



# John Taylor Free School

## Safeguarding Procedure 2025/2026

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## 1.Key Contacts

Role in school	Name	Date and level of safeguarding training
Headteacher	Mrs E Pugh (Interim)	
Designated Safeguarding Lead (DSL)	Mrs L Bosworth	Level 3 – June 2025
Deputy Designated Safeguarding Lead(s) (DDSL)	Mrs W Burton Mrs M Hassell Mrs A Rogers Miss C Anderson Mrs C Starkey Mrs V Scott Miss J Bradley	Level 3 – February 2023 Level 2 – September 2025 Level 3 – June 2023 Level 3 – September 2025 Level 3 – September 2024 Level 3 – February 2024 Level 2 – June 2025
Nominated Governor for Safeguarding	Miss E O'Mara	Level 1 – May 2025
Chair of Governors	Mr G Evans	
Designated teacher for Looked After Children	Mrs L Bosworth	Level 3 – June 2025
Prevent Lead	Mrs L Bosworth	Level 3 – June 2025
Mental Health Lead	Mr R Bowen-Jones	Level 1 – September 2023

## 2.Links to other procedures and agencies

This procedure has been adapted from the Staffordshire County Council and Stoke-on Trent and Staffordshire [Safeguarding Children Board](#) policy.

This procedure should be read in conjunction with:

- JTMAT Whistleblowing Policy
- JTMAT Attendance Policy
- JTFS Attendance Procedure
- JTMAT SEND Policy
- JTMAT Anti-Bullying Policy
- JTMAT Safeguarding Policy
- JTMAT Child on Child Abuse Policy
- JTFS Child on Child Abuse Procedure
- JTFS Positive Behaviour Procedure

JTFS Procedures: [Policies & Procedures | John Taylor Free School](#)

JTMAT Policies: <https://jtmat.co.uk/privacy/policies/>

[Keeping children safe in education - GOV.UK](#)

The purpose of John Taylor Free School's safeguarding procedure is to ensure we:

- **Are committed** – developing a robust culture of vigilance
- **Build resilience** – raising awareness of safeguarding and child protection issues, and equipping children with the language and skills to keep themselves safe
- **Establish a safe environment** – in which children can learn and develop within an ethos of openness and are taught to treat each other with respect, to feel safe, to have a voice and are listened to
- **Support vulnerable students** – supporting students who have been abused, have witnessed violence towards others or may be vulnerable to abuse
- **Prevent unsuitable people** – from working with children by ensuring we practice safe recruitment in checking the suitability of staff and volunteers to work with our children. And to maintain an active vigilance thereafter

All staff at John Taylor Free School will meet the purpose and aims set out by the JTMAT Safeguarding Procedure and in addition will follow the procedures within this document.

Link to JTMAT Safeguarding Policy

JTMAT Policies: <https://jtmata.co.uk/privacy/policies/>

[After-school clubs, community activities and tuition: safeguarding guidance for providers](#)

### 3.Ethos and Culture

Each child's welfare is of paramount importance: we are a child centred school and make all efforts possible to capture the voice of the child and try to understand what their daily lived experiences are like.

**We all have a statutory duty to safeguard and promote the welfare of children and to maintain a professional attitude of **it could happen here** where safeguarding is concerned.**

Our school is committed to safeguarding children and promoting children's welfare and expects all staff, governors, volunteers, and visitors to share this commitment and maintain a vigilant and safe environment. Everyone has a responsibility to act without delay to protect children by reporting anything that might suggest a child is being abused or neglected. It is our willingness to work safely and challenge inappropriate behaviours that underpins this commitment. The school seeks to work in partnership with families and other agencies to improve the outcomes for children who are vulnerable or in need.

**'Safeguarding and promoting the welfare of children is everyone's responsibility. Everyone who comes into contact with children and their families and carers has a role to play in safeguarding children. In order to fulfil this responsibility effectively, all professionals should make sure their approach is child centred. This means that they should consider, at all times, what is in the best interests of the child.'** (Keeping Children Safe in Education 2023)

All staff are encouraged to report any concerns that they have and not see these as insignificant. On occasions, a referral is justified by a single incident such as an injury or disclosure of abuse. More often

however, concerns accumulate over a period and are evidenced by building up a picture of harm over time; this is particularly true in cases of emotional abuse and neglect. In these circumstances, it is crucial that staff record and pass on concerns in accordance with this procedure to allow the Designated Safeguarding Lead to build up a picture and access support for the child at the earliest opportunity.

We are aware that children may not feel ready or know how to tell someone that they are being abused, exploited, or neglected and/or they may not recognise their experiences as harmful. They may feel embarrassed, humiliated or being threatened. This could be due to vulnerability, disability and/or sexual orientation or language barriers.

This does not prevent ALL staff from having professional curiosity and speaking to the DSL if they have concerns about a child and our staff determine how best to build trusted relationships with children which facilitate this communication.

We maintain a professional attitude of 'it could happen here' where safeguarding is concerned. When there are concerns about the welfare of a child, staff members will always act in the best interests of the child. Our procedures have been developed in-conjunction with our school culture of prevention, protection, and support.

Children at John Taylor Free School are reassured that they have a voice, they are listened to and what they say taken seriously. They know that they will be supported and kept safe. They are never be given the impression that they are creating a problem by reporting abuse, sexual violence, or sexual harassment. Children at our school are encouraged to talk freely with staff if they are worried or concerned about something and our staff understand that a victim of any type of abuse should never be made to feel ashamed for making a report.

We are a 'telling school' and encourage students to speak up. This is tested via stakeholder voice twice per year where students are asked if they have a trusted adult in school.

Students in the school are encouraged to communicate any concerns for themselves or others through their Personal Tutor, Pastoral Staff, the Safeguarding Team, Mental Health First Aiders, or any other member of staff. If they have more general questions, they are also signposted to a range of external agencies accessible at any time, with details shared through the school on screens, and in their individual Learning Journals which are provided to all students.

#### **4.Safeguarding Training for Staff**

At John Taylor Free School we have an ongoing programme of safeguarding professional development. This includes an annual update focused on KCSIE and contextual safeguarding. Staff are required to sign to say they have read and understood KCSIE Part 1, the JTFS Safeguarding Procedure, Online Safety Procedure, Child on Child Abuse Procedure, Whistleblowing Policy, and Attendance Procedure (Including children missing from education). As part of the Annual Safeguarding Update staff are required to complete learning tasks and scenarios to apply their knowledge.

To evidence staff engagement, a log is kept via MyConcern to evidence that they have read the key information to support keeping children and young people safe. Appropriate professional development and training is provided in house and or by external providers for specific roles to ensure staff are appropriately trained to support our students.

In addition to this, staff complete the required Level 1 Training within 3 months of employment and renew within 3 years. Staff also complete PREVENT training using the Home Office materials every 2 years with additional information shared in the interim from local learning. Key messages are shared through internal platforms such as email, newsletters, bulletins, briefings, and staff meetings to ensure safeguarding is at the forefront and our staff body are trained around escalation processes internally and in line with local safeguarding board procedures.

At John Taylor Free School we have a Safeguarding Area accessible online (SharePoint) that includes regular safeguarding updates, a safeguarding training library and resources used in our half termly safeguarding training, this is delivered as part of our Professional Learning calendar.

All staff are aware that if they feel outcomes for a child are not improving, they MUST escalate internally through the DSL.

In all cases, if our staff are unsure, they know that they should always speak to the DSL/DDSL and NOT discuss with any other staff.

Further guidance on [whistleblowing](#) is available here and the NSPCC whistleblowing helpline is available for staff who do not feel able to raise concerns regarding safeguarding failures internally. Staff can call on 0800 028 0285 and the line is available from 8am to 8pm, Monday to Friday. Email: [help@nspcc.org.uk](mailto:help@nspcc.org.uk)

### **Safer Recruitment and Selection**

At John Taylor Free School the PA to the Headteacher is responsible for the Single Central Record, this is discussed with the DSL and Governors on a termly basis and checked by the JTMAT core team on a termly basis. JTFS provides safer recruitment training for the Headteacher, Chair of Governors, Deputy Headteacher and School Business Manager.

### **6.Roles and Responsibilities of the DSL/DDSL**

The job description of the DSL at JTFS is supplied by JTMAT and responsibilities are line managed by the Headteacher.

The DSL monitors the electronic case management system MyConcern to record concerns about children, ensuring that the quality of information is accurate, proportionate, timely and assessment/referrals are made appropriately. The recording and storing of information are kept in-line with the Data Protection Act 2018 and General Data Protection.

There is regular liaison within the Safeguarding Team. The AHT Safeguarding (DSL), Safeguarding Officer (DDSL) and Student Support Team (DDSL's) meet on a weekly basis to support with escalating any safeguarding/pastoral concerns. All members of the Safeguarding Team have access to external supervision as and when required.

The DSL/DDSLs will always engage with the Staffordshire DSL Briefings that typically take place on a termly basis. Whoever attends these courses within the safeguarding team will disseminate information to the wider team. The DSL/DDSLs have access to training information and resources from the Safeguarding Network and for local context information all have access to the Staffordshire Learning Net. Identified staff complete Safer Recruitment training and renew every 3 years. All staff training is recorded with completion dates and expiry dates. This allows effective communication with staff when refresher training is required.

John Taylor Free School has a thorough Safeguarding Induction Process for all staff, volunteers and governors including recorded safeguarding training for new staff that covers the requirements of KCSIE, the induction process also includes a meeting with a DSL/DDSL as well as a reading list to ensure that new staff are aware of policies, procedures, and legislation.

All new staff must complete an induction checklist and return this to a DSL/DDSL with any further training needs to be identified before a copy is placed on the staff personnel file.

The DSL/DDSLs engage with local stakeholders including but not limited to:

- Local PCSO
- Harm Reduction Hub
- MACE Panels
- Locality Management Meetings
- PREVENT Synergy events

Out of term time a member of SLT is on call for trips, we utilise out-of-office signposting emails during school closure periods, information to parents and students for signposting at the end of each term, information is also available on the school website. An SLT member is on-call cover for summer school.

At John Taylor Free School we have strong relationships with the local PCSO and community policing team, the AHT Behaviour and Safeguarding (DSL) holds regular discussions, so we are aware of current issues facing our students in the local community.

### **Trips and Visits**

All trips and visits are logged via the Evolve portal for approval by the Educational Visits Coordinator and the Headteacher. Prior to the approval of any trip or visit a thorough assessment of the appropriateness of the visit, its location and related safeguarding procedures are established to ensure all students and staff remain safe and risk is minimised.

Please refer to the following documents in conjunction to the following documents;

- [JTMAT Trips and Visits Policy](#)

### **7. Local Governing Body**

At John Taylor Free School our Governing Body has a strategic leadership responsibility for safeguarding arrangements, and they must ensure that we comply with our duties under legislation. They must have regard to this guidance in ensuring policies, procedures and training are effective and always comply with the law. See Part 2 [KCSIE 2025](#).

The Headteacher ensures that the policies and procedures, adopted by the governing body (particularly those concerning referrals of cases of suspected abuse and neglect), are understood, and followed by all staff. These policies are transparent, clear, and easy to understand for staff, children, and their parents/carers.

The Governing Body ensure that all governors and trustees receive appropriate safeguarding (including online) training at induction. This will equip them with the knowledge to provide strategic challenge to test and assure themselves that the safeguarding policies and procedures in place here are effective and

support the delivery of a robust whole school approach to safeguarding and this training is regularly updated. At John Taylor Free School, Governors are included on the main school training register that includes review/refresher dates.

The Governing body is aware of their obligations under the [Human Rights Act 1998](#), the [Equality Act 2010](#), (including the [Technical Guidance on the Public Sector Equality Duty](#)), and their local multi-agency safeguarding arrangements. Further guidance is found in Pg 24-26

Para 82-93 [KCSIE 2025](#) & [Equality Act 2010-Advice for schools](#)

The Governing body facilitate a whole school approach to safeguarding involving everyone in school, ensuring that safeguarding is at the forefront and underpins all relevant aspects of process and procedure development. These systems, processes and policies operate with the best interests of our children at their heart of what we do.

The Governing body has appointed the Designated Safeguarding Lead (DSL) who takes lead responsibility for safeguarding and child protection (including online safety). This is explicit in the JTMAT DSL job description, and they ensure that the DSL understands their responsibility in leading safeguarding across the school. They also ensure that the DSL is given additional time, funding, training, resources, and support needed to carry out the role effectively.

The Governing Body has also identified Deputy Designated Safeguarding Lead(s)(DDSL), who are trained to the same safeguarding standard as the DSL.

The Governing body and proprietors ensure that children are taught about how to keep themselves and others safe, including online. It is recognised that effective education will be tailored to the specific needs and vulnerabilities of individual children, including children who are victims of abuse, and children with special educational needs or disabilities. There is an expectation that all teachers manage behaviour effectively to ensure a good and safe educational environment and requires teachers to have a clear understanding of the needs of all pupils.

The following is a resource: - [Teaching about relationships, sex and health](#) and there are more listed in Annex B KCSIE including [Harmful online challenges and online hoaxes](#)

Our Governing Body, whilst considering their responsibility to safeguard and promote the welfare of children and provide them with a safe environment in which to learn, are doing all that they reasonably can to limit children's exposure to the online risks from the school's IT system. As part of this process, our governing body ensure that our school has appropriate filters and monitoring systems in place and regularly review their effectiveness, at JTFs we use SECURUS to monitor all computer activity in the school building. They ensure that the leadership team and relevant staff have an awareness and understanding of the provisions in place and manage them effectively and know how to escalate concerns when identified. Governing bodies and proprietors consider the age range of our children, the number of children, how often they access the IT system and the proportionality of costs verses safeguarding risks.

The Governing Body will ensure compliance with the completion of the Section 175/157 audit return, via the Phew electronic system, to the Local Authority and that any areas of concern in safeguarding are identified and a safeguarding action plan is developed. Our school also completes a trust wide safeguarding audit however this audit works in conjunction and does not replace the statutory return to the local safeguarding partnership.

They also ensure that the school contributes to inter-agency practice in line with [Working Together to Safeguard Children 2018](#)

The Governing Body ensure that those involved with the recruitment and employment of staff to work with children have received safer recruitment training and are compliant with safer recruitment procedures. This includes the requirement for appropriate checks to be carried out in line with national guidance. See Part 3 Safer Recruitment KCSIE 2025

Our Governing Body/Headteacher have ensured that there is a current whistleblowing policy and staff are aware of this procedure and understand its content. We have a culture where staff can raise concerns about poor or unsafe practice, and such concerns are addressed professionally and sensitively in accordance with agreed whistleblowing procedures <https://jtmat.co.uk/privacy/policies/>

Further guidance on [whistleblowing](#) is available here and the NSPCC whistleblowing helpline is available for staff who do not feel able to raise concerns regarding safeguarding failures internally. Staff can call on 0800 028 0285 and the line is available from 8am to 8pm, Monday to Friday. Email: [help@nspcc.org.uk](mailto:help@nspcc.org.uk)

## **8.Working with Parents/Carers**

At John Taylor Free School we update parents about safeguarding through our website. Further information regarding this can be found on our website. We also use newsletters and MCAS (My Child at School) to communicate more frequently with parents about contextual safeguarding and community issues. We also include Safeguarding information for parents at our appropriate school events.

## **9.Specific Safeguarding Risks Training**

The safeguarding team remain in regular contact with local, regional, and national safeguarding advice (see section 6). The profile and level of risks vary over time, and the school will implement a proportionate level of training for staff and other stakeholders.

This includes:

- Publication of information materials electronically
- Professional learning sessions for all staff or a section of staff with certain responsibilities
- Cascading of specific training or action points from hubs to in-school safeguarding team
- Small-group briefings (e.g. for the teachers of a student at risk)

## **10.Site Security**

At John Taylor Free School we provide a secure site which is controlled by precise management directives, but the site is only as secure as the people who use it. All people on our site must adhere to the rules which govern it. Laxity can cause potential problems with safeguarding, therefore: -

Gates are kept closed during the school day; visitors gain access through the main entrance.

- Main Entrance – access to the school site is through a series of intercom-controlled gates and doors which are always active in the school day.
- Visitors, volunteers, and students must only enter through the main entrance.
- After signing in at the office Visitors will be issued with a school lanyard or visitor's pass.
- Visitors who have not gone through our DBS compliance procedure will be given a red lanyard staff are accompanied / supervised by regulated staff member.

- Visitors who have passed our DBS compliance procedure will be given a purple lanyard these are named on the SCR.
- Any visitor on site who is not identifiable by a visitor's pass will be challenged by any staff member and this will be reported to a member of the Senior Leadership Team immediately.
- Parents, carers, and grandparents attending functions have access only through the designated and supervised entrances, with tickets for visitors for appropriate school events.
- Children will only be allowed home with adults with parental responsibility or confirmed permission.
- Children should never be allowed to leave school alone during school hours unless collected by an adult such as a parent who is doing so for a valid reason. They should report to the main reception and signed out appropriately with a date and time recorded.
- A minimum of four members of staff is always on duty at break times.
- Health and Safety audits are completed annually with risk assessment/safety planning and forms part of the Governors annual report. This will include a Fire Evacuation and Lockdown Procedure.
- The risk management of site security is managed by senior leaders/governance.
- DSL/DDSL information leaflets are available at sign in and on the main reception desk for all visitors to site informing them of the procedure and contact details for raising safeguarding concerns.

### **11.Safeguarding Induction Summary**

*Members of staff inducted into JTFS are provided with the following aide-memoire in addition to the more detailed safeguarding training that all members of staff and governors receive:*

We all have a statutory duty to safeguard and promote the welfare of children, and at our school we take this responsibility seriously.

If you have any concerns about a child or young person in our school, you must share this information immediately with our Designated Safeguarding Lead Mr A Warner or Deputy Designated Safeguarding Leads as listed on the contacts page of this procedure.

Staff should not think that their worry is insignificant if it is about hygiene, appearance, or behaviour – we would rather you told us as we would rather know about something that appears small than miss a worrying situation.

If you think the matter is very serious and may be related to child protection, for example, physical, emotional, sexual abuse or neglect, you must find one of the Designated Safeguarding Leads immediately.

If you are a member of staff who has access to our school network, you must record your concern on MyConcern.

If you are a visitor or supply member of staff, please speak directly to a member of the Safeguarding Team, the safeguarding team will then log the concern on MyConcern.

If you are unable to locate them, ask a member of the school office staff to find them and to ask them to speak with you immediately about a confidential and urgent matter.

Any allegation concerning a member of staff, a child's foster carer or a volunteer should be reported immediately to the Head teacher. If an allegation is made about the Head teacher, you should pass this

information to the Chair of the Governing Body. If you feel you need to escalate your concern or do not feel comfortable in speaking to the Chair Of

Governors, you can contact the Local Authority Designated Officer on 0300 111 8007.

The people you should talk to in school are:

Designated Safeguarding Lead:	Mrs L Bosworth
Location of office:	1 <sup>st</sup> Floor 1-002
Contact email:	<a href="mailto:l.bosworth@johntaylorfreeschool.co.uk">l.bosworth@johntaylorfreeschool.co.uk</a>

Deputy Designated Safeguarding Leads	
Location of office:	1 <sup>st</sup> Floor 1-002
Contact email:	<a href="mailto:m.hassell@johntaylorfreeschool.co.uk">m.hassell@johntaylorfreeschool.co.uk</a>

Chair of Governing Body:	Mr Gary Evans
Contact email:	<a href="mailto:g.evans@lgb.jtmat.co.uk">g.evans@lgb.jtmat.co.uk</a>

## 12. Specific Safeguarding Risks

### Behaviours linked to safeguarding issues

All staff have an awareness of safeguarding issues that can put children at risk of harm. Presenting behaviours linked to issues such as drug taking and or alcohol misuse, deliberately missing education, serious violence (including the link to county lines), radicalisation and consensual and non-consensual sharing of nude and semi-nude images and/or videos can be signs that children are at risk.

### 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 form of "deal line."

Exploitation is an integral part of the county lines offending model with children and vulnerable adults exploited to move and/or store drugs and money. Offenders will often use coercion, intimidation, violence (including sexual violence), and weapons to ensure compliance of victims. Children can be targeted and recruited into county lines in several locations including schools, further and higher educational institutions, pupil referral units, special educational needs schools, children's homes, and care homes.

Children are often recruited to move drugs and money between locations and are known to be exposed to techniques such as 'plugging,' where drugs are concealed internally to avoid detection. 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.

One of the ways of identifying potential involvement in county lines are missing episodes (both from home and school), when the victim may have been trafficked for the purpose of transporting drugs and a referral to the National Referral Mechanism (NRF) should be considered. Further information can be found here [National Referral Mechanism](#).

If a child is suspected to be at risk of or involved in county lines, a safeguarding referral should be considered alongside consideration of availability of local services/third sector providers who offer support to victims of county lines exploitation.

Like other forms of abuse and exploitation, county lines exploitation: -

- Can affect any child or young person (male or female) under the age of 18 years.
- Can affect any vulnerable adult over the age of 18 years.
- Can still be exploitation even if the activity appears consensual.
- Can involve force and/or enticement-based methods of compliance and is often accompanied by violence or threats of violence.
- Can be perpetrated by individuals or groups, males or females, and young people or adults and
- Is typified by some form of power imbalance in favour of those perpetrating the exploitation. Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including gender, cognitive ability, physical strength, status, and access to economic or other resources.

Guidance Document:

- [Criminal Exploitation of Children and Vulnerable Adults; County Lines](#)
- [County Lines toolkit](#)

## Drugs

There is evidence that children and young people are increasingly misusing alcohol and illegal drugs. Consequences range from non-attendance and poor attainment at school, poor health, committing crime to support 'habits' and increased risk of being a victim of violent crime and criminal exploitation, including sexual exploitation.

Guidance Documents:

- [NSPCC-Parental Substance Misuse](#)
- [SSCB-Working with parents who misuse substances](#)
- [Drugs Advise for Schools](#)

## Fabricated or Induced Illness (FI)

Fabricated or Induced Illness is a condition whereby a child suffers harm through the deliberate action of their carer, and which is attributed by the adult to another cause.

There may be several explanations for these circumstances, and each requires careful consideration and review. Concerns about a child's health should be discussed with a health professional who is involved with the child. Guidance Documents:

- [Safeguarding children in whom illness is fabricated or induced](#)
- [Staffsccb-Fabricated or induced Illness Guidance](#)

### **Homelessness**

Being homeless or being at risk of becoming homeless presents a real risk to a child's welfare. The DSL/DDSL are aware of local contact details and referral routes into local housing organisations, so they can raise/progress concerns at the earliest opportunity.

Indicators of risk include household debt, rent arrears, domestic abuse, and antisocial behaviour, as well as the family being asked to leave a property. Whilst referrals and/or discussion with the Local Housing Authority will be progressed as appropriate, and in accordance with local procedures, this will not replace a referral into children's social care where a child has been harmed or is at risk of harm.

We also recognise that in some cases 16/17 yr olds could be living independently from their parents or guardians and they will require a different level of intervention and support. Children's services will be the lead agency for these young people, and the DSL will ensure that appropriate referrals are made based on the child's circumstances.

### **Honour-based Abuse**

So-called 'honour-based' abuse (HBA) encompasses incidents or crimes which have been committed to protect or defend the honour of the family and/or the community, including 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. All forms of HBA are abuse (regardless of the motivation) and should be handled and escalated as such. Professionals in all agencies, and individuals and groups in relevant communities, need to be alert to the possibility of a child being at risk of HBA, or already having suffered HBA.

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

FGM comprises of all procedures involving partial or total removal of the external female genitalia or other injury to the female genital organs. It is illegal in the UK and a form of child abuse with long-lasting harmful consequences. It is known by several names including "cutting", "female circumcision" or "initiation". The term female circumcision suggests that the practice is like male circumcision, but it bears no resemblance to male circumcision, and it has serious health consequences with no medical benefits. FGM is also linked to domestic abuse, particularly in relation to "honour-based abuse."

FGM mandatory reporting duty for teachers Section 5B of the Female Genital Mutilation Act 2003 (as inserted by section 74 of the Serious Crime Act 2015) places a statutory duty upon teachers along with regulated health and social care professionals in England and Wales, to report to the police where they discover (either via disclosure by the victim or visual evidence) that FGM appears to have been carried out on a girl under 18.

Those failing to report such cases may face disciplinary sanctions. It is rare to see visual evidence, and children should not be examined but the same definition of what is meant by "to discover **that**

an act of FGM appears to have been carried out" is used for all professionals to whom this mandatory reporting duty applies.

Staff must personally report to the police cases where they discover that an act of FGM appears to have been carried out. Unless there is good reason not to, they should still consider and discuss any such case with the DSL (or deputy) and involve children's social care as appropriate.

The duty does not apply in relation to at risk or suspected cases (i.e. where staff do not discover that FGM appears to have been carried out, either through disclosure by the victim or visual evidence) or in cases where the woman is 18 or over. In these cases, staff will follow local safeguarding procedures.

Guidance Documents:

- [Multi Agency Statutory guidance on Female Genital Mutilation](#)
- [Female Genital Mutilation Act 2003](#)

### **Forced Marriage**

Forcing a person into a marriage is a crime in England and Wales. A forced marriage is one, entered, without the full and free consent of one or both parties and where violence, threats or any other form of coercion is used to cause a person to enter a marriage. The threats can be physical or emotional and psychological. A lack of full and free consent can be where a person does not consent or where they cannot consent (if they have learning disabilities, for example). Some perpetrators use perceived culture practices, to coerce a person into marriage. Schools and colleges play a significant role in safeguarding children from forced marriage.

There are some significant differences between the referral of a concern about a young person being forced into marriage and other child protection referrals. Professionals must be aware that sharing information with a young person's parents, extended family, or members of their community, could put the young person in a situation of significant risk.

Any disclosure that indicates a young person may be facing a forced marriage must be taken seriously by professionals who should also realise that this could be 'one chance to save a life.' A forced marriage is a marriage in which one or both spouses do not consent to the marriage but are coerced into it. Duress can include physical, psychological, financial, sexual, and emotional pressure. In cases of vulnerable adults who lack the capacity to consent to marriage, coercion is not required for a marriage to be forced.

Guidance Document:

- [Forced Marriage](#)
- [The right to choose: government guidance on forced marriage](#)

### **Online Safety**

The use of technology has become a significant component of many safeguarding issues. Child Criminal Exploitation, Child Sexual Exploitation, radicalisation, sexual predation, and technology often provide the platform that facilitates harm.

At John Taylor Free School we realise that it is essential for our children to be safeguarded from potentially harmful and inappropriate online material. We have an effective whole school/college approach to online safety which empowers us to protect and educate pupils, students, and staff in their use of technology and establishes mechanisms for us to identify, intervene in, and escalate any concerns where appropriate.

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

Content: being exposed to illegal, inappropriate, or harmful content, for example:

pornography, fake news, racism, misogyny, self-harm, suicide, anti-Semitism, radicalisation, and extremism.

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

Conduct: personal online behaviour that increases the likelihood of, or causes, harm; for example, making, sending, and receiving explicit images (e.g. consensual and nonconsensual sharing of nudes and semi-nudes and/or pornography, sharing other explicit images and online bullying; and

Commerce: risks such as online gambling, inappropriate advertising, phishing and or financial frauds. If you feel your pupils, students or staff are at risk, please report it to the Anti-Phishing Working Group (<https://apwg.org/>).

We ensure that online safety is a running and interrelated theme whilst devising and implementing policies and procedures. We consider online safety in other relevant policies, when planning curriculum, teacher training, the role and responsibilities of the DSL and parental engagement. We have filters and monitoring systems in place, and these are regulated, and risk assessed as part of the prevent duty.

We have an online safety procedure which identifies the usage and expected behaviour of children/students. As a school we appreciate the value of technology and that appropriate filters are in place, yet this does not lead to unreasonable restrictions which would limit online teaching and safeguarding.

**Education at home/Remote learning:** - Where children are being asked to learn online at home, our school will refer to and use the links and resources provided by the DfE; Safeguarding in schools, colleges and other providers and safeguarding in remote education.

JTMAT has an Online Safety Statement and have Acceptable User Agreements (AUP). All Staff must ensure they read and sign the AUP.

JTFS has an Online safety Procedure which outlines that all staff have the responsibility for:

- Implementing the Online Safety procedure consistently
- Agreeing and adhering to the terms on acceptable use of the school's ICT systems and the internet  
(<http://resources.jtmat.co.uk/policies/ICTSecurityAUP.pdf>), and ensuring that pupils follow the school's terms on acceptable use

<http://resources.jtmat.co.uk/policies/ICTSecurity-AUP.pdf>

- Working with the DSL to ensure that any online safety incidents are logged and dealt with appropriately in line with this procedure.
- Ensuring that any incidents of cyber-bullying are dealt with appropriately

At John Taylor Free School we have a filtering product with multiple layers of filtering. Student accounts have the most restrictive filtering applied. The filtering is monitored by the Senior IT Technician in school and the JTMAT have oversight of all filtering. Staff cannot change filters without a request made through the IT Support email. The DSL reviews on a termly basis the requests made. Where the monitoring software identifies domains that are inappropriate this leads to a request for this to be added to the blocked list.

At John Taylor Free School we have a monitoring system called Securus. Securus alerts when members of our community are using or accessing inappropriate websites and gives an early warning to potential safeguarding situations. The DSL and Safeguarding Officer (DDSL) have access to this system. The AHT Behaviour and Safeguarding also has access to monitor staff IT use.

Where significant concerns are record, Securus notifies the DSL and Safeguarding Officer of Grade 4 and Grade 5 captures where a safeguarding risk has been identified and immediate follow up is required. This information is then recorded on MyConcern where a student has been identified as being at risk.

The DSL signs up to Alan MacKenzie E-safety Advisor bulletins and the National Online Safety weekly bulletins. Relevant information from these is shared with parents via our school newsletter.

Guidance Documents:

- [Children's Commissioner-Online Safety](#)
- [Teaching online safety in education settings](#)
- [Appropriate Filtering and Monitoring](#)
- [CEOP-Safety Centre](#)
- [National Cyber Security Centre](#)
- [NSPCC-Undertaking remote teaching safely](#)
- [360 Degree Safe - Online Safety Review Tool](#)
- [UKCCIS-UK Council for Child Internet Safety](#)

### **Private Fostering**

A private fostering arrangement is one that is made privately (without the involvement of a local authority) for the care of a child under the age of 16 (under 18, if disabled) by someone other than a parent or immediate relative. If the arrangement is to last, or has lasted, for 28 days or more, it is categorised as private fostering.

Close relatives are defined as a grandparent, brother, sister, uncle, or aunt (whether of full blood or half blood or by marriage or civil partnership), or a stepparent.

People become involved in private fostering for all kinds of reasons. Examples of private fostering include:

- Children who need alternative care because of parental illness.
- Children whose parents cannot care for them because their work or study involves long or antisocial hours.
- Children sent from abroad to stay with another family, usually to improve their educational opportunities.
- Unaccompanied asylum seeking and refugee children.
- Teenagers who stay with friends (or other non-relatives) because they have fallen out with their parents.
- Children staying with families while attending a school away from their home area.

Our staff at John Taylor Free School will notify the DSL/DDSL when they become aware of a private fostering arrangement. There is a mandatory duty on the school to inform Staffordshire Children's Social Care of a private fostering arrangement by contacting (0800 1313126), who then have a duty to check that the young person is being properly cared for and that the arrangement is satisfactory.

Guidance Document:

- [Children Act 1989 – Private Fostering](#)

### **Serious Violence**

All staff should be aware of the indicators, which may signal children are at risk from, or are involved with serious violent crime. These may include increased absence from school, a change in friendships or relationships with older individuals or groups, a significant decline in performance, signs of self-harm or a significant change in wellbeing, or signs of assault or unexplained injuries.

Unexplained gifts or new possessions could also indicate that children have been approached by, or are involved with, individuals associated with criminal networks or gangs and may be at risk of criminal exploitation.

All staff should be aware of the range of risk factors which increase the likelihood of involvement in serious violence, such as being male, having been frequently absent or permanently excluded from school, having experienced child maltreatment and having been involved in offending, such as theft or robbery.

Guidance documents:

- [Home Office Preventing Youth Violence and Gang Involvement](#)
- [Criminal Exploitation of Children and Vulnerable Adults; County Lines](#)

### **12.1 Domestic Abuse- Operation Encompass**

Any incident or pattern of incidents of controlling, coercive or threatening behaviour, violence, or abuse between those aged 16 or over who are or have been intimate partners or family members regardless of gender or sexuality. This can encompass but is not limited to the following types of abuse:

- Psychological
- Physical
- Sexual
- Financial
- Emotional

Children can be victims of domestic abuse. They may see, hear, or experience the effects of abuse at home and/or suffer domestic abuse in their own intimate relationships (teenage relationship abuse) 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. We will signpost and support our children/ young people.

We are an Operation Encompass school and act appropriately when we receive an alert to support the children in our school.

Guidance Documents:

- [Domestic Violence and Abuse](#)
- [Domestic Abuse-Staffsscb](#)
- [NSPCC-Domestic Abuse](#)
- Operation Encompass helpline 0204 513 9990 (8am-1pm Mon-Fri)

## 12.2 Mental Health and Wellbeing

All staff have a vital role to play in supporting the mental health and wellbeing of our pupils and are aware that mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation. We have clear systems and processes in place for identifying possible mental health problems, including routes to escalate and clear referral and accountability systems.

All students at John Taylor School have a personal tutor. This member of staff will see students each morning and is the first port of call for supporting students with their wellbeing through our strong pastoral system. Students should speak to their personal tutor if they have any concerns initially. This might not mean a referral on to another professional in school or other agency and the form tutor may lead on supporting the student with how they are feeling at that time. If a form tutor is concerned about risk to a student, the personal tutor would log this on MyConcern.

All students are assigned to a 'House' at John Taylor School. Students are supported by a House Progress leader and Pastoral Support member of staff. Where personal tutors feel that a student may need more support than can be offered by the personal tutor, a referral would be made to determine the next steps. This may mean Pastoral Support leads on supporting the student. If they are concerned about risk to a student, they would log this on MyConcern. If Pastoral Support felt that a student needed more specific Wellbeing support in school, they may also complete a referral to other colleagues or external agencies may be made

The Safeguarding staff (DSL/DDSLs) monitors MyConcern and keeps up to date records of direct work with students throughout their interventions. This is reviewed and monitored regularly.

At John Taylor Free School we have a Mental Health Lead - Mr Rhys Bowen-Jones

We also have a team of Mental Health First Aiders:

Mrs J Haslam

Mrs S Mellors (SENCo)

Mrs M Mercer

Mrs W Burton

Mr J Bates

Mrs C Starkey

Mr Bowen-Jones

Only appropriately trained professionals will attempt to make a diagnosis of a mental health problem. Education staff, however, are well placed to observe children day-to-day and identify those whose behaviour suggests that they may be experiencing a mental health problem or be at risk of developing one.

Where children have suffered abuse and neglect, or other potentially traumatic Adverse Childhood Experiences (ACE), this can have a lasting impact throughout childhood, adolescence and into adulthood. It is key that staff are aware of how these children's experiences, can impact on their mental health, behaviour, and education.

Guidance and helpful documents: -

- [Addressing Trauma and Adversity](#)
- [Mental Health and Behaviour in Schools Guidance.](#)
- [Preventing and tackling bullying](#)
- [PHE Rise Above for Schools programme.](#)
- [Every Interaction Matters](#)
- [Education recovery](#)
- [MIND-Parenting Capacity and Mental Health](#)
- [NSPCC-Mental Health and Parenting](#)
- [SSCB-Children & Young People who Self Harm or Disclose an Intent to Die by Suicide](#)
- Staffordshire County Council Resource Bank (sent out at least annually)

If staff have a mental health concern about a child that is also a safeguarding concern, immediate action should be taken, following their child protection procedure, and by speaking to the designated safeguarding lead or a deputy.

## 12.3 Online Safety

The use of technology has become a significant component of many safeguarding issues. Child Criminal Exploitation, Child Sexual Exploitation, radicalisation, sexual predation, and technology often provide the platform that facilitates harm.

At John Taylor Free School we realise that it is essential for our children to be safeguarded from potentially harmful and inappropriate online material. We have an effective whole school/college approach to online safety which empowers us to protect and educate pupils, students, and staff in their use of technology and establishes mechanisms for us to identify, intervene in, and escalate any concerns where appropriate. Where appropriate to broadcast advice, we interact with families through our online channels, newsletters and sharing of messaging from safeguarding partner agencies. Where more specific guidance or information is relevant (but not related to a specific case), we will send letters to students nominated contacts through the Bromcom messaging facility. This applies not only to online safety, but all areas of safeguarding.

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

Content: being exposed to illegal, inappropriate, or harmful content, for example:

pornography, fake news, racism, misogyny, self-harm, suicide, anti-Semitism, radicalisation, and extremism.

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

Conduct: personal online behaviour that increases the likelihood of, or causes, harm; for example, making, sending, and receiving explicit images (e.g. consensual and nonconsensual sharing of nudes and semi-nudes and/or pornography, sharing other explicit images and online bullying; and

Commerce: risks such as online gambling, inappropriate advertising, phishing and or financial frauds. If you feel your pupils, students or staff are at risk, please report it to the Anti-Phishing Working Group (<https://apwg.org/>).

We ensure that online safety is a running and interrelated theme whilst devising and implementing policies and procedures. We consider online safety in other relevant policies, when planning curriculum, teacher training, the role and responsibilities of the DSL and parental engagement. We have filters and monitoring systems in place, and these are regulated, and risk assessed as part of the prevent duty.

We have an online safety procedure which identifies the usage and expected behaviour of children/students. As a school we appreciate the value of technology and that appropriate filters are in place, yet this does not lead to unreasonable restrictions which would limit online teaching and safeguarding.

In general, the school does not allow the use of students' own devices and mobile phones while onsite, and students breaching this rule will have the device confiscated for parents to collect. Exceptions do exist, such as for post-16 students, but for the most part students' online access is only through the school's devices and terminals.

Education at home/Remote learning: - Where children are being asked to learn online at home, our school will refer to and use the links and resources provided by the DfE; Safeguarding in schools, colleges and other providers and safeguarding in remote education.

JTMAT has an Online Safety Statement and have Acceptable User Agreements (AUP). All Staff must ensure they read and sign the AUP.

JTFS has an Online safety Procedure which outlines that all staff have the responsibility for:

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(<http://resources.jtmat.co.uk/policies/ICTSecurityAUP.pdf>), and ensuring that pupils follow the school's terms on acceptable use  
  
(<http://resources.jtmat.co.uk/policies/ICTSecurity-AUP.pdf>)
- Working with the DSL to ensure that any online safety incidents are logged and dealt with appropriately in line with this procedure.
- Ensuring that any incidents of cyber-bullying are dealt with appropriately

At John Taylor Free School we have a filtering product with multiple layers of filtering. Student accounts have the most restrictive filtering applied. The filtering is monitored by the Senior IT Technician in school and the JTMAT have oversight of all filtering. Staff cannot change filters without a request made through the IT Support email. The DSL reviews on a termly basis the requests made. Where the monitoring software identifies domains that are inappropriate this leads to a request for this to be added to the blocked list.

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Where significant concerns are record, Securus notifies the DSL and Safeguarding Officer of Grade 4 and Grade 5 captures where a safeguarding risk has been identified and immediate follow up is required. This information is then recorded on MyConcern where a student has been identified as being at risk.

The DSL signs up to Alan MacKenzie E-safety Advisor bulletins and the National Online Safety weekly bulletins. Relevant information from these is shared with parents via our school newsletter.

Guidance Documents:

- [Children's Commissioner-Online Safety](#)
- [Teaching online safety in education settings](#)
- [Appropriate Filtering and Monitoring](#)
- [CEOP-Safety Centre](#)
- [National Cyber Security Centre](#)
- [NSPCC-Undertaking remote teaching safely](#)
- [360 Degree Safe - Online Safety Review Tool](#)

- [UKCCIS-UK Council for Child Internet Safety](#)

## 12.4 Radicalisation and Extremism

Children are vulnerable to extremist ideology and radicalisation. Similar to protecting children from other forms of harms and abuse, protecting children from this risk should be a part of a schools' or colleges' safeguarding approach.

- Extremism is the vocal or active opposition to our fundamental values, including democracy, 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.
- Radicalisation refers to the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups.
- Terrorism is an action that endangers or causes serious violence to a person/people; causes considerable damage to property; or seriously interferes or disrupts an electronic system. The use or threat must be designed to influence the government or to intimidate the public and is made for the purpose of advancing a political, religious, or ideological cause.

At John Taylor Free School we value freedom of speech and the expression of beliefs and ideology as fundamental rights underpinning our society's values. Pupils/students and school staff have the right to speak freely and voice their opinions.

However, freedom comes with responsibility and free speech that is designed to manipulate the vulnerable or that leads to violence and harm of others goes against the moral principles in which freedom of speech is valued. Free speech is not an unqualified privilege; it is subject to laws and policies governing equality, human rights, community safety, and community cohesion.

There is no single way of identifying whether a child is likely to be susceptible to an extremist ideology. Background factors combined with specific influences such as family and friends may contribute to a child's vulnerability. Similarly, radicalisation can occur through many different methods (such as social media or the internet) and settings (such as within the home).

The normalisation of extreme views may also make children and young people vulnerable to future manipulation and exploitation. John Taylor Free School is clear that this exploitation and radicalisation must be viewed as a safeguarding concern and that protecting children from the risk of radicalisation is part of the school's safeguarding duty.

The school's or college's designated safeguarding lead (and any deputies) should be aware of local procedures for making a Prevent referral.

Definitions of radicalisation and extremism, and indicators of vulnerability to radicalisation are in Appendix 4.

## Prevent Duty and Channel

### Prevent

The school governors, the Head Teacher/ and the DSL will assess the level of risk within the school and put actions in place to reduce that risk. Risk assessment may include consideration of the school's RE curriculum, SEND Procedure, Assembly Procedure, the use of school premises by external agencies, integration of students by gender and SEN, antibullying Procedure and other issues specific to the school's profile, community, and philosophy.

All schools are subject to a duty to have "due regard to the need to prevent people being drawn into terrorism" (section 26, Counter Terrorism and Security Act 2015). This is known as The Prevent Duty and is part of our schools wider safeguarding obligations.

Designated safeguarding leads and other senior leaders familiarise themselves with the revised Prevent duty guidance: for England and Wales, especially paragraphs 57-76, which are specifically concerned with schools (and covers childcare). We follow the guidance in terms of four general themes: risk assessment, working in partnership, staff training, and IT policies.

Our school has a Prevent Single Point of Contact (SPOC) who is the lead within the organisation for safeguarding in relation to protecting individuals from radicalisation and involvement in terrorism.

The SPOC for our school is **Mrs L Bosworth**

Our School will monitor online activity within the school to ensure that inappropriate sites are not accessed by students or staff. This is best done using specialist online monitoring software, which in this school is called Securus.

### Channel

Channel is a multi-agency approach to provide support to individuals who are at risk of being drawn into terrorist related activity. It is led by the Staffordshire Police Counterterrorism Unit, and it aims to:

- Establish an effective multi-agency referral and intervention process to identify vulnerable individuals.
- Safeguard individuals who might be vulnerable to being radicalised, so that they are not at risk of being drawn into terrorist-related activity; and
- Provide early intervention to protect and divert people away from the risks they face and reduce vulnerability.
- The Channel programme 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 schools to make referrals if they are concerned that an individual might be vulnerable to radicalisation. An individual's participation in the programme is entirely voluntary at all stages.
- Schools have a duty to cooperate with the Channel programme in the carrying out of its functions, and with the Police in providing information about an individual who is referred to Channel (Section 38, Counter Terrorism and Security Act 2015).

Guidance Documents:

- [The Prevent Duty](#)
- [Educate Against Hate](#)
- [ACT Early | Prevent radicalisation](#)

## 12.5 Child on Child Abuse

All staff have the knowledge and awareness that children are capable of abusing other children (including online). All staff are clear about this school's procedure regarding child-on-child abuse. We have a separate Child-on-Child Abuse Procedure in addition to anti-bullying and behaviour policies to guide, inform and support children, staff, and parents/carers.

Child-on-child abuse can occur, both physically and verbally, either online or face to face, between two children of any age and sex, with a single child or group of children and can happen both inside and outside of our setting. Children who are victims of this abuse, will find the experience stressful and distressing and it is likely to have an adverse effect their educational attainment. This type of abuse can exist on a continuum and may overlap; they can occur online and offline (both physical and verbal) and are never acceptable.

All staff at John Taylor Free School recognise the indicators and signs of child-on-child abuse and know how to identify it and respond to reports of it. They understand the importance of the timely challenge of inappropriate behaviours between peers, many listed below, that are abusive in nature. They are aware of the importance of: -

- Making clear that child-on-child abuse including sexual violence and sexual harassment, is never acceptable and that that we have a zero-tolerance approach.
- Not dismissing this abuse as "banter," "part of growing up," "just having a laugh" or "boys being boys;" and
- Challenging behaviours (potentially criminal in nature), such as physical and sexual assaults e.g. grabbing bottoms, breasts, and genitalia, flicking bras and the lifting up of skirts.

All staff know that if we do not challenge and support our children that this will lead to a culture of unacceptable behaviours, an unsafe environment for children and in worst case scenarios a culture that normalises abuse leading to children accepting it as normal and not coming forward to report it.

We know that the initial response to a report from a child is vitally important. We do not want to miss that opportunity and so we reassure victims that their reports are being taken seriously and that they will be supported and kept safe. We never give victims the impression that they are creating a problem by reporting sexual violence or sexual harassment. We reassure victims that they should not feel ashamed for making a report.

We have well promoted and easily understood systems in place so that our children feel confident to knowing their concerns will be treated seriously. We have a strong pastoral system, where all students have a personal tutor. We have six Progress Leaders and a team of full-time non-teaching pastoral student support staff. We have a member of staff who is focused on supporting student wellbeing.

Allegations of child-on-child abuse will be recorded on MyConcern. Students and staff are likely to be asked to provide written accounts, and pastoral staff will support the Safeguarding Team in ensuring accurate records are maintained.

All victims are reassured that they are being taken seriously, regardless of how long it has taken them to come forward, and that they will be supported and kept safe. Abuse that occurs online or outside of the school or college will not be downplayed and will be treated equally seriously. A victim

should never be given the impression that they are creating a problem by reporting sexual violence or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report. We will ensure that children know that the law is in place to protect them rather than criminalise them, and we will be explained in such a way that avoids alarming or distressing them.

Staff are aware of the groups that are potentially more at risk as evidence shows that girls, children with SEND and LGBT children are at greater risk. The DfE states 'Child on Child abuse should be taken as seriously as abuse by adults and should be subject to the same child protection procedures.

Victims of Child-on-Child abuse will be supported by the school's pastoral system and referred to specialist agencies if appropriate. Risk assessment and/or safety planning are an integral part of this support plan, particularly regarding the post incident management.

All staff understand, that even if there are no reports in our setting, this does not mean that it is not happening, it may be the case that it is just not being reported. As such it is important that if staff at John Taylor Free School have any concerns regarding Child-on Child abuse, they speak to their Designated Safeguarding Lead (DSL) or deputy (DDSL).

Our staff will not develop high thresholds before acting.

Child on child abuse is most likely to include, but may not be limited to:

- bullying (including cyberbullying, prejudice-based and discriminatory bullying).
- abuse in intimate personal relationships between peers.
- physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (this may include an online element which facilitates, threatens, and/or encourages physical abuse).
- sexual violence such as rape, assault by penetration and sexual assault and may include an online element which facilitates, threatens, and/or encourages sexual violence. Causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party.
- sexual harassment such as sexual comments, remarks about clothes and/or appearance, jokes, taunting and online sexual harassment. This also includes the telling of sexual stories, making lewd comments and calling someone sexual names and physical behaviour, such as deliberately brushing against someone, interfering with someone's clothes, and displaying pictures, photos, or drawings of a sexual nature; and online sexual harassment.
- causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party.
- consensual and non-consensual sharing of nudes and semi-nude images and or videos (also known as sexting or youth produced sexual imagery) Consensual image sharing, especially between older children of the same age, may require a different response. It might not be abusive – but children still need to know it is illegal- whilst non-consensual is illegal and abusive.
- upskirting, which typically involves taking a picture under a person's clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress, or alarm; and
- initiation/hazing type violence and rituals (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element).

All staff are aware of the importance of understanding intra familial harms and any necessary support for siblings following incidents.

All staff are clear as to the school's procedures with regards to child-on-child abuse and the vital role they play in preventing it and responding where they believe a child may be at risk from it.

If staff have a concern about a child or a child makes a report to them, they will follow the safeguarding referral process. As in any case, if staff are in any doubt as to what to do, they should speak to the DSL/DDSL. Our behaviour procedure will support any sanctions.

Guidance Documents:

- [Staffscb-Responding to Sexting Guidance](#)
- [Disrespect NoBody](#)
- [CEOP-Safety centre](#)
- [UKCIS Guidance: Sharing Nudes and Semi-Nudes](#)
- [Sexual violence and sexual harassment between children in schools and colleges \(publishing.service.gov.uk\)](#)
- [Review of sexual abuse in schools and colleges - GOV.UK \(www.gov.uk\)](#)
- [Searching, screening and confiscation \(publishing.service.gov.uk\)](#)
- [Sharing nudes and semi-nudes: advice for education settings working with children and young people - GOV.UK \(www.gov.uk\)](#)
- [Undressed \(lgfl.net\)](#)

## 12.6 Children Missing from Education

All professionals working with children, as well as the wider community can help by remaining vigilant to children's safety. The law states every child should be receiving an education, and we stand a better chance of ensuring a child's safety if we know where and how they are receiving this.

A child going missing, particularly repeatedly, can be a vital warning sign of a range of safeguarding risks, including abuse and neglect, which may include sexual abuse or exploitation; child criminal exploitation; mental health problems; substance abuse and other issues. Early intervention is necessary to identify the existence of any underlying safeguarding risk and to help prevent the risks of them going missing in future.

Our school holds at least 2 emergency contact numbers for each pupil. If a child goes missing from our school and we are unable to locate them, we will inform parents/carers and we will also contact the Police to report them missing. This will ensure that the Police and other partners have a true picture of missing episodes, which are indicators of risk for some children.

Class registers are completed at the earliest opportunities to ensure all students are accounted for, if a child is found to be missing the Attendance Officer will notify the Senior Leadership team and a full sweep of the school building will be completed.

The school will notify the Local Authority of any pupil/student who fails to attend school regularly after making reasonable enquiries or has been absent without the school's permission for a continuous period of 10 days or more.

The school will also notify the Local Authority of any pupil/student who is to be deleted from the admission register because s/he:

- Has been taken out of school by their parents and is being educated outside the school system (e.g. elective home education).
- Has ceased to attend school and no longer lives within a reasonable distance of the school at which s/he is registered (moved within the city, within the country or moved abroad but failed to notify the school of the change).
- Displaced because of a crisis e.g. domestic violence or homelessness.
- Has been certified by the school medical officer as unlikely to be in a fit state of health to attend school before ceasing to be of compulsory school age, and neither s/he nor his/her parent has indicated the intention to continue to attend the school after ceasing to be of compulsory school age;
- Is in custody for a period of more than four months due to a final court order and the proprietor does not reasonably believe that s/he will return to the school at the end of that period; or
- Has been permanently excluded.

Our school will demonstrate that we have taken reasonable enquiries to ascertain the whereabouts of children that would be considered ['missing'](#)

See also: [JTFS Attendance Procedure](#) and [Working together to improve school attendance](#)  
JTMAT Attendance Policy

### **Child Missing from Home or Care**

There are strong links between children involved in criminal and sexual exploitation and other behaviours such as running away from home, care or school, bullying, self-harm, teenage pregnancy, truancy, and substance misuse.

In addition, some children are particularly vulnerable, for example, children with special needs, those in residential or foster care, those leaving care, migrant children, particularly those who are unaccompanied, those forced into marriage, those involved in gangs and unaccompanied asylum-seeking children. Most children who go missing are not in care and go missing from their family home. However, children who are looked after are much more likely to run away than those who live at home, and over 50% of young people in care have run away at some point.

Guidance document - [Children who run away or go missing from home or care](#)

## 12.7 Child Sexual and Criminal Exploitation

Both CSE and CCE are forms of abuse that occur where an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a child into taking part in sexual or criminal activity, in exchange for something the victim needs or wants, and/or for the financial advantage or increased status of the perpetrator or facilitator and/or through violence or the threat of violence.

CSE and CCE can affect children, both male and female and can include children who have been moved (commonly referred to as trafficking) for the purpose of exploitation.

At John Taylor Free School we utilise the Risk Factor Matrix where concerns arise that a child may be vulnerable to exploitation. Staff in the Safeguarding Team will work with the student to fully understand their vulnerabilities. The DSL/DDSL will also work with parents to ensure they are aware of the proactive purpose of the RFM to help identify and reduce risk. School will seek consent from parents/carers before a referral is made using the RFM.

A member of the Safeguarding Team attends the MACE Panels to ensure a full understanding of risks in the wider community.

CSE is a form of child sexual abuse. Sexual abuse may involve physical contact, including assault by penetration (for example, rape or oral sex) or nonpenetrative acts such as masturbation, kissing, rubbing, and touching outside clothing. It may include noncontact activities, such as involving children in the production of sexual images, forcing children to look at sexual images or watch sexual activities, encouraging children to behave in sexually inappropriate ways or grooming a child in preparation for abuse including via the internet.

CSE can occur over time or be a one-off occurrence and may happen without the child's immediate knowledge e.g., through others sharing videos or images of them on social media.

CSE can affect any child, who has been coerced into engaging in sexual activities. This includes 16- and 17-year-olds who can legally consent to have sex. Some children may not realise they are being exploited e.g. they believe they are in a genuine romantic relationship.

The above CCE indicators can also be signs of CSE, as can having older boyfriends or girlfriends and/or suffering from sexually transmitted infections/becoming pregnant.

Guidance documents :

- [Child Sexual Exploitation Definition & Guidance](#)
- [Know about CSE](#)

## 13. Opportunities to Teach Safeguarding

Preventative education is most effective in the context of a whole school approach that prepares pupils for life in modern Britain and creates a culture of zero tolerance for sexism, misogyny/misandry, homophobia, biphobia, and sexual violence/harassment.

At JTFS, we have a clear message around the school of *"everyone welcome - everyone respected."* A significant part of the PSHCE curriculum, delivered to same-age groups of students in curriculum time, relates to safeguarding oneself and staying healthy emotionally, physically, and socially. These sessions are specifically constructed to meet the level of development of each year group, as is our RSE curriculum.

Besides the PSHCE curriculum, Post 16 students access age-appropriate materials through 'drop-down' days which cover risk management for young adults, amongst other information.

Students of all ages come together in assemblies for their houses, which are designed to support a healthy awareness and critical thinking about the world around them as well as a social responsibility.

In our taught curriculum subjects, students additionally receive age-appropriate guidance about safeguarding themselves. For instance, online safety is taught in the computing curriculum; texts in English are chosen to encourage students to reflect on their own safety.

Arching over all of the above, students are explicitly taught about how to behave in our society and the community beyond our doors. All students receive induction in how to behave in corridors, around toilets, in the restaurant and on the way to and from home as part of their school induction. The constant reminders of the school's mantra "Turn Up, Work Hard, Be Nice" in each of their lesson starters acts as an aide-memoire for students to keep themselves and others safe and well.

#### **14. Responsibilities of all Staff**

All school staff are expected to:

- Recognise signs of abuse, neglect, exploitation, and mental health concerns.
- Respond appropriately to disclosures from children.
- Report concerns to the Designated Safeguarding Lead (DSL).
- Maintain accurate records of concerns and actions taken

#### **When a student tells me about abuse, they have suffered, what should I remember?**

- Stay calm
- Do not communicate shock, anger, or embarrassment
- Reassure the child. Tell them you are pleased that they are speaking to you • Never agree or promise to keep it a secret. Assure them that you will try to help but let the child know that you will have to tell other people in order to do this. State who this will be and why
- Tell them that you believe them. Children very rarely lie about abuse; but they may have tried to tell others and not been heard or believed
- Tell the child that it is not their fault
- Encourage the child to talk but do not ask "leading questions" or press for information
- Use the acronym **T.E.D**: **T**ell me. **E**xplain. **D**escribe
- Listen and remember
- Check that you have understood correctly what the child is trying to tell you
- Communicate that they have a right to be safe and protected
- It is inappropriate to make any comments about the alleged offender
- Be aware that the child may retract what they have told you. It is essential to record in writing, all you have heard, though not necessarily at the time of disclosure.
- At the end of the conversation, tell the child again who you are going to tell and why that person or those people need to know
- As soon as you can afterwards, make a detailed record of the conversation using the child's own language. Include any questions you may have asked. Do not add any opinions or interpretations. (dates, times, names mentioned and to whom the information was passed need to be clearly recorded)
- Use the schools written/electronic recording forms

- If the disclosure relates to a physical injury do not photograph the injury, but record in writing as much detail as possible

The information should then be passed, in a timely way, to the DSL/DDSL. Immediately if the child discloses any abuse they have suffered or may be at risk of suffering.

If DSL/DDSL not available, it is the staff member's **responsibility** to make a referral to First Response and then inform the DSL at the earliest opportunity.

(Staffordshire Children's Advice and Support Services, 0300 111 8007) or email [www.staffordshire.gov.uk/reportconcern](http://www.staffordshire.gov.uk/reportconcern)

### Role of the Staffordshire LADO

The Staffordshire LADO (Local Authority Designated Officer) promotes a safer children's workforce by providing effective guidance, advice, and investigation oversight to cases.

Staffordshire LADO may be able to offer advice and assist with communication in situations which sit outside the statutory criteria, albeit at the discretion of the LADO Duty Officer and where the broader goals of a safer children's workforce are relevant.

The service will give advice on how concerns or allegations should be investigated, including if a referral needs to be raised with the Police and/or Children's Social Care. Staffordshire LADO is not directly responsible for investigatory activities but will actively support any investigation and give advice around a range of parameters including suspension, possible media interest, when to tell the adult, and ensure all interested parties are appropriately linked together.

Staffordshire LADO will retain oversight of individual cases to ensure concerns or allegations are investigated thoroughly in a fair and timely manner, and will advise in relation to any subsequent duties to communicate with regulatory bodies and/or the DBS. |

The SSCB inter-agency procedures for managing [Section 4A - Managing Allegations of Abuse Against a Person who works with Children & the Role of the LADO](#) is based on the framework for dealing with allegations made against an adult who works with children, detailed in **Working Together 2018** and should be followed by all organisations providing services for children and young people. Compliance with these procedures will help to ensure that allegations are dealt with consistently and in a timely manner; that a thorough, proportionate, and fair process is followed and that processes are open to challenge.

Arrangements for managing concerns or allegations of this nature should be robust and effective in keeping children safe. All allegations should be taken seriously, approached with an open mind, and not be driven by preconceived opinions about whether a child has or has not been harmed. [Guidance for Safer Working Practice for Adults who work with Children](#) is available which will help individuals form judgements on what may constitute behaviour that is unsafe or abusive.

*Who to refer concerns to:*

All reports of concern or allegation to the Staffordshire LADO (Local Authority Designated Officer) that an adult working or volunteering with children:

- Has or may have harmed a child

- May have committed a criminal offence related to a child and / or
- Behaved towards a child or children in a way that indicates they may pose a risk of harm to children; or
- Behaved or may have behaved in a way that indicates they may not be suitable to work with children.

**Step 1:** FOLLOW KCSIE 2025 GUIDANCE. The Headteacher will contact the LADO via First Response on 0800 1313126

**Step 2:** Staffordshire Children's Advice and Support Team will ensure that the matter is passed promptly to the Staffordshire LADO Duty Officer and assist in initiating any additional safeguarding activities.

If your concern or allegation is urgent and outside of office hours telephone: 0845 6042 886 (the Emergency Duty Team).

This single referral point will provide a responsive and inclusive service for all children's workforce sectors, focus the advice and support where it is needed most and enable the team to continue to work effectively with partners.

**Further advice on Safeguarding matters can also be obtained from:**

#### Local Contacts

- Staffordshire County Council's Education Safeguarding Advice Service 01785 895836 email: [esas@staffordshire.gov.uk](mailto:esas@staffordshire.gov.uk)
- LADO Staffordshire 0800 13 13 126
- Staffordshire Children's Social Care Services: Children's Advice and Support Services in Multi Agency Safeguarding Hub (M.A.S.H.) 0800 111 8007. Email [www.staffordshire.gov.uk/reportconcern](http://www.staffordshire.gov.uk/reportconcern)
- Emergency Duty Services (out of hours safeguarding concerns) 0845 604 2886 or email [eds.team.manager@staffordshire.gov.uk](mailto:eds.team.manager@staffordshire.gov.uk)
- Staffordshire Police M.A.S.H. can be contacted on 101. In the event of an emergency please dial 999
- Stoke-on-Trent Children's Services: Advice and Referral Team (ART) 01782 235100 Emergency Duty Team: 01782 234234 (outside office hours, weekends, and bank holidays) Minicom: 01782 236037
- Sam Hubza – School Guidance around Asylum Seekers (Central Thoroughfare Team) Tel: 01785 854906
- Staffordshire Police Force coordinator: Mark Hardern, Tel: 07539 3636299 Email: [mark.hardern@staffordshire.pnn.police.uk](mailto:mark.hardern@staffordshire.pnn.police.uk)
- Staffordshire Police Prevent Team 01785 232054, 01785 233109 or email [prevent@staffordshire.pnn.police.uk](mailto:prevent@staffordshire.pnn.police.uk)

## NSPCC

Harmful Sexual Behaviour project: **0844 892 0273**

[Keeping children safe online-online safety/sexting/sending nudes](#)

### Local Advice

- Entrust Learning Technologies ICT/Computing/E-safety Teacher Consultants 0300 111 8030
- Fostering Service (Staffordshire) 0800 169 2061 email [fostering&adoptionbus@staffordshire.gov.uk](mailto:fostering&adoptionbus@staffordshire.gov.uk)  
Out of Hours: Emergency Duty Service 01785 354030
- Staffordshire Safeguarding Children Board 01785 277151 [sscb.admin@staffordshire.gov.uk](mailto:sscb.admin@staffordshire.gov.uk)
- Derbyshire starting point number: 01629533190
- Entrust HR Services (subscription basis) 01785 278961
- Fostering Service (Stoke-on-Trent) 01782 234555 Email: [fostering@stoke.gov.uk](mailto:fostering@stoke.gov.uk)
- Stoke-on-Trent Family Information Service Hub (F.I.S.H) 01782 232200 email [fish@stoke.gov.uk](mailto:fish@stoke.gov.uk)

### National Contacts

- Police (non-emergency 101)
- CEOP (Child Exploitation and Online Protection) <http://ceop.police.uk/>
- Professionals Online Safety Helpline – 0844 381 4772 [www.saferinternet.org.uk/helpline](http://www.saferinternet.org.uk/helpline)
- Internet Watch Foundation (IWF) – <http://www.iwf.org.uk>
- Safer Internet Centre – [helpline@saferinternet.org.uk](mailto:helpline@saferinternet.org.uk)
- Childline – 0800 1111 [www.childline.org.uk](http://www.childline.org.uk)
- Ofsted – General enquiries: 0300 123 1231  
About Schools: 0300 123 4234  
Concerns : 0300 123 4666 e-mails : [enquiries@ofsted.gov.uk](mailto:enquiries@ofsted.gov.uk)
- HM Government (advice on protecting children from radicalisation for parents, teachers, and leaders) [www.educateagainsthate.com](http://www.educateagainsthate.com)
- NSPCC Harmful Sexual Behaviour project: **0844 892 0273**

### Useful websites

- Staffordshire Safeguarding Children Board [StaffsSCB](#)
- Child Exploitation and Online Protection Centre (CEOP) – [Ceop-Police & knowaboutcse](#)
- NSPCC – 24-hour Child Protection Helpline 0808 800 5000 [NSPCC](#)
- WOMENS AID - 24 Hour Helpline: **0870 2700 123**
- UNICEF – Support Care Team 0300 330 5580 (Mon – Fri 8am-6pm). If you think a child is in immediate danger, please call 999. [Unicef](#)

## 15. Appendix 1 - Definitions and Indicators of Abuse

### 1. Neglect

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

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

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

The following may be indicators of neglect (this is not designed to be used as a checklist):

- Constant hunger;
- Stealing, scavenging and/or hoarding food;
- Frequent tiredness or listlessness;
- Frequently dirty or unkempt;
- Often poorly or inappropriately clad for the weather;
- Poor school attendance or often late for school;
- Poor concentration;
- Affection or attention seeking behaviour;
- Illnesses or injuries that are left untreated;
- Failure to achieve developmental milestones, for example growth, weight;
- Failure to develop intellectually or socially;
- Responsibility for activity that is not age appropriate such as cooking, ironing, caring for siblings;
- The child is regularly not collected or received from school; or
- The child is left at home alone or with inappropriate carers.
- Adolescent neglect
- Affluent neglect

### 2. Physical Abuse

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

The following may be indicators of physical abuse (this is not designed to be used as a checklist):

- Multiple bruises in clusters, or of uniform shape;
- Bruises that carry an imprint, such as a hand or a belt;
- Bite marks;
- Round burn marks;
- Multiple burn marks and burns on unusual areas of the body such as the back, shoulders, or buttocks;
- An injury that is not consistent with the account given;

- Changing or different accounts of how an injury occurred;
- Bald patches;
- Symptoms of drug or alcohol intoxication or poisoning;
- Unaccountable covering of limbs, even in hot weather;
- Fear of going home or parents being contacted;
- Fear of medical help;
- Fear of changing for PE;
- Inexplicable fear of adults or over-compliance;
- Violence or aggression towards others including bullying; or
- Isolation from peers.

### 3. Sexual Abuse

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

The following may be indicators of sexual abuse (this is not designed to be used as a checklist):

- Sexually explicit play or behaviour or age-inappropriate knowledge;
- Anal or vaginal discharge, soreness, or scratching;
- Reluctance to go home;
- Inability to concentrate, tiredness;
- Refusal to communicate;
- Thrush, persistent complaints of stomach disorders or pains;
- Eating disorders, for example anorexia nervosa and bulimia;
- Attention seeking behaviour, self-mutilation, substance abuse;
- Aggressive behaviour including sexual harassment or molestation;
- Unusual compliance;
- Regressive behaviour, enuresis, soiling;
- Frequent or open masturbation, touching others inappropriately;
- Depression, withdrawal, isolation from peer group; • ~~or~~ Reluctance to undress for PE or swimming;  
or
- Bruises or scratches in the genital area.

### 4. Exploitation

Child Sexual Exploitation occurs when a child or young person, or another person, receives "something" (for example food, accommodation, drugs, alcohol, cigarettes, affection, gifts, money) as a result of the child/young person performing sexual activities, or another person performing sexual activities on the child/young person.

The presence of any significant indicator for sexual exploitation should trigger a referral to Staffordshire Children's Social Care. The significant indicators are:

- Having a relationship of concern with a controlling adult or young person (this may involve physical and/or emotional abuse and/or gang activity);
- Entering and/or leaving vehicles driven by unknown adults;
- Possessing unexplained amounts of money, expensive clothes, or other items;
- Frequenting areas known for risky activities;
- Being groomed or abused via the Internet and mobile technology; and
- Having unexplained contact with hotels, taxi companies, or fast-food outlets.
- Missing for periods of time (CSE and County Lines)

## 5. Emotional Abuse

Emotional abuse is the persistent emotional maltreatment of a child such as to cause severe and persistent adverse effects on the child's emotional development. It may involve conveying to children that they are worthless or unloved, inadequate, or valued only as far 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 the 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 also involve seeing or hearing the ill-treatment of another person. 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.

The following may be indicators of emotional abuse (this is not designed to be used as a checklist):

- The child consistently describes him/herself in extremely negative ways – as stupid, naughty, hopeless, ugly;
- Over-reaction to mistakes;
- Delayed physical, mental, or emotional development;
- Sudden speech or sensory disorders;
- Inappropriate emotional responses, fantasies;
- Neurotic behaviour: rocking, banging head, regression, tics, and twitches;
- Self-harming, drug, or solvent abuse;
- Fear of parents being contacted;
- Running away;
- Compulsive stealing;
- Appetite disorders - anorexia nervosa, bulimia; or
- Soiling, smearing faeces, enuresis.

N.B.: Some situations where children stop communicating suddenly (known as "traumatic mutism") can indicate maltreatment.

## 6. Responses from Parents/Carers

Research and experience indicate that the following responses from parents may suggest a cause for concern across all five categories:

- Delay in seeking treatment that is obviously needed.
- Unawareness or denial of any injury, pain, or loss of function (for example, a fractured limb);
- Incompatible explanations offered, several different explanations or the child is said to have acted in a way that is inappropriate to her/his age and development.
- Reluctance to give information or failure to mention other known relevant injuries.
- Frequent presentation of minor injuries.
- A persistently negative attitude towards the child;
- Unrealistic expectations or constant complaints about the child;
- Alcohol misuse or other drug/substance misuse.
- Parents request removal of the child from home; or
- Violence between adults in the household.
- Evidence of coercion and control.

## 7. Disabled Children

When working with children with disabilities, practitioners need to be aware that additional possible indicators of abuse and/or neglect may also include:

- A bruise in a site that may not be of concern on an ambulant child such as the shin, maybe of concern on a non-mobile child.
- Not getting enough help with feeding leading to malnourishment.
- Poor toileting arrangements.
- Lack of stimulation.
- Unjustified and/or excessive use of restraint.
- Rough handling, extreme behaviour modification such as deprivation of medication, food, or clothing, disabling wheelchair batteries.
- Unwillingness to try to learn a child's means of communication.
- Ill-fitting equipment, for example, callipers, sleep boards, inappropriate splinting; • Misappropriation of a child's finances; or
- Inappropriate invasive procedures.