destructive tendencies

## Emotional abuse

### The nature of emotional abuse

Most harm is produced in *low warmth, high criticism* homes, not from single incidents.

Emotional abuse is difficult to define, identify/recognise and/or prove.

Emotional abuse is chronic and cumulative and has a long-term impact.

All kinds of abuse and neglect have emotional effects although emotional abuse can occur by itself.

Children can be harmed by witnessing someone harming another person – as in domestic abuse.

It is sometimes possible to spot emotionally abusive behavior from parents and carers to their children, by the way that the adults are speaking to, or behaving towards children. An appropriate challenge or intervention could affect positive change and prevent more intensive work being carried out later on.

### **Indicators of emotional abuse**

#### Developmental issues

- Delays in physical, mental and emotional development
- Poor school performance
- Speech disorders, particularly sudden disorders or changes.

#### Behaviour

- Acceptance of punishment which appears excessive
- Over-reaction to mistakes
- Continual self-deprecation (I'm stupid, ugly, worthless etc.)
- Neurotic behaviour (such as rocking, hair-twisting, thumb-sucking)
- Self-mutilation
- Suicide attempts
- Drug/solvent abuse
- Running away
- Compulsive stealing, scavenging
- Acting out
- Poor trust in significant adults
- Regressive behaviour – e.g., wetting
- Eating disorders
- Destructive tendencies
- Neurotic behaviour
- Arriving early at school, leaving late

#### Social issues

- Withdrawal from physical contact
- Withdrawal from social interaction
- Over-compliant behaviour
- Insecure, clinging behaviour
- Poor social relationships

#### Emotional responses

- Extreme fear of new situations
- Inappropriate emotional responses to painful situations (“I deserve this”)
- Fear of parents being contacted
- Self-disgust
- Low self-esteem
- Unusually fearful with adults



- Lack of concentration, restlessness, aimlessness
- Extremes of passivity or aggression

## Physical abuse

The nature of physical abuse

Most children collect cuts and bruises quite routinely as part of the rough and tumble of daily life. Clearly, it is not necessary to be concerned about most of these minor injuries. But accidental injuries normally occur on the *bony prominences* – e.g. knees, shins.

Injuries on the *soft* areas of the body are more likely to be inflicted intentionally and should therefore make us more alert to other concerning factors that may be present.

A body map can assist in the clear recording and reporting of physical abuse. The body map should only be used to record observed injuries and no child should be asked to remove clothing by a member of staff of the school.

## Indicators of physical abuse / factors that should increase concern

- Multiple bruising or bruises and scratches (especially on the head and face)
- Clusters of bruises – e.g., fingertip bruising (caused by being grasped)
- Bruises around the neck and behind the ears – the most common abusive injuries are to the head
- Bruises on the back, chest, buttocks, or on the inside of the thighs
- Marks indicating injury by an instrument – e.g., linear bruising (stick), parallel bruising (belt), marks of a buckle
- Bite marks
- Deliberate burning may also be indicated by the pattern of an instrument or object – e.g., electric fire, cooker, cigarette
- Scalds with upward splash marks or *tide marks*
- Untreated injuries
- Recurrent injuries or burns
- Bald patches.

In the context of the school, it is normal to ask about a noticeable injury. The response to such an enquiry is generally light-hearted and detailed. So, most of all, concern should be increased when:

- the explanation given does not match the injury
- the explanation uses words or phrases that do not match the vocabulary of the child (adult's words)
- no explanation is forthcoming
- the child (or the parent/carer) is secretive or evasive

- the injury is accompanied by allegations of abuse or assault

You should be concerned if a child:

- is reluctant to have parents/carers contacted
- runs away or shows fear of going home
- is aggressive towards themselves or others
- flinches when approached or touched
- is reluctant to undress to change clothing for sport
- wears long sleeves during hot weather
- is unnaturally compliant in the presence of parents/carers.
- has a fear of medical help or attention
- admits to a punishment that appears excessive.

## Sexual abuse

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The nature of sexual abuse

Sexual abuse is often perpetrated by people who are known and trusted by the child – e.g., relatives, family friends, neighbours, babysitters, and people working with the child in school, faith settings, clubs or activities. Children can also be subject to child sexual exploitation.

Sexual exploitation is seen as a separate category of sexual abuse. The [SSCB Screening Tool and guidance](#) provides school staff with information regarding indicators of CSE.

Characteristics of child sexual abuse:

- it is often planned and systematic – people do not sexually abuse children by accident, though sexual abuse can be opportunistic
- grooming the child – people who abuse children take care to choose a vulnerable child and often spend time making them dependent (this may occur online)
- grooming the child's environment – abusers try to ensure that potential adult protectors (parents and other carers especially) are not suspicious of their motives.

Most people who sexually abuse children are men, but some women sexually abuse too.

## Indicators of sexual abuse

Physical observations:

- Damage to genitalia, anus or mouth
- Sexually transmitted diseases
- Unexpected pregnancy, especially in very young girls

- Soreness in genital area, anus or mouth and other medical problems such as chronic itching
- Unexplained recurrent urinary tract infections and discharges or abdominal pain

Behavioural observations:

- Sexual knowledge inappropriate for age
- Sexualised behaviour or affection inappropriate for age
- Sexually inappropriate behaviour
- Hinting at sexual activity
- Inexplicable decline in education progress
- Depression or other sudden apparent changes in personality as becoming insecure
- Lack of concentration, restlessness, aimlessness
- Socially isolated or withdrawn
- Overly-compliant behaviour
- Acting out, aggressive behaviour
- Poor trust or fear concerning significant adults
- Regressive behaviour,
- Onset of wetting, by day or night; nightmares
- Arriving early at school, leaving late, running away from home
- Suicide attempts, self-mutilation,
- Suddenly drawing sexually explicit pictures
- Eating disorders or sudden loss of appetite or compulsive eating
- Regressing to younger behaviour patterns such as thumb sucking or bringing out discarded cuddly toys
- Become worried about clothing being removed
- Trying to be 'ultra-good' or perfect; overreacting to criticism.

## **Risk Assessment**

Following a report, the DSL will make an immediate risk and needs assessment on a case-by-case basis.

The Risk assessment will consider;

The victim, especially their protection and support.

The alleged perpetrator, their support needs and any discipline action.

All other children at the school.

The victim and the alleged perpetrator sharing classes and space at school.

The risk assessment will be recorded and kept under review.

Where there has been other professional intervention and/or other specialist risk assessments, these professional assessments will be used to inform the school's approach to supporting and protecting pupils.

**Action: The DSL will consider:**

The wishes of the victim.

The nature of the incident including whether a crime has been committed and the harm caused.

Ages of the children involved.

Developmental stages of the children.

Any power imbalance between the children.

Any previous incidents.

Ongoing risks.

Other related issues or wider context.

**Options: The DSL decision making regarding the issue with the following possible options:-**

Manage internally

Early Help intervention

Refer to MASH

Report to the police (generally in parallel with a referral to MASH)

**Ongoing Response:**

The DSL will manage each case individually and will ensure the risk assessment is reviewed regularly with relevant partner agencies, for example the Police and Children's Social Care.

Where there is a criminal investigation into a rape, assault by penetration or sexual assault, the alleged perpetrator should be removed from any classes they share with the victim.

The DSL will consider how best to keep the victim and perpetrator a reasonable distance apart on school premises and on transport where appropriate.

Where a criminal investigation into a rape or assault by penetration leads to a conviction or caution, ACS will take suitable action. Such a circumstance is likely to constitute a serious breach of discipline and may lead to the view that allowing the perpetrator to remain in the same school or college would seriously harm the education or welfare of the victim (and potentially themselves and other students).

Where a criminal investigation into sexual assault leads to a conviction or caution, ACS will consider any suitable sanctions in light of the behaviour policy, which may include consideration of permanent exclusion. Where the perpetrator is going to remain at ACS, the Head of School will continue keeping the victim and perpetrator in separate classes, and continue to consider the most appropriate way to manage potential contact on school and college premises and transport. The nature of the conviction or caution and wishes of the victim will be especially important in determining how to proceed in such cases.

The victim, alleged perpetrator and any other affected children and adults will receive appropriate support and safeguards on a case-by-case basis.

ACS will take any disciplinary action against the alleged perpetrator in accordance with the school behaviour policy.

ACS recognises that taking disciplinary action and providing appropriate support are not mutually exclusive actions and will occur at the same time if necessary.

### **Physical Abuse**

While a clear focus of peer on peer abuse is around sexual abuse and harassment, physical assaults and initiation violence and rituals from students to students can also be abusive.

These are equally not tolerated and if it is believed that a crime has been committed, will be reported to the police.

The principles from the anti-bullying policy will be applied in these cases, with recognition that any police investigation will need to take priority.

#### *References:*

[DfE Keeping Children Safe in Education \(September, 2020\)](#)

[DfE Sexual Violence and Sexual Harassment between Children in Schools and Colleges May 2018](#)

## Harmful Sexual Behaviour

The [Brook Traffic Light Tool](#) uses a traffic light system to categorise the sexual behaviours of young people and is designed to help professionals:

- Make decisions about safeguarding children and young people
- Assess and respond appropriately to sexual behaviour in children and young people
- Understand healthy sexual development and distinguish it from harmful behaviour
- By categorising sexual behaviours, school can work with other agencies to the same standardised criteria when making decisions and can protect children and young people with a multi-agency approach.

ACS recognises that it is vital that professionals agree on how behaviours should be categorised regardless of culture, faith, beliefs, and their own experiences or values.

## Signs of Abuse in Children:

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

- Significant change in behaviour
- Extreme anger or sadness
- Aggressive and attention-seeking behaviour
- Suspicious bruises with unsatisfactory explanations
- Lack of self-esteem
- Self-injury
- Depression
- Age inappropriate sexual behaviour

## Risk Indicators

The factors described in this section are frequently found in cases of child abuse.

Their presence is not proof that abuse has occurred, but:

- Must be regarded as indicators of the possibility of significant harm.
- Justifies the need for careful assessment and discussion with designated/named/lead person, manager (or in the absence of all those individuals, an experienced colleague).
- May require consultation with and/or referral to Children's Services.

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

In an abusive relationship the child may:

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

The parent or carer may:

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

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

## **Recognising Physical Abuse**

The following are often regarded as indicators of concern:

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

## **Bruising**

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

- Any bruising to a pre-crawling or pre-walking baby.

- Bruising in or around the mouth, particularly in small babies, which may indicate force-feeding.
- Two simultaneous bruised eyes, without bruising to the forehead, (rarely accidental, though a single bruised eye can be accidental or abusive).
- Repeated or multiple bruising on the head or on sites unlikely to be injured accidentally.
- Variation in colour possibly indicating injuries caused at different times.
- The outline of an object used, e.g. belt marks, handprints or a hairbrush.
- Bruising or tears around, or behind, the earlobe/s indicating injury by pulling or twisting.
- Bruising around the face.
- Grasp marks on small children.
- Bruising on the arms, buttocks and thighs may be an indicator of sexual abuse.

### **Bite Marks**

Bite marks can leave clear impressions of the teeth. Human bite marks are oval or crescent shaped. Those over 3 cm in diameter are more likely to have been caused by an adult or older child.

A medical opinion should be sought where there is any doubt over the origin of the bite.

### **Burns and Scalds**

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

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

Scalds to the buttocks of a small child, particularly in the absence of burns to the feet, are indicative of dipping into a hot liquid or bath.

## **Fractures**

Fractures may cause pain, swelling and discolouration over a bone or joint.

Non-mobile children rarely sustain fractures.

There are grounds for concern if:

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

## **Scars**

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

## **Recognising Emotional Abuse**

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

The indicators of emotional abuse are often also associated with other forms of abuse.

The following may be indicators of emotional abuse:

- Developmental delay
- Abnormal attachment between a child and parent/carer
- Indiscriminate attachment or failure to attach
- Aggressive behaviour towards others
- Scapegoated within the family
- Frozen watchfulness, particularly in pre-school children
- Low self-esteem and lack of confidence
- Withdrawn or seen as a “loner” – difficulty relating to others.

## Recognising Signs of Sexual Abuse

Boys and girls of all ages may be sexually abused and are frequently scared to say anything due to guilt and/or fear. This is particularly difficult for a child to talk about and full account should be taken of the cultural sensitivities of any individual child/family.

Recognition can be difficult, unless the child discloses and is believed. There may be no physical signs and indications are likely to be emotional/behavioural.

Some behavioural indicators associated with this form of abuse are:

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

Some physical indicators associated with this form of abuse are:

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

## Sexual Abuse by Young People

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

**Developmental Sexual Activity** encompasses those actions that are to be expected from children and young people as they move from infancy through to an adult understanding of their physical, emotional and behavioural relationships with

each other. Such sexual activity is essentially information gathering and experience testing. It is characterised by mutuality and of the seeking of consent.

**Inappropriate Sexual Behaviour** can be inappropriate socially, inappropriate to development, or both. In considering whether behaviour fits into this category, it is important to consider what negative effects it has on any of the parties involved and what concerns it raises about a child or young person. It should be recognised that some actions may be motivated by information seeking, but still cause significant upset, confusion, worry, physical damage, etc. It may also be that the behaviour is “acting out” which may derive from other sexual situations to which the child or young person has been exposed.

If an act appears to have been inappropriate, there may still be a need for some form of behaviour management or intervention. For some children, educative inputs may be enough to address the behaviour.

Abusive sexual activity included any behaviour involving coercion, threats, aggression together with secrecy, or where one participant relies on an unequal power base.

## Assessment

In order to more fully determine the nature of the incident the following factors should be given consideration. The presence of exploitation in terms of:

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

In evaluating sexual behaviour of children and young people, the above information should be used only as a guide. Further information and advice is available in the Surrey multi-agency protocol *Working with Sexually Active Young People* available at [www.surreycc.gov.uk/safeguarding](http://www.surreycc.gov.uk/safeguarding), by choosing Safeguarding Children – Protocols and Guidance for Professionals. Assessment, Consultation and Therapy (ACT) 01306 745310 can also assist professionals in identifying sexual behaviour of concern in children and adolescents.

### **Recognising Neglect**

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

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

### **Child Sexual Exploitation**

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

Signs include:

- underage sexual activity
- inappropriate sexual or sexualised behaviour
- sexually risky behaviour, 'swapping' sex
- repeat sexually transmitted infections
- in girls, repeat pregnancy, abortions, miscarriage
- receiving unexplained gifts or gifts from unknown sources
- having multiple mobile phones and worrying about losing contact via mobile
- having unaffordable new things (clothes, mobile) or expensive habits (alcohol, drugs)



- changes in the way they dress
- going to hotels or other unusual locations to meet friends
- seen at known places of concern
- moving around the country, appearing in new towns or cities, not knowing where they are
- getting in/out of different cars driven by unknown adults
- having older boyfriends or girlfriends
- contact with known perpetrators
- involved in abusive relationships, intimidated and fearful of certain people or situations
- hanging out with groups of older people, or anti-social groups, or with other vulnerable peers
- associating with other young people involved in sexual exploitation
- recruiting other young people to exploitative situations
- truancy, exclusion, disengagement with school, opting out of education altogether
- unexplained changes in behaviour or personality (chaotic, aggressive, sexual)
- mood swings, volatile behaviour, emotional distress
- self-harming, suicidal thoughts, suicide attempts, overdosing, eating disorders
- drug or alcohol misuse
- getting involved in crime
- police involvement, police records
- involved in gangs, gang fights, gang membership
- injuries from physical assault, physical restraint, sexual assault.

## Appendix 6

### **Forced Marriage (FM)**

FM is an entirely separate issue from arranged marriage. It is a human rights abuse and, in the UK, falls within the Crown Prosecution Service definition of domestic violence. Young men and women can be at risk in affected ethnic groups.

Whistleblowing may come from younger siblings. Other indicators may be detected by changes in adolescent behaviours. Never attempt to intervene directly or through a third party. In the UK always call either the Contact Centre or the Forced Marriage Unit 020 7008 0151.

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

It is essential that staff are aware of FGM practices and the need to look for signs, symptoms and other indicators of FGM. Under the FGM mandatory reporting duty teachers and health and social care professionals in England and Wales are required to make a report to the police where, in the course of their professional duties, they either:

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

### **What is FGM?**

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

#### 4 types of procedure:

Type 1 Clitoridectomy – partial/total removal of clitoris

Type 2 Excision – partial/total removal of clitoris and labia minora

Type 3 Infibulation entrance to vagina is narrowed by repositioning the inner/outer labia

Type 4 all other procedures that may include: pricking, piercing, incising, cauterising and scraping the genital area.

Why is it carried out?

Belief that:



- FGM brings status/respect to the girl – social acceptance for marriage
- Preserves a girl's virginity
- Part of being a woman/rite of passage
- Upholds family honour
- Cleanses and purifies the girl
- Gives a sense of belonging to the community
- Fulfils a religious requirement
- Perpetuates a custom/tradition
- Helps girls be clean/hygienic
- Is cosmetically desirable
- Mistakenly believed to make childbirth easier.

### **Is FGM legal?**

FGM is internationally recognised as a violation of human rights of girls and women. It is **illegal** in most countries including the UK.

### **Circumstances and occurrences that may point to FGM happening are:**

- Child talking about getting ready for a special ceremony
- Family taking a long trip abroad
- Child's family being from one of the 'at risk' communities for FGM (Kenya, Somalia, Sudan, Sierra Leone, Egypt, Nigeria, Eritrea as well as non-African communities including Yemeni, Afghani, Kurdistani, Indonesian and Pakistani communities)
- Knowledge that the child's sibling has undergone FGM
- Child talks about going abroad to be 'cut' or to prepare for marriage.

Signs that may indicate a child has undergone FGM:

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

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

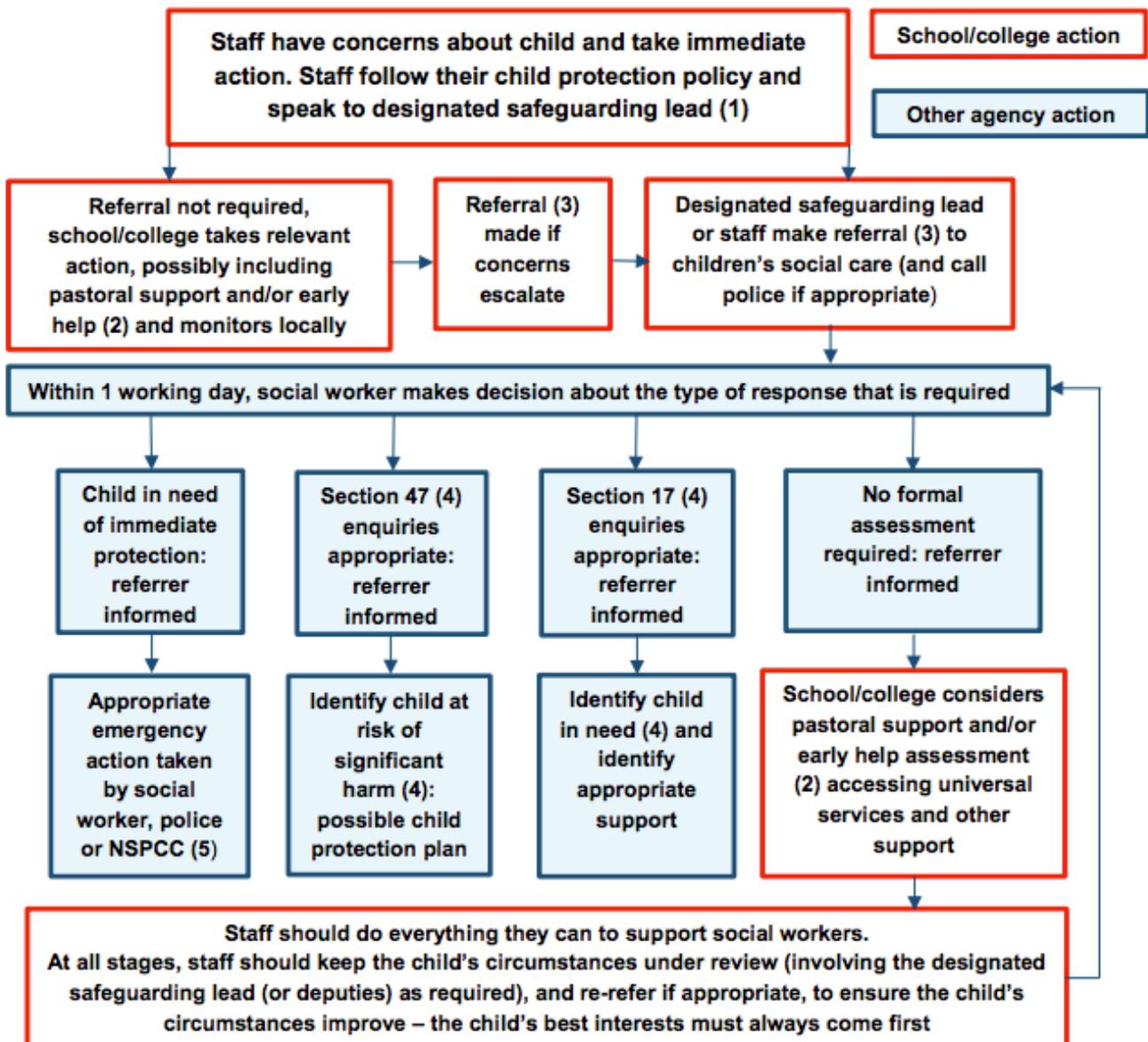
As with Forced Marriage there is the 'One Chance' rule. It is essential that any suspicion be reported immediately to the DSL.

## Appendix 7

### Actions where there are concerns about a child (UK Campuses)

The diagram below is taken from [Keeping Children Safe in Education \(September, 2020\)](#), and is intended to guide what action should be taken and who should take it where there are concerns about a child. If, at any point, there is a risk of immediate serious harm to a child a referral should be made to children's social care immediately.

#### Actions where there are concerns about a child



<sup>1</sup>In cases which also involve an allegation of abuse against a staff member, ACS will follow the guidance set out in part four of [Keeping Children Safe in Education \(September, 2020\)](#), which explains action schools should take in respect of the staff member.

<sup>2</sup>Early help means providing support as soon as a problem emerges in any point in a child's life. Where a child

would benefit from coordinated early help, an early help inter-agency assessment should be arranged. Chapter one of [Working Together to Safeguard Children \(July 2018\)](#) provides detailed guidance on the early help process.

<sup>3</sup>Referrals should follow the process set out in the local threshold document and local protocol for assessment. This is also set out in chapter one of [Working Together to Safeguard Children \(July 2018\)](#).

<sup>4</sup>ACS is guided by the Childcare Act 1989 in regard to its cooperation with local authorities in the UK and elsewhere for the provision of safeguarding and welfare support and services for children in need. This can include an assessment of children in need guided by section 17 or section 47 of the Children Act. Full details are provided in Chapter one of [Working Together to Safeguard Children \(July 2018\)](#).

<sup>5</sup>This could include applying for an emergency protection order (EPO).

## Appendix 8

### Action when a child has suffered or is likely to suffer harm (ACS Doha)

This diagram illustrates what action should be taken and who should take it where there are concerns about a child. If, at any point, there is a risk of immediate serious harm to a child a referral should be made to children’s social care immediately.

