



# Circles Network Policy

Child Protection and Safeguarding Policy

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Circles Network Human Resources

# Child Protection and Safeguarding Policy

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## Policy statement and principles

Circles Network provides a range of services to children and their families in various locations throughout the UK. The Board of Trustees takes its responsibility to protect and safeguard the welfare of children and young people entrusted in to the care of, or in the venues of Circles Network, very seriously and is committed to the safeguarding of children. This policy is one of a series in Circles Network's integrated safeguarding portfolio. Circles Networks designated safeguarding lead arrangements (code of conduct), safer recruitment policy, complaints, and online safety.

This policy is available on the Circles Network website and all trustees, colleagues and volunteers are required to read it and confirm they have done so in writing before commencing work with Circles Network, annually thereafter.

## Child protection statement

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

## Policy principles:

- Safeguarding is everyone's responsibility
- Circles Network's responsibility to safeguard and promote the welfare of children and young people is of paramount importance.
- All children, regardless of age, gender, ability, culture, race, language, religion or sexual identity, have equal rights to protection.
- Children who are safe and feel safe are better equipped to learn.
- Circles Network is committed to safeguarding and promoting the welfare of children and young people and expects all staff and volunteers to share this commitment. All adults at Circles Network are required to take all welfare concerns seriously and to encourage children and young people to talk to them about anything that worries them. Staff will always act in the best interests of children.
- Due to their day-to-day contact with children and young people, staff at Circles Network are uniquely placed to observe changes in children's behaviour and the outward signs of abuse, neglect, exploitation and radicalisation. Children may also turn to a trusted adult at Circles Network when they are in distress or at risk. It is vital that all of Circles Network staff are alert to the signs of abuse, are approachable and trusted by pupils/students, listen actively to children and understand the procedures for reporting their concerns. Circles Network will act on identified concerns and will provide early help to prevent concerns from escalating.
- All staff have an equal responsibility to act on any suspicion or disclosure that may suggest a child is at risk of harm at home, in the community or in school/college.
- All staff members will maintain an attitude of 'It could happen here' where safeguarding is concerned. When concerned about the welfare of a child, staff members should always act in the interests of the child.
- If, at any point, there is a risk of immediate serious harm to a child a referral will be made to Children's Social Care and/or the Police immediately. **Anybody can make a referral.** If the child's situation does not appear to be improving, any staff member with concerns should press the Designated Safeguarding Lead (DSL) for re-consideration.
- If a member of staff remains concerned about a child, they can discuss their concerns with the Regional Manager, DSL or contact the MASH Lead for additional advice as necessary.
- Children, young people and staff involved in child protection issues will receive appropriate support.

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- This policy will be reviewed at least annually unless an incident, new legislation or guidance suggests the need for an interim review.

### Policy aims:

- To provide all staff with the necessary information to enable them to meet their safeguarding and child protection responsibilities.
- To ensure consistent good practice.
- To demonstrate Circles Network's commitment regarding safeguarding and child protection to children, young people, parents and other partners.
- To contribute to Circles Network's safeguarding portfolio.

### Terminology

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

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

**Staff** refers to all those working for or on behalf of Circles Network, full-time or part-time, temporary or permanent, in either a paid or voluntary capacity.

**Child** includes everyone under the age of 18.

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

## Safeguarding legislation and guidance

**Academies, free schools, independent schools, alternative providers of education** - Section 157 of the Education Act 2002 and the Education (Independent School Standards) Regulations 2014 require proprietors of independent schools (including academies and city technology colleges) to have arrangements to safeguard and promote the welfare of children or young people who are receiving support within the alternative provision.

- The statutory guidance **Keeping Children Safe in Education (DfE 2020)** is issued under Section 175 of the Education Act 2002, the Education (Independent School Standards) Regulations 2014 and the Non-Maintained Special Schools (England) Regulations 2015. Schools and colleges must have regard to this guidance when carrying out their duties to safeguard and promote the welfare of children. Unless otherwise stated, 'school' in this guidance means all schools, whether maintained, non-maintained or independent, including academies and free schools, alternative provision academies, maintained nursery schools and pupil referral units. 'College' means further education colleges and sixth form colleges as established under the Further and Higher Education Act 1992 and relates to their responsibilities to children under the age of 18 (but excludes 16-19 academies and free schools, which are required to comply with relevant safeguarding legislation by virtue of their funding agreement).

All staff must read Part One of **Keeping Children Safe in Education 2020**. Staff can find a copy at Circles Network [[Keeping children safe in education - GOV.UK](#)]. In addition, all staff who work directly with children and young people must read Part Five and Annex A.

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- **What to do if you're worried a child is being abused 2015 - Advice for practitioners** is non-statutory advice which helps practitioners (everyone who works with children) to identify abuse and neglect and take appropriate action. *(this information can be found in the Staff quick guide document)*

## **COVID-19**

**Keeping Children Safe in Education (DfE 2020)** and this policy are to remain in force throughout the response to coronavirus (COVID-19). This policy has been updated in accordance with DfE advice published in July 2020 updated February 2021, 'Guidance for full opening: schools' - <https://www.gov.uk/government/publications/actions-for-schools-during-the-coronavirus-outbreak/guidance-for-full-opening-schools>; and will be further updated when new and/or revised guidance is issued.

*This policy applies to children who are attending school and others who may be staying at and accessing learning from home because of COVID-19. Please refer to Appendix 3 for specific arrangements in relation to the safeguarding of children who are at home.*

# 1. Roles and responsibilities

## Key personnel

**The Designated Safeguarding Lead (DSL) is Caroline Hunte in the East**

Contact details: email: [caroline.hunte@circlesnetwork.org.uk](mailto:caroline.hunte@circlesnetwork.org.uk) tel: 01733 243 828

**The Deputy Safeguarding Lead is Justine Langman in the East**

Contact details: email: [Justine.langman@circlesnetwork.org.uk](mailto:Justine.langman@circlesnetwork.org.uk) tel: 01733 234 828

**The Designated Safeguarding Lead (DSL) is Mandy Neville in the Midlands**

Contact details: email: [mandy.neville@circlesnetwork.org.uk](mailto:mandy.neville@circlesnetwork.org.uk) tel: 01788 816 671

**The Deputy Safeguarding Lead is Ashleigh Bird in the Midlands tel: 01788 816 671**

**The nominated safeguarding trustee is Emma Sharp**

Contact details: email: [ESharp@circlesnetwork.org.uk](mailto:ESharp@circlesnetwork.org.uk) tel: 01788 816 671

**The CEO is Mandy Neville**

Contact details: email: [mandyneville@circlesnetwork.org.uk](mailto:mandyneville@circlesnetwork.org.uk) tel: 01788 816 671.

All provisions are required to appoint a member of the senior leadership team to co-ordinate child protection arrangements and to ensure that there are appropriate cover arrangements.

## The Designated Safeguarding Lead (DSL):

- is a senior member of staff from the Circles Network leadership team and therefore has the status and authority within the Circles Network to carry out the duties of the post, including committing resources and supporting and directing other staff.
- takes lead responsibility for safeguarding and child protection (including online safety) within Circles Network, which will not be delegated although the activities of the DSL may be delegated to appropriately trained deputies. The role and responsibilities are explicit in the role holder's job description.
- is appropriately trained (including Prevent training), receives refresher training at two-yearly intervals and regularly (at least annually) updates their knowledge and skills to keep up with any developments relevant to their role.
- acts as a source of advice, support and expertise to Circles Network.
- encourages a culture of listening to children and taking account of their wishes and feelings.
- is alert to the specific needs of children in need; those with special educational needs; children who are looked after or were previously looked after; children who have a social worker; and young carers; and oversees the provision of effective pastoral support to all of those children, promoting their educational outcomes by sharing information about their welfare, circumstances and needs with teachers and other staff as appropriate.
- works closely with pastoral support staff; the SENCo; the designated teacher for children who are looked after or were previously looked after; staff with designated responsibility for promoting children's mental health and emotional wellbeing; in relation to safeguarding matters (including online and digital safety) and whether to make referrals to relevant partner agencies.
- has a working knowledge of locally agreed multi-agency safeguarding arrangements and procedures put in place
- has an understanding of the early help process to ensure effective support, assessment and understanding of children's additional needs in order to inform appropriate provision of early help and intervention.

- keeps detailed and accurate written records of all concerns, ensuring that such records are stored securely and flagged, but kept separate from, the children's or young person's general file.
- refers cases of suspected abuse to Children's Social Care and/or the Police as appropriate; and, where a crime may have been committed, refers cases to the Police.
- refers cases using the prescribed pro forma to Children's Social Care and the Prevent policing team for a joint assessment where there is a concern that a child is at risk of radicalisation; and to the Channel panel if subsequently advised to do so.
- ensures that staff do everything they can to support social workers and contribute to assessments of children when Children's Social Care become involved.
- notifies Children's Social Care if a child with a child protection plan is absent without explanation at intervals as defined in the plan.
- ensures that, when a pupil under the age of 18 years leaves Circles Network, all child protection records are passed to the new provision (separately from the main children or young person's file and ensuring secure transit) and confirmation of receipt is obtained. If the child is the subject of an open case to Children's Social Care, the child or young person's social worker is also informed.
- considers whether to share any information about a child leaving the provision with the receiving provider in advance so that the receiving setting is appropriately informed in order to support the child as effectively as possible and plan for her/his arrival.
- attends and/or contributes to child protection conferences, strategy meetings and multi-agency exploitation meetings.
- co-ordinates Circles Network's contribution to child protection plans as part of core groups, attending and actively participating in core group meetings.
- ensures that all staff sign to indicate that they have read and understand the child protection and safeguarding policy; (code of conduct); Circles Network's safeguarding response to children who go missing; the role of the DSL (including the identity of the DSL and any deputies); and Part 1 of *Keeping Children Safe in Education 2020* (and also Part 5 and Annex A of *Keeping Children Safe in Education 2020* in relation to staff who work directly with children).
- ensures that all staff understand that if they have **any concerns** about a child's welfare, they should act on them immediately, either by speaking to the DSL (or a deputy) or, in exceptional circumstances, taking responsibility to make a referral to Children's Social Care.
- ensures that all staff know how to make a referral as described in sections 27-29 (these numbers might change in this policy).
- has a working knowledge of relevant national guidance in respect of all specific safeguarding issues highlighted in sections 27-40 (pages 9-12) and Annex A (pages 82-96) of *Keeping Children Safe in Education 2020*, ensuring that all staff receive necessary training, information and guidance.
- understands the unique risks associated with online safety and ensures that staff are trained to have the requisite knowledge and up to date capability to keep children safe whilst they are online.
- understands the relevance of data protection legislation and regulations, especially the Data Protection Act 2018 and General Data Protection Regulation (GDPR) in respect of safeguarding children.
- ensures that the child protection and safeguarding policy and procedures are reviewed and updated at least annually, working with trustee and/or proprietors regarding this.
- informs Circles Network's CEO of any serious safeguarding enquiries, especially under section 47 of the Children Act 1989 and any Police investigations
- keeps a record of staff attendance at child protection training.
- makes the child protection and safeguarding policy available publicly, on the Circles Network's website or by other means.
- ensures parents are aware of Circles Network's role in safeguarding and that referrals about suspected abuse and neglect may be made.
- ensures that Circles Network holds more than one emergency contact number for every learner.
- ensures that the CEO is aware of the responsibility under *Working Together 2018* to refer all allegations that a child has been harmed by or that children may be at risk of harm from a member of staff or volunteer to the Designated Officer (DO) in the Local Authority within one working day prior to any internal investigation; and to the Disclosure and Barring Service (DBS) as appropriate.

## The Deputy Designated Safeguarding Lead(s)

Are appropriately trained to the same standard as the DSL and supports the DSL with safeguarding matters as appropriate. In the absence of the DSL, carries out those functions necessary to ensure the ongoing safety and protection of pupils. The role and responsibilities are explicit in the role holder's job description. In the event of the long-term absence of the DSL, the deputy will assume all the functions of the DSL as above.

## The governing body or Trustees

- appoints a Designated Safeguarding Lead who is a member of the senior leadership team and who has undertaken training in inter-agency working, in addition to basic child protection training.
- ensures that the DSL role is explicit in the role holder's job description (and also the job description of any Deputy Designated Safeguarding Leads) and that safeguarding responsibilities are identified explicitly in the job/role descriptions of every member of staff and volunteer.
- ensures that the DSL or a Deputy DSL is always available during Circles Network hours for staff to discuss any safeguarding concerns. The DSL or a Deputy DSL will generally be expected to be available in person but in exceptional circumstances availability will be via telephone and/or Skype or other such media.
- ensures that the DSL or a Deputy DSL is always available at least via telephone or other media as above during any out of hours/out of Circles Network activities.
- ensures that Circles Network has a child protection policy and procedures, including a staff code of conduct, that are consistent with local safeguarding partnership and statutory requirements, reviewed annually and made available publicly on the Circles Network's website or by other means.
- ensures that Circles Network has procedures for dealing with allegations of abuse made against members of staff and volunteers including allegations made against the headteacher and allegations against other children.
- follows safer recruitment procedures that include statutory checks on the suitability of staff to work with children and disqualification from providing childcare regulations.
- develops an induction strategy that ensures all staff, including the CEO, Senior Management Team, and volunteers receive information about the Circles Network's safeguarding arrangements, (Code of Conduct) and the role of the DSL on induction.
- develops a training strategy that ensures all staff, including the CEO, Trustees, Senior Management Team, and volunteers receive appropriate and regularly updated safeguarding and child protection training and updates as required (at least annually) to provide them with the relevant skills and knowledge to safeguard children effectively. The training strategy will also ensure that the DSL receives refresher training and regular updates as defined under the DSL's duties above.
- ensures that all staff, including temporary staff and volunteers, are provided with copies of or access to Circles Network's child protection and safeguarding policy and (code of conduct) before they start.
- ensures that Circles Network contributes to inter-agency working and plans.
- teaches individuals about safeguarding and how to keep themselves safe at all times, including when online, as part of a broad and balanced curriculum.
- The governing body nominates a member (normally the chair) to be responsible for liaising with the Local Authority and other agencies in the event of an allegation being made against the CEO.

The governing body also identifies a named trustee to take leadership responsibility for the Circles Network's safeguarding arrangements. That trustee will maintain regular contact with the DSL and will ensure that the governing body receives regular reports about safeguarding activity at Circles Network.

It is the responsibility of the governing body to ensure that Circles Network's safeguarding, recruitment and managing allegations procedures take into account the procedures and practice of the Local Authority, local safeguarding partnership and national guidance.

## 2. Good practice guidelines and staff code of conduct

To meet and maintain our responsibilities towards the child or young person, we identify standards of good practice and set out our expectations of staff in the staff code of conduct policy, which all members of staff and volunteers are required to read and sign before starting work at Circles Network. In summary,

expectations of staff include:

- treating all children and young people with respect
- setting a good example by conducting appropriate behaviour
- involving children and young people in decisions that affect them
- encouraging positive, respectful and safe behaviour among children and young people
- being a good listener
- being alert to changes in children or young person's behaviour and to signs of abuse and neglect and exploitation
- recognising that challenging behaviour and mental health difficulties may be an indicator of abuse
- reading and understanding Circles Network child protection policy, code of conduct and guidance documents on wider safeguarding issues, for example bullying, behaviour, physical contact, criminal and sexual exploitation, extremism, online safety and information-sharing
- asking the child/ren or young person's permission before initiating physical contact, such as assisting with dressing, physical support during equine activity or administering first aid
- maintaining appropriate standards of conversation and interaction with and between children and young person and avoiding the use of sexualised or derogatory language
- not participating in, tolerating or dismissing sexual violence or sexual harassment as "banter", "part of growing up", "just having a laugh" or "boys being boys";
- making clear that sexual violence and sexual harassment is not acceptable, will never be tolerated and is not an inevitable part of growing up; and challenging behaviours (potentially criminal in nature) which constitutes sexual harassment, such as grabbing bottoms, breasts and genitalia, flicking bras and lifting up skirts
- being aware that the personal and family circumstances and lifestyles of some children and young people lead to an increased risk of abuse
- applying the use of reasonable force and physical intervention only as a last resort.
- referring all concerns about a child/ren or young person's safety and welfare to the DSL or, if necessary, directly to the Police or Children's Social Care
- following Circles Network's rules regarding communication and relationships with children and young people, including via social media
- referring all allegations against members of staff, volunteers or other adults that work with children and any concerns about breaches of the Code of Conduct policy directly to the CEO/HR; and any similar allegations against or concerns about the CEO directly to the board of trustees.

## **Abuse of position of trust**

All Circles Network staff are aware that inappropriate behaviour towards children or young people is unacceptable and that their conduct towards children and young people must be beyond reproach.

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

## **3. Children who may be particularly vulnerable**

Some children are more vulnerable to abuse and neglect than others. Several factors may contribute to that increased vulnerability, including prejudice, discrimination, isolation, social exclusion, communication issues, a reluctance on the part of some adults to accept that abuse can occur, as well as an individual child's personality, behaviour, disability, mental and physical health needs and family circumstances.

To ensure that all children and young people receive equal protection, we will give special consideration to children who are:

- disabled, have special educational needs or have mental health needs
- young carers
- affected by parental substance misuse, domestic abuse and violence or parental mental health needs

- asylum seekers
- looked after by the Local Authority, otherwise living away from home or were previously looked after
- in receipt of support and services from a social worker
- vulnerable to being bullied, or engaging in bullying behaviours
- living away from home or in temporary accommodation
- living transient lifestyles
- living in chaotic and unsupportive home situations
- vulnerable to discrimination and maltreatment on the grounds of race, ethnicity, religion, disability or sexuality
- at risk of child sexual exploitation (CSE) and/or child criminal exploitation
- at risk from, or are involved with, serious violent crime
- do not have English as a first language
- at risk of female genital mutilation (FGM)
- at risk of forced marriage
- at risk of being drawn into extremism.

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

#### **4. Children with special educational needs and disabilities or have mental health needs**

Children with special educational needs (SEN), disabilities or who have mental health needs can face additional safeguarding challenges. Additional barriers can exist when recognising abuse and neglect in this group of children, which can include:

- assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's disability or mental health issues without further exploration;
- the potential for children with SEN and disabilities being disproportionately impacted by behaviours such as bullying, without outwardly showing any signs; and
- communication barriers and difficulties in overcoming these barriers.

Staff are trained to manage these additional barriers to ensure this group of children/young people are appropriately safeguarded; and are aware that mental health difficulties can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation.

Staff are not expected or trained to diagnose mental health conditions or issues but they will record and report any concerns about a child's mental health to the Designated Safeguarding Lead as with any other safeguarding concern, recognising that mental health concerns may be an outcome and/or indicator of wider safeguarding issues and concerns.

#### **5. Support for children and young people, families and staff involved in a child protection issue**

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

We will support children and young people, their families, and staff by:

- taking all suspicions and disclosures seriously
- nominating a link person (*usually the DSL*) who will keep all parties informed and be the central point of contact; and may liaise with the DSL at Circles Network
- Where a member of staff is the subject of an allegation made by a child/ren or young person, separate link people will be nominated to avoid any conflict of interest;

- responding sympathetically to any request from child/ren or young person or staff for time out to deal with distress or anxiety;
- maintaining confidentiality and sharing information on a need-to-know basis only with relevant individuals and agencies;
- storing records securely;
- offering details of helplines, counselling or other avenues of external support;
- following the procedures laid down in our child protection, whistleblowing, complaints and disciplinary procedures;
- co-operating fully with relevant statutory agencies.

## 6. Complaints procedure

Circles Network complaints procedure will be followed where a child, young person or parent raises a concern about poor practice towards a child or young person that initially does not reach the threshold for child protection action. Poor practice examples include unfairly singling out a child or young person or attempting to humiliate them, bullying or belittling or discriminating against them in some way. Complaints are managed by the CEO/HR, other members of the senior leadership team and trustees. An explanation of the complaint's procedure is included in the safeguarding information for parents and children and young people.

Complaints from staff are dealt with under Circles Network's complaints and disciplinary and grievance procedures.

Complaints which escalate into a child protection concern will automatically be managed under Circles Network's child protection procedures.

## 7. Staff reporting concerns about a colleague or other adult who works with children (Whistleblowing)

Staff who are concerned about the conduct of a colleague - including visiting practitioners and volunteers - towards a pupil are undoubtedly placed in a very difficult situation. They may worry that they have misunderstood a situation and they will wonder whether a report could jeopardise a colleague's career. All staff must remember that the welfare of the child is paramount.

Circles Network's **whistleblowing** policy enables staff to raise concerns or allegations, initially in confidence, and for a sensitive enquiry to take place.

Staff are expected to report all concerns about poor practice or possible child abuse by colleagues - including what may seem minor contraventions of Circles Network's code of conduct - to the CEO/HR; to facilitate proactive and early intervention in order to maintain appropriate boundaries and a safe culture that protect children and reduce the risk of serious abuse.

The recommended format for all staff at Circles Network to record any such poor practice or possible child abuse by colleagues or other adults who work with children is the pro forma 'Logging A Concern about the behaviour of an adult who works with children', also known as the 'Yellow form'.

All such forms should be **passed directly to the CEO/HR**. Alternatively, staff are free to approach the CEO/HR directly to discuss their concerns.

**Concerns or complaints about the CEO should be reported to the board of trustees**, whose contact details are displayed - *The 'Yellow form' should also be used for that purpose as above.*

Staff may also report concerns about suspected abuse or neglect directly to Children's Social Care or the Police if they believe direct reporting is necessary to secure action to safeguard children.

**Staff can also contact the Designated Officer in the Local Authority (LADO)**, who is responsible for the co-

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ordination of responses to allegations against people who work with children (see contact and referral details in section 16 below). The Designated Officer's contact details are displayed on the notice boards.

The NSPCC whistleblowing helpline is also available for staff who do not feel able to raise concerns regarding child protection failures internally. Staff can call 0800 028 0285 between 8.00a.m. and 8.00p.m., Monday to Friday or e mail [help@nspcc.org.uk](mailto:help@nspcc.org.uk). Information is also available on the NSPCC website at <https://www.nspcc.org.uk/what-you-can-do/report-abuse/dedicated-helplines/whistleblowing-advice-line/>.

The NSPCC whistleblowing helpline and contact numbers for Children's Social Care, the Police and the Designated Officer are all displayed/ or can be found in the office.

## 8. Managing allegations against staff

When an allegation is made against a member of staff, set procedures must be followed. The full procedures for dealing with allegations against staff can be found in Part 4 of *Keeping Children Safe in Education 2020* and para 1.14 of WS inter-agency safeguarding procedures *Allegations against staff or volunteers* – <https://www.safeguardingwarwickshire.co.uk/safeguarding-children/i-work-with-children-and-young-people/interagency-safeguarding-procedures>.

Staff who are the subject of an allegation have the right to have their case dealt with fairly, quickly and consistently and to be kept informed of its progress.

Suspension is not the default option and alternatives to suspension will always be considered. In some cases however, staff may be suspended (without prejudice) where this is deemed to be the best way to ensure that allegations are investigated fairly, quickly and consistently and that all parties are protected. In the event of suspension, Circles Network will provide support and a named contact for the member of staff.

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

Allegations concerning staff who no longer work at the organisation or historical allegations will be reported to the Police.

In accordance with *Keeping Children Safe in Education 2020*, Circles Network will make every effort to maintain confidentiality and guard against unwanted publicity while an allegation is being investigated or considered.

As required by *Keeping Children Safe in Education 2020*, all allegations in respect of an individual who works at Circles Network that fulfil any of the following criteria will be reported to the Designated Officer in the Local Authority (LADO) within one working day:

- behaved in a way that has harmed a child, or may have harmed a child
- possibly committed a criminal offence against or related to a child
- behaved towards a child or children in a way that indicates they may pose a risk of harm to children.
- behaved or may have behaved in a way that indicates they may not be suitable to work with children.

Please see your local Safeguarding procedures to gain contact information for the Designated Safeguarding Lead (s)

**NB** it is the CEO/HR's responsibility to contact and refer to the Designated Officer when necessary. The only exception is when the allegation is against the CEO/HR, in which instance the nominated trustee will undertake that responsibility.

## 9. Staff training

It is important that all staff have training to enable them to recognise the possible signs of abuse, neglect, exploitation and radicalisation and to know what to do if they have a concern.

New colleagues, trustees who will have direct contact with children and volunteers will receive an explanation during their induction which will include:

- Circles Network's child protection and safeguarding policy
- signs and symptoms of abuse and neglect
- responding to disclosure of abuse or neglect by a child
- reporting and recording arrangements
- Code of Conduct
- the identity and role of the DSL and all Deputy DSLs
- the organisations behaviour policy
- the organisations safeguarding response to children who go missing from education.

All of the above will be explained **before** a new member of staff, trustee or volunteer has direct contact with children at Circles Network. Circles Network's child protection policy and staff code of conduct will be sent with the letter confirming an appointment with a written requirement that the individual reads the two policies in advance of starting work at Circles Network. The individual will be given an opportunity to clarify any issues on their first day at work and then asked to sign to confirm that they have read and understood both policies and undertake to comply with them.

All staff, including the CEO (unless the CEO is the DSL), volunteers and trustee will receive appropriate and regularly updated safeguarding and child protection training and thematic updates as required (at least annually) during regular discussions at staff meetings, to provide them with the requisite skills and knowledge to safeguard children effectively in line with statutory guidance and any requirements of the local safeguarding partnership.

The DSL will attend training for newly appointed DSLs and refresher training every two years. That training will include up to date information about local safeguarding partnership inter-agency procedures. In addition, the DSL will update their knowledge and skills at least annually to keep up with any developments relevant to their role and will be supported to access inter-agency training as part of their continuing professional development.

All staff will be made aware of the increased risk of abuse to certain groups, including children with special educational needs and disabilities, looked after children, previously looked after children, young carers and risks associated with specific safeguarding issues including child sexual exploitation, child criminal exploitation, county lines activity, peer on peer abuse, sexual harassment and sexual violence in school, extremism, so-called honour based abuse including female genital mutilation and forced marriage; and will receive training in relation to keeping children safe online.

In addition, the CEO and HR and at least one trustee (usually the chair) will attend safer recruitment training and Circles Network will ensure that there are at least two senior members of staff and/or trustee that have attended safer recruitment training within the past three years.

## 10. Safer recruitment

Circles Network endeavours to ensure that we do our utmost to employ 'suitable' staff and allow 'suitable' volunteers to work with children by complying with the requirements of *Keeping Children Safe in Education 2020* together with *Safeguarding Safer Recruitment* policies.

Safer recruitment means that all applicants will:

- complete an application form which includes their employment history and explains any gaps in that history;
- provide two referees, including at least one who can comment on the applicant's suitability to work with children;

- provide evidence of identity and qualifications;
- if offered employment, be checked in accordance with the Disclosure and Barring Service (DBS) regulations as appropriate to their role. This will include:
  - an enhanced DBS check and a barred list check for those including unsupervised volunteers engaged in Regulated Activity;
  - an enhanced DBS check without a barred list check for all volunteers not involved in Regulated Activity but who have the opportunity of regular contact with children;
  - an enhanced DBS check for all trustee (not including associate members), which will only include a barred list check for trustee involved in Regulated Activity;
- if offered employment, provide evidence of their right to work in the UK;
- be interviewed by a panel of at least two managers, if shortlisted.

Circles Network is a 'specified places' which means that the majority of staff and volunteers will be engaged in Regulated Activity. A fuller explanation of Regulated Activity can be found in Part 3 of *Keeping Children Safe in Education 2020*.

Circles Network will also

- ensure that every job description and person specification for roles at Circles Network includes a description of the role holder's responsibility for safeguarding;
- ask at least one value-based question at interview for every role about the candidate's attitude to safeguarding and motivation for working with children;
- verify the preferred candidate's mental and physical fitness to carry out their work responsibilities;
- obtain references for all shortlisted candidates, including internal candidates;
- carry out additional or alternative checks for applicants who have lived or worked outside the UK;

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

All new members of staff and volunteers will undergo an induction that includes familiarisation with the charity's child protection and safeguarding policy, code of conduct, other issues as in section 17 of this policy and identification of their child protection training needs.

All staff are required to sign to confirm they have received a copy of the child protection and safeguarding policy and code of conduct.

Graduates will be checked either by the university or by the training provider, from whom written confirmation will be obtained confirming their suitability to work with children.

Circles Network maintains a single central record of recruitment checks undertaken and ensures that the record is maintained.

## Volunteers

Volunteers will undergo checks commensurate with their work in the charity and contact with children and young people. Under no circumstances will a volunteer who has not been appropriately checked be left unsupervised or be allowed to engage in Regulated Activity.

## Supervised volunteers

Volunteers who work only in a supervised capacity and are not in Regulated Activity will undergo the safer recruitment checks appropriate to their role, in accordance with Circles Network's risk assessment process and statutory guidance.

## Contractors

Circles Network checks the identity of all contractors and their staff on arrival at Circles Network and requests DBS checks where appropriate. As required by statutory guidance, where contractors and/or their staff are engaged in Regulated Activity, barred list checks are also requested. Contractors and any of their staff who have not undergone checks will not be allowed to work unsupervised or in Regulated Activity.

## 11. Site security

Visitors to Circles Network, including contractors, are asked to sign in on arrival, which confirms they have permission to be on site. Parents who are simply delivering or collecting their children do not need to sign in.

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All visitors are expected to observe Circles Network's safeguarding and health and safety regulations to ensure children at Circles Network are kept safe. The CEO/Senior Manager will exercise professional judgement in determining whether any visitor should be escorted or supervised while on site.

## 12. Code of Conduct

Our code of conduct policy is set out in a separate document and is reviewed regularly by the board of trustees. It is shared with all staff before they start working with children and young people as part of their induction. The policy is publicly available.

*Keeping Children Safe in Education 2020* highlights that there are circumstances when it is appropriate for staff at Circles Network to use reasonable force to safeguard children and young people. This can range from guiding a child to safety by the arm, to more extreme circumstances such as breaking up a fight or where a young person needs to be restrained to prevent violence or injury. 'Reasonable' in these circumstances means 'using no more force than is needed'. The use of force may involve either passive physical contact, such as standing between children or young person(s) or blocking a child or young person's path, or active physical contact such as leading a child or young person by the arm out or away from an activity or away from an area.

Circles Network operates in accordance with *Guidance on the Use of Force and Physical Intervention*, which highlights that staff should deploy every possible strategy to prevent the need for physical intervention. Those strategies would include de-escalation whenever there is a threat of violence or aggression towards an individual or property; communicating calmly with children; using non-threatening verbal and body language; helping children to recognise their own 'triggers' and 'early warning signs', and distracting or helping children to see a positive way out of a difficult situation.

Circles Network however supports staff to intervene physically and to use reasonable force when all of those strategies are unsuccessful in calming a situation; and a risk of physical harm to other children, adults or the child her/himself, serious damage to property or serious disruption to Circles Network remains. Staff should always be able to demonstrate that any such intervention is reasonable, proportionate and necessary in the circumstances, is used for the shortest possible period of time, deploys the minimum force that is necessary and is never used as a sanction.

### Searching

In accordance with DfE guidance *Searching, screening and confiscation - Advice for headteachers, school staff and governing bodies* -

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/674416/Searching\\_screening\\_and\\_confiscation.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/674416/Searching_screening_and_confiscation.pdf), Circles Network staff can search a child or young person for any item if the child or young person agrees. The CEO and any member of staff authorised by the CEO also has a statutory power to search children and young people or their possessions, without consent, where they have reasonable grounds for suspecting that the child or young person may have one or more of the following prohibited items in their possession: knives or weapons; alcohol; illegal drugs; stolen items; tobacco and cigarette papers; fireworks; pornographic images; indecent images of children; any article that a member of staff reasonably suspects has been, or is likely to be, used to commit an offence or to cause personal injury to or damage to the property of any person (including the child or young person themselves).

The CEO and authorised staff can also search for any item banned by Circles Network rules which has been identified in the rules as an item which may be searched for.

Circles Network staff can confiscate any prohibited item found as a result of a search. They can also confiscate any item they consider harmful or detrimental to Circles Network.

In the event that a member of staff suspects that a confiscated device contains indecent images of children, they will pass the device to the DSL and will not examine the device themselves. The DSL will take advice from the Police and/or the MASH before examining the device – see 'Viewing the Imagery' on page 50 below.

## 13. Record Keeping

Circles Network will maintain safeguarding (including early help) and child protection records in accordance with the guidance document *Child Protection Record Keeping Guidance*.

Circles Network will:

- keep clear detailed written records of concerns about children (noting the date, event and action taken), even where there is no need to refer the matter to Children's Social Care immediately;
- keep records in a meticulous chronological order, either on paper or electronically;
- ensure all records are kept secure and in locked locations;
- ensure all safeguarding records are transferred - separately from the child or young person's main activity file - to the receiving school, college, other education or other supporting charity organisation when a child or young person moves. The DSL will do this as soon as possible, ensuring secure transit, and will ensure that confirmation of receipt of the records is obtained.
- the DSL will also consider whether it is appropriate to share any information with a child's or young person's receiving setting in advance of the child leaving so that the receiving setting is able to support the child as effectively as possible and plan for his/her arrival.
- ensure that incoming safeguarding records are brought to the attention of the DSL, Deputy DSLs and other key staff such as the SENCO when a child transfers in from another setting.

Safeguarding and child protection records will be maintained independently from the children or young person's activity file and the activity file will be 'tagged' on Nurse Buddy to indicate that separate information is held. Such records will only be accessible to the Designated Safeguarding Lead and immediate staff who need to be aware.

The recommended format to record any safeguarding or child protection observations or concerns about a child is the pro forma *Logging A Concern About A Child's Safety and Welfare* (Form C) also known as the 'Green form'. The same format will be used by staff to record and report any observations or concerns that suggest a child might benefit from early help.

Such records will include, in addition to the name, address and age of the child, timed and dated observations describing the child's behaviour, appearance, statements/remarks made to staff or other children and observations of interactions between the child, other children, members of staff and/or parents/carers that give rise to concern. Where possible and without interpretation, the exact words spoken by the child or parent/carer will be recorded. Records will be signed, dated and timed by the member of staff making the record.

Records of safeguarding/child protection observations or concerns can be completed electronically or as a paper version but it is most important that **one consistent system for the recording of concerns is readily accessible to every member of staff irrespective of role and that all records are passed to the Designated Safeguarding Lead**, who should complete the form to confirm what action has been taken.

Child protection records form a part of a child's or young person's record, which parents ordinarily have a right to see. Any young person or parent wishing to access child protection records will need to submit a request to Circles Network for consideration. Access to the record will then be arranged but records may be redacted in line with the requirements of the General Data Protection Regulation (GDPR) if releasing information would place the child, or any other person, at risk of significant harm.

The Data Protection Act 2018 and GDPR do not prevent Circles Network staff from sharing information with relevant agencies without the consent of parents, where that information may help to protect a child.

## 14. Confidentiality and Information Sharing

Circles Network will manage and share confidential information about children in line with *Information sharing - Advice for practitioners providing safeguarding services to children, young people, parents and*

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carers (HMG 2018) -

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/721581/Information\\_sharing\\_advice\\_practitioners\\_safeguarding\\_services.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/721581/Information_sharing_advice_practitioners_safeguarding_services.pdf)

All staff will understand that child protection issues warrant a high level of confidentiality, not only out of respect for the child/ren or young person, family and staff involved but also to ensure that information being released into the public domain does not compromise evidence.

The Data Protection Act 2018 (DPA) and the GDPR place duties on Circles Network and individual staff to process personal information fairly and lawfully and to keep the information they hold safe and secure.

However, neither the DPA nor the GDPR prevent or limit the sharing of information for the purposes of keeping children safe. Keeping Children Safe in Education (DfE 2020) states clearly that "Fears about sharing information **must not** be allowed to stand in the way of the need to promote the welfare and protect the safety of children".

Staff will ensure confidentiality protocols are adhered to and information is shared appropriately. If in any doubt about confidentiality, staff will seek advice from the DSL, another senior manager or outside agency as required, such as the MASH Education Lead.

It is reasonable for staff to discuss day-to-day concerns about children or young person with colleagues in order to ensure that children's or young person's general needs are met at Circles Network. Staff however, should report all child protection and safeguarding concerns to the DSL or CEO. In the case of concerns about the CEO, to the board of trustees. The person receiving the referral will then decide who else needs to have the information and they will disseminate it on a 'need-to-know' basis.

**Keeping Children Safe in Education 2020 emphasises that the DSL or a deputy DSL should always be available to discuss safeguarding concerns but in exceptional circumstances where neither the DSL nor any appointed deputy DSL are available, that should not delay appropriate action being taken and staff should speak to a member of Senior Leadership Team or take advice from Children's Social Care if they are concerned about a child.**

The GDPR and the Data Protection Act 2018 do not prevent Circles Network staff from sharing information with relevant agencies, where that information may help to protect a child. All staff must be aware that they have a professional responsibility to share information with other agencies in order to safeguard children.

The DSL will normally obtain consent from the young person/or parents to share sensitive information within Circles Network or with outside agencies. Where there is good reason to do so, the DSL may share information *without* consent, and will record the reason for not obtaining consent.

If any member of staff receives a request from a child, young person or parent to see child protection records, they will refer the request to the DSL and data protection officer.

Information sharing will take place in a timely and secure manner and where:

- it is necessary and proportionate to do so; and
- the information to be shared is relevant, adequate and accurate.

Information sharing decisions will be recorded, whether or not the decision is taken to share.

All staff must be aware that they cannot promise a child/young person or parent to keep secrets.

All safeguarding and child protection information will be handled in line with the principles of the Data Protection Act 2018, which require that sensitive information is:

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

- kept no longer than necessary
- processed in accordance with the data subject's rights
- secure.

Record of concern forms (Form C – Green forms) and other written information will be stored in a locked facility and any electronic information will be password protected and only made available to relevant individuals.

Every effort will be made to prevent unauthorised access to sensitive information. Any sensitive information that needs to be stored on portable devices such as laptop computers or tablets or on portable media such as a CD or flash drive will be password protected or encrypted and kept in locked storage.

Circles Network's policy on confidentiality and information-sharing is available to parents and young people on request.

## 15. Extended provision and off-site arrangements

The DSL will maintain an overview of all children and young people accessing the Circles Network provisions and will ensure that robust arrangements are in place for timely and effective two-way sharing of safeguarding information - including records of all safeguarding concerns - between the provisions and the safeguarding lead for Circles Network

The DSL will also take responsibility for ensuring that robust procedures are in place to confirm attendance and swift reporting of non-attendance and children going missing from Circles Network provisions at any time when they should be there. The DSL will also ensure that effective quality assurance arrangements are in place in order to monitor the ongoing effectiveness of all safeguarding arrangements that the children's or young person's provision has in place.

## 16. Photography and images

The vast majority of people who take or view photographs or videos of children do so for entirely innocent, understandable and acceptable reasons. Sadly, some people abuse children through taking or using images, so we must ensure that we have some safeguards in place.

To protect children and young people we will:

- seek their consent for photographs or video images to be taken;
- seek parental consent;
- ensure children and young people are appropriately dressed; and
- encourage children and young people to tell us if they are worried about any photographs/images that are taken of them.

Furthermore, when using images for publicity purposes (e.g. on our website or in newspapers or publications), we will:

- avoid naming children or young person's name when possible;
- if it is necessary to name children or the young person, use first names rather than surnames;
- if children or young person are named, avoid using their image;
- establish whether the image will be retained for further use, where and for how long;
- ensure that images are stored securely and used only by those authorised to do so.

For the protection of children and young people and staff, only Circles Network owned equipment will be used to record and store images taken by staff or volunteers on Circles Network site or during offsite activities including residential visits.

Parents are welcome to take still photographs of their **own children only** during activities, subject to other restrictions notified to parents in advance in writing or verbally (e.g. parents may be asked not to take photographs during concerts/performances in order not to distract children who are performing or other

audience members). Parents must not publish (including on social media) photographs of other children inadvertently captured during events without the express permission of the parents of those children.

Parents are welcome to video record their **own children only** during activities, subject to the same terms and conditions as for photographs above.

Visiting practitioners who work directly with children are subject to the same restrictions as Circles Network staff and volunteers in respect of recording and storing images of children. However, some visiting professionals are permitted to record images of the premises only specifically for professional purposes and in order to support Circles Network, e.g., professionals providing advice or preparing quotations for work such as maintenance, health and safety and building.

## 17. Online Safety

Children and young people commonly use electronic equipment including mobile phones, tablets and computers on a daily basis to access the internet and share content and images via social networking sites such as Facebook, X, MSN, Tumblr, TikTok, Snapchat and Instagram.

Those technologies and the internet are a source of fun, entertainment, communication and education. Unfortunately, some adults and young people will use those technologies to harm children and young people and the use of technology has become a significant component of many safeguarding issues. Technology often provides the platform that facilitates harm through child criminal and sexual exploitation, county lines activity, radicalisation, sexual predation and cyber bullying.

The breadth of issues within online safety is considerable, but can be categorised into three areas of risk:

- **content:** being exposed to illegal, inappropriate or harmful material; for example, pornography, fake news, racist or radical and extremist views;
- **contact:** being subjected to harmful online interaction with other users; for example, commercial advertising as well as adults posing as children or young adults; and
- **conduct:** personal online behaviour that increases the likelihood of, or causes, harm; for example, making, sending and receiving explicit images, or online bullying.

Chatrooms and social networking sites are the more obvious sources of inappropriate and harmful behaviour and children and young people are not allowed to access those sites at Circles Network. Many children and young people own or have access to handheld devices and should be used in accordance with online safety policy.

All staff receive online safety training and are trained to be vigilant about and to report any concerns about risk to children online in the same way that they notice and report offline concerns. Circles Network **online safety policy** explains how we try to keep children and young people safe. Circles Network and protect and educate children and young people in the safe use of technology.

Cyberbullying and sexting by children or young people will be treated as seriously as any other type of bullying and will be managed through our anti-bullying procedures (see 'Youth produced sexual imagery ('sexting') in section 31 below). Serious incidents may be managed in line with our sexual exploitation policy or child protection procedures.

## 18. Safeguarding individuals in online learning and communication

Where Circles Network staff are delivering activities online or virtually (e.g., to children unable to attend Circles Network due to COVID-19 or ill health), all such activities will be delivered in accordance with the Circles Network's safeguarding and child protection, code of conduct and acceptable use of ICT policies. This will ensure that Circles Network's filtering and monitoring software is enabled.

Circles Network will take account of guidance from DfE in relation to the planning and delivery of online activities when it is issued; as well as nationally recognised guidance including [guidance from the UK Safer Internet Centre on safe remote learning](#) and [London Grid for Learning on the use of videos and](#)

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## livestreaming.

Staff will always use Circles Network owned devices and accounts for the delivery of online/virtual activities. Where possible, applications that facilitate the recording of activities will be used subject to data protection and retention/storage guidelines will randomly sample recorded activities in order to safeguard children and young people and staff to ensure that policies are being followed.

When delivering online/virtual activities on a one-to-one basis or communicating with vulnerable children who are not attending Circles Network via video chat, staff will speak to parents/carers before conversations commence and when they finish before logging off.

Circles Network will request and obtain written consent from parents/carers including consent to record activities and video conversations before staff communicate with children online.

It is important that all staff who interact with children online continue to look out for signs that a child or young person may be at risk, distressed for some reason or vulnerable in some other way; and report and record any concerns to the DSL in the normal way. The DSL will respond to any such concern as they would any other safeguarding concern.

Circles Network will ensure that online learning tools and systems are used in line with privacy and data protection/GDPR requirements.

Staff delivering online/virtual activities will be expected to display the same standards of dress and conduct that they would when working face to face at Circles Network, modelling appropriate behaviour and presentation to the children, young person and parents.

Below are other issues that staff need to take into account when delivering online/virtual activities or communicating with children and young people online, particularly where webcams/video chat are used:

- Staff and children/young person must be fully dressed and 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 blurred. If it is not possible to blur the background, staff must consider what children can see in the background and whether it would be appropriate. This includes photographs, artwork, identifying features, mirrors etc.
- Staff will ensure that resources used are age appropriate – the child may not have support immediately to hand at home if they feel distressed or anxious about the activity.
- Live activities should be recorded so that if any issues were to arise, the video can be reviewed.
- Live activities will be kept to a reasonable length of time so that children and young people do not have too much screen time and in order to minimise disruption for the family.
- Language must be professional and appropriate, including that used by any family members in the background.
- Staff must only use platforms specified by senior managers and approved by the ICT manager/co-ordinator for communication with children or young person
- Staff should record the length, time, date and attendance of any activity held.

Staff members delivering activities or communicating with children online/virtually will raise any issues in respect of inappropriate dress, setting or behaviour with the child, young person and/or parent immediately and will end the online interaction if necessary. Any such incident will be recorded and reported to the DSL.

If a staff member believes that a child, young person or parent is recording an activity or conversation without prior consent, the activity will be brought to an end or the child or young person will be logged out immediately.

In **rare and exceptional circumstances** where staff urgently need to contact a child, young person or parent by telephone and do not have access to Circles Network device, they will discuss this with a senior member of staff. If it is agreed there is no alternative to using a personally owned device, staff members will always use 'caller withheld' to ensure the child, young person and/or parent is not able to identify the staff member's personal contact details.

Staff also receive advice regarding personal online activity, use of social networking and electronic communication with children and young people, to which there are strict rules. Staff found to be in breach of these rules may be the subject of a referral to the Designated Officer in the Local Authority and/or may be subject to disciplinary action.

## **19. Child protection procedures**

### **Recognising abuse**

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

Abuse and neglect are forms of maltreatment of children. Somebody may abuse or neglect a child by inflicting harm, for example by hitting them, or by failing to act to prevent harm, for example by leaving a small child home alone.

Children and young people may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Children may be abused by adult men or women or by other children or young people. Staff are trained to understand and recognise indicators of all four categories of abuse as defined below.

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

#### **Physical abuse**

A form of abuse which may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm to a child. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child (this used to be called Munchausen's Syndrome by Proxy, however, is now more usually referred to as fabricated or induced illness).

#### **Emotional abuse**

The persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. It may involve conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability as well as overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including 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 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. Sexual abuse can take place online, and technology can be used to facilitate offline abuse. Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children. The sexual abuse of children by other children is a specific safeguarding issue in education and is known as peer on peer. (see section 31).

## Neglect

The persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy, for example, as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to:

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

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

These definitions are taken from *Keeping Children Safe in Education* (DfE 2020).

## Indicators of abuse

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

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

A child who is being abused or neglected may:

- have bruises, bleeding, burns, fractures or other injuries;
- show signs of pain or discomfort;
- keep arms and legs covered, even in warm weather;
- be concerned about changing for PE or swimming;
- look unkempt and uncared for;
- change their eating habits;
- have difficulty in making or sustaining friendships;
- appear fearful;
- be reckless with regard to their own or other's safety;
- self-harm;
- frequently miss school or arrive late;
- show signs of not wanting to go home;
- display a change in behaviour – from quiet to aggressive, or happy-go-lucky to withdrawn;
- challenge authority;
- become disinterested in their school work;
- be constantly tired or preoccupied;
- be wary of physical contact;
- be involved in, or particularly knowledgeable about drugs or alcohol;
- display sexual knowledge or behaviour beyond that normally expected for their age and/or stage of development; and/or
- acquire gifts such as money or a mobile phone from new 'friends' or adults recently acquainted with the child's family.

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

**It is very important that staff report all of their concerns, however minor or insignificant they may think they are – they do not need 'absolute proof' that the child is at risk.**

## Impact of abuse

The impact of child abuse, neglect and exploitation should not be underestimated. Many children do

recover well and go on to lead healthy, happy and productive lives, although most adult survivors agree that the emotional scars remain, however well buried. For some children, full recovery is beyond their reach and the rest of their childhood and their adulthood may be characterised by one or more of the following: anxiety, depression or other mental health difficulties, self-harm, eating disorders, alcohol and substance misuse, unequal and destructive relationships, unfulfilled potential and long-term physical health difficulties.

## Taking action

**Any child in any family could become a victim of abuse. Staff should always maintain an attitude of "It could happen here".**

Key points for staff to remember when taking action are:

- in an emergency take the action necessary to help the child or young person, for example, call 999;
- report your concern to the DSL as quickly as possible – immediately when there is evidence of physical or sexual abuse and certainly by the end of the day;
- do not start your own investigation; share information on a need-to-know basis only – **do not discuss the issue with colleagues, friends or family;**
- complete a record of concern, using a Form C (Green form);
- seek support for yourself if you are distressed or need to debrief.

## If a member of staff or volunteer is concerned about a child/young person's welfare

There will be occasions when staff may suspect that a child/young person may be at risk without unequivocal evidence. The child/young person's behaviour may have changed, they may write/tell stories or poetry that reveal confusion or distress or physical but inconclusive signs may have been noticed. In these circumstances, staff will try to give the child/young person the opportunity to talk. The signs they have noticed may be due to a variety of factors, for example a parent has moved out, a pet has died, a grandparent is very ill or an accident has occurred. Staff are encouraged and supported to ask child/young person if they are OK, if there is anything the child would like to talk to them about and if they can help in any way. Staff are trained to do this by asking appropriate open questions which do not lead the child/young person in any particular direction but invite the child/young person to talk about anything if they wish to.

Staff should use the same record of concern form, Form C (Green form) to record these early concerns. If the child/young person does begin to reveal that they are being harmed, staff should follow the advice below. Following an initial conversation with the child/young person, if the member of staff remains concerned, they should discuss their concerns with the DSL.

Concerns which do not meet the threshold for child protection intervention will be managed through the Early Help process as in section 8 of this policy.

## If a child/young person discloses to a member of staff or volunteer

It takes a lot of courage for a child to disclose that they are being abused. They may feel ashamed, particularly if the abuse is sexual. Their abuser may have threatened what will happen if they tell. They may have lost all trust in adults. Or they may believe, or have been told, that the abuse is their own fault. Sometimes they may not be aware that what is happening is abusive.

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

If child/young person have been completing the Taking Care curriculum they will have been taught about confidentiality and will generally understand the concept of safe and unsafe secrets. They should have a good knowledge and understanding of why staff cannot keep some information confidential but also know that information is passed on to specific people on a 'need to know' basis only.

During their conversations with child/young person, staff will:

- allow child/young person to speak freely;
- remain calm and not overreact – the pupil may stop talking if they feel they are upsetting their listener;
- give reassuring nods or words of comfort – **'I'm glad you told me'/'Thank you for telling me'; 'You're doing very well'; 'I believe you'; 'What happened to you is not your fault'/'This isn't your fault'; 'I'm going to do what I can to help you'**;
- not be afraid of silences – staff must remember how hard this must be for the child/young person;
- **under no circumstances** ask investigative questions – such as how many times this has happened, whether it happens to siblings too, or what does the pupil's mother think about it; (**however**, it is reasonable to ask questions to clarify understanding and to support a meaningful referral if that is required, e.g., 'when did this happen', 'where did this happen?')
- at an appropriate time tell the child/young person that in order to help them, the member of staff must pass the information on;
- not automatically offer any physical touch as comfort. It may be anything but comforting to a child who has been abused;
- avoid admonishing the child for not disclosing earlier. Saying things such as 'I do wish you had told me about this when it started' or 'I can't believe what I'm hearing' may be the staff member's way of being supportive but may be interpreted by the child to mean that they have done something wrong;
- tell the child/young person what will happen next;
- let the child/young person know that someone (either the member of staff or another named person, e.g., the DSL) will come to see them before the end of the day;
- report verbally to the DSL (or CEO if the child has made an allegation against a member of staff);
- write up their conversation as soon as possible on the **record of concern form** Form C (Green form) and hand it to the DSL (or CEO if the child has made an allegation against a member of staff); and
- seek support if they feel distressed or need to debrief.

## Notifying parents

Circles Network will normally seek to discuss any concerns about a child/young person with their parents/carers. This must be handled sensitively and the DSL will make contact with the parent/carer in the event of a concern, suspicion or disclosure.

Our focus is the safety and wellbeing of the child/young person. Therefore, if Circles Network believes that notifying parents could increase the risk to the child or exacerbate the problem, advice will be sought first from Children's Social Care.

## 20. Making a referral to Children's Social Care

*Keeping Children Safe in Education 2020* emphasises that the DSL (and any deputies) are most likely to have a complete safeguarding picture and be the most appropriate person to advise on the response to safeguarding concerns. The DSL will make a referral to Children's Social Care (and if appropriate the Police) if it is believed that a pupil is suffering or is likely to suffer significant harm.

The child/young person (subject to their age and understanding) and the parents will be told that a referral is being made, unless to do so would increase the risk to the child or create undue delay. *Keeping Children Safe in Education 2020* also emphasises that **all** staff should be aware of the process for making referrals to Children's Social Care and for statutory assessments under the Children Act 1989, especially section 17 (children in need) and section 47 (a child suffering, or likely to suffer, significant harm) that may follow a referral, along with the role they might be expected to play in such assessments.

### Statutory assessments

#### Children in need

A child in need is defined under the Children Act 1989 as a child who is unlikely to achieve or maintain a reasonable level of health or development, or whose health and development is likely to be significantly or further impaired, without the provision of services; or a child who is disabled. Local authorities are required to provide services for children in need for the purposes of safeguarding and promoting their welfare. Children in need may be assessed under section 17 of the Children Act 1989.

#### Children suffering or likely to suffer significant harm

Local authorities, with the help of other organisations as appropriate, have a duty to make enquires under

section 47 of the Children Act 1989 if they have reasonable cause to suspect that a child is suffering, or is likely to suffer, significant harm. Such enquiries enable them to decide whether they should take any action to safeguard and promote the child's welfare and must be initiated where there are concerns about maltreatment, including all forms of abuse and neglect, female genital mutilation or other so-called honour-based violence, and extra-familial threats like radicalisation and sexual exploitation.

## 21. Submitting child protection referrals

All child protection referrals should be made to the local Multi-Agency Safeguarding Hub (MASH) by completing a Multi-Agency Referral Form (MARF) and submitting it to the MASH. The form can also be completed online.

All urgent child protection referrals, i.e. where there is an immediate concern about a child's safety, should be made in the first instance by telephoning MASH. This should be followed by submission of a MARF as above.

**NB** If a child is already the subject of an open case to Children's Social Care, the DSL will have the name and contact details of the allocated social worker. Further child protection concerns about any child in those circumstances must be referred directly to the allocated social worker, **not** to the MASH. Again, where there is an immediate concern about a child's safety, the DSL should contact the social worker by telephone in the first instance. Any difficulties in contacting the social worker must be escalated to their line manager, **not** to the MASH.

Outside of office hours, immediate concerns about a child should be referred to the Emergency Duty Team.

If staff are ever concerned that a child is in immediate danger, they will contact the Police by dialling 999.

## 22. Staff reporting directly to child protection agencies

Staff should ordinarily follow the reporting procedures outlined in this policy.

As highlighted above, **all** staff however should be aware of the early help process and understand their role in it; and **all** staff should be aware of the process for making referrals to Children's Social Care and for statutory assessments under the Children Act 1989. **Any member of staff may therefore refer their concerns directly to Children's Social Care and/or the Police if:**

- the situation is an emergency and the DSL, the deputy DSL, the CEO and/or the board of trustees are all unavailable;
- they are convinced that a direct report is the only way to ensure the child/young person safety; or
- for any other reason they make a judgement that a direct referral is in the best interests of the child/young person.

In any of those circumstances, staff may make direct child protection referrals and share information without being subject of censure or disciplinary action. Staff should however inform the DSL and/or CEO at the earliest opportunity that they have made a direct referral unless in their judgement doing so would increase the risk of harm to the child.

If in any doubt, members of staff may consult the MASH or seek support from the **MASH General Enquiries**.

## 23. What will Children's Social Care do?

Children's Social Care should make a decision about the type of response that is required within one working day of a referral being made; and should let the referrer know the outcome. This will include determining whether:

- the child requires immediate protection and urgent action is required;
- whether the child is in need, and should be assessed under section 17;

- 
- there is reasonable cause to suspect the child is suffering, or likely to suffer, significant harm, and whether enquiries must be made and the child assessed under section 47;
  - any services are required by the child and family and what type of services; and
  - further specialist assessments are required in order to help the local authority to decide what further action to take.

Circles Network will follow up if this information is not forthcoming and if, after a referral, the child's situation does not appear to be improving, we will consider following the Safeguarding escalation procedure to ensure the referred concerns have been addressed and, most importantly, that the child's situation improves. We will not be afraid of escalating referrals where serious concerns are held by Circles Network staff.

If Children's Social Care decide to carry out a statutory assessment, Circles Network colleagues will do everything they can to support that assessment, led and supported by the DSL (or deputy) as required.

## 24. Bullying, peer on peer abuse and harmful sexual behaviour

Circles Network believes that all children have a right to attend Circles Network and learn in a safe environment. Children should be free from harm, both from adults at Circles Network and other children and young people.

Children may be harmed by other children or young people. All staff recognise that children can abuse their peers and are trained to understand and implement Circles Network's policy and procedures regarding peer-on-peer abuse. All peer-on-peer abuse is unacceptable and will be taken seriously. It is most likely to include, but is not limited to:

- bullying (including cyberbullying);
- physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm;
- sexual violence, such as rape, assault by penetration and sexual assault;
- sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment, which may be stand-alone or part of a broader pattern of abuse;
- sexting including pressuring another person to send a sexual image or video content (also known as youth produced sexual imagery);
- upskirting, which typically involves taking a picture under a person's clothing (not necessarily a skirt) without them knowing, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm (upskirting is a criminal offence and may constitute sexual harassment). Anyone of any gender can be a victim;
- teenage relationship abuse - defined as a pattern of actual or threatened acts of physical, sexual or emotional abuse, perpetrated against a current or former partner;
- initiation/hazing - used to induct newcomers into an organisation such as sports team or school groups by subjecting them to a series of potentially humiliating, embarrassing or abusing trials which promote a bond between them; and
- prejudiced behaviour - a range of behaviours which causes someone to feel powerless, worthless or excluded and which relates to prejudices around belonging, identity and equality, in particular prejudices linked to disabilities, special educational needs, ethnic, cultural and religious backgrounds, gender and sexual identity.

Bullying is a very serious issue that can cause children considerable anxiety and distress. At its most serious level, bullying can have a disastrous effect on a child's well-being and in very rare cases has been a feature in the suicide of some young people.

All incidences of bullying, including cyber-bullying and prejudice-based bullying should be reported and will be managed through the Circles Network's anti-bullying procedures which can be accessed online. All children/young persons and parents receive a copy of the procedures on joining Circles Network and the subject of bullying is addressed at regular intervals. All members of staff receive a copy of Circles Network code of Conduct policy, which contains the anti-bullying procedures, as part of their induction and are trained to be aware of the harm caused by bullying and to respond to all incidents of bullying and peer on peer abuse proactively.

Abuse is abuse and will not be tolerated, minimised or dismissed as 'banter'; 'just having a laugh'; 'part of growing up'; 'boys being boys'; or 'girls being girls'. Different gender issues can be prevalent when dealing with peer-on-peer abuse, for example girls being sexually touched/assaulted or boys being subject to initiation/hazing type violence. Whilst mindful of the particular vulnerability of women and girls to violence, it is also recognised that boys as well as girls can be abused by members of the opposite as well as the same gender group.

We recognise that a child/young person will sometimes negatively affect the learning and wellbeing of others and their behaviour will be dealt with under Circles Network's behaviour policy. There will, however, be occasions when a child/young person's behaviour warrants a response under child protection, rather than anti-bullying procedures. In particular, research suggests that up to 30 per cent of child sexual abuse is committed by someone under the age of 18.

Occasionally, allegations may be made against child/young person by others at Circles Network, which are of a safeguarding nature. Safeguarding issues raised in this way may include physical abuse, emotional

abuse, sexual abuse and sexual exploitation. Members of staff to whom such allegations are made and/or who become concerned about a child/young person's sexualised behaviour, including any known online sexualised behaviour, should record their concerns in the usual way on a *Green form* and report them to the DSL as soon as possible, as with any other safeguarding concern.

It is likely that for an allegation or concern to be addressed under child protection procedures, some of the following features will be found. The allegation or concern:

- is made against an older child/young person and refers to their behaviour towards a younger child/young person or a more vulnerable child/young person;
- is of a serious nature, possibly including a criminal offence;
- raises risk factors for other children/young persons at Circles Network;
- indicates that other children/young persons may have been affected by this child/young person;
- indicates that young people outside Circles Network may be affected by this child/young person.

It is important for Circles Network to consider the wider environmental factors and context within which peer on peer abuse occurs (please also see *Contextual Safeguarding* below). Such factors may include the potential for bullying and peer on peer abuse to take place across a number of social media platforms and services; and for things to move from platform to platform online. Circles Network will also consider the potential for the impact of the incident to extend further than Circles Network's local community (e.g. for images or content to be shared around neighbouring schools/colleges) and for a victim (or alleged perpetrator) to become marginalised and excluded by both online and offline communities. There is also the strong potential for repeat victimisation in the future if abusive content continues to exist somewhere online. Online concerns can be especially complicated. Support is available from **The UK Safer Internet Centre** at 0344 381 4772 and [helpline@saferinternet.org.uk](mailto:helpline@saferinternet.org.uk) and the **Internet Watch Foundation** at <https://www.iwf.org.uk/>.

## Peer on peer sexual violence and sexual harassment

Sexual violence and sexual harassment can occur between two children of any age and gender and between children of the opposite or the same gender. They can also occur through a group of children sexually assaulting or sexually harassing a single child or group of children.

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. While it is important that **all** victims are taken seriously and offered appropriate support, staff are trained to be aware that it is more likely that girls will be the victims of sexual violence and sexual harassment and more likely it will be perpetrated by boys.

This policy largely refers to sexual violence and sexual harassment between child/young person at Circles Network or school/college. There may be occasions, however, when a child/young person report sexual violence and/or harassment perpetrated by other young people who attend a different educational provision. In that situation, the DSL will liaise with the DSL at the alleged perpetrator's school/college as well as the victim's parents, the Police and Children's Social Care. Support for the victim will be provided as described below, irrespective of which educational/alternative provision the alleged perpetrator attends.

## What is sexual violence and sexual harassment?

When referring to sexual violence, this policy uses the definitions of sexual offences in the Sexual Offences Act 2003 as follows:

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

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

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

**What is consent?** Consent is about having the freedom and capacity to choose. Consent to sexual activity may be given to one sort of sexual activity but not another, e.g. to vaginal but not anal sex or penetration with conditions, such as wearing a condom. Consent can be withdrawn at any time during sexual activity and each time activity occurs. Someone consents to vaginal, anal or oral penetration only if s/he agrees by choice to that penetration and has the freedom and capacity to make that choice.

- a child under the age of 13 can never consent to any sexual activity;
- the age of consent is 16;
- sexual intercourse without consent is rape.

**Sexual harassment** in the context of peer-on-peer behaviour is unwanted conduct of a sexual nature that can occur online and offline. Sexual harassment is likely to: violate a child's dignity, and/or make them feel intimidated, degraded or humiliated and/or create a hostile, offensive or sexualised environment.

Online sexual harassment may happen on its own or as part of a wider pattern of sexual harassment and/or sexual violence.

Sexual harassment creates an atmosphere that, if not challenged, can normalise inappropriate behaviours and provide an environment that may lead to sexual violence. Circles Network therefore recognises the importance of recognising the nature of, identifying and challenging sexual violence and sexual harassment in its wider approach to safeguarding and promoting the welfare of children; through policies and through the curriculum.

## **Minimising the risk of sexual violence and sexual harassment at Circles Network through planned activity**

Circles Network addresses the following through the planned activities and policies, e.g. behaviour policy; and staff Code of Conduct policy.

Circles Network's ethos and its inherent values and standards are demonstrated, promoted and upheld throughout all aspects of life;

- healthy and respectful relationships;
- what respectful behaviour looks like;
- consent;
- gender roles, stereotyping, equality;
- body confidence and self-esteem;
- prejudiced behaviour;
- making clear that sexual violence and sexual harassment is not acceptable, will never be tolerated and is not an inevitable part of growing up;
- not tolerating or dismissing sexual violence or sexual harassment as "banter", "part of growing up", "just having a laugh" or "boys being boys";
- challenging cultures of sexual harassment including behaviour (potentially criminal in nature), such as grabbing bottoms, breasts and genitalia and flicking bras and lifting up skirts - dismissing or tolerating such behaviours risks normalising them;
- how additional barriers to minimising the risk of sexual violence and harassment are addressed, including assumptions that indicators of possible abuse such as behaviour, mood and injury relate to a child's disability or special needs without further exploration;
- recognition that, in some cases, a child who is perceived by their peers to be LGBT (whether they are or not) can be just as vulnerable as children who identify as LGBT.
- How a child/young person is made aware of the process for them to raise their concerns or make a report and how any report will be handled. This should include processes when they have a concern about a friend or peer.

- **How the Circles Network will respond to reports of sexual violence and sexual harassment**

Circles Network will respond to reports in accordance with Part 5 of Keeping Children Safe in Education 2020. peer on peer abuse toolkit available at:

<https://www.farrer.co.uk/globalassets/clients-and-sectors/safeguarding/farrer--co-safeguarding-peer-on-peer-abuse-toolkit-2019.pdf>.

It is not possible to anticipate every particular set of circumstances and therefore what the Circles Network's response will be to every case. This policy sets out a set of principles which Circles Network will consider in responding on a case-by-case basis.

All responses to reports of sexual violence will be subject to an immediate risk and needs assessment undertaken by the DSL (or a deputy), using her/his professional judgement and supported by other agencies, such as Children's Social Care and the Police. The need for a risk and needs assessment in relation to reports of sexual harassment will be considered on a case-by-case basis.

Advice may also be sought from the MASH General Enquiries.

## **Risk & needs assessment**

The risk and needs assessment will consider:

- the victim, especially their protection and support;
- the alleged perpetrator/s (if she/he/they attend the same provision); and
- all the other children and staff at Circles Network, especially any actions that are appropriate to protect them.

The DSL (or a deputy) should ensure they are engaging with Children's Social Care and specialist services as required. Where there has been a report of sexual violence, it is likely that professional risk assessments by social workers and or sexual violence specialists will be required. Circles Network's risk assessment should not replace the detailed assessments of expert professionals. Any such professional assessments should be used to inform the Circles Network's approach to supporting and protecting child/young person and updating our own risk assessment.

## **Action following a report of sexual violence and/or sexual harassment - what to consider**

The DSL (or deputy) is likely to have a complete safeguarding picture and will therefore be the most appropriate person to lead Circles Network's initial response. Important considerations will include:

- the wishes of the victim in terms of how they want to proceed. This is especially important in the context of sexual violence and sexual harassment. Victims will be given as much control as is reasonably possible over decisions regarding how any investigation will be progressed and any support that they will be offered. If however, the victim asks Circles Network not to tell anyone about the sexual violence or sexual harassment, the DSL (or a deputy) will have to balance the victim's wishes against their duty to protect the victim and other children. It is likely to be justified and lawful to share the information if doing so is in the public interest, e.g., to protect the victim and other young people from harm and to promote the welfare of children;
- the nature of the alleged incident(s), including: whether a crime may have been committed and consideration of harmful sexual behaviour;
- the ages of the children involved;
- the developmental stages of the children involved;
- any power imbalance between the children. For example, is the alleged perpetrator significantly older, more mature or more confident? Does the victim have a disability or learning difficulty?
- if the alleged incident is a one-off or a sustained pattern of abuse;
- whether there are ongoing risks to the victim, other children, adults, staff and volunteers;
- informing parents/carers (unless this would put the victim at greater risk);
- only sharing information with those staff who need to know in order to support the children involved and/or be involved in any investigation. For instance, staff may be asked to monitor the victim's welfare without needing to know that they are a victim of sexual violence or harassment.

## **Children sharing a room - initial considerations following a report of sexual violence**

Any report of sexual violence is likely to be traumatic for the victim. Reports of rape and assault by penetration however, are likely to be especially difficult for the victim and close proximity with the alleged perpetrator is likely to be especially distressing. Whilst Circles Network establishes the facts of the case and starts the process of liaising with Children's Social Care and the Police, the alleged perpetrator will usually

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be removed from any activities they share with the victim. Consideration will also be given to how best to keep the victim and alleged perpetrator a reasonable distance apart on Circles Network's premises. These actions are in the best interests of both children/young person(s) and should not be perceived to be a judgment on the guilt of the alleged perpetrator.

For other reports of sexual violence and sexual harassment, the proximity of the victim and alleged perpetrator and considerations regarding shared activities and premises, will be considered immediately.

In all cases, the wishes of the victim, the nature of the allegations and the protection of all children at Circles Network will be especially important when considering any immediate actions.

### **Responding to the report**

If an offence has been committed, the Police will be informed. It is the prerogative of parents and victims to make complaints to the Police directly, however Circles Network will also speak to the Police in order to ensure effective action is taken to safeguard other young people as well as the victim.

If a child has suffered significant harm, a referral will be made to Children's Social Care via the MASH in order to ensure that the needs of both the victim and perpetrator are the subject of professional risk assessments by social workers. Similarly, any instance of sexual activity between a child/young person on a Circles Network site will always be referred to Children's Social Care.

Responses to all incidents of both sexual violence and sexual harassment will be underpinned by the principles of:

- zero tolerance of sexual violence and sexual harassment;
- support for both the victim and alleged perpetrator/s, particularly pending the outcome of investigations
- all parties have an ongoing right to an education and are safest if they remain in their given provision subject to appropriate risk assessments and risk management.
- exclusion will be avoided unless that is the only realistic option to keep one or more parties safe.

In principle, there are four possible responses to an allegation or concern about sexual violence or harassment on the part of a child/young person:

#### **1. Manage internally**

In some cases of sexual harassment, e.g., one-off incidents, Circles Network may take the view that the children concerned are not in need of early help or statutory intervention and that it would be appropriate to handle the incident internally, perhaps through utilising the behaviour policy and anti-bullying procedures, speaking to the child/young person and her/his parents, making expectations of future behaviour clear (in writing where appropriate) and by providing pastoral support. Careful consideration will be given to the need to separate the victim and alleged perpetrator/s in activities (as with sexual assaults) pending investigation.

#### **2. Early help**

Circles Network may decide that the child/ren involved do not require statutory interventions but may benefit from early help, which can be particularly useful to address non-violent harmful sexual behaviour and may prevent escalation of sexual violence.

A safeguarding record will be maintained of all concerns, discussions, decisions and reasons for decisions for all responses as in 1. and 2.

## Referrals to Children's Social Care

Where a child has been harmed, is at risk of harm, or is in immediate danger, Circles Network will make a referral to Children's Social Care. All instances of sexual activity between child/young person on Circles Network premises will be referred to Children's Social Care. All instances of sexual violence perpetrated by a child under ten years of age will be referred to Children's Social Care. This will facilitate a consultation about the role of the Police. Whilst the age of criminal responsibility is 10 years, the starting principle of reporting to the Police via the MASH remains. The Police will take a welfare, rather than a criminal justice, approach.

Circles Network will generally inform parents or carers, unless there are compelling reasons not to (i.e., if informing a parent or carer is going to put the child/young person at additional risk or create undue delay). Any such decision should be made with the support of Children's Social Care. Collaborative working will help ensure the best possible package of co-ordinated support is implemented for the victim and, where appropriate, the alleged perpetrator and any other children that require support.

Circles Network, however, will not wait for the outcome (or even the start) of a Children's Social Care investigation before protecting the victim and other children at Circles Network. The DSL (or a deputy) will work closely with Children's Social Care (and other agencies as required) to ensure any actions by Circles Network does not jeopardise a statutory investigation. The risk and needs assessments (described above) will help inform any decision. Consideration of safeguarding the victim, alleged perpetrator, any other children directly involved in the safeguarding report and all children at Circles Network should be **immediate**.

In some cases, Children's Social Care will review the evidence and decide a statutory intervention is not appropriate. Circles Network (generally led by the DSL or a deputy) will refer again if we believe the child remains in immediate danger or at risk of harm. If a statutory assessment is not appropriate, the DSL (or a deputy) will consider other support mechanisms such as early help, specialist support and pastoral support.

## 4. Reporting to the Police

Any report to the Police will generally be in parallel with a referral to Children's Social Care (as above).

Where Circles Network receives a report of rape, assault by penetration or sexual assault, the starting point is this should be passed on to the Police. It is the prerogative of victims and their parents/carers to make direct complaints to the Police. Circles Network will also be very clear with victims and parents/carers that it has a duty to ensure the Police are informed when an alleged crime has been committed in order to safeguard other young people.

Where a serious crime is reported, Circles Network can report directly to the local Police station. In most circumstances however, Circles Network will consult with the MASH in the first instance in order to ensure that both the Police and Children's Social Care are informed.

Where a report has been made to the Police, Circles Network will consult with the Police and agree what information can be disclosed to staff and others, in particular, the alleged perpetrator and their parents or carers. They should also discuss the best way to protect the victim and their anonymity.

In some cases, it may become clear very quickly, that the Police (for whatever reason) will not take further action. In such circumstances, it is important that Circles Network continue to engage with specialist support for the victim as required.

Circles Network will also be informed by the Police or Children's Social Care about referrals made directly to those agencies from other sources (e.g. family members, family friends, parents of other children) in relation to alleged sexual offences or harmful sexual behaviours displayed by child/young person inside and/or outside of Circles Network.

Circles Network is committed to participating in plans both to provide child/young person who are at risk from other children and those child/young people who may present a risk to other children with appropriate services to address any concerns and, wherever possible, to facilitate ongoing access to provision at Circles Network for all children concerned, subject to appropriate risk assessments and risk management plans.

## Subsequent considerations

The needs and wishes of the victim should continue to be paramount (along with protecting the child) as the case progresses. Wherever possible, the victim, if they wish, should be able to continue in their normal routine. Overall, the priority should be to make the victim's daily experience as normal as possible, so that Circles Network is a safe space for them.

Similarly, the alleged perpetrator/s has an ongoing right to an education and should be able to continue in their normal routine subject to the ongoing risk assessment and the needs of the victim.

Where a young person is the subject of bail conditions, Circles Network will work with Children's Social Care and the Police to manage any implications and safeguard all child/young person concerned without jeopardising the Police investigation.

If a young person is convicted or receives a caution for a sexual offence, Circles Network will update its risk assessment, ensure relevant protections are in place for every child/young person and consider any suitable action in light of the behaviour policy. If the perpetrator remains at Circles Network along with the victim, Circles Network will meet with the young person and her/his parents/carers to revisit and reiterate in writing expectations of the perpetrator in terms of future behaviour and complying with any restrictions and arrangements put in place to safeguard the victim and other child/young person.

In the light of possible publicity, speculation and interest within the young person and parent body, Circles Network will consider any other measures necessary to safeguard both the victim and perpetrator, especially from any bullying or harassment (including online).

In respect of a not guilty verdict or a decision not to progress with a criminal prosecution, Circles Network recognises that this will likely be traumatic for the victim and will continue to offer support. The alleged perpetrator is also likely to require ongoing support for what will have likely been a difficult experience.

Support will be tailored on a case-by-case basis. Support can include emotional and practical support for victims from Children and Young People's Independent Sexual Violence Advisors in the specialist sexual violence sector; and/or provision of a designated trusted adult in Circles Network of the child/young person's choice to talk to about their needs. Every effort will be made to avoid isolating the victim, in particular from supportive peer groups, but it is recognised that there may be times when a victim finds it difficult to maintain contact and may express a wish to withdraw from activities. Circles Network will provide a physical space for the victim to withdraw.

Where a criminal investigation into a rape or assault by penetration leads to a conviction or caution, Circles Network will consider any suitable sanctions in light of the behaviour policy, including consideration of permanent exclusion. In all but the most exceptional of circumstances, the rape or assault will constitute a serious breach of discipline and lead to the view that allowing the perpetrator to remain in Circles Network would seriously harm the welfare of the victim (and potentially other children/young person).

Where the perpetrator is going to remain at the Circles Network, the principle would be to continue keeping the victim and perpetrator in separate areas and continue to consider the most appropriate way to manage potential contact on Circles Network premises. The nature of the conviction or caution and wishes of the victim will be especially important in determining how to proceed in such cases.

Circles Network will have a difficult balancing act to consider. On one hand it needs to safeguard the victim (and the wider group) and on the other hand provide the alleged perpetrator with alternative provision, safeguarding support as appropriate and implement any disciplinary sanctions. Support (and sanctions) will be considered on a case-by-case basis. An alleged perpetrator may potentially have unmet needs (in some cases these may be considerable) as well as potentially posing a risk of harm to other children. Harmful sexual behaviours in young children may be (and often are) a symptom of either their own abuse or exposure to abusive practices and or materials. Advice will be taken, as appropriate, from Children's Social Care, specialist sexual violence services and the Police.

If a perpetrator (alleged or convicted) does move to another educational institution (for any reason), Circles Network will make the new educational institution aware of any ongoing support needs and, where

appropriate, potential risks to other children and staff. The DSL will take responsibility to ensure this happens as well as transferring the child protection file.

## Youth produced sexual imagery ('sexting')

Circles Network will act in accordance with advice endorsed by DfE 'Sexting in schools and colleges: responding to incidents and safeguarding young people' (UK Council for Child Internet Safety 2017) - [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/609874/6\\_2939\\_SP\\_NCA\\_Sexting\\_In\\_Schools\\_FINAL\\_Update\\_Jan17.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/609874/6_2939_SP_NCA_Sexting_In_Schools_FINAL_Update_Jan17.pdf)

All incidents of youth produced sexual imagery (YPSI) will be dealt with as safeguarding concerns. The primary concern at all times will be the welfare and protection of the young people involved.

Young people who share sexual imagery of themselves or their peers are breaking the law. As highlighted in national guidance however, it is important to avoid criminalising young people unnecessarily. Circles Network will therefore work in partnership with external agencies with a view to responding proportionately to the circumstances of any incident.

All incidents of YPSI should be reported to the DSL as with all other safeguarding issues and concerns. Staff will not make their own judgements about whether an issue relating to YPSI serious enough to warrant a report to the DSL. What may seem like less serious concerns to individual members of staff may be more significant when considered in the light of other information known to the DSL, which the member of staff may not be aware of.

If staff become concerned about a YPSI issue in relation to a device in the possession of a child/young person (e.g. mobile phone, tablet, digital camera), the member of staff will secure the device (i.e. it should be confiscated). This is consistent with DfE advice *Searching, Screening and Confiscation - Advice for headteachers, school staff and governing bodies (DfE 2018)*, page 11 'After the search'.

Staff will not look at or print any indecent images. The confiscated device will be passed immediately to the DSL (see 'Viewing the imagery' below).

The DSL will discuss the concerns with appropriate staff and speak to young people involved as appropriate. Parents/carers will be informed at an early stage and involved in the process unless there is good reason to believe that involving parents would put the young person at risk of harm.

If, at any point in the process, there is concern that a young person has been harmed or is at risk of harm a referral will be made to Children's Social Care and/or the Police via the MASH immediately.

The Police will always be informed when there is reason to believe that indecent images involve sexual acts and any child in the imagery is under 13 years of age.

The DSL will make a judgement about whether a reported YPSI incident is 'experimental' as in section 12 above or 'aggravated'.

Aggravated incidents involve criminal or abusive elements beyond the creation, sending or possession of sexual images created by young people. These include possible adult involvement; criminal or abusive behaviour by young people such as sexual abuse, extortion or threats; malicious conduct arising from personal conflicts; coercion; an imbalance of power, e.g. an older student pressurising a younger or vulnerable student to create and share an indecent image; or creation or sending or showing of images without the knowledge or against the will of a young person who is pictured.

Aggravated incidents of sexting will usually be referred to Multi-Agency Safeguarding Hub (MASH) for advice about whether or not a response by the Police and/or Children's Social Care is required. This will facilitate consideration of whether:

- there are any offences that warrant a Police investigation
- child protection procedures need to be invoked
- parents/carers require support in order to safeguard their children
- a Multi-Agency Child Exploitation (MACE) meeting is required

- any of the perpetrators and/or victims require additional support. This may require the initiation of a CAF and the offer of early help services

Examples of aggravated incidents include:

- evidence of adult involvement in acquiring, creating or disseminating indecent images of young people (possibly by an adult pretending to be a young person known to the victim)
- evidence of coercing, intimidating, bullying, threatening and/or extortion of students by one or more other students to create and share indecent images of themselves
- pressure applied to several child/young person(s) (e.g., all females in a class or year group) to create and share indecent images of themselves
- pressurising a child/young person who does not have the capacity to consent (e.g., due to their age, level of understanding or special educational needs) or with additional vulnerability to create and share indecent images of themselves
- dissemination of indecent images of young people to a significant number of others with an intention to cause harm or distress (possibly as an act of so-called 'revenge porn', bullying or exploitation)
- what is known about the imagery suggests the content depicts sexual acts which are unusual for the young person's developmental stage or are violent
- sharing of indecent images places a young person is at immediate risk of harm, for example the young person is presenting as suicidal or self-harming

The DSL will make a judgement about whether or not a situation in which indecent images have been shared with a small number of others in a known friendship group with no previous concerns constitutes an aggravated incident; or whether Circles Network is able to contain the situation in partnership with all parents of the young people involved, arrange for the parents to ensure that all indecent images are deleted and that the young people involved learn from the incident in order to keep themselves safe in the future.

In the latter instance, the DSL will usually consult with the Police and/or Children's Social Care through the MASH to check that no other relevant information is held by those agencies and to ensure an agreed response is documented before proceeding.

**Viewing the imagery** - adults should **not** view youth produced sexual imagery unless there is good and clear reason to do so. Wherever possible, the DSL's responses to incidents will be based on what they have been told about the content of the imagery.

Any decision to view imagery will be based on the DSL's professional judgement. Imagery will never be viewed if the act of viewing will cause significant distress or harm to a child or young person.

If a decision is made to view potentially indecent images, the DSL will be satisfied that viewing:

- is the only way to make a decision about whether to involve other agencies (i.e., it is not possible to establish the facts from the young people involved)
- is necessary to report the image to a website, app or suitable reporting agency to have it taken down, or to support the young person or parent in making a report
- is unavoidable because a young person has presented an image directly to a staff member or the imagery has been found on a Circles Network device or network

If it is necessary to view the imagery then the DSL will:

- discuss and agree the decision to do so beforehand with the CEO, Children's Social Care or the MASH Lead
- ensure viewing is undertaken by the DSL or Deputy DSL with delegated authority from the CEO
- ensure viewing takes place with another member of staff present in the room, ideally the CEO, another DSL or a member of the senior leadership team. The other staff member does not need to view the images
- wherever possible ensure viewing takes place on Circles Network premises, ideally in the CEO or DSL's office ensure wherever possible that images are viewed by a staff member of the same sex as the young



- person in the imagery
- record the viewing of the imagery in the child/young person's safeguarding record, including who was present, why the image was viewed and any subsequent actions; and ensure this is signed and dated and meets the wider standards set out by Ofsted for recording safeguarding incidents

**Deletion of images** - if Circles Network has decided that other agencies do not need to be involved, then consideration will be given to deleting imagery from devices and online services to limit any further sharing of the imagery.

## 25. Serious violence

All staff are made aware of the indicators that children are at risk from or are involved with serious violent crime; and are trained to record and report any concern about children at risk of or involved in perpetrating serious violence as with any other safeguarding concern. Indicators may include increased absence, a change in friendships or relationships with older individuals or groups, a significant decline in performance, signs of self-harm or a significant change in wellbeing, or signs of assault or unexplained injuries. Unexplained gifts could also indicate that children have been approached by or are involved with individuals associated with criminal gangs and criminal exploitation.

## 26. Contextual safeguarding

Safeguarding incidents or behaviours can be associated with factors outside children's home environments; and can occur between children outside the realm of Circles Network. The DSL, deputy DSLs and all staff will consider the context within which such incidents or behaviours occur. Contextual safeguarding means that assessments of children should consider wider environmental factors present in a child's life that are a threat to their safety and welfare. Staff will listen to children and be vigilant about any signs or indicators that would suggest children may be at risk in the community and will share intelligence with the Police in order to prevent children suffering harm. Circles Network will provide as much information as possible when asked to do so as part of a police investigation and when making referrals to Children's Social Care, thus allowing any investigation or assessment to consider all the available evidence and the full context of any abuse.

## 27. Child sexual exploitation and child criminal exploitation

**Child sexual exploitation (CSE)** is a form of child sexual abuse. **Child criminal exploitation (CCE)** is a form of child abuse. Both occur 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 and/or criminal 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; or
- (c) through violence or the threat of violence.

The victim may have been sexually and criminally exploited even if the sexual/criminal activity appears consensual. CSE and CCE do not always involve physical contact; they can also occur through the use of technology.

CSE and CCE can affect any child or young person, female or male, under the age of 18 years, including 16 and 17-year olds who can legally give consent to have sex.

Sexual exploitation can include both contact (penetrative and non-penetrative acts) and non-contact sexual activity and may occur without the child or young person's immediate knowledge (e.g., through others copying videos or images they may have created and posted on social media).

CSE is a serious crime and can have a long-lasting adverse impact on a child's physical and emotional health.

It may also be linked to other criminal activity including trafficking and illegal drugs. Drug networks or gangs

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groom and exploit children and young people to carry drugs and money from urban areas to suburban and rural areas, market and seaside towns.

Criminal exploitation of children can involve force and/or enticement-based methods of compliance and is often accompanied by violence or threats of violence. It can be perpetrated by individuals or groups; males or females; and young people or adults. It is typified by some form of power imbalance in favour of those perpetrating the exploitation. As well as age, the power imbalance can also be due to other factors including gender, cognitive ability, physical strength, status and access to economic or other resources.

Children and young people are often unwittingly drawn into sexual and/or criminal exploitation through the offer of friendship and care, gifts, drugs, alcohol and sometimes accommodation.

Child criminal exploitation may include activities such as:

- a child travelling outside the area in which she/he lives in order to transport, distribute or sell drugs or money for others by whom they are being exploited. This form of criminal activity and exploitation is referred to as **county lines** (see below);
- a child committing crimes on behalf of or at the behest of others because they, their friends or relatives have been threatened, deceived or manipulated;
- a child being forced to shoplift or pickpocket;
- a child being forced to threaten other young people;
- a child being forced to work in a cannabis factory;
- a child being forced to commit crime in order to settle actual or fabricated debts;
- gang membership, which may lead to the child being exploited to do something illegal or dangerous in return for kudos/status in the gang;
- a child being encouraged or manipulated to commit crime via social media;
- a child receiving food, money, kudos or status in return for storing a weapon or drugs for others.

All staff are trained to be vigilant about and report indicators of CSE and CCE including:

- children appearing with money, clothes, mobile phones, etc. without plausible explanation;
- children who associate with other young people involved in exploitation;
- children in relationships with controlling or significantly older individuals or groups;
- children frequenting areas known for sex work and/or criminal activity;
- children who associate with gangs and/or become isolated from their peers/social networks;
- children receiving excessive texts/phone calls;
- multiple callers (unknown adults or peers) to children;
- concerning use of internet or other social media by children;
- increasing secretiveness around children's behaviours;
- children presenting inappropriate sexualised behaviour for their age and/or with sexually transmitted infections and/or becoming pregnant;
- children self-harming or presenting with significant changes in their emotional well-being;
- children who misuse drugs and alcohol;
- children who go missing for periods of time or regularly come home late;
- children who regularly miss school or education, have unexplained absences or do not take part in education;
- children being exposed to or perpetrating serious levels of violence; and/or being manipulated or forced into excessive violence towards others by somebody who is exploiting them (for further information see [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/418131/Preventing\\_youth\\_violence\\_and\\_gang\\_involvement\\_v3\\_March2015.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/418131/Preventing_youth_violence_and_gang_involvement_v3_March2015.pdf));
- evidence of/suspicions of children suffering physical or sexual assault.

Although the following vulnerabilities increase the risk of child sexual and/or criminal exploitation, not all children with these indicators will be exploited and child sexual and criminal exploitation can occur without any of these issues:

- having a prior experience of neglect, physical and/or sexual abuse;
- lack of a safe/stable home environment, now or in the past (domestic violence or parental substance misuse, mental health issues or criminality, for example);
- recent bereavement or loss;
- social isolation or social difficulties;

- absence of a safe environment to explore sexuality;
- economic vulnerability;
- homelessness or insecure accommodation status;
- connections with other children and young people who are being sexually and/or criminally exploited;
- family members or other connections involved in adult sex work and/or other criminal activity;
- having a physical or learning disability;
- being looked after (particularly those in residential care and those with interrupted care histories);
- issues/anxieties about sexual identity.

All staff are trained to report all concerns about CSE and CCE to the DSL immediately. The DSL will consider the need to make a referral to Children's Social Care via the MASH (see sections 27 and 28 above) as with any other child protection concern. Parents will be consulted and notified as above providing this would not cause any further risk or harm.

Circles Network will attend and share information at MACE meetings as required. Parents and young people will be invited to attend MACE meetings by Children's Social Care as appropriate.

## County Lines

County lines is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs (primarily crack cocaine and heroin) into one or more importing areas [within the UK], using dedicated mobile phone lines or other forms of "deal line".

Exploitation is an integral part of the county lines offending model with children and vulnerable adults exploited to move [and store] drugs and money. Offenders will often use coercion, intimidation, violence (including sexual violence) and weapons to ensure compliance of victims.

Children can easily become trapped by this type of exploitation as county lines gangs create drug debts and can threaten serious violence and kidnap towards victims (and their families) if they attempt to leave the county lines network.

For further information see:

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/741194/HOCountyLinesGuidanceSept2018.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/741194/HOCountyLinesGuidanceSept2018.pdf).

## 28. So-called 'honour based' abuse

So-called 'honour-based' abuse (HBA) encompasses crimes which have been committed to protect or defend the honour of a family and/or community. Such crimes include Female Genital Mutilation (FGM), forced marriage, and practices such as breast ironing. Abuse committed in the context of preserving 'honour' often involves a wider network of family or community pressure and can include multiple perpetrators. It is important to be aware of this dynamic and additional risk factors when deciding what form of safeguarding action to take.

Staff will be alert to the possibility of a child being at risk of HBA or already having suffered HBA.

All forms of so-called HBA are abuse (regardless of the motivation) and staff will record and report any concerns about a child who might be at risk of HBA to the Designated Safeguarding Lead as with any other safeguarding concern. The DSL will consider the need to make a referral to the Police and/or Children's Social Care as with any other child protection concern; and may also contact the Forced Marriage Unit on 020 7008 0151 or via email at [fmufco.gov.uk](mailto:fmufco.gov.uk) for advice as necessary.

## Female genital mutilation

Female genital mutilation (FGM) is a form of child abuse. It is the collective name given to a range of procedures involving the partial or total removal of the external female genitalia for non-medical reasons or other injury to the female genital organs. It has no health benefits and harms girls and women in many ways. The practice, which is most commonly carried out without anaesthetic, can cause intense pain and

distress with long-lasting harmful consequences, including difficulties in childbirth.

FGM is carried out on girls of any age, from young babies to older teenagers and adult women, so school staff are trained to be aware of risk indicators. Many such procedures are carried out abroad and staff will need to be particularly alert to suspicions or concerns expressed by females about going on a long holiday during the summer vacation period.

In England, Wales and Northern Ireland, the practice is illegal under the Female Genital Mutilation Act 2003. Any person found guilty of an offence under the Female Genital Mutilation Act 2003 is liable to a maximum penalty of 14 years imprisonment or a fine, or both.

(See <https://www.gov.uk/government/publications/female-genital-mutilation-guidelines> for further information).

If staff have a concern that a girl may be at risk of FGM, they will record their concern and inform the DSL as they would any other safeguarding concern. The DSL will discuss the concern with Children's Social Care with a view to making a referral and will inform the Police as appropriate.

Indications that FGM may already have taken place may include a child:

- having difficulty or looking uncomfortable when walking, sitting or standing;
- spending longer than normal in the bathroom or toilet due to difficulties urinating;
- having frequent urinary, menstrual or stomach problems;
- having prolonged or repeated absences, especially with noticeable behaviour changes (e.g. withdrawal or depression) on the girl's return;
- being reluctant to undergo normal medical examinations;
- confiding in a member of staff without being explicit about the problem due to embarrassment or fear;
- talking about pain or discomfort between her legs.

Staff are subject to a statutory duty defined by Section 5B of the Female Genital Mutilation Act 2003 (as inserted by section 74 of the Serious Crime Act 2015) to report to the Police personally where they discover (e.g., by means of a disclosure) that an act of FGM appears to have been carried out on a girl who is aged under 18. This is known as mandatory reporting. Information on when and how to make a report can be found at: <https://www.gov.uk/government/publications/mandatory-reporting-of-female-genital-mutilation-procedural-information>.

Staff in that situation will record their concerns and inform the DSL, who will support the staff member in making a direct report to the Police. A referral will also be made to Children's Social Care.

## **Forced Marriage**

A forced marriage is a marriage in which a female (and sometimes a male) does not consent to the marriage but is coerced into it. Coercion may include physical, psychological, financial, sexual and emotional pressure. It may also involve physical or sexual violence and abuse.

A forced marriage is not the same as an arranged marriage. In an arranged marriage, which is common in several cultures, the families of both spouses take a leading role in arranging the marriage but the choice of whether or not to accept the arrangement remains with the prospective spouses.

In a forced marriage situation, children may be married at a very young age, and well below the age of consent in England. Staff will be particularly alert to suspicions or concerns raised by a pupil about being taken abroad and not being allowed to return to England.

Since June 2014 forcing someone to marry has become a criminal offence in England and Wales under s.121 of the Anti-Social Behaviour, Crime and Policing Act 2014 – see <https://www.gov.uk/forced-marriage> for further information).

## 29. Protecting Children from Radicalisation and Extremism

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

Some children are vulnerable to extremist ideology and radicalisation. Protecting children from the risk of radicalisation is part of the Circles Network's wider safeguarding duties and is similar in nature to protecting children from other forms of harm and abuse. As such, the Designated Safeguarding Lead is responsible for the organisation's strategy for protecting children from those risks.

Radicalisation refers to the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups. Extremism is the vocal or active opposition to fundamental values, including the rule of law, individual liberty and the mutual respect and tolerance of different faiths and beliefs. This also includes calling for the death of members of the armed forces. Even very young children have been exposed, in rare circumstances, to extremism at home and elsewhere, including online.

As children get older, they look for adventure and excitement and they may start to ask questions about their identity and belonging. During that stage of their development, they are vulnerable to extremist groups that may claim to offer answers, identity and a social network apparently providing a sense of belonging. Many of those extremist groups make sophisticated use of the internet and social media to target young people and spread their ideology, making young people more vulnerable to being influenced by extremist ideas. Young people who feel isolated or disaffected in some way are particularly vulnerable to radicalisation, as they are too, other forms of abuse and exploitation.

Circles Network has defined responsibilities to ensure that children are safe from terrorist and extremist material when accessing the internet at Circles Network.

During the process of radicalisation, it is possible to intervene to prevent vulnerable people being radicalised. Circles Network is committed to preventing children/young people from being radicalised and drawn into any form of extremism or terrorism. Circles Network promotes the values of democracy, the rule of law, individual liberty, mutual respect and tolerance of those with different faiths and beliefs by providing children/young people with opportunities to discuss issues of religion, ethnicity and culture and learn how to discuss and debate points of view; and by ensuring that all children/young people are valued and listened to within Circles Network.

Circles Network staff receive training that provides them with both the information they need to understand the risks affecting children and young people in this area; and a specific understanding of how to identify individual children who may be at risk of radicalisation and how to support them. Staff are trained to report all concerns about possible radicalisation and extremism to the DSL immediately as they would any other safeguarding concern, identifying early indicators of possible radicalisation including changes in behaviour and attitudes to learning; and expressions of interest in extremist ideas along with a tolerance towards potential violence to certain members of society.

Circles Network recognises the importance of providing a safe space for children to discuss controversial issues; and building their resilience and the critical thinking skills they need in order to challenge extremist perspectives. The DSL (or deputy), however, will make appropriate referrals to the Police PREVENT team and Channel programme in respect of any child/young person whose behaviour or comments suggest that they are vulnerable to being radicalised and drawn into extremism and terrorism in order to ensure that children receive appropriate support.

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

As a Channel partner, Circles Network may be asked to attend a Channel panel to discuss the individual referred and determine whether they are vulnerable to being drawn into terrorism and consider the appropriate support.

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Circles Network will discuss any concerns about possible radicalisation identified at Circles Network with a child/young person's parents/carers as with any other safeguarding or child protection issue unless there is reason to believe that doing so would place the child at risk; and will also support parents/carers who raise concerns about their children being vulnerable to radicalisation. Subject to consultation with the Police PREVENT team and in the interests of making proportionate responses, Circles Network may offer support to children and their families through the provision of early help as appropriate.

Circles Network expects all staff, volunteers, trustees, visiting practitioners, contractors and individuals or agencies that frequent the premises to behave in accordance with the Circles Networks code of conduct, will challenge the expression and/or promotion of extremist views and ideas by any adult on the premises or at Circles Network events and, when necessary, will make appropriate referrals in respect of any such adult.

Parents and staff may find the website [www.educateagainsthate.com](http://www.educateagainsthate.com) informative and useful. The website is designed to equip leaders, staff and parents with the information, tools and resources they need to recognise and address extremism and radicalisation in young people and how best to support them. The website provides information on training resources for, staff and senior management leaders.

As part of the Circles Network's overall safeguarding arrangements and ongoing action plan for improvement, the DSL will consider identified local issues; intelligence from children/young people, parents, staff and partner agencies; and new information from national issues and learning to review practice and procedures in order to keep children /young people safe.

### **30. Children who are looked after, were previously looked after or who have a social worker**

The most common reason for children becoming looked after is as a result of abuse or neglect. Children who were previously looked after potentially remain vulnerable. Circles Network ensures that staff have the necessary skills and understanding to keep children who are looked after, and children who were previously looked after, safe and ensures that appropriate staff have information about a child's looked after status and care arrangements, including the level of authority delegated to the carer by the authority looking after the child. The designated member of staff for children who are looked after, and previously looked after, and the DSL hold details of the social workers for all children who are looked after or were previously looked after; and the name and contact details of the Local Authority's virtual head for children who are looked after.

#### **Children with a social worker**

Circles Network recognises that when a child has a social worker, that is an indicator that she/he may be more vulnerable to harm than other children as well as facing barriers to educational attainment in relation to attendance, learning, behaviour and poor mental health issues.

Circles Network will take those issues and needs into account when making plans to support children who have a social worker.

#### **Care leavers**

Local authorities have ongoing responsibilities to young people who cease to be looked after and become care leavers. That includes keeping in touch with them, preparing an assessment of their needs and appointing a Personal Advisor who develops a pathway plan with the young person. This plan describes how the local authority will support the care leaver to participate in education or training. The DSL will have details of the local authority Personal Advisor appointed to guide and support all care leavers; and should liaise with them as necessary regarding any issues of concern affecting a care leaver.

### **31. Private fostering arrangements**

A private fostering arrangement is one that is made privately (without the involvement of a local authority) for the care of a child under the age of 16 years (*under 18 if the child has a disability*) by someone other

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than a parent or close relative\*, in their own home, with the intention that it should last for 28 days or more. Children looked after by the local authority or who are placed in a residential school, children's home or hospital are not considered to be privately fostered.

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

On admission to Circles Network, we will take steps to verify who has parental responsibility for the child and the relationship of the adults accompanying the child who is being registered.

Private fostering occurs in all cultures including British culture and a private fostering arrangement may start at any age.

Whilst most privately fostered children are appropriately supported, looked after and remain safe and well, they are a potentially vulnerable group who should be monitored by the local authority, particularly when the child has come from another country. In some cases, privately fostered children are affected by abuse and neglect; have been trafficked; are sexually or criminally exploited; or suffer modern-day slavery.

Parents and private foster carers both have a legal duty to inform Children's Social Care in the relevant local authority at least six weeks before the arrangement is due to start. Not to do so is a criminal offence.

Circles Network has a mandatory duty to report to Children's Social Care in the local authority where they are aware or suspect that a child is subject to a private fostering arrangement.

Circles Network staff should notify the designated safeguarding lead when they become aware of or suspect private fostering arrangements. The designated safeguarding lead will speak to the family of the child involved to check that they are aware of their duty to inform the Local Authority. Circles Network will also fulfil its duty to inform the local authority of the private fostering arrangement.

## 32. Domestic abuse

Domestic abuse is defined as any incident or pattern of incidents of controlling, coercive, threatening behaviour, violence or abuse between those aged 16 or over who are, or have been, intimate partners or family members regardless of gender or sexuality. The abuse can encompass, but is not limited to:

- psychological;
- physical;
- sexual;
- financial; and
- emotional abuse.

All children can witness and be adversely affected by domestic abuse in the context of their home life where domestic abuse occurs between family members.

Exposure to domestic abuse and/or violence can have a serious, long lasting emotional and psychological impact on children. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result. Domestic abuse affecting young people can also occur within their personal relationships, as well as in the context of their home life.

All concerns about children being affected by domestic abuse will be reported to the DSL as with any other safeguarding concern. The DSL will respond to the report by consulting Children's Social Care in order to establish whether a referral is required or the situation should be managed by discussion with parents/carers and possibly the offer of early help.

## 33. Homelessness

Being homeless or being at risk of becoming homeless presents a real risk to a child's welfare. The DSL (and any deputies) will refer any concerns to the *Local Housing Authority* so they can raise/progress concerns at the earliest opportunity. Indicators that a family may be at risk of homelessness include household debt,

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rent arrears, domestic abuse and anti-social behaviour, as well as the family being asked to leave a property. Whilst referrals and/or discussion with the Local Housing Authority should be progressed as appropriate, this does not, and should not, replace a referral into Children's Social Care where a child has been harmed or is at risk of harm.

In most cases staff will be considering homelessness in the context of children who live with their families, and intervention will be on that basis. It should also however, be recognised that in some cases 16- and 17-year-olds could be living independently from their parents or guardians, for example through their exclusion from the family home, and will require a different level of intervention and support. Children's services will be the lead agency for these young people and the DSL (or a deputy) will ensure appropriate referrals are made based on the child's circumstances.

## **34. Special Circumstances**

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

Approximately 200,000 children have a parent sent to prison each year. These children are at risk of poor outcomes including poverty, stigma, isolation and poor mental health. The Circles Network will seek to support child/young person in this position through pastoral care, early help and discussions with parents/carers and other family members as appropriate.

## **35. Related safeguarding portfolio policies**

- Code of Conduct
- Physical intervention and the use of reasonable force
- Behaviour
- Personal and intimate care
- Complaints procedure
- Tackling bullying including prejudice-based bullying
- Physical contact
- Whistleblowing
- SEN
- Missing children
- Safer recruitment and selection
- Managing allegations
- Grievance and disciplinary

## Child Protection and Safeguarding

**'Under the Education Act 2002 (Section 175 for maintained schools/Section 157 for academies/free/independent schools), schools must make arrangements to safeguard and promote the welfare of children.** Parents/carers should know that the law (Children Act 1989) requires all Circles Network staff to pass on information which gives rise to a concern about a child's welfare, including risk from neglect, physical, emotional or sexual abuse. Staff will seek, in general, to discuss any concerns with the parent/carer and discuss the need to make a referral to Children's Social Care if that is considered necessary. **This will only be done where such discussion will not place the child at increased risk of significant harm or cause undue delay.** Circles Network will seek advice from Children's Social Care when they have reasonable cause to suspect a child may be suffering or likely to suffer significant harm. Occasionally, concerns are passed on which are later found to be unfounded. Parents/carers will appreciate that the school's Designated Safeguarding Lead carries out their responsibilities in accordance with the law and acts in the best interests of all children.'

## Standards for Effective Child Protection Practice

Circles Network child protection and safeguarding responsibilities are adhered to under the 'Leadership and Management' judgement in Ofsted inspections. The following standards assist Circles Network in evaluating our practice. The best practice guidance is used jointly by the Designated Safeguarding Lead and the Designated Trustee for Safeguarding to ensure Circles Network is effective in safeguarding and child protection matters.

In best practice, Circles Network:

1. Has an ethos in which children feel secure, their viewpoints are valued and they are encouraged to talk and are listened to;
2. Provides suitable support and guidance so that children/young people have a range of appropriate adults to whom they can turn if they are worried or in difficulties;
3. Works with parents to build an understanding of Circles Network's responsibilities to safeguard and promote the welfare of all children and a recognition that this may occasionally require children to be referred to investigative agencies as a constructive and helpful measure;
4. Ensures all staff are able to identify children who may benefit from early help; provide co-ordinated offers of early help; and ensure that children/young people receive the right help at the right time to address concerns and risks and prevent issues escalating;
5. Is vigilant in cases of suspected child abuse, recognising the signs and symptoms, have clear procedures whereby all members of staff report such cases to the Designated Safeguarding Lead or – in her/his absence – the deputy Designated Safeguarding Lead, and are aware of Local Authority and Safeguarding procedures so that information is passed on effectively to the relevant professionals;
6. Monitors children who have been identified as in need of early help or at risk; maintains clear records of child/young persons' progress and welfare *in a secure place*; maintains sound policies on confidentiality; provides appropriate information to other professionals; and submits reports to and attend child protection conferences;
7. Provides and supports regular child protection training and updates for **all** staff and ensures that Designated Safeguarding Leads attend refresher training every two years to ensure their skills and expertise are up to date; and ensures that targeted funding for this work is used solely for this purpose;
8. Contributes to an inter-agency approach to safeguarding and child protection by developing effective and supportive liaison with other agencies;
9. Uses activities to teach children about safeguarding and raise their awareness and build confidence so that children/young people have a range of contacts and strategies to identify risk, know who they can talk to about anything causes them concern and understand the importance of protecting others;
10. Provides clear policy statements for parents, staff and children and young people on this and on both positive behaviour policies and Circles Network's approach to bullying;
11. Has a clear understanding of the various types of bullying and peer on peer abuse – face to face, online, physical, verbal, sexual, prejudice based and indirect - and act promptly and firmly to combat it, making sure that children/young people are aware of Circles Network's position on this issue and who they can contact for support;
12. Has a clear understanding of the signs and impact of racist, disability, homophobic, transphobic and teenage relationship abuse; and has a clear commitment to identifying and challenging those forms of abuse in order to safeguard children and maintain the safeguarding culture of Circles Network
13. Takes particular care that children/young people with SEN, disabilities and/or mental health difficulties in mainstream and special schools, who may be especially vulnerable to abuse, are supported effectively with particular attention paid to ensuring that those with communication difficulties are enabled to express themselves to a member of staff with appropriate communication skills;



14. Has a clear policy about the handling of allegations of abuse by members of staff, ensuring that all staff are fully aware of the procedures and that they are followed correctly at all times, using the guidance set out in *Keeping Children Safe in Education 2020* and Safeguarding inter-agency child protection procedures;
15. Has a written safeguarding policy, which is produced, owned and regularly reviewed by all staff, taking into account the views of trustees, and which clearly outlines the Circles Network's position and positive action in respect of the aforementioned standards;
16. Ensures that specified information is passed on in a timely manner to the Local Authority.
17. Has a Single Central Record in place that fully complies with the guidance in *Keeping Children Safe in Education 2020*.

## Reference Documents

Keeping Children Safe in Education (DfE 2020)

Working Together to Safeguard Children (DfE 2018)

Warwickshire Safeguarding (WS) inter-agency safeguarding procedures -

<https://www.safeguardingwarwickshire.co.uk/safeguarding-children/i-work-with-children-and-young-people/interagency-safeguarding-procedures>

Child Protection Record Keeping Guidance (WCC Education Safeguarding Service)

What to do if You're Worried a Child is being Abused 2015 - Advice for Practitioners (HMG 2015)

Children missing education - Statutory guidance for local authorities (DfE 2016)

Sexting in schools and colleges: responding to incidents and safeguarding young people (UK Council for Child Internet Safety 2017)

## Further Information, Advice and Support

For advice and support about any safeguarding matter, please contact:

Your local MASH Lead via telephone or email

## Integrated Safeguarding Training

For information about a range of integrated safeguarding training courses, please contact:

Marina Kitchen

[marinakitchen@warwickshire.gov.uk](mailto:marinakitchen@warwickshire.gov.uk)

Sophie Morley (Training Administrator)

01926 742601

or via Email - [sophiemorley@warwickshire.gov.uk](mailto:sophiemorley@warwickshire.gov.uk)

Linda Fenn (Team Administrator)

01926 742525

or via Email - [lindafenn@warwickshire.gov.uk](mailto:lindafenn@warwickshire.gov.uk)

## Safeguarding children during Coronavirus (COVID-19)

### Context

This appendix is based on DfE advice published in July 2020 'Guidance for full opening: schools':

<https://www.gov.uk/government/publications/actions-for-schools-during-the-coronavirus-outbreak/guidance-for-full-opening-schools>.

For safeguarding purposes, the above guidance refers back to earlier guidance 'Coronavirus (COVID-19): safeguarding in schools, colleges and other providers', even though such guidance was withdrawn on 31/07/2020:

<https://www.gov.uk/government/publications/covid-19-safeguarding-in-schools-colleges-and-other-providers/coronavirus-covid-19-safeguarding-in-schools-colleges-and-other-providers>

It was expected that, with the exception of children with specific health vulnerabilities, all children will return to school from January 2021. This appendix addresses how Circles Network will apply the safeguarding and child protection policy in order to safeguard children/young people including a minority of children who may remain at, and access activities, from home.

### Supporting children, staff training and reporting concerns

All staff and volunteers continue to have a responsibility for safeguarding children and will report any safeguarding concerns about children to a DSL in the normal way as set out in the main policy.

Staff should have access to the normal safeguarding recording format (e.g., green forms) when working off site including when working from home.

Staff and volunteers are reminded of the need to report any concern immediately and without delay.

In the unlikely event that a member of staff cannot access the normal safeguarding recording format (green forms,) remotely, they will contact the DSL via Email (cc CEO) to inform them that they need to share a concern. This will ensure that the concern is received.

The DSL will communicate any new or revised safeguarding advice, guidance, requirements, arrangements or information in writing to all staff and volunteers. The DSL and Deputy DSLs will provide training and support to staff to ensure vigilance about, sensitive and supportive responses to, and appropriate recording and reporting of any safeguarding and welfare concerns arising from children's experiences in connection with COVID-19 lockdown restrictions and extended absence from school. The DSL will evaluate all concerns and reports in the normal way, ensuring that children are offered requisite support, early help is provided and/or referrals made to Children's Social Care and other agencies as appropriate.

Circles Network recognises that it is ordinarily a protective factor for children and young people and that the extraordinary circumstances created by the COVID-19 virus may well affect the mental health of some children/young people and/or their parents/carers. All staff will maintain an awareness of those issues in communications with children/young people

In addition to all of the other safeguarding issues and risks as set out in this policy, staff will also be mindful of the increased likelihood that some children/young people will have experienced one or more of the following as a result of the COVID-19 situation and the restrictions imposed on children and their families by the lockdown arrangements:

- neglect as a result of lost/reduced income and diminished circumstances;
- domestic abuse/parental mental ill health/parental drug and/or alcohol abuse as a result of parental anxiety, loss of employment/income, frustration, not coping with increased contact with children, boredom.

- higher likelihood of online bullying, abuse and/or grooming for sexual abuse, sexual and criminal exploitation or radicalization as a result of spending more time online;
- physical and emotional abuse as a result of parents not coping, becoming very low or bad-tempered;
- greater risk of all forms of 'hidden' abuse including sexual abuse, emotional abuse, witnessing or being caught up in domestic abuse as a result of families spending more time together without children being able to access other protective adults, recreational activities or go outside.

**NB** the above is not an exhaustive list. Circles Network will write to all parents/carers with a request for them to inform Circles Network about any change in the child's circumstances, incident, or development during the time the child has not been attending Circles Network due to COVID-19 that may affect the child's presentation or that Circles Network needs to be aware of in order to safeguard and promote the child's welfare.

Where a member of staff is concerned about the behaviour of an adult working with children, they should inform the CEO as normal. If the notification needs to be made when the reporting individual is offsite, this should be done verbally and followed up with an email to the CEO on the same working day.

As normal, any concerns about the CEO should be reported to the board of trustees

## Vulnerable children

From 5<sup>th</sup> January 2021 the government asked schools/provisions to remain open for children of workers critical to the COVID-19 response and children defined as vulnerable as follows:

- Children who have a social worker, including children who have a child protection plan; those who are looked after by the local authority; and those assessed as being in need or who otherwise meet the definition in section 17 of the Children Act 1989.
- Children and young people up to the age of 25 with education, health and care (EHC) plans.
- Other children who the Designated Safeguarding Lead considers to be vulnerable, including those children who may be in receipt of early help; were previously the subject of child protection or child in need plans; were previously looked after; or whose situation and wellbeing at home may become unsafe or insecure if they do not attend school.

Circles Network will maintain an up-to-date database of all children/young people who are considered vulnerable as above. The database will contain the names and contact details of the child/young person's parents/carers; other significant family members; social workers; family support workers; and any other key professionals including health professionals and youth justice workers. The database will be accessible to the designated safeguarding lead (DSL) and all deputy designated safeguarding leads.

Circles Network will assess and continually re-assess the level of vulnerability of each child/young person on the database using the RAG rating format as below. This will support the DSL to identify the level of contact Circles Network needs to maintain with any child not able to attend school.

The RAG rating criteria are:

Red - most at risk of harm or neglect (will include all children subject to a child protection plan; and all children who are looked after);

Amber - a moderate risk of harm, but with some protective factors (will include those with a Child in Need plan and/or those being supported by a social worker or family support worker who are not subject of a child protection plan or looked after);

Green - some concerns or unmet needs; or have been red or amber and need monitoring.

Every child on the vulnerable children database will be allocated to a named DSL who will be responsible for ensuring that the identified level of support and contact is provided.

DSLs will record all contacts and outcomes with vulnerable children and their families in the usual way so that those records are visible to colleague DSLs and can be reviewed in regular DSL meetings.

## Supporting children not in school/attending alternative provision

Any child on Circles Network's database of vulnerable children who cannot attend the provision due to a risk to their own health or the health of another member of their household; or whose parents/ carers are unwilling to send them to Circles Network will have an identified plan of support that will be overseen by a named DSL and recorded on the child's safeguarding file.

The plan will include regular communication with the child/young person's named social worker or family support worker where there is one. A record of all communications\* with the child/young persons, parents/carers and practitioners in partner agencies will be made on the child/young person's safeguarding file (\*including telephone calls, emails, other online communication, video conversations and virtual meetings).

Circles Network will work closely with all stakeholders to maximise the effectiveness of any communication plan in order to safeguard the child.

This plan must be reviewed regularly (at least once per week) by the allocated DSL in discussion with at least one other member of the DSL team, using regular/planned DSL team meetings as appropriate.

## Supporting children attending alternative provision

Circles Network will continue to be a safe space for all children/young people who attend during the COVID-19 virus, subject to individual risk assessments as appropriate. During any periods of partial closure, the CEO will ensure that appropriate numbers of staff are on site and that staff to child/young person ratio numbers are appropriate.

Circles Network will ensure that government guidance for education and childcare settings in respect of social distancing and advice from Public Health England in respect of handwashing and other protective measures to limit the risk of spreading COVID19 is followed regularly and robustly.

All children attending Circles Network will be provided with appropriate emotional support, bespoke to their needs, assessed vulnerability and circumstances.

Where Circles Network has concerns about the availability of critical staff to work at Circles Network those concerns will be raised with the Local Authority without delay.

## Home visits

Any home visit must be risk assessed. If it is agreed that a home visit is necessary, it should be undertaken by two members of staff.

If they are undertaken, they will be subject to a risk assessment based on the following guidelines:

- (1) The DSL will speak to the child's parents/carers to establish whether any member of the household has symptoms of COVID-19; has been diagnosed with COVID-19; or is self-isolating.
- (2) Home visits will be undertaken by two members of staff, one of whom will be a DSL.
- (3) Staff undertaking home visits must wear gloves and avoid contacting metal surfaces with their bare skin. They will knock on the door of the house with covered hands. After knocking on the door, they will step back from the door.
- (4) Visiting staff will ask to see and talk to the child
- (5) However, if undertaking a home visit, staff must actually see the child.

If a family is self-isolating or it is difficult to carry out a home visit subject to the risk assessment, the DSL will consider whether technology can be used to see the child, e.g., via Skype or other means of video chat. If carrying out Skype/video chat, this should be agreed with parents/carers prior to any call being made.

All Circle Network policies including the child protection, Code of Conduct and ICT acceptable use policies must be followed at all times both in face to face and electronic communication with pupils and parents/carers. No staff member should use their own ICT or telephone equipment; or private message children; or video conference with a child directly other than via Circles Network-owned equipment subject to parental agreement as above.

Where concerns for a child at home reach the threshold for significant harm, a referral will be made to Children's Social Care/Police as per normal safeguarding procedures. For that reason, all DSLs will ensure they have access to MASH and other key agency phone numbers and children's details even when working from home.

## **Designated Safeguarding Lead (DSL)**

The DSL and Deputy DSLs are as named in the main policy. The DSL or a deputy DSL will be available on site at all times Circles Network is open. In the event of full closures during and on occasions when it is not possible for the DSL or deputy DSL to be on site (every effort will be made to ensure that such occasions are rare), the DSL or a deputy DSL will be readily accessible via telephone or online video contact, e.g., when working from home. All staff will be provided with contact details in order to be able to contact a DSL without any difficulty and will be informed about which members of the DSL team are available for each day that Circles Network is fully or partially closed.

Where it is not possible for the DSL (or deputy) to be on site, a senior leader will always be present and will assume responsibility for co-ordinating safeguarding on site, always with ready telephone/ online access to the DSL as above.

All DSLs will have remote access to the register/database of all vulnerable children and other safeguarding records when working off site.

The DSL team will meet weekly to discuss the welfare and status of each child on the register/ database of vulnerable children.

The DSL team will liaise with MASH, Social Care, family support workers and other key safeguarding partners as normal, whether working in Circles Network or working remotely. When working from home, DSLs will be accessible via access to email account and should have use of a company-owned mobile telephone, the number of which should be shared with colleague DSLs, partners and the Education Safeguarding service.

The DSL team will continue to attend – either in person or virtually – child protection conferences; core group meetings; strategy meetings; child in need meetings; children who are looked after reviews; and early help meetings.

## **Safeguarding Trustee**

In the event of full or partial closures, the trustee will review the arrangements for overseeing and supporting the DSL in fulfilling the trustee's responsibility for safeguarding. In the event of the safeguarding trustee and/or board of trustees not being able to fulfil their usual safeguarding and support functions because of COVID-19, social distancing or lockdown arrangements, the trustees will identify and appoint an alternative trustee to oversee and support Circles Network's safeguarding arrangements.

## **Safer recruitment/volunteers and movement of staff**

Circles Network will maintain its commitment to ensuring that only suitable people are given opportunities to work with children face to face or online. All recruitment during times affected by COVID-19 will therefore be undertaken following the normal safer recruitment processes subject to Circles Network's policy, local authority guidance and advice and Part 3 of *Keeping Children Safe in Education (DfE 2020)*.

It may be necessary to undertake some recruitment activities remotely, e.g., via virtual interviews, shortlisting. It may be necessary to adapt selection activities designed to assess candidates' suitability in



which candidates have contact with children. Safer recruitment principles also apply to the recruitment of volunteers, subject to KCSiE.

It is essential from a safeguarding perspective that Circles Network is aware, on any given day irrespective of full or partial closures, which staff/volunteers are working with children on Circles Network business – whether physically attending the provision, online or working from home - and that appropriate checks have been carried out, especially for anyone engaging in Regulated Activity. As such, Circles Network will maintain the single central record as outlined in KCSiE at all times.

## **Induction**

Where new staff or volunteers are recruited; they will be provided with a safeguarding induction in the usual way.

Upon arrival, staff will be given a copy of Circles Network's safeguarding and child protection policy, staff code of conduct policy, behaviour policy, Circles Network's safeguarding recording and reporting procedures and confirmation of DSL details and arrangements.

## **Peer on peer abuse**

Circles Network recognises that a revised process for managing any report of peer on peer abuse and supporting victims may be required during the COVID-19 virus when children will be attending Circles Network and remaining in smaller groups.

Where Circles Network receives a report of peer on peer abuse, it will follow the principles as set out in part 5 of KCSiE and as outlined in the main policy as closely as possible.

Circles Network will listen and work with all children involved, their parents/carers and any multi-agency partner required to ensure the safety and security of alleged victims, alleged perpetrators and all other children attending the school.

Concerns and actions will be recorded on the child's safeguarding file and appropriate referrals made by the DSL.