

Responding to a concern about a child

Where a young person alleges or appears to be the victim of abuse or neglect

- Listen to the child. Take their allegations seriously.
- Reassure the child that you will take action to keep them safe
- Do not promise to keep secrets.
- Make a written record of what the child tells you.
- Explain to the child what you are going to do next.
- Do not question the child further or attempt to question the alleged abuser.

Discuss concerns with the Designated/Deputy Safeguarding Lead (DSL/DDSL)

- The Organisation DSL at Eat That Frog is Kate Dorling. The Centre DSLs/DDSL are Jo Deacon, Rosie Mitchell, Lee Hanks, JoJo Boynton, Sophie Godwin, Julia Foster and Zoe Ellis ILM .
- If the matter involves the DSL, it should be brought to the attention of a Director.
- A written record of the concern will be recorded as an incident in the learners file on CPOMS.
- A member of staff should contact Children's Social Care directly only in exceptional circumstances and are asked to advise a DSL that they have done so.

The child is judged to be in real and immediate danger:

- Dial 999 and ask for Police assistance.

There is a safeguarding concern: the matter should be referred to Children's Social Care

- Contact the Multi Agency Safeguarding Hub (MASH) on:

TORBAY - 01803 208100 - Out of Hours Emergency Duty Team - 0300 456 4876

DEVON - 0345 155 1071. Out of Hours Emergency Duty Team - 0345 6000 388.

PLYMOUTH - 01752 668000 Out of Hours Emergency Duty Team 01752 346984.

There is not a safeguarding concern:

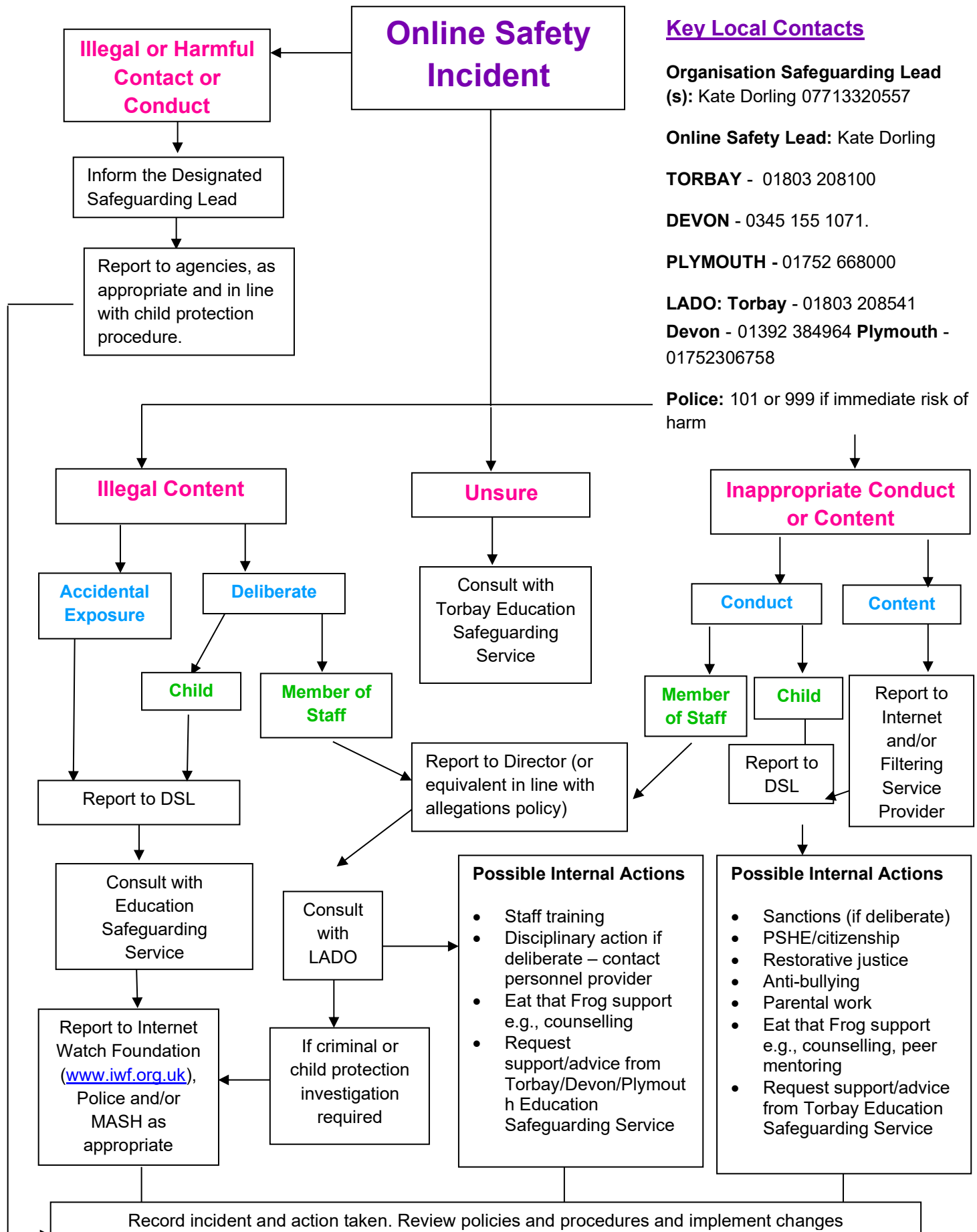
- The DSL will carefully consider if the child/family has any further needs which ought to be addressed.
- The DSL will consult with family and relevant agencies and undertake an Early Help Assessment if required.
- The member of staff who made the referral will be informed of the outcome.

Children's Social Care will:

- Acknowledge receipt of the referral
- Decide (within 24 hours) on next steps
- Inform the referrer of the course of action that has been decided

Please note: This flowchart is intended as a brief guide.
Staff should also refer to the Eat That Frog's Child Protection Policy, KCSiE 2025 and Working Together to Safeguard Children 2023.

Responding to an Online Safety Concern



Key Local Contacts

Organisation Safeguarding Lead (s): Kate Dorling 07713320557

Online Safety Lead: Kate Dorling

TORBAY - 01803 208100

DEVON - 0345 155 1071.

PLYMOUTH - 01752 668000

LADO: Torbay - 01803 208541

Devon - 01392 384964 **Plymouth** - 01752306758

Police: 101 or 999 if immediate risk of harm

Child Protection and Safeguarding Policy

Last Update:

Contents

1. Key facts	Page 5
2. Safeguarding Statement	Page 5
3. Key personnel & Terminology	Page 7
4. Introduction	Page 8
5. Policy Principles	Page 8
6. Policy Aims	Page 8
7. Values	Page 9
8. Safe College, Safe Staff	Page 11
9. Roles and Responsibilities	Page 12
10. Confidentiality	Page 16
11. Child Protection Procedures	Page 16
12. Children who are particularly vulnerable	Page 21
13. Anti-Bullying / Cyberbullying	Page 22
14. Racist Incidents	Page 22
15. Radicalisation and Extremism	Page 22
16. Domestic Abuse	Page 24
17. Child Sexual Exploitation (CSE) & Child Criminal Exploitation (CCE)	Page 24
18. Female Genital Mutilation (FGM)	Page 25
19. Forced Marriage	Page 26
20. Honour based abuse	Page 26
21. One Chance Rule	Page 27
22. Mental Health	Page 27
23. Private Fostering Arrangements	Page 27

Child Protection and Safeguarding Policy

24. Cared for Children & Previously Cared for Children	Page 28
25. Children Absent from Education	Page 28
26. Online Safety	Page 29
27. Child on child sexual violence & sexual harassment	Page 30
28. Youth Produced Sexual Imagery (Sexting)	Page 30
29. Allegations against Staff	Page 32
30. Whistle-blowing	Page 33
31. Physical Intervention	Page 34
32. Confidentiality and Information Sharing	Page 34
33. Linked Policies	Page 35
Appendix 1 – Child-on-Child abuse policy and procedure	Page 38
Appendix 2 - Recognising signs of child abuse	Page 50
Appendix 3 – Sexual Abuse & Sexual Harassment	Page 55
Appendix 4 – Exploitation (incl. CSE & CCE)	Page 57
Appendix 5 – Female Genital Mutilation	Page 59
Appendix 6 – Domestic Abuse (incl. Operation Encompass)	Page 61
Appendix 7 – Indicators of vulnerability to Radicalisation	Page 63
Appendix 8 – Police and Criminal Evidence Act (Code C)	Page 65
Appendix 9 – Resources	Page 66
Appendix 10 - Contacts including MASH	Page 68

Child Protection and Safeguarding Policy

1. Child Protection and Safeguarding Policy

Managing Director: Ian Powell

Organisation Safeguarding Lead: Kate Dorling

Centre Designated Safeguarding Leads: Jo Deacon, Sophie Godwin, Rosie Mitchell, Lee Hanks, JoJo Boynton Zoe Ellis

Status & Review Cycle: Statutory/Annual

Next Review Date: August 2026

2 Safeguarding and Wellbeing Statement

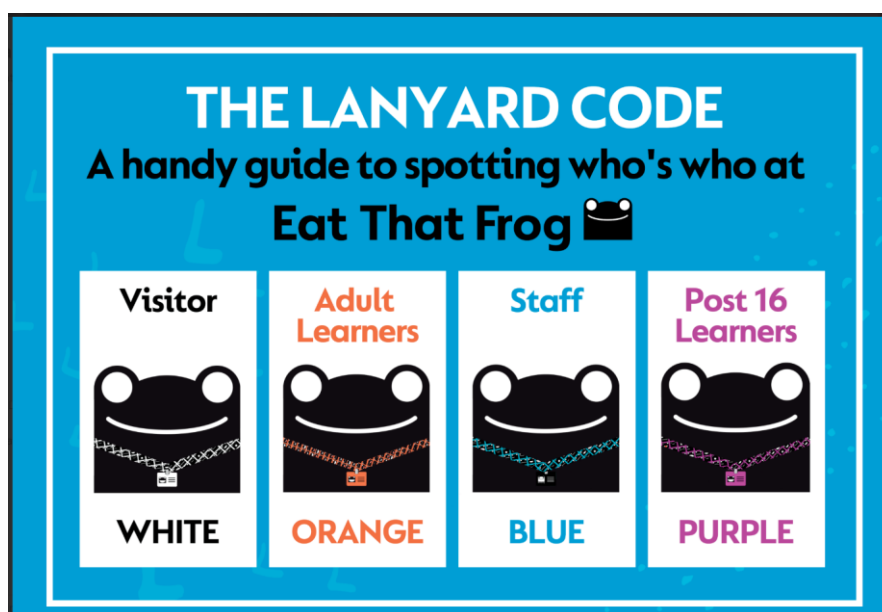
2.1 Eat That Frog recognise our moral and statutory responsibility to safeguard and promote the welfare of all learners. We endeavour to provide a safe and welcoming environment where learners are respected and valued. We are alert to the signs of abuse and neglect and follow our procedures to ensure that learners receive effective support, protection, and justice. We do this first and foremost by listening to our learners and remembering the principle of the Children's Act 1989 that the welfare of the child is paramount. Adults in the college take all welfare concerns seriously and encourage learners to talk to us about anything that worries them. We will always act in the best interest of the young person.

2.2 Child protection forms part of the college's safeguarding responsibilities. The Child Protection and Safeguarding policy underpins and guides Eat That Frog's procedures and protocols to ensure its learners and staff are safe. All our staff understand that it is everyone's responsibility to safeguard and protect children, and the way we try to do this is by developing trusting relationships with children and giving them time to talk to us.

2.3 At Eat That Frog we aspire to a culture of zero tolerance against any sort of unacceptable behaviour. We will take seriously any reports of sexual harassment or peer on peer abuse or discrimination of any kind. As carers you know your children best. Please do not hesitate to contact the key personnel named below to ask for support or to discuss any worries you have for your children and be assured we will do all we can to help. We would also like to emphasise that our responsibilities still apply if your child cannot be in Eat That Frog for any reason so, please do not hesitate to contact us.

2.4 Key Personnel

Role	Name	Email	Telephone
Designated Safeguarding Leads (DSL)*	Joanne Deacon	joanne.deacon@eatthatfrog.ac.uk	07483 418918
	Rosie Mitchell	rosie.mitchell@eatthatfrog.ac.uk	01803 551551
	JoJo Boynton	JoJo.boynton@eatthatfrog.ac.uk	01803 551551
	Lee Hanks	lee.hanks@eatthatfrog.ac.uk	01803 551551
	Zoe Ellis	zoe.ellis@eatthatfrog.ac.uk	07483418949
	Julia Foster	julia.foster@eatthatfrog.ac.uk	07483940061
	Sophie Godwin	sophie.godwin@eatthatfrog.ac.uk	07802379374
Organisation Designated Safeguarding lead	Kate Dorling	kate.dorling@eatthatfrog.ac.uk	07713320557
Managing Director	Ian Powell	ian.powell@eatthatfrog.ac.uk	07730 126 300



The wearing of the Eat That Frog lanyard and ID card is compulsory and must be worn at all times when at work and on Eat That Frog Premises. This is for everyone's safety and to clearly identify staff, learners and visitors. The lanyard should be worn around the neck, on the front of the body and on the outermost piece of clothing. The ID must be visible and not covered, only the Eat That Frog lanyard must be worn. If staff forget their lanyard and ID card, they must go immediately to the reception desk of the building that they are in to receive a replacement. If a staff member identifies another individual on Eat That Frog premises who is not wearing their lanyard and ID card, they must escort them to the manager of that building immediately.

*Out of hours contact details will be made available to staff

3 Terminology

3.1 Safeguarding and promoting the welfare of children is defined as:

- providing help and support to meet the needs of children as soon as problems emerge
- protecting children from maltreatment, whether that is within or outside the home, including online
- preventing the impairment of children's mental and physical health or development
- ensuring that children grow up in circumstances consistent with the provision of safe and effective care
- taking action to enable all children to have the best outcomes

3.2 Child Protection is a part of safeguarding and promoting welfare. It refers to the activity that is undertaken to protect specific children who are suffering, or are likely to suffer, significant harm.

3.3 Staff refers to all those working for or on behalf of Eat That Frog, full or part time, temporary or permanent, in either a paid or voluntary capacity.

3.4 Child includes everyone under the age of 18.

3.5 Parents refers to birth parents and other adults who are in a parenting role, for example stepparents, foster carers and adoptive parents and LA corporate parents.

4 Introduction

4.1 The following safeguarding legislation and guidance has been considered when drafting this policy:

- Section 175 of the Education Act 2002
- Section 157 of the Education Act 2002
- The Education (Independent Schools Standards) (England) Regulations 2003
- The Safeguarding Vulnerable Groups Act 2006
- The Teacher Standards 2012
- Working Together to Safeguarding Children 2023
- Keeping Children Safe in Education 2025
- Education and Training (Welfare of Children) Act 2021 (Post 16 providers)
- Information Sharing 2018
- What to do if you're worried a child is being abused 2015

5 Policy Principles

5.1 The welfare of the child is paramount.

5.2 All children regardless of age, gender, culture, language, race, ability, sexual identity or religion have equal rights to protection, safeguarding and opportunities.

5.3 We recognise that all adults, including temporary staff¹ and volunteers have a full and active part to play in protecting our learners from harm and have an equal responsibility to act on any suspicion or concern that may suggest a child is at risk of harm.

5.4 All staff believe that Eat That Frog should provide a caring, positive, safe, and stimulating environment that promotes the social, physical, mental wellbeing and moral development of the individual child.

5.5 Learners and staff involved in child protection issues will receive appropriate support and supervision.

6 Policy Aims

6.1 Safeguarding incidents and/or behaviours can be associated with factors outside Eat That Frog and/or can occur between children outside Eat That Frog. All staff, but especially the designated safeguarding lead (or deputy) should be considering the context within which such incidents and/or behaviours occur. This is known as contextual safeguarding, which simply means assessments of children should consider whether wider environmental factors are present in a

¹ Wherever the word "staff" is used, it covers ALL staff on site, including ancillary supply and self-employed staff, contractors, volunteers working with children etc and governors.

Child Protection and Safeguarding Policy

child's life that are a threat to their safety and/or welfare. These can also be considered as extra-familial contexts

6.2 To demonstrate Eat That Frog's commitment with regard to safeguarding and child protection to learners, parents, and other partners.

6.3 To support the child's development in ways that will foster security, confidence, and independence.

6.4 To provide an environment in which children and young people feel safe, secure, valued, and respected, and feel confident to, and know how to approach adults if they are in difficulties, believing they will be effectively listened to.

6.5 To raise the awareness of all teaching and non-teaching staff of the need to safeguard children and of their responsibilities in identifying and reporting possible cases of abuse.

6.6 To provide a systematic means of monitoring children known or thought to be at risk of harm, and ensure we, Eat That Frog, contribute to assessments of need and support packages for those children.

6.7 To emphasise the need for good levels of communication between all members of staff.

6.8 To develop a structured procedure within Eat That Frog which will be followed by all members of the college community in cases of suspected abuse.

6.9 To develop and promote effective working relationships with other agencies, especially the Police and MASH.

6.10 To ensure that all staff working within Eat That Frog who have substantial access to children have been checked as to their suitability, including verification of their identity, qualifications, and a satisfactory DBS check (according to guidance)², and a single central record is kept for audit.

7 Values

7.1 Supporting Children.

7.2 We recognise that a child who is abused or is a witness to violence may feel helpless and humiliated, may blame themselves, and find it difficult to develop and maintain a sense of self-worth.

7.3 We recognise that the Eat That Frog may provide the only stability in the lives of children who have been abused or who are at risk of harm.

² Guidance regarding DBS checks recently updated by the Protection of Freedoms Act 2012

Child Protection and Safeguarding Policy

7.4 We accept that research shows that the behaviour of a child in these circumstances may range from that which is perceived to be normal to aggressive or withdrawn as well as exhibiting signs of mental health problems.

7.5 We understand the impact on a child's mental health, behaviour and education when experiencing difficulties, abuse and/or neglect.

7.6 Eat That Frog will support all children by:

- encouraging self-esteem and self-assertiveness, through the curriculum as well as our relationships, whilst not condoning aggression or bullying.
- promoting a caring, safe, and positive environment within Eat That Frog.
- responding sympathetically to any requests for time out to deal with distress and anxiety.
- offering details of helplines, counselling, or other avenues of external support.
- liaising and working together with all other settings, support services and those agencies involved in the safeguarding of children.
- notifying Torbay Multi Agency Safeguarding Hub (MASH) as soon as there is a significant concern.
- providing continuing support to a child about whom there have been concerns who leaves Eat That Frog by ensuring that appropriate information is copied under confidential cover to the child's new setting and ensuring the Eat That Frog medical records are forwarded as a matter of priority.

Children are taught to understand and manage risk through Relationship and Sex Education and through all aspects of Eat That Frog life. This includes online safety; and by accessing and utilising the necessary resources, guidance, and toolkits to support the identification of children requiring mental health support, support services and assessments and the subsequent systems and processes.

7.7 We recognise that Eat That Frog plays a significant part in the prevention of harm to our children by providing children with good lines of communication with trusted adults, supportive friends, and an ethos of protection.

7.8 Eat That Frog will therefore:

- work to establish and maintain an ethos where learners feel secure, are encouraged to talk, and are always listened to.
- include regular consultation with learners e.g., through safety questionnaires, participation in anti-bullying week, asking learners to report concerns
- ensure that all learners know there are adults in Eat That Frog whom they can approach if they are worried or in difficulty.
- include safeguarding across the curriculum and opportunities which equip children with the skills they need to stay safe from harm and to know to whom they should turn for help; this will include anti-bullying work, online-safety, road safety, pedestrian safety; provide

Child Protection and Safeguarding Policy

focussed activities to prepare key year groups for transition to new settings and/or key stages e.g., more personal safety/independent travel; and

- ensure all staff, learners and parents are aware of Eat That Frog guidance for their use of mobile technology and the safeguarding issues around the use of mobile technologies and their associated risks have been shared.

8. Safe college, Safe Staff

8.1 We will ensure that:

- all staff and volunteers read and understand KCSiE 2025 as required and relevant to their role at the Eat That Frog.
- all staff receive information about the Eat That Frog's safeguarding arrangements, staff behaviour policy (code of conduct)³, child protection and safeguarding policy, behaviour policy, the safeguarding response to children who go missing from education, the role and names of the Designated Safeguarding Leads and sign to say they have read, understood, and will abide by it.
- all staff receive safeguarding and child protection information, including online safety, at induction.
- all staff receive safeguarding and child protection training, including online safety, in line with advice from Torbay Safeguarding Children Partnership (TSCP), The Devon Safeguarding Children Partnership (Devon SCP) and Plymouth Safeguarding Children Partnership which is regularly updated (for example, via email, e-bulletins and staff meetings), as required, but at least annually.
- all members of staff are trained in and receive regular updates in online safety and reporting concerns.
- all staff have annual child protection awareness training, updated by the DSL as appropriate, to maintain their understanding of the signs and indicators of abuse.
- the Child Protection and Safeguarding policy is made available via the Eat That Frog website or other means and that parents/carers are made aware of this policy and their entitlement to have a copy via Eat That Frog's handbook/newsletter/website. All parents/carers are made aware of the responsibilities of staff members regarding child protection procedures through the publication of the Child Protection and Safeguarding policy and reference to it in handbook.
- Eat That Frog provides a coordinated offer of Early Help when additional needs of children are identified and contributes to early help arrangements and inter-agency working and plans
- our lettings policy will seek to ensure the suitability of adults working with children on Eat That Frog sites at any time, for example, by having evidence of DBS checks having been undertaken.

³ The code of conduct should include acceptable use of technology, staff & learner relationship boundaries and communications, including the use of social media.

Child Protection and Safeguarding Policy

- Any visits to Eat That Frog by professionals will be booked in advance and the centre DSL made aware.
- community users organising activities for children are aware of the Eat That Frog's Child Protection and Safeguarding policy, guidelines, and procedures.
- The name of the designated members of staff for child protection are clearly advertised in Eat That Frog with a statement explaining Eat That Frog's role in referring and monitoring cases of suspected abuse.

9 Roles and Responsibilities

9.1 All Directors understand and fulfil their responsibilities, namely, to ensure that there is an effective Child Protection and Safeguarding policy together with a staff behaviour policy (code of conduct).

9.2 Child protection, safeguarding, recruitment and managing allegations policies and procedures, including the staff behaviour policy (code of conduct), are consistent with Torbay Devon and Plymouth guidance and statutory requirements, are reviewed annually and that the Child Protection and Safeguarding policy is publicly available on the Eat That Frog website or by other means.

9.3 Ensures that all staff including temporary staff and volunteers are provided with Eat That Frog's child protection and safeguarding policy and staff Code of Conduct.

9.4 All staff have read the appropriate sections of Keeping Children Safe in Education (2025) and mechanisms are in place to assist staff in understanding and discharging their roles and responsibilities as set out in the guidance.

9.5 Eat That Frog operates a safer recruitment procedure that includes statutory checks on staff suitability to work with children and disqualification by association regulations and by ensuring that there is at least one person on every recruitment panel who has completed safer recruitment training.

9.6 Eat That Frog has procedures for dealing with allegations of abuse against staff (including Directors), supply staff, volunteers and against other children and that a referral is made to the DBS if a person in regulated activity has been dismissed or removed due to safeguarding concerns or would have had they not resigned.

9.7 A Director will liaise with the local authority (LA) on Child Protection issues and in the event of an allegation of abuse made against another Director.

9.8 A member of the senior leadership (SLT) team has been appointed as the Organisation Designated Safeguarding Lead by the Governing Body/Board who will take lead responsibility for safeguarding and child protection and that the role is explicit in the role holder's job description.

Child Protection and Safeguarding Policy

- 9.9 On appointment, the DSLs undertake appropriate Level 3 identified training offered by TSCP or other provider every two years.
- 9.10 All professionals working consistently with vulnerable learners will receive robust supervision.
- 9.11 All other staff have safeguarding training updated as appropriate; but at least annually.
- 9.12 At least one Director has completed safer recruitment training to be repeated every five years.
- 9.13 Learners are taught about safeguarding (including online safety) as part of a broad and balanced curriculum covering relevant issues through personal social health and economic education (pastoral tuition) and through Eat That Frog's relationship and sex education (RSE).
- 9.14 Appropriate safeguarding responses are in place for children who go missing from education, particularly on repeat occasions, to help identify the risk of abuse and neglect including sexual abuse or exploitation and to help prevent the risks of their going missing in future.
- 9.15 Appropriate online filtering and monitoring systems are in place.
- 9.16 Enhanced DBS checks are in place for all Directors.
- 9.17 Any weaknesses in Child Protection are remedied immediately.
- 9.18 Directors will ensure that:
- the Child Protection and Safeguarding policy is effective, and procedures are implemented and followed by all staff.
 - sufficient time, training, support, resources, including cover arrangements where necessary, is allocated to the DSLs to carry out their roles effectively, including the assessment of learners and attendance at child protection and other necessary meetings.
 - where there is a safeguarding concern that the child's wishes, and feelings are considered when determining what action to take and what services to provide.
 - systems are in place for children to express their views and give feedback which operate with the best interest of the child at heart.
 - all staff feel able to raise concerns about poor or unsafe practice and that such concerns are handled sensitively and in accordance with the whistle-blowing procedures.
 - learners are provided with opportunities throughout the curriculum to learn about safeguarding, including keeping themselves safe online. We are sensitive to the specific needs and vulnerabilities of individual children, including children who are victims of abuse, and children with special educational needs or disabilities.

Child Protection and Safeguarding Policy

- they liaise with the Local Authority Designated Officer (LADO), before taking any action and on an ongoing basis, where an allegation is made against a member of staff, supply staff or volunteer; and
- anyone who has harmed or may pose a risk to a child is referred to the Disclosure and Barring Service.

9.19 The Organisation Designated Safeguarding Lead (ODSL)

- holds ultimate responsibility for safeguarding and child protection (including online safety) in Eat That Frog and is a member of the SLT.
- will liaise with the Directors to inform them of issues - especially ongoing enquiries under section 47 of the Children Act 1989 and police investigations. This should include being aware of the requirement for children to have an Appropriate Adult – see Appendix 8
- will liaise with the Directors to ensure the school fully adheres to the DfE Searching, screening and confiscation guidance for schools⁴ paying particular attention to the requirements in respect of strip searching and the encouragement to involve parents in decision making
- acts as a source of support and expertise in carrying out safeguarding duties for the whole Eat That Frog community.
- will have the necessary knowledge and understanding to recognise possible children at risk of contextual and/or extra familial abuse or exploitation. Eat that Frog assesses the risks and issues in the wider community when consider the well-being and safety of its pupils.
- encourages a culture of listening to learners and taking account of their wishes and feelings.
- is appropriately trained with updates every two years and will refresh their knowledge and skills at regular intervals but at least annually.
- will refer a child if there are concerns about possible abuse, to the MASH⁵, and act as a focal point for staff to discuss concerns. Enquiries⁶ must be followed up in writing, if referred by telephone.
- will keep detailed, accurate records, either written or using appropriate online software, of all concerns about a child even if there is no need to make an immediate referral.
- will ensure that all such records are kept confidential, stored securely and are separate from learner records, until the child's 25th birthday.
- will ensure that an indication of the existence of the additional file is marked on the learner records.

- will ensure that when a learner leaves the Eat That Frog, relevant child protection information is passed to the new provider (separately from the main learner file) as soon as possible, ensuring secure transit and that confirmation of receipt is obtained.
- in addition to the child protection file, the designated safeguarding lead should also consider if it would be appropriate to share any information with the DSL of the new provider or college in advance of a learner leaving; for example, information that would allow the new provider or college to continue supporting victims of abuse and have that support in place for when the child arrives. All transfers should be made securely.
- will liaise with the LA, its safeguarding partners and work with other agencies and professionals in line with Working Together to Safeguard Children 2023.
- has a working knowledge of Torbay Devon and Plymouth safeguarding procedures.
- will ensure that either they, or another staff member, attend case conferences, core groups, or other multi-agency planning meetings; contribute to assessments, and provide a report where required which has been shared with the parents/carers.
- will ensure that any learner currently with a child protection plan who is absent in the educational setting without explanation for two days is referred to their social worker.
- will ensure that all staff sign to say they have read, understood, and agree to work within Eat That Frog's child protection policy, behaviour policy, staff Code of conduct and Keeping Children Safe in Education 2025 and ensure that the policies are used appropriately.
- will organise child protection and safeguarding induction, regularly updated training, and provide a minimum of annual updates on (including online safety) for all Eat That Frog staff, keep a record of attendance and address any absences.
- will contribute to and provide, with the Directors, the "Audit of Statutory Duties and Associated Responsibilities" (S175/157 audit) to be submitted annually to the Education Team working on behalf of Torbay Council.
- understands locally agreed processes for providing early help and intervention and will support members of staff where Early Help is appropriate, or completion of the exploitation tool is necessary; and
- will ensure that the name of the designated members of staff for Child Protection, the Designated Safeguarding Lead, and deputies, are clearly advertised in the Eat That Frog, with a statement explaining Eat That Frog's role in referring and monitoring cases of suspected abuse.

9.20 The Deputy Designated Safeguarding Lead(s) (DDSLs):

- are trained to the same standard as the Designated Safeguarding Lead and, in the absence of the DSL, carries out those functions necessary to ensure the ongoing

safety and protection of learners. In the event of the long-term absence of the DSL the deputy will assume all the functions above.

9.21 All Eat That Frog Staff:

- understand that it is everyone's responsibility to safeguard and promote the welfare of children and that they have a role to play in identifying concerns, sharing information, and taking prompt action.
- consider, always, what is in the best interests of the learner.
- have a role to play in ensuring there is a whole school approach to safeguarding, including promoting a culture of zero tolerance towards any form of abuse, including peer on peer abuse.
- will be aware of the indicators of abuse and neglect both familial and contextual; and recognise that contextual harm can take a variety of different forms.
- know how to respond to a learner who alleges or appears to be the victim of abuse through delivery of 'Working together to Safeguard Children', and 'What to do if you're worried a child is being abused'.
- will refer any safeguarding or child protection concerns to the DSL or if necessary, where the child is at immediate risk to the police or MASH. Staff share any concerns they have about a child with the Designated Safeguarding Lead. However, it should be remembered that sometimes children will 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.
- will complete a safeguarding incident form on CPOMS and ensure it is alerted to the centres DLS and ODSL who can manage the situation and action the concern.
- will be aware of the Torbay, Devon and Plymouth Professional Differences (Escalation) policies or the duty to report concerns if the DSL fails to do so without reasonable cause.
- are aware of the Early Help process and understand their role within it including identifying emerging problems for children who may benefit from an offer of Early Help, liaising with the DSL in the first instance and supporting other agencies and professionals in an early help assessment through information sharing. In some cases, staff may act as the Lead Professional in Early Help cases; and
- will provide a safe and nurturing environment in which children can learn.

10 Confidentiality

10.1 Eat That Frog recognises that to effectively meet a learner's needs, safeguard their welfare, and protect them from harm, Eat That Frog must contribute to inter-agency working in line with Working Together to Safeguard Children (2023) and share information between professionals and agencies where there are concerns.

Child Protection and Safeguarding Policy

10.2 All staff must be aware that they have a professional responsibility to share information with other agencies to safeguard children and that the Data Protection Act 2018 ⁷ is not a barrier to sharing information where the failure to do so would place a child at risk of harm.

10.3 All staff must be aware that they cannot promise a child to keep secrets which might compromise the child's safety or wellbeing.

10.4 However, we also recognise that all matters relating to child protection are personal to children and families. Therefore, in this respect they are confidential, and the Directors or DSLs will only disclose information about a child to other members of staff on a need-to-know basis.

10.5 We will always undertake to share our intention to refer a child to MASH with their parents /carers unless to do so could put the child at greater risk of harm or impede a criminal investigation. If in doubt, we will seek advice from the MASH. Eat That Frog can also consult with TESS (Torbay Education Safeguarding Service) Devon or Plymouth safeguarding advisors.

11 Child Protection Procedures

11.1 Abuse and neglect are forms of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Children may be abused in the family or in an institutional or community setting by those known to them or by others. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. They may be abused by an adult or adults or by another child or children. Harm can include ill treatment that is not physical as well as the impact of witnessing ill treatment of others. This can be particularly relevant, for example, in relation to the impact on children of all forms of domestic abuse.

11.2 Abuse and neglect may also take place outside of the home, (contextual safeguarding) and this may include (but is not limited to), sexual exploitation, criminal exploitation, serious youth violence, radicalisation. Further information about the four categories of abuse; physical, emotional, sexual and neglect, and indicators that a child may be being abused can be found in the appendices.

11.3 Any child in any family in any Eat That Frog setting could become a victim of abuse. Staff should always maintain an attitude of "It could happen here".

11.4 There are also several specific safeguarding concerns that we recognise our learners may experience.

- child missing from education
- child missing from home or care
- child sexual exploitation (CSE)
- child criminal exploitation
- bullying including cyberbullying
- domestic abuse
- drugs
- fabricated or induced illness
- faith abuse

Child Protection and Safeguarding Policy

- female genital mutilation (FGM)
- forced marriage
- gangs and youth violence
- gender-based violence/violence against women and girls (VAWG)
- mental health
- private fostering
- radicalisation
- youth produced sexual imagery (sexting)
- teenage relationship abuse
- trafficking
- peer on peer abuse
- up skirting
- serious violence

11.5 Staff are aware that behaviours linked to drug taking, alcohol abuse, truanting and sexting put children in danger and that safeguarding issues can manifest themselves via child-on-child abuse. See Appendix A for a more detailed description of the Eat That Frog procedures in respect of child-on-child abuse.

11.6 We also recognise that abuse, neglect, and safeguarding issues are complex and are rarely standalone events that can be covered by one definition or label. Staff are aware that in most cases multiple issues will overlap one another.

If staff are concerned about a child's welfare

11.7 If staff notice any indicators of abuse/neglect or signs that a child may be at risk of harm they should record these concerns by logging an incident onto CPOMS altering the DSL and ODSL. **If using an electronic alert, the sender should not assume the DSL will immediately receive this and any serious concerns should be reported immediately.** If concerns are discussed in person with the DSL details should also be recorded in writing and actioned onto CPOMS.

11.8 There will be occasions when staff may suspect that a learner may be at risk but have no 'real' evidence. The learner's behaviour may have changed, their artwork could be bizarre, and they may write stories or poetry that reveal confusion or distress, or physical or inconclusive signs may have been noticed.

11.9 Eat That Frog recognise that the signs may be due to a variety of factors, for example, a parent has moved out, a pet has died, a relative is unwell, or an accident has occurred. However, they may also indicate a child is being abused or needs safeguarding.

11.10 In these circumstances staff will try to give the child the opportunity to talk. It is fine for staff to ask the learner if they are OK or if they can help in any way. Following an initial conversation with the learner, if the member of staff remains concerned, they should discuss their concerns with the DSL and put them in writing. If the learner does begin to reveal that they are

⁷ [Data protection - GOV.UK \(www.gov.uk\)](https://www.gov.uk)

Child Protection and Safeguarding Policy

being harmed, staff should follow the advice below regarding a learner making an allegation of abuse or displaying behaviours that suggest they may have been abused.

If a learner tells a member of staff that they have been abused or behaves in such a way as to lead to a concern they may have been abused

11.11 We recognise that it takes a lot of courage for a child to tell someone they are being abused. They may feel ashamed, guilty, or scared, their abuser may have threatened that something will happen if they tell, they may have lost all trust in adults or believe that what has happened is their fault. Sometimes they may not be aware that what is happening is abuse.

11.12 A child who tells/shows that they have been abused may have to tell their story on several subsequent occasions to the police and/or social workers. Therefore, it is vital that their first experience of talking to a trusted adult is a positive one.

11.13 During their conversation with the learner staff will:

- listen to what the child has to say and allow them to speak freely.
- remain calm and not overact or give any indication of being shocked or alarmed – the learner may stop talking if they feel they are upsetting the listener.
- reassure the child that it is not their fault and that they have done the right thing in telling someone.
- not be afraid of silences – staff must remember how difficult it is for the learner and allow them time to talk.
- take what the child is telling them seriously.
- avoid asking leading questions, where possible allow the child to take the lead. Use TED – Tell, Explain, Describe.
- limit questions to those necessary to try and obtain a context.
- where sexual abuse has been alleged or an allegation of criminal abuse do not ask additional questions telephone the MASH for advice, however, do not stop the child talking.
- avoid jumping to conclusions, speculation or make accusations.
- not automatically offer any physical touch as comfort. It may be anything but comforting to a child who is being abused.
- avoid admonishing the child for not telling them sooner. Saying things such as ‘I do wish you had told me about it when it started’ may be the staff member’s way of being supportive but may be interpreted by the child to mean they have done something wrong; and
- tell the child what will happen next.

11.14 If a learner talks to any member of staff about any risks to their safety or wellbeing the staff member will let the child know that they will have to pass the information on – staff are not allowed to keep secrets.

11.15 The member of staff should log the incident as soon as possible onto CPOMS in the learner’s own words. It should also detail where the allegation/statement was made and who else was

Child Protection and Safeguarding Policy

present. Staff should make this a matter of priority. The DSL and ODLS must be alerted and a followed up immediately in person.

11.16 Eat That Frog will normally seek to discuss any concerns about a learner with their parents. This must be handled sensitively and normally the DSL will contact the parent in the event of a concern, suspicion, or allegation

11.17 However, if Eat That Frog believes that notifying parents could increase the risk to the child or exacerbate the problem, advice will first be sought from children's MASH e.g., familial sexual abuse.

11.18 Where there are concerns about forced marriage or honour-based violence parents should not be informed a referral is being made as to do so may place the child at a significantly increased risk. In some circumstances it would be appropriate to contact the police.

Making a referral

11.19 Concerns about a child having been abused should be immediately raised with the DSL who will help decide whether a referral to children's MASH or other support is appropriate in accordance with TSCP/Devon and Plymouth interactive threshold tool ⁸

11.20 If a referral is needed, then the DSL should make this rapidly and there must be systems in place to enable this to happen. However, anyone can make a referral and if for any reason a staff member thinks a referral is appropriate and one hasn't been made, they can and should consider making a referral themselves.

11.21 The child (subject to their age and understanding) and the parents will be told that a referral is being made, unless to do so would increase the risk to the child.

11.22 If after a referral the child's situation does not appear to be improving the DSL (or the person that made the referral) should press for re-consideration to ensure their concerns have been addressed, and most importantly the child's situation improves.

11.23 If a child is in immediate danger or is at risk of harm a referral should be made to children's MASH and/or the police immediately.

11.24 Where referrals are not made by the DSL, the DSL should be informed as soon as possible.

Supporting our Staff

11.25 We recognise that staff working in the Eat That Frog who have become involved with a learner who has suffered harm or appears to be likely to suffer harm may find the situation stressful and upsetting.

⁸ [Interactive Threshold Tool \(torbaysafeguarding.org.uk\)](https://torbaysafeguarding.org.uk)

Child Protection and Safeguarding Policy

11.26 We will support such staff by providing an opportunity to talk through their anxieties with the DSL and to seek further support as appropriate.

11.27 All professionals working consistently with vulnerable learners will receive robust supervision

12 Children who are particularly vulnerable

12.1 Eat That Frog recognises that some children are more vulnerable to abuse and neglect and that additional barriers exist when recognising abuse for some children.

12.2 We understand that this increase in risk is due more to societal attitudes and assumptions or child protection procedures which fail to acknowledge children's diverse circumstances, rather than the individual child's personality, impairment, or circumstances.

12.3 In some cases, possible indicators of abuse such as a child's mood, behaviour or injury might be assumed to relate to the child's impairment or disability rather than giving a cause for concern. Or a focus may be on the child's disability, special educational needs, or situation without consideration of the full picture. In other cases, such as bullying, the child may be disproportionately impacted by the behaviour without outwardly showing any signs that they are experiencing it.

12.4 Some children may also find it harder to tell others about abuse due to communication barriers, lack of access to a trusted adult or not being aware that what they are experiencing is abuse.

12.5 Any child may benefit from early help, but all Eat That Frog staff should be particularly alert to the potential need for early help for a learner who:

- is disabled and has specific additional needs.
- has special educational needs (regardless of whether they have a statutory education, health, and care plan).
- is a young carer
- is showing signs of being drawn in to anti-social or criminal behaviour, including gang involvement and association with organised crime groups.
- is frequently missing/goes missing from care or from home.
- is misusing drugs or alcohol themselves.
- is at risk of modern slavery, trafficking, or exploitation.
- is in a family circumstance presenting challenges for the child, such as substance abuse, adult mental health problems or domestic abuse.
- has returned home to their family from care.
- is showing early signs of abuse and/or neglect.
- is at risk of being radicalised.
- is a privately fostered child.

Child Protection and Safeguarding Policy

- has an imprisoned parent.
- is experiencing mental health, wellbeing difficulties.

13 Anti-Bullying/Cyberbullying

13.1 Our Eat That Frog policy on anti-bullying is set out in a separate document and acknowledges that to allow or condone bullying may lead to consideration under child protection procedures. This includes all forms e.g., cyber, racist, homophobic and gender related bullying. We keep a record of known bullying incidents which is shared with and analysed by the governing body. All staff are aware that children with SEND and/or differences/perceived differences are more susceptible to being bullied/victims of child abuse.

13.2 If the bullying is particularly serious, or the anti-bullying procedures are seen to be ineffective, the Centre Manager and the DSL will consider implementing child protection procedures and/or consider legislation regarding hate crimes⁹. The subject of bullying is addressed at regular intervals in pastoral education.

14 Racist Incidents

14.1 Our policy on racist incidents is set out separately in the Anti-bullying and harassment Policy and acknowledges that repeated racist incidents or a single serious incident may lead to consideration under child protection procedures and/or consider legislation regarding hate crimes. We keep a record of racist incidents and report them to the Local Authority (racist incident form).

15 Radicalisation and Extremism

15.1 The Prevent Duty for England and Wales (2023)¹⁰ under section 26 of the Counterterrorism and Security Act 2015 places a duty on education and other children's services to have due regard to the need to prevent people from being susceptible to terrorism.

15.2 Extremism is defined as 'vocal' or active opposition to fundamental British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs. We also include in our definition of extremism calls for the death of members of our armed forces, whether in this country or overseas.

15.3 Some children are at risk of being radicalised; adopting beliefs and engaging in activities which are harmful, criminal, or dangerous.

15.4 Eat That Frog is clear that exploitation of vulnerable children and radicalisation should be viewed as a safeguarding concern and follows the Department for Education guidance for schools and childcare providers on preventing children and young people from being susceptible to terrorism¹⁰.

[Hate Crime \(campaign.gov.uk\)](https://www.campaign.gov.uk/) ¹⁰ [Revised Prevent duty guidance: for England and Wales - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/publications/prevent-duty-guidance-for-england-and-wales)

15.5 Eat That Frog seeks to protect children and young people against the messages of all violent extremism including, but not restricted to, those linked to Islamist ideology, or to Far Right / Neo

Child Protection and Safeguarding Policy

Nazi / White Supremacist ideology, Irish Nationalist and Loyalist paramilitary groups, and extremist Animal Rights movements.

9

15.6 Eat That Frog staff receive training to help identify early signs of radicalisation and extremism. Indicators of vulnerability to radicalisation are in detailed in Appendix 7.

15.7 Opportunities are provided in the curriculum to enable learners to discuss issues of religion, ethnicity and culture and Eat That Frog follows the DfE advice Promoting Fundamental British Values as part of SMSC (spiritual, moral, social, and cultural education) in schools (2014)¹¹.

15.8 The Eat That Frog Directors and the ODSL will assess the level of risk within Eat That Frog and put actions in place to reduce that risk. Risk assessment may include the use of Eat That Frog premises by external agencies, anti-bullying policy and other issues specific to Eat That Frog's profile, community, and philosophy.

15.9 When any member of staff has concerns that a learner may be at risk of radicalisation or involvement in terrorism, they should speak with the DSL. They should then follow normal safeguarding procedures. If the matter is urgent then Devon & Cornwall Police must be contacted by dialling 999. In non-urgent cases where police advice is sought then dial 101. The Department of Education has also set up a dedicated telephone helpline for staff and Directors to raise concerns around Prevent (020 7340 7264) 11am -3pm Monday to Friday or fill out a form outside of these hours [Report Extremism in Education - Start](#)

15.10 Recognising Extremism

Early indicators of radicalisation or extremism may include:

- showing sympathy for extremist causes
- glorifying violence, especially to other faiths or cultures
- making remarks or comments about being at extremist events or rallies outside school
- evidence of possessing illegal or extremist literature
- advocating messages similar to illegal organisations or other extremist groups
- out of character changes in dress, behaviour and peer relationships (but there are also very powerful narratives, programmes and networks that young people can come across online so involvement with particular groups may not be apparent.)
- secretive behaviour
- online searches or sharing extremist messages or social profiles
- intolerance of difference, including faith, culture, gender, race or sexuality
- graffiti, art work or writing that displays extremist themes
- attempts to impose extremist views or practices on others
- verbalising anti-Western or anti-British views

- advocating violence towards others

16 Domestic Abuse

16.1 Domestic abuse represents at least one quarter of all violent crime. It is actual or threatened physical, emotional, psychological, or sexual abuse. It involves the use of power and control by one person over another. It occurs regardless of race, ethnicity, gender, class, sexuality, age, and religion, mental or physical ability. Domestic abuse can also involve other types of abuse.

16.2 We use the term domestic abuse to reflect that abusive and controlling behaviours do not necessarily involve physical violence. Slapping, punching, kicking, bruising, rape, ridicule, constant criticism, threats, manipulation, sleep deprivation, social isolation, and other controlling behaviours all count as abuse.

16.3 Living in a home where domestic abuse takes place is harmful to children and can have a serious impact on their behaviour, wellbeing and understanding of healthy, positive relationships. Children who witness domestic abuse are victims of abuse and have suffered or are at risk of significant harm. Staff are alert to the signs and symptoms of a child suffering or witnessing domestic abuse (See Appendix 6).

16.4 Government legislation enacted in 2021 recognises that a child who sees or hears, or experiences the effects of, domestic abuse and is related to the person being abused or the perpetrator is also to be regarded as a victim of domestic abuse.

16.5 In addition, the age limit for criminal offences related to domestic abuse was lowered from 18 to 16, to recognise that young people can experience abuse in their relationships.

17 Child Sexual Exploitation (CSE) and Child Criminal Exploitation (CCE)

17.1 Both CSE and CCE are forms of abuse and both occur where an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a child into sexual or criminal activity. This power imbalance could be due to age, gender, sexual identity, cognitive ability, physical strength, status, and /or access to economic or other resources. The abuse could be linked to an exchange for something the victim perceives that they need or want and/or will be to the financial benefit or other advantage (such as increase status) of the perpetrator or facilitator. The abuse can be perpetrated by individuals or groups, males or females, and children or adults. The abuse can be a one-off occurrence or a series of incidents over time and range from opportunistic to complex organised abuse. It may involve force and/or enticement-based methods of compliance and may, or may not, be accompanied by violence or threats of violence. Victims can be exploited even when the activity appears consensual, and it should be noted exploitation as well as being physical can be facilitated and/or take place online. More definitions and indicators are included in Appendix 4.

¹¹[Promoting fundamental British values through SMSC - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/news/promoting-fundamental-british-values-through-sm-sc)

Child Protection and Safeguarding Policy

Any concerns that a child is being or is at risk of being sexually or criminally exploited should be passed without delay to the DSL. Eat That Frog is aware there is a clear link between regular absence/truancing, CSE and CCE. Staff should consider a child to be at potential CSE/CCE risk in the case of regular absence/truancing and make reasonable enquiries with the child and parents to assess this risk.

17.2 The DSL will use the TSCP Exploitation Risk Assessment ¹² on all occasions when there is a concern that a child is being or is at risk of being sexually or criminally exploited or where indicators have been observed that are consistent with a child who is being or who is at risk of being sexually or criminally exploited. The Exploitation Risk Assessment will indicate to the DSL whether a MASH referral is necessary. If the DSL is in any doubt, they will contact their local authority safeguarding team or the MASH.

17.3 If a child is in immediate danger the police should be called on 999.

17.4 Eat That Frog is aware that a child often is not able to recognise the coercive nature of the abuse and does not see themselves as a victim. Consequently, the child may resent what they perceive as interference by staff. However, staff must act on their concerns as they would for any other type of abuse.

17.5 Eat That Frog includes the risks of sexual and criminal exploitation in the pastoral curriculum. Learners will be informed of the grooming process and how to protect themselves from people who may potentially be intent on causing harm. They will be supported in terms of recognising and assessing risk in relation to CSE/CCE, including online, and knowing how and where to get help.

18 Female Genital Mutilation (FGM)

18.1 Female Genital Mutilation (FGM) is illegal in England and Wales under the FGM Act (2003). It is a form of child abuse and violence against women. A mandatory reporting duty requires teachers to report 'known' cases of FGM in under 18s, which are identified in the course of their professional work, to the police ¹³.

18.2 The duty applies to all persons in Eat That Frog who are employed or engaged to carry out 'teaching work', whether or not they have qualified teacher status. The duty applies to the individual who becomes aware of the case to make a report. It should not be transferred to the DSL; however, the DSL should be informed.

18.3 If a teacher is informed by a girl under 18 that an act of FGM has been carried out on her or a teacher observes physical signs which appear to show that an act of FGM has been carried out on a girl under 18 and they have no reason to believe the act was necessary for the girl's physical or mental health or for purposes connected with labour or birth, the teacher should personally make a report to the police force in which the girl resides by calling 101. The report should be made by the close of the next working day.

¹² Available from the MASH

Child Protection and Safeguarding Policy

18.4 Eat That Frog staff are trained to be aware of risk indicators of FGM which are set out in Appendix 5. Concerns about FGM outside of the mandatory reporting duty should be reported as per Eat That Frog's child protection procedures. Staff should be particularly alert to suspicions or concerns expressed by female learners about going on a long holiday during the summer vacation period. There should also be consideration of potential risk to other girls in the family and practicing community.

18.5 Where there is a risk to life or likelihood of serious immediate harm the teacher should report the case immediately to the police, including dialling 999 if appropriate.

18.6 There are no circumstances in which a teacher or other member of staff should examine a girl.

19 Forced Marriage

19.1 A forced marriage is a marriage in which one or both people do not (or in cases of people with learning disabilities cannot) consent to the marriage but are coerced into it. Coercion may include physical, psychological, financial, sexual, and emotional pressure. It may also involve physical or sexual violence and abuse.

19.2 Forced marriage is an appalling and indefensible practice and is recognised in the UK as a form of violence against women and men, domestic/child abuse, and a serious abuse of human rights. Since June 2014 forcing someone to marry has become a criminal offence in England and Wales under the Anti-Social Behaviour, Crime and Policing Act 2014.

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

19.4 Eat That Frog staff should never attempt to intervene directly or through a third party. Contact should be made with MASH.

20 Honour-based Abuse

20.1 Honour based abuse (HBA) can be described as a collection of practices, which are used to control behaviour within families or other social groups to protect perceived cultural and religious beliefs and/or honour. Such abuse can occur when perpetrators perceive that a relative has shamed the family and/or community by breaking their honour code.

20.2 Honour based abuse might be committed against people who;

- become involved with a boyfriend or girlfriend from a different culture or religion.
- want to get out of an arranged marriage.
- want to get out of a forced marriage.

¹³ [Multi-agency statutory guidance on female genital mutilation - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/61622/multi-agency-guidance-on-female-genital-mutilation.pdf)

Child Protection and Safeguarding Policy

- wear clothes or take part in activities that might not be considered traditional within a particular culture.

20.3 It is a violation of human rights and may be a form of domestic and/or sexual abuse. There is no, and cannot be, honour or justification for abusing the human rights of others.

21 One Chance Rule

21.1 This term is used in the FGM Guidance for colleges produced by the national FGM centre July 2019 [FGM schools guidance](#). Multi agency statutory guidance dated July 20 [FGM Statutory guidance July 20](#) does not appear to use the term, however, the expression is intended to convey the importance of acting promptly and recognise there may be “only one chance to speak to a learner who is a potential victim and have just one chance to save a life.

21.2 Eat That Frog are aware that if the victim is not offered support following an allegation that the ‘One Chance’ opportunity may be lost. Therefore, all staff are aware of their responsibilities and obligations when they become aware of potential forced marriage, FGM and HBA cases.

22 Mental Health

22.1 Staff will be 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. Staff are not expected or trained to diagnose mental health conditions or issues, but may notice behaviours that may be of concern. Whilst Eat That Frog recognise that only appropriately trained professionals can diagnose mental health problems; staff are able to make day to day observations of children and identify such behaviour that may suggest they are experiencing a mental health problem or be at risk of developing one. Eat That Frog is also aware of the many studies evidencing the impact on the emotional well being of Covid and lockdown and the many adverse experiences children and their families may have faced. If staff have a mental health concern about a child that is also a safeguarding concern, immediate action should be taken by speaking to the designated safeguarding lead or a deputy or the Senior Mental Health Lead Kate Dorling.

22.2 Adverse Childhood Experiences have been shown to impact on a child’s mental health, behaviour, and education through to adolescence and adulthood. This will be covered in safeguarding awareness training and updates. If staff have a mental health concern about a child that is also a safeguarding concern, they will share this with the DSL. An informative video produced by NHS Wales.

23 Private Fostering Arrangements

23.1 A private fostering arrangement occurs when someone other than a parent or close relative cares for a child for a period of 28 days or more, with the agreement of the child’s parents. It applies to children under the age of 16 or 18 if the child is disabled. Children cared for by the local authority or who are placed in residential schools, children’s homes or hospitals are not considered

Child Protection and Safeguarding Policy

to be privately fostered. Private fostering occurs in all cultures, including British culture and children may be privately fostered at any age.

23.2 Eat That Frog recognise that most privately fostered children remain safe and well but are aware that safeguarding concerns have been raised in some cases. Therefore, all staff are alert to possible safeguarding issues, including the possibility that the child has been trafficked into the country.

23.3 By law, a parent, private foster carer or other persons involved in making a private fostering arrangement must notify children's services as soon as possible. However, where a member of staff becomes aware that a learner may be in a private fostering arrangement, they will raise this with the DSL and the DSL will notify MASH of the circumstances.

24 Cared for children and previously cared for children

24.1 The most common reason for children becoming cared for is because of abuse and neglect, although there may be other reasons, such as parental poor health. Eat That Frog ensures that staff have the necessary skills and understanding to keep cared for/previously cared for children safe. Appropriate staff have information about a child's cared for legal status and care arrangements, including the level of authority delegated to the carer by the authority looking after the child and contact arrangements with birth parents or those with parental responsibility.

24.2 The designated teacher for looked-after children and the Designated Safeguarding Lead (DSL) hold the contact details of the child's social worker, as well as the name and contact information of the Virtual School Head from the relevant local authority.

24.3 The designated teacher will follow the statutory guidance 'Promoting the education of Cared for Children'.

25 Children Absent from Education

25.1 Attendance, absence, and exclusions are closely monitored. Eat That Frog will hold more than one emergency contact number for learners and students where reasonably possible. A child going missing from education is a potential indicator of abuse and neglect, including sexual abuse and sexual exploitation.

25.2 The DSL will monitor unauthorised absences and take appropriate action including notifying the local authority particularly where children go missing on repeat occasions and/or are missing for periods during the day in conjunction with 'Children Missing Education: Statutory Guidance for Local Authorities'¹⁴. Staff must be alert to signs of children at risk of travelling to conflict zones, female genital mutilation and forced marriage.

¹⁴ [Children missing education - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/612222/Children_Missing_Education_-_Statutory_Guidance_for_Local_Authorities.pdf)

Child Protection and Safeguarding Policy

26 Online Safety

26.1 Our learners increasingly use electronic equipment daily to access the internet and share content and images via social media sites such as Facebook, Twitter, Instagram, Snapchat, and many others constantly emerging.

26.2 Unfortunately, some adults and other children use these technologies to harm children. The harm might range from sending hurtful or abusive texts or emails, to grooming and enticing children to engage in sexual behaviour such as webcam photography or face-to-face meetings. Learners may also be distressed or harmed by accessing inappropriate material such as pornographic websites or those which promote extremist behaviour, criminal activity, suicide or eating disorders. Misinformation, Disinformation, and Conspiracy Theories

We recognise that children can be harmed not only through direct abuse or neglect, but also through exposure to misleading or harmful information online and offline. This includes misinformation, disinformation (including fake news), and conspiracy theories, which can negatively impact a child's emotional wellbeing, understanding of the world, and relationships. Such exposure is considered a safeguarding concern, and staff are expected to take appropriate action in line with this policy.

26.3 Eat That Frog has an online safety policy which explains how we try to keep learners safe in Eat That Frog and how we respond to online safety. The Online Safety policy is regularly reviewed and reflects the "4Cs" (Content/Contact/Conduct/Commerce). ETFG recognises that pupils and staff may use AI tools, including generative AI, as part of their learning and work. All AI use is subject to the college's Acceptable Use Policy and safeguarding procedures. Pupils are taught to use AI responsibly, verify information, and avoid sharing personal or sensitive data. Staff will monitor AI use in college and provide guidance to ensure it is safe, appropriate, and supports learning. Any concerns arising from AI-generated content or interactions will be reported through the college's safeguarding channels.

26.4 Eat That Frog will also provide advice to parents when learners are being asked to learn online at home and consider how best to safeguard both learners and staff.

26.5 Learners are taught about online safety throughout the curriculum and all staff receive online safety training which is regularly updated. Eat That Frog's online safety lead is Kate Dorling

Note that guidance about online learning can be found in the 'Guidance for Safer Working Practices... (February 2022)' which can be found here: <https://saferrecruitmentconsortium.org>

Child Protection and Safeguarding Policy

27 Child on Child Sexual violence and sexual harassment

27.1 The DSL and Directors will take due regard to Part 5, KCSiE 2025

27.2 In most instances, learners will behave towards each other in a respectful manner. Where they do not, this will be covered by our behaviour policy. However, some allegations may be of such a serious nature that they may raise safeguarding concerns. Eat That Frog recognise that children can abuse their peers and that child-on-child abuse can happen in any setting. It will not be passed off as 'banter' or 'part of growing up'. The forms of child-on-child abuse are outlined below.

- Domestic abuse – an incident or pattern of actual or threatened acts of physical, sexual, financial and/or emotional abuse, perpetrated by an adolescent against a current or former dating partner regardless of gender or sexuality.
- Child Sexual Exploitation – children under the age of 18 may be sexually abused in the context of exploitative relationships, contexts and situations by peers who are also under 18.
- Harmful Sexual Behaviour – Children and young people presenting with sexual behaviours that are outside of developmentally 'normative' parameters and harmful to themselves and others (For more information, please see Appendix 2).
- Up skirting – which typically involves taking a picture under a person's clothing without them knowing, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress, or alarm.
- Serious Youth Violence ¹⁵ – Any offence of most serious violence or weapon enabled crime, where the victim is aged 1-19' i.e., murder, manslaughter, rape, wounding with intent and causing grievous bodily harm. 'Youth violence' is defined in the same way, but also includes assault with injury offences. All staff will receive training so that they are aware of indicators which may signal that children are at risk from or involved with serious violence and crime.

27.3 The term child-on-child abuse can refer to all these definitions and a child may experience one or multiple facets of abuse at any one time. We will adopt a whole school approach to addressing peer – on peer abuse and the policy is detailed in Appendix 1

28 Youth produced sexual imagery (sexting)

28.1 The practice of children sharing images and videos via text message, email, social media, or mobile messaging apps has become commonplace. However, this online technology has also given children the opportunity to produce and distribute sexual imagery in the form of photos and videos. Such imagery involving anyone under the age of 18 is illegal.

28.2 Youth produced sexual imagery refers to both images and videos where:

- A person under the age of 18 creates and shares sexual imagery of themselves with a peer under the age of 18.
- A person under the age of 18 shares sexual imagery created by another person under the age of 18 with a peer under the age of 18 or an adult.

Child Protection and Safeguarding Policy

- A person under the age of 18 is in possession of sexual imagery created by another person under the age of 18.

28.3 All incidents of this nature should be treated as a safeguarding concern and in line with government guidance ¹⁶

28.4 Cases where sexual imagery of people under 18 has been shared by adults and where sexual imagery of a person of any age has been shared by an adult to a child is child sexual abuse and should be responded to accordingly.

28.5 If a member of staff becomes aware of an incident involving youth produced sexual imagery, they should follow the child protection procedures and refer to the DSL as soon as possible. The member of staff should confiscate the device involved and set it to flight mode or, if this is not possible, turn it off. Staff should not view, copy or print the youth produced sexual imagery.

¹⁵ [Preventing youth violence and gang involvement - Practical advice for schools and colleges \(publishing.service.gov.uk\)](https://publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/612212/preventing-youth-violence-and-gang-involvement-practical-advice-for-schools-and-colleges.pdf)

28.6 The DSL should hold an initial review meeting with appropriate Eat That Frog staff and subsequent interviews with the children involved (if appropriate). Parents should be informed at an early stage and involved in the process unless there is reason to believe that involving parents would put the child at risk of harm. At any point in the process if there is concern a young person has been harmed or is at risk of harm a referral should be made to MASH or the Police as appropriate.

28.7 Immediate referral at the initial review stage should be made to MASH/Police if;

- The incident involves an adult.
- There is good reason to believe that a young person has been coerced, blackmailed or groomed or if there are concerns about their capacity to consent (for example, owing to special education needs);
- What you know about the imagery suggests the content depicts sexual acts which are unusual for the child's development stage or are violent.
- The imagery involves sexual acts.
- The imagery involves anyone aged 12 or under.
- There is reason to believe a child is at immediate risk of harm owing to the sharing of the imagery, for example the child is presenting as suicidal or self-harming.

28.8 If none of the above apply then the DSL will use their professional judgement to assess the risk to learners involved and may decide, with input from the Headteacher, to respond to the incident without escalation to MASH or the police. Such decisions will be recorded.

28.9 In applying judgement, the DSL will consider if;

- there is a significant age difference between the sender/receiver.
- there is any coercion or encouragement beyond the sender/receiver.
- the imagery was shared and received with the knowledge of the child in the imagery.
- the child is more vulnerable than usual i.e., at risk.

Child Protection and Safeguarding Policy

- there is a significant impact on the children involved.
- the image is of a severe or extreme nature.
- the child involved understands consent.
- the situation is isolated or if the image been more widely distributed.
- there are other circumstances relating to either the sender or recipient that may add cause for concern i.e., difficult home circumstances.
- the children have been involved in incidents relating to youth produced imagery before.

28.10 If any of these circumstances are present the situation will be escalated according to our child protection procedures, including reporting to the police or MASH. Otherwise, the situation will be managed within Eat That Frog.

¹⁶ [Sharing nudes and semi-nudes: advice for education settings working with children and young people - GOV.UK \(www.gov.uk\)](https://www.gov.uk/guidance/sharing-nudes-and-semi-nudes-advice-for-education-settings-working-with-children-and-young-people)

28.11 The DSL will record all incidents of youth produced sexual imagery, including both the actions taken, actions not taken, reasons for doing so and the resolution in line with safeguarding recording procedures.

29 Allegations against staff

29.1 All Eat That Frog staff should take care not to place themselves in a vulnerable position with a child. It is always advisable for interviews or work with individual children or parents to be conducted in view of other adults.

29.2 Guidance about conduct and safe practice, including safe use of mobile phones by staff and volunteers will be given at induction.

29.3 We understand that a learner may make an allegation against a member of staff or staff may have concerns about another staff member. If such an allegation is made, or information is received which suggests that a person may be unsuitable to work with children, the member of staff receiving the allegation or aware of the information, will immediately inform a DSL.

29.4 The DSL on all such occasions will discuss the content of the allegation with the Local Authority Designated Officer (LADO) at the earliest opportunity and before taking any further action. If the allegation made to a member of staff concerns the DSL, the person receiving the allegation will immediately inform the LADO directly as above.

29.5 Eat That Frog will follow the Local Authority procedures for managing allegations against staff, procedures set out in KCSiE 2025 and Eat That Frog's Managing Allegations policy and procedures.

29.6 Suspension of the member of staff, excluding a Director, against whom an allegation has been made, needs careful consideration, and the Directors will seek the advice of the LADO and an HR Consultant in making this decision. In the event of an allegation against a Director, the decision to suspend will be made by the Board of Directors with advice as above.

Child Protection and Safeguarding Policy

29.7 We have a procedure for managing the suspension of a contract for a community user in the event of an allegation arising in that context.

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

29.9 Low-level Concerns

Concerns may be graded Low-level if the concern does not meet the criteria for an allegation; and the person* has acted in a way that is inconsistent with the staff code of conduct, including inappropriate conduct outside of work. Example behaviours include, but are not limited to:

- being over friendly with children;
- having favourites;
- taking photographs of children on their mobile phone;
- engaging with a child on a one-to-one basis in a secluded area or behind a closed door; or,
- using inappropriate sexualised, intimidating or offensive language.

If the concern has been raised via a third party, the Directors should collect as much evidence as possible by speaking:

- directly to the person who raised the concern, unless it has been raised anonymously;
- to the individual involved and any witnesses.

Reports about supply staff and contractors should be notified to their employers, so any potential patterns of inappropriate behaviour can be identified.

Staff should be encouraged and feel confident to self-refer, where, for example, they have found themselves in a situation which could be misinterpreted, might appear compromising to others, and/or on reflection they believe they have behaved in such a way that they consider falls below the expected professional standards.

Low-level concerns should be recorded in writing, including:

- name* of individual sharing their concerns
- details of the concern
- context in which the concern arose
- action taken

(* if the individual wishes to remain anonymous then that should be respected as far as reasonably possible)

30 Whistleblowing

30.1 We recognise that children cannot be expected to raise concerns in an environment where staff fail to do so.

30.2 All staff should be aware of their duty to raise concerns, where they exist, about the management of child protection, which may include the attitude or actions of colleagues, poor or unsafe practice and potential failures in the Eat That Frog's safeguarding arrangements. If it

Child Protection and Safeguarding Policy

becomes necessary to consult outside Eat That Frog, they should speak in the first instance, to the LADO following the Whistleblowing Policy.

30.3 The NSPCC whistleblowing helpline is available for staff who do not feel able to raise concerns regarding child protection failures internally. Staff can call: 0800 028 0285 line is available from 8:00 AM to 8:00 PM, Monday to Friday and email: help@nspcc.org.uk

30.4 Whistleblowing re a Director should be made to the Board of Directors/LADO whose contact details are readily available to staff.

31 Physical Intervention

31.1 We acknowledge that staff must only ever use physical intervention as a last resort, when a learner is endangering him/herself or others, and that always it must be the minimal force necessary to prevent injury to another person. Such events should be recorded and signed by a witness.

31.2 Staff who are likely to need to use physical intervention will be appropriately trained.

31.3 We understand that physical intervention of a nature which causes injury or distress to a child may be considered under child protection or disciplinary procedures.

31.4 We recognise that touch is appropriate in the context of working with children, and all staff have been given 'Safe Practice' guidance to ensure they are clear about their professional boundary.

32 Confidentiality, sharing information and GDPR

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

32.2 Eat That Frog staff should be proactive in sharing as early as possible to help identify, assess and respond to risks or concerns about the safety and welfare of children, whether this is when problems are first emerging, or where a child is already known to local authority children's social care.

32.3 Staff should only discuss concerns with the DSL or Director (depending on who is the subject of the concern). That person will then decide who else needs to have the information and they will disseminate it on a 'need-to-know' basis.

32.4 Child protection information will be stored and handled in line with the Data Protection Act 2018¹⁵ and government guidance for sharing information¹⁶

32.5 Information sharing is guided by the following principles:

- necessary and proportionate

Child Protection and Safeguarding Policy

- relevant
- adequate
- accurate
- timely
- secure

32.6 Fears about sharing information cannot be allowed to stand in the way of the need to promote the welfare and protect the safety of children.

33 Linked policies

- Learner disciplinary policy and procedure
- Professional and personal relationships and Staff Charter, Learner Induction Handbook
- Whistleblowing
- Anti-Bullying and harassment policy
- Health & Safety
- Allegations against adults
- Stakeholder feedback
- Physical intervention (restraints)
- Online safety/Social media policy
- Safer recruitment
- Modern slavery
- Data Protection/GDPR Guidance

¹⁵ The UK Data Protection Act 2018 (DPA 2018) is supplementary to the General Data Protection Regulation 2016 (the GDPR) and replaces DPA 1998.

¹⁶ [Information sharing: advice for practitioners \(publishing.service.gov.uk\)](https://publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/672212/Information-sharing-advice-for-practitioners.pdf)

Date	Page	Details of the change	Agreed by
August 2024		Addition of Plymouth and Devon Local Authority services. Addition of Plymouth and Devon signposting services. Removal of links no longer in use Addition of DSL Zoe Ellis	
August 2025		Addition of Julia Foster – DSL Addition of CPOMS as a safeguarding database and how safeguarding concerns and incidents are stored.	Board
Sept 2025 Interim review to keep in line with KCSIE 2025	Page 7 Page 5 Page 29	Policy updated in line with KCSIE 2025 to cover 3 3.1 New definition of safeguarding Addition of 2 2.1 Adults in the college take all welfare concerns seriously and encourage learners to talk to us about anything that worries them. We will always act in the best interest of the young person. 26.2 Addition of: Misinformation, Disinformation, and Conspiracy Theories We recognise that children can be harmed not only through direct abuse or neglect, but also through exposure to misleading or harmful information online and offline. This includes misinformation, disinformation (including fake news), and conspiracy theories, which can negatively impact a child’s emotional wellbeing, understanding of the world, and relationships. Such exposure is considered a safeguarding concern, and staff are expected to take appropriate action in line with this policy. 26.3 The college recognises that pupils and staff may use AI tools, including generative AI, as part of their learning and work. All AI use is subject to the college’s Acceptable Use Policy and safeguarding procedures. Pupils are taught	Board

Child Protection and Safeguarding Policy

	Page 67 Page 6	to use AI responsibly, verify information, and avoid sharing personal or sensitive data. Staff will monitor AI use in college and provide guidance to ensure it is safe, appropriate, and supports learning. Any concerns arising from AI-generated content or interactions will be reported through the college's safeguarding channels. Appendix 9 : addition of The Lucy Faithfull Foundation information and links 2.4 Change to Centre Manager from Deputy for Sophie Godwin– Phone number Plymouth Pathways and Futures 2.4 Change of mobile for Joanne Deacon	
Next review August 2026			

Child Protection and Safeguarding Policy

Appendix 1

Child-on-child abuse – policy and procedure

1 Introduction

1.1 Eat That Frog recognises that children are vulnerable to and capable of abusing their peers. We take such abuse as seriously as abuse perpetrated by an adult. This includes verbal as well as physical abuse. Peer on peer abuse will not be tolerated or passed off as part of “banter” or “growing up”. We are committed to a whole school approach to ensure the prevention, early identification, and appropriate management of child-on-child abuse within Eat That Frog and beyond. In cases where peer on peer abuse is identified we will follow our child protection procedures, taking a contextual /extra familial approach to support all children and young people who have been affected by the situation.

1.2 Staff must challenge any form of derogatory and sexualised language or behaviour. Staff should be vigilant to sexualised/aggressive touching/grabbing DfE guidance situates sexual violence, sexual harassment, and harmful sexual behaviour in the context of developing a whole-school safeguarding culture, where sexual misconduct is seen as unacceptable, and not 'banter' or an inevitable part of growing up. Advice about tackling and reporting sexual harassment in schools and colleges is here: [Sexual violence and sexual harassment between children in schools and colleges \(publishing.service.gov.uk\)](https://www.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/616222/sexual-violence-and-sexual-harassment-between-children-in-schools-and-colleges.pdf)

1.3 We recognise that peer on peer abuse can manifest itself in many ways such as:

- Child Sexual Exploitation
- Sexting or youth produced digital imagery
- Up skirting
- Bullying
- Radicalisation
- Abuse in intimate relationships
- Children who display sexually harmful behaviour
- Gang association and serious violence (County Lines)
- Technology can be used for bullying and other abusive behaviour

1.4 Some of these behaviours will need to be handled with reference to other policies in Eat That Frog such as the behaviour policy, anti- bullying policy, and online safety policy, however, they should all be considered in the wider context of the Eat That Frog approach to safeguarding in general. It should be recognised that these issues are more likely to occur than not. Learners will be protected from ‘up skirting’, bullying, homophobic, biphobic and transphobic behaviour, racism, sexism, and other forms of discrimination

1.5 This appendix concentrates on child-on-child abuse in the context of sexual harassment and sexual violence. It is compliant with the statutory guidance on child-on-child abuse as set out in

Child Protection and Safeguarding Policy

KCSiE 2025 and should be read in conjunction with Torbay, Devon and Plymouth Safeguarding Policy and Procedures, and any relevant Practice Guidance issued by it.

2 Aims

The policy will: -

Set out our strategies for preventing, identifying, and managing peer on peer abuse

- Take a contextual/extra familial approach to safeguarding all children and young people involved.
- Acknowledge that children who have allegedly abused their peers or displayed harmful sexual behaviour are themselves vulnerable and may have been abused by peers, parents, or adults in the community.
- Understand that peer on peer abuse (Sexual violence and sexual harassment) can occur between two children of any age and sex or a group of children sexually assaulting or sexually harassing a single child or group of children. The impact of this behaviour on children can be very distressing and have an impact on academic achievement and emotional health and wellbeing. Sexual harassment and sexual violence may also occur online and offline.

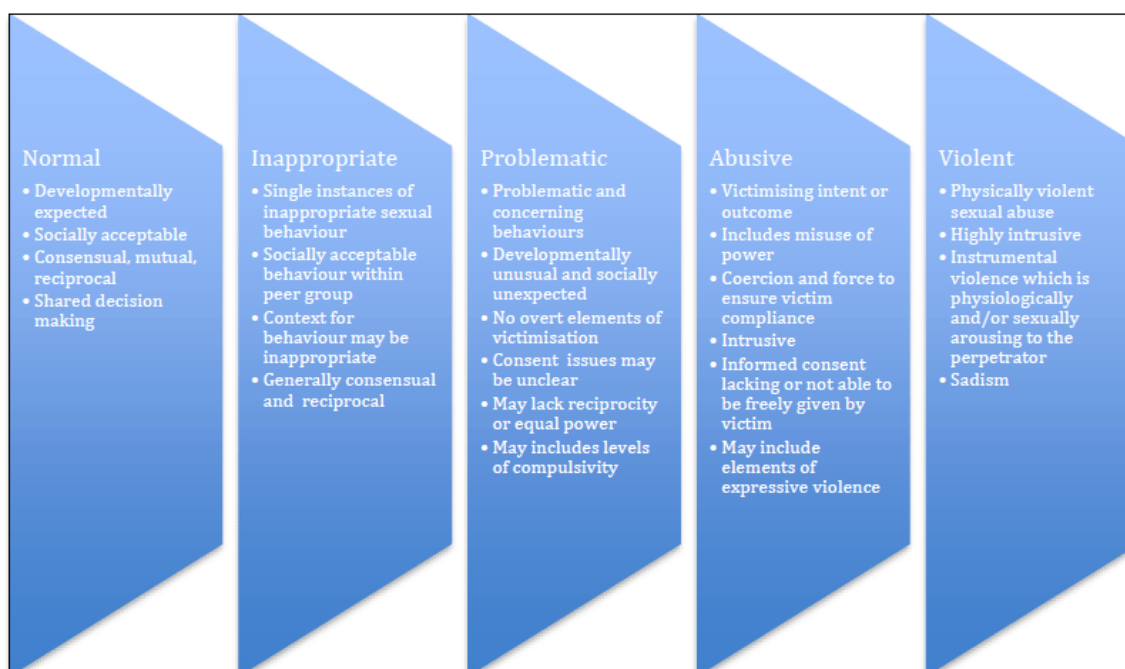
3 The Context

3.1 All behaviour takes place on a spectrum. Understanding where a child's behaviour falls on a spectrum is essential to being able to respond appropriately to it. In this policy we recognise the importance of distinguishing between problematic and abusive sexual behaviour (Harmful Sexual Behaviour HSB). We are adopting the NSPCC definition of HSB as: - "Sexual behaviours expressed by children...that are developmentally inappropriate, may be harmful towards self or others, or be abusive towards another child...or adult."

3.2 We will also use Simon Hackett 's continuum model to demonstrate the range of sexual behaviours. Hackett (2010) has proposed a continuum model to demonstrate the range of sexual behaviours presented by children and young people, from those that are normal, to those that are

Child Protection and Safeguarding Policy

highly deviant:



4 Vulnerable groups

- We recognise that all children can be at risk however we acknowledge that some groups are more vulnerable. This can include experience of abuse within their family; living with domestic violence; young people in care; children who go missing; children with additional needs (SEN and/or disabilities); children who identify or are perceived as LGBT and/or have other protected characteristics under the Equalities Act 2010.
- The fact that a child or a young person may be LGBT is not in itself an inherent risk factor for harm. However, children who are LGBT can be targeted by other children. In some cases, a child who is perceived by other children to be LGBT (whether or not) can be just as vulnerable as children who identify as LGBT.
- Risks can be compounded where children who are LGBT lack a trusted adult with whom they can be open. At Eat that Frog], we endeavour to reduce the additional barriers faced by providing a safe space for them to speak to by personalised support.
- Whilst research tells us girls are more frequently identified as being abused by their peers and, girls are more likely to experience unwanted sexual touching in schools this is not confined to girls. Boys are less likely to report intimate relationship abuse and may display other behaviour such as antisocial behaviour. Boys report high levels of victimisation in areas where they are affected by gangs. We recognise that both boys and girls experience peer on peer abuse, but they do so in gendered ways.
- All staff should be aware of indicators, which may signal that children are at risk from, or are involved with serious violent crime. These may include increased absence from Eat That Frog, 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

Child Protection and Safeguarding Policy

that children have been approached by, or are involved with, individuals associated with criminal networks or gangs.

- For all vulnerable children it is important to try to ensure a safe space where they can speak out or share their worries.

5 Responding to Alleged Incidents

5.1 Responding to reports of sexual violence and sexual harassment

5.2 All reports of child-on-child abuse will be made on a case-by-case basis with the designated safeguarding lead taking a leading role using their professional judgement and supported by other agencies such as social care or the police as required.

5.3 The immediate response to a report

- Eat That Frog will take all reports seriously and will reassure the victim that they will be supported and kept safe.
- All staff will be trained to manage a report.
- Staff will not promise confidentiality as the concern will need to be shared further (for example, with the designated safeguarding lead or social care) staff will however only share the report with those people who are necessary to progress it.
- A written report will be made as soon after the interview as possible recording the facts as presented by the child. These may be used as part of a statutory assessment if the case is escalated later.
- Where the report includes an online element Eat That Frog will follow advice on searching, screening, and confiscation. The staff will not view or forward images unless unavoidable and only if another member of staff (preferably the DSL) is present.
- The DSL will be informed as soon as possible.

6 Risk Assessment

When there has been a report of sexual violence, the DSL will make an immediate risk and needs' assessment. Where there has been a report of sexual harassment, the need for a risk assessment should be considered on a case-by-case basis. The risk and needs' assessment should consider:

- The victim, especially their protection and support.
- The alleged perpetrator; and
- All the other children (and, if appropriate, adult students and staff) at Eat That Frog, especially any actions that are appropriate to protect them; Risk assessments will be recorded (written or electronic say where these are filed) and be kept under review. The DSL will ensure they are engaging with MASH.

7. Responding to Reports

Responding to reports of sexual violence and sexual harassment.

Child Protection and Safeguarding Policy

- All reports of child-on-child abuse will be made on a case-by-case basis with the designated safeguarding lead or their deputy taking a leading role using their professional judgement and supported by other agencies such as social care or the police as required.

The immediate response to a report

- The college will take all reports seriously and will reassure the victim that they will be supported and kept safe.
- All staff will be trained to manage a report.
- Staff will not promise confidentiality as the concern will need to be shared further (for example, with the designated safeguarding lead or social care) staff will however only share the report with those people who are necessary to progress it.
- A written report will be made as soon after the interview as possible recording the facts as presented by the child. These may be used as part of a statutory assessment if the case is escalated later.
- Where the report includes an online element the college will follow advice on searching, screening, and confiscation. The staff will not view or forward images unless unavoidable and only if another member of staff (preferably the DSL) is present.
- The DSL will be informed as soon as possible.

Risk Assessment

When there has been a report of sexual violence, the DSL/DDSL will make an immediate risk and needs' assessment. Where there has been a report of sexual harassment, the need for a risk assessment should be considered on a case-by-case basis. The risk and needs' assessment should consider:

- The victim, especially their protection and support.
- The alleged perpetrator; and
- All the other children (and, if appropriate, adult students and staff) at the school or college, especially any actions that are appropriate to protect them; Risk assessments will be recorded (written or electronic say where these are filed) and be kept under review. The DSL/DDSL will ensure they are engaging with MASH.

Action following a report of sexual violence and/or sexual harassment

Following an incident, we will consider:

- The wishes of the victim in terms of how they want to proceed. This is especially important in the context of sexual violence and sexual harassment.
- The nature of the alleged incident(s), including whether a crime may have been committed and consideration of harmful sexual behaviour.

Child Protection and Safeguarding Policy

- The ages of the children involved.
- The developmental stages of the children involved.
- Any power imbalance between the children. For example, is the alleged perpetrator significantly older, more mature or more confident? Does the victim have a disability or learning difficulty?
- If the alleged incident is a one-off or a sustained pattern of abuse.
- Are there ongoing risks to the victim, other children, adult students or school or college staff, and other related issues and wider context?

Follow up Actions

Whilst the college establishes the facts of the case and starts the process of liaising with children's social care and the police:

- The perpetrator will be removed from any classes they share with the victim.
- We will consider how best to keep the victim and alleged perpetrator a reasonable distance apart on college premises and on transport to and from the college. These actions are in the best interests of both children and should not be perceived to be a judgment on the guilt of the alleged perpetrator.

Options to manage the report

- Manage internally
 - I. In some cases of sexual harassment, for example, one-off incidents, we may decide that the children concerned are not in need of early help or statutory intervention and that it would be appropriate to handle the incident internally, perhaps through utilising the behaviour and bullying policies and by providing pastoral support. This decision will be made based on the principle that sexual violence and sexual harassment is never acceptable and will not be tolerated. All decisions, and discussions around making these decisions will be recorded and stored (by whom, where).
 - II. In line with (I) above, we may decide that the children involved do not require statutory interventions but may benefit from early help. Early help means providing support as soon as a problem emerges, at any point in a child's life. Providing early help is more effective in promoting the welfare of children than reacting later. Early help can be particularly useful to address non-violent harmful sexual behaviour and may prevent escalation of sexual violence.
- Refer to MASH
 - I. Where a child has been harmed, is at risk of harm, or is in immediate danger, we will make a referral to the MASH. Where statutory assessments are appropriate, the DSL/DDSL will be working alongside, and cooperating with, the relevant lead social worker. Collaborative working will help ensure the best possible package of coordinated

support is implemented for the victim and, where appropriate, the alleged perpetrator and any other children that require support.

- Reporting to the Police
 - I. Any report to the police will generally be made through the MASH as above. The DSL/DDSL will follow local processes for referrals. Where a report of rape, assault by penetration or sexual assault is made, the starting point is this will be passed on to the police. Whilst the age of criminal responsibility is ten, if the alleged perpetrator is under ten, the starting principle of reporting to the police remains. The police will take a welfare, rather than a criminal justice, approach. Where a report has been made to the police, the school or college will consult the police and agree what information can be disclosed to staff and others, the alleged perpetrator and their parents or carers. They will also discuss the best way to protect the victim and their anonymity. Where there is a criminal investigation, we will work closely with the relevant agencies to support all children involved (especially potential witnesses). Where required, advice from the police will be sought to help us.
 - II. Whilst protecting children and/or taking any disciplinary measures against the alleged perpetrator, we will work closely with the police (and other agencies as required), to ensure any actions the school or college take do not jeopardise the police investigation.
- The end of the criminal process
 - I. If a child is convicted or receives a caution for a sexual offence, the school /academy will update its risk assessment, ensure relevant protections are in place for all children. We will consider any suitable action following our behaviour policy. If the perpetrator remains in school/academy we will be very clear as to our expectations regarding the perpetrator now they have been convicted or cautioned. This could include expectations regarding their behaviour and any restrictions we think are reasonable and proportionate about the perpetrator's timetable. Any conviction (even with legal anonymity reporting restrictions) is potentially going to generate interest among other pupils or students in the college. We will ensure all children involved are protected, especially from any bullying or harassment (including online).
 - II. Where cases are classified as "no further action" (NFA'd) by the police or Crown Prosecution Service, or where there is not guilty verdict, we will continue to offer support to the victim and the alleged perpetrator for as long as is necessary. A not guilty verdict or a decision not to progress the report does not necessarily mean that it was unfounded. We will continue to support all parties in this instance.
 - III. Whatever the response, it should be underpinned by the principle that there is a zero-tolerance approach to sexual violence and sexual harassment and it is never acceptable and will not be tolerated.

Support for Children Affected by sexual assault

- I. Support for victims of sexual assault is available from a variety of agencies ([see Appendix 8](#)). We will support the victim of sexual assault to remain in college but if they are unable to do so we will enable them to continue their education elsewhere. This decision will be made only at the request of the child and their family. If they are moved, we will ensure the new setting is aware of the ongoing support they may need. The DSL will support this move. Where there is a criminal investigation, the alleged perpetrator will be removed from any shared classes with the victim, and we will also consider how best to keep them a reasonable distance apart on the school premises or on school transport. This is in the best interest of the children concerned and should not be perceived to be a judgement of guilt before any legal proceedings.
- II. We will work closely with the police. Where a criminal investigation into a rape or assault by penetration leads to a conviction or caution, we may take suitable action, if we have not already done so. In all but the most exceptional of circumstances, the rape or assault is likely to constitute a serious breach of discipline and lead to the view that allowing the perpetrator to remain in the same college would seriously harm the education or welfare of the victim (and potentially other pupils or students).
- III. Where a criminal investigation into sexual assault leads to a conviction or caution, we may, if we have not already done so, consider any suitable sanctions using our behaviour policy, including consideration of permanent exclusion. Where the perpetrator is going to remain at the college, the principle would be to continue keeping the victim and perpetrator in separate classes and continue to consider the most appropriate way to manage potential contact on college premises and transport. The nature of the conviction or caution and wishes of the victim will be especially important in determining how to proceed in such cases.
- IV. Reports of sexual assault and sexual harassment will, in some cases, not lead to a report to the police (for a variety of reasons). In some cases, rape, assault by penetration, sexual assault or sexual harassment are reported to the police and the case is not progressed or are reported to the police and ultimately result in a not guilty verdict. None of this means the offence did not happen or that the victim lied. The process will have affected both victim and alleged perpetrator. Appropriate support will be provided to both as required and consideration given to sharing classes and potential contact as required on a case-by-case basis. All the above will be considered with the needs and wishes of the victim at the heart of the process (supported by parents and carers as required). Any arrangements should be kept under review.

11 Physical Abuse

11.1 While a clear focus of child-on-child abuse is around sexual abuse and harassment, physical assaults and initiation violence and rituals from learners to learners can also be abusive. These are equally not tolerated and if it is believed that a crime has been committed, will be reported to the

Child Protection and Safeguarding Policy

police. The principles from the anti-bullying policy will be applied in these cases, with recognition that any police investigation will need to take priority. When dealing with other alleged behaviour which involves reports of, for example, emotional and/or physical abuse, staff can draw on aspects of Hackett's continuum (see above) to assess where the alleged behaviour falls on a spectrum and to decide how to respond. This could include, for example, whether it:

- is socially acceptable
- involves a single incident or has occurred over a period of time.
- is problematic and concerning
- involves any overt elements of victimisation or discrimination e.g., related to race, gender, sexual orientation, physical, emotional, or intellectual vulnerability
- involves an element of coercion or pre-planning
- involves a power imbalance between the child/children allegedly responsible for the behaviour
- involves a misuse of power

12 Online Behaviour

12.1 Many forms of child-on-child abuse have an element of online behaviour including behaviours such as cyberbullying and sexting. Policies and procedures concerning this type of behaviour can be found in the anti-bullying policy and online safety policy.

13 Prevention

13.1 Eat That Frog actively seeks to raise awareness of and prevent all forms of child-on-child abuse by:

- Educating all Directors, staff and volunteers, learners, and parents about this issue.

This will include training all Directors, staff and volunteers on the nature, prevalence, and effect of child-on-child abuse, and how to prevent, identify and respond to it.

This includes: (a) Contextual Safeguarding/extra familial abuse; (b) The identification and classification of specific behaviours; and (c) The importance of taking seriously all forms of child-on-child abuse (no matter how low level they may appear) and ensuring that no form of child-on-child abuse is ever dismissed as horseplay or teasing.

- Educating learners about the nature and prevalence of child-on-child abuse via pastoral sessions and the wider curriculum.
- Learners are frequently told what to do if they witness or experience such abuse, the effect that it can have on those who experience it and the possible reasons for it, including vulnerability of those who inflict such abuse.
- They are regularly informed about Eat That Frog's approach to such issues, including its zero-tolerance policy towards all forms of child-on-child abuse.
- Engaging parents on this issue by:

Child Protection and Safeguarding Policy

- (a) Talking about it with parents, both in groups and one to one;
 - (b) Asking parents what they perceive to be the risks facing their child and how they would like to see Eat That Frog address those risks;
 - (c) Involving parents in the review of Eat That Frog policies where possible; and
 - (d) Encouraging parents to hold Eat That Frog to account on this issue.
- Ensuring that all child-on-child abuse issues are fed back to the Eat That Frog's safeguarding team so that they can spot and address any concerning trends and identify learners who maybe in need of additional support. This is done by way of a weekly staff meeting at which all concerns about learners (including child-on-child abuse issues) are discussed.
 - Challenging the attitudes that underlie such abuse (both inside and outside the classroom).
 - Working with Directors, all staff and volunteers, learners and parents to address equality issues, to promote positive values, and to encourage a culture of tolerance and respect amongst all members of the Eat That Frog community.
 - Creating conditions in which our learners can aspire to and realise safe and healthy relationships.
 - Creating a culture in which our learners feel able to share their concerns openly, in a non-judgmental environment, and have them listened to; and
 - Responding to cases of child-on-child abuse promptly and appropriately.

14 Multi-agency working

14.1 Eat That Frog actively engages with its local partners in relation to child-on-child abuse, and works closely with: Local Authorities safeguarding team, MASH, Children's Social care, Early Help and/or other relevant agencies, other schools, and the community in general, including our young people and their families. The relationships built with these partners are essential to ensuring that Eat That Frog is able to prevent, identify early and appropriately handle cases of child-on-child abuse. They help the Eat That Frog

- (a) To develop a good awareness and understanding of the different referral pathways that operate in its local area, as well as the preventative and support services which exist.
- (b) To ensure that our learners can access the range of services and support they need quickly.
- (c) To support and help inform our local community's response to child-on-child abuse.
- (d) To increase our awareness and understanding of any concerning trends and emerging risks in our local area to enable us to take preventative action to minimise the risk of these being experienced by our learners. Eat That Frog actively refers concerns/allegations of child-on-child abuse where necessary to MASH and other safeguarding partners. Children

Child Protection and Safeguarding Policy

resident out of county but attending Eat That Frog will be reported to their home Children's Services. In cases involving children who are subject to risk, harm, and abuse and who are cared for, the children's social worker will be informed and a coordinated approach to address any incidents or concerns will be required.

15 Prevention

As well as having strategies for dealing with incidents we will consider what we can do to foster healthy and respectful relationships between all learners including through pastoral education. The most effective preventative education programme will be through a whole school approach that prepares learners for life. Eat That Frog has a clear set of values and standards, and these will be upheld and demonstrated throughout all aspects of Eat That Frog life. This will be underpinned by Eat That Frog's behaviour policy and pastoral support system, and by a planned programme of evidence-based content delivered through the whole curriculum. Such a programme will be appropriate to the age and stage of development (especially when considering SEND children and their cognitive understanding), and may tackle such issues as:

- Healthy and respectful relationships.
- What respectful behaviour looks like?
- Consent.
- Gender roles, stereotyping, and equality.
- Body confidence and self-esteem.
- Prejudiced behaviour.
- That sexual violence and sexual harassment is always wrong; and
- Addressing cultures of sexual harassment.

16 **Some useful definitions:**

Sexual Harassment This can be defined as 'unwanted conduct of a sexual nature' that can occur online and offline. In the context of this guidance this means in the context of child-on-child sexual harassment. Sexual harassment is likely to: violate a child's dignity, and/or make them feel intimidated, degraded, or humiliated and/or create a hostile, offensive or sexualised environment.

It can include

- Sexual comments, such as: telling sexual stories, making lewd comments, making sexual remarks about clothes and appearance, and calling someone sexualised names.
- Sexual "jokes" or taunting.

Sexting: Sexting is when someone shares sexual, naked, or semi-naked images or videos of themselves or others or sends sexually explicit messages. They can be sent using mobiles, tablets, smartphones, laptops - any device that allows you to share media and messages.

Up skirting This typically involves taking a picture under a person's clothing without them knowing, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the

Child Protection and Safeguarding Policy

victim humiliation, distress, or alarm. It is now a criminal offence and may constitute sexual harassment. Cases of 'up skirting' have a mandatory requirement for being reported.

Sexual Violence In this guidance this refers to sexual violence in the context of child-on-child sexual violence. Children can and do abuse other children. Sexual violence covers a spectrum of behaviour. It can refer to sexual offences under the Sexual Offences Act 2013. This includes: -

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

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

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

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

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

It is also important to differentiate between consensual sexual activity between children of a similar age and that which involves any power imbalance, coercion, or exploitation. Due to their additional training, the DSL (or deputy) should be involved and leading the Eat That Frog response. If in any doubt, they should seek expert advice. It is important that Eat That Frog considers sexual harassment in broad terms. Sexual harassment (as set out above) creates an atmosphere that, if not challenged, can normalise inappropriate behaviours and provide an environment that may lead to sexual violence.

Harmful Sexual Behaviour (HSB) Children's sexual behaviour exists on a wide continuum, from normal and developmentally expected to inappropriate, problematic, abusive, and violent. Problematic, abusive, and violent sexual behaviour is developmentally inappropriate and may cause developmental damage. A useful umbrella term is "harmful sexual behaviour". The term has been widely adopted in child protection and is used in this advice. Harmful sexual behaviour can occur online and/or offline and can also occur simultaneously between the two. Harmful sexual behaviour

Child Protection and Safeguarding Policy

should be considered in a child protection context. Useful guidance can be found in: -
NSPCC and Research in Practice's Harmful Sexual Behaviour Framework: [Harmful sexual behaviour framework | NSPCC Learning](#)

Hazing/Initiation The practice of rituals, challenges, and other activities involving harassment, abuse or humiliation used as a way of initiating a person into a group.

Contextual Safeguarding and extra-familial harm

All staff, but especially the DSL should be considering the context within which incidents and/or behaviours occur. This is known as contextual safeguarding, which simply means assessments of children should consider whether wider environmental factors are present in a child's life that are a threat to their safety and/or welfare.

Additional considerations for Eat That Frog when considering harmful sexual behaviour.

Age and the stages of development of the children are critical factors to consider. Sexual behaviour between children can be considered harmful if one of the children is much older, particularly if there is more than two years' difference or if one of the children is pre-pubescent and the other is not. However, a younger child can abuse an older child, particularly if they have power over them, for example, if the older child is disabled or smaller in stature. Eat That Frog should ensure that their response to sexual violence and sexual harassment between children of the same sex is equally robust as it is for sexual violence and sexual harassment between children of the opposite sex.

Appendix 2

Recognising signs of child abuse

Categories of Abuse:

- Physical Abuse
- Emotional Abuse (including Domestic Abuse)
- Sexual Abuse (including child sexual exploitation)
- Neglect

Signs of Abuse in Children:

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

- Significant change in behaviour
- Extreme anger or sadness
- Aggressive and attention-needing behaviour
- Suspicious bruises with unsatisfactory explanations
- Lack of self-esteem
- Self-injury

Child Protection and Safeguarding Policy

- Depression and/or anxiousness
- Age-inappropriate sexual behaviour
- Child Sexual Exploitation
- Criminality
- Substance abuse
- Mental health problems
- Poor attendance

Risk Indicators

The factors described in this section are frequently found in cases of child abuse. Their presence is not proof that abuse has occurred, but:

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

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

In an abusive relationship the child may:

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

The parent or carer may:

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

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

Recognising Physical Abuse

The following are often regarded as indicators of concern:

- An explanation which is inconsistent with an injury
- Several different explanations provided for an injury

Child Protection and Safeguarding Policy

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

Bruising

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

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

Bite Marks

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

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

Burns and Scalds

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

- Circular burns from cigarettes (but may be friction burns if along the bony protuberance of the spine)
- Linear burns from hot metal rods or electrical fire elements
- Burns of uniform depth over a large area
- Scalds that have a line indicating immersion or poured liquid (a child getting into hot water is his/her own accord will struggle to get out and cause splash marks)

Child Protection and Safeguarding Policy

- Old scars indicating previous burns/scalds which did not have appropriate treatment or adequate explanation

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

Fractures

Fractures may cause pain, swelling and discolouration over a bone or joint. Non-mobile children rarely sustain fractures.

There are grounds for concern if:

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

Scars

Many scars or scars of different sizes or ages, or on different parts of the body, may suggest abuse.

Recognising Emotional Abuse

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

The following may be indicators of emotional abuse:

- Developmental delay
- Abnormal attachment between a child and parent/carer e.g., anxious, indiscriminate, or no attachment
- Indiscriminate attachment or failure to attach
- Aggressive behaviour towards others
- Scapegoated within the family
- Frozen watchfulness, particularly in pre-school children
- Low self-esteem and lack of confidence
- Withdrawn or seen as a “loner” – difficulty relating to others

Recognising Signs of Sexual Abuse

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

Child Protection and Safeguarding Policy

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

Some behavioural indicators associated with this form of abuse are:

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

Some physical indicators associated with this form of abuse are:

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

It is rare for children to make false allegations about sexual abuse and any allegations should always be taken seriously.

Recognising Neglect

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

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

Child Protection and Safeguarding Policy

Appendix 3

Sexual Abuse & Sexual Harassment

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

- bullying (including cyberbullying)
- physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm
- sexual violence and sexual harassment
- sexting (also known as youth produced sexual imagery)
- initiation/hazing type violence and rituals
- up skirting

Developmental Sexual Activity

Encompasses those actions that are to be expected from children and young people as they move from infancy through to an adult understanding of their physical, emotional, and behavioural relationships with each other. Such sexual activity is essentially information gathering and experience testing. It is characterised by mutuality and of the seeking of consent.

Inappropriate Sexual Behaviour

Can be inappropriate socially, inappropriate to development, or both. In considering whether behaviour fits into this category, it is important to consider what negative effects it has on any of the parties involved and what concerns it raises about a child or young person. It should be recognised that some actions may be motivated by information seeking, but still cause significant upset, confusion, worry, physical damage, etc. It may also be that the behaviour is “acting out” which may derive from other sexual situations to which the child or young person has been exposed. If an act appears to have been inappropriate, there may still be a need for some form of behaviour management or intervention. For some children, educative inputs may be enough to address the behaviour.

Abusive sexual activity includes any behaviour involving coercion, threats, aggression together with secrecy, or where one participant relies on an unequal power base. To determine the nature of the incident the following factors should be given consideration.

Child Protection and Safeguarding Policy

The presence of exploitation in terms of:

Equality – consider differentials of physical, cognitive, and emotional development, power and control and authority, passive, and assertive tendencies

Informed consent - In 2015 (recirculated in 2018) Thames Valley police produced a video on the topic of consent using the analogy of asking for a cup of tea. [Consent is everything.](#)

They highlight the following: Sexual consent is where a person has the freedom to agree to sexual activity. It is vital the person instigating sex makes sure their partner is participating freely and readily. The website sets out what the consequences are for a person who takes part in sexual activity without seeking consent:

- Rape is a crime.
- It happens to men and women. Rape occurs when a person penetrates another person's mouth, anus, or vagina with their penis without consent.
- If someone initially agrees to have sex, but later withdraws their consent and the other person continues anyway, that person will have committed rape.
- Being drunk or on drugs is not a defence.
- Being accused of rape has life-changing consequences:
- Suspects will be arrested and questioned by the police.
- Their belongings will be seized, and DNA taken, analysed and added to a database.
- A suspect charged with rape will appear in Crown Court before a judge and jury for trial.
- A convicted rapist could be sent to prison. The maximum sentence is life imprisonment.
- Offenders would be ordered to sign the sex offenders register.
- After being convicted it may be harder to get a job or a place at university.
- Offenders may not be able to travel to some countries.
- Offenders may also damage or even lose relationships with friends and families.
- To have sex without consent is to commit rape.

For there to be informed consent the following must be present

- Understanding that is proposed based on age, maturity, development level, functioning and experience
- Knowledge of society's standards for what is being proposed
- Awareness of potential consequences and alternatives
- Assumption that agreements or disagreements will be respected equally
- Voluntary decision
- Mental competence

Coercion – the young perpetrator who abuses may use techniques like bribing, manipulation and emotional threats of secondary gains and losses that is loss of love, friendship, etc. Some may use physical force, brutality or the threat of these regardless of victim resistance. See Appendix 4

Child Protection and Safeguarding Policy

In evaluating sexual behaviour of children and young people, the above information should be used only as a guide. The TSPC offer guidance to sexually harmful behaviour in its guides to harmful behaviour generally: [TSCP Harmful Behaviour Guide and policy](#)

Appendix 4

Exploitation (including Child Sex Exploitation, Child Criminal Exploitation and County Lines)

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

Signs include:

- going missing from home or Eat That Frog
- regular absence/truanting
- underage sexual activity
- inappropriate sexual or sexualised behaviour
- sexually risky behaviour, 'swapping' sex
- repeat sexually transmitted infections
- in girls, repeat pregnancy, abortions, miscarriage
- receiving unexplained gifts or gifts from unknown sources
- having multiple mobile phones and worrying about losing contact via mobile
- online safety concerns such as youth produced sexual imagery or being coerced into sharing explicit images.
- having unaffordable new things (clothes, mobile) or expensive habits (alcohol, drugs)
- changes in the way they dress
- going to hotels or other unusual locations to meet friends
- seen at known places of concern
- moving around the country, appearing in new towns or cities, not knowing where they are
- getting in/out of different cars driven by unknown adults
- having older boyfriends or girlfriends
- contact with known perpetrators
- involved in abusive relationships, intimidated and fearful of certain people or situations
- hanging out with groups of older people, or anti-social groups, or with other vulnerable peers
- associating with other young people involved in sexual exploitation
- recruiting other young people to exploitative situations
- truancy, exclusion, disengagement with Eat That Frog, opting out of education altogether
- unexplained changes in behaviour or personality (chaotic, aggressive, sexual)

Child Protection and Safeguarding Policy

- mood swings, volatile behaviour, emotional distress
- self-harming, suicidal thoughts, suicide attempts, overdosing, eating disorders
- drug or alcohol misuse
- getting involved in crime
- police involvement, police records
- involved in gangs, gang fights, gang membership
- injuries from physical assault, physical restraint, sexual assault.

Consent

Gillick competency and Fraser guidelines help people who work with children to balance the need to listen to children's wishes with the responsibility to keep them safe. When practitioners are trying to decide whether a child is mature enough to make decisions about things that affect them, they often talk about whether the child is 'Gillick competent' or whether they meet the 'Fraser guidelines'. Although the two terms are frequently used together and originate from the same legal case, there are distinct differences between them but both often refer to children in relation to health issues? [NSPCC Gillick Competent Fraser Guidelines](#)

In relation to children who are exploited consideration should be given to if a child is consenting but

- the structure of grooming by their abuser means they do not understand the power differential, and they will often side with their abuser (coerced abused consent)
- they believe that their own and or families survival depends on them and therefore they are exploited for money, food, drugs and or accommodation (survival abused consent)
- normalising violent non – consenting sex (given access to pornography, sexting, music lyrics, gang culture, peer pressure) other young people sometimes groom others to get out of being abused or assaulted themselves. (abused normalised consent)
- professionals unconsciously normalise the abuse i.e. “all 14 year olds have sex” (professional condoned abused consent)

County lines is a term used to describe gangs and organised criminal networks involved in the exporting of 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 being exploited to move (and store) drugs and money. The same grooming models used to

Child Protection and Safeguarding Policy

coerce, intimidate, and abuse individuals for sexual and criminal exploitation are also used for grooming vulnerable individuals for county lines.

Appendix 5

Female Genital Mutilation (FGM)

It is essential that staff are aware of FGM practices and the need to look for signs, symptoms, and other indicators of FGM. If a member of staff, in the course of their work, discovers that an act of FGM appears to have been carried out, the member of staff must report this to the Police.

Female Genital Mutilation (FGM) is illegal in England and Wales under the FGM Act 2003 ("the 2003 Act"). It is a form of child abuse and violence against women. FGM comprises all procedures involving partial or total removal of the external female genitalia for non-medical reasons.

Section 5B of the 2003 Act¹ introduces a mandatory reporting duty which requires regulated health and social care professionals and teachers in England and Wales to report 'known' cases of FGM in under 18s which they identify in the course of their professional work to the police. The duty came into force on 31 October 2015.

What is FGM?

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

4 types of procedure:

Type 1 Clitoridectomy – partial/total removal of clitoris

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

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

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

Why is it carried out?

Belief that:

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

Child Protection and Safeguarding Policy

- Is cosmetically desirable
- Mistakenly believed to make childbirth easier

Is FGM legal?

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

Circumstances and occurrences that may point to FGM happening are:

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

Signs that may indicate a child has undergone FGM:

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

The 'One Chance' rule

As with Forced Marriage there is the 'One Chance' rule. It is essential that settings act **without delay** and make a referral to children's services.

Child Protection and Safeguarding Policy

Appendix 6

Domestic Abuse (including Operation Encompass)

How does it affect children?

Children can be traumatised by seeing and hearing violence and abuse. They may also be directly targeted by the abuser or take on a protective role and get caught in the middle. In the long term this can lead to serious long lasting emotional and psychological impact on children. In some cases, children may blame themselves for the abuse or may have had to leave the family home as a result. Government legislation enacted in 2021 recognises that a child who sees or hears, or experiences the effects of, domestic abuse and is related to the person being abused or the perpetrator is also to be regarded as a victim of domestic abuse

In addition, the age limit for criminal offences related to domestic abuse was lowered from 18 to 16, to recognise that young people can experience abuse in their relationships.

What are the signs to look out for?

Children affected by domestic abuse reflect their distress in a variety of ways. They may change their usual behaviour and become withdrawn, tired, start to wet the bed, and have behavioural difficulties. They may not want to leave their house or may become reluctant to return. Others will excel, using their time in your care as a way to escape from their home life. None of these signs are exclusive to domestic abuse so when you are considering changes in behaviours and concerns about a child, think about whether domestic abuse may be a factor.

What should I do if I suspect a family is affected by domestic abuse?

Contact: <http://www.areyouok.co.uk/>

If you are concerned about a child or young person:

Torbay, please contact the [Multi Agency Safeguarding Hub](#) on 01803 208100 or email mash@torbay.gov.uk

Devon, completing an online [request for support form](#) calling on [0345 155 1071](tel:03451551071) emailing mashsecure@devon.gov.uk and giving as much information as you can

Plymouth, please complete a [MASH Contact Form](#). If you have an urgent child protection concern then please call Plymouth Multi Agency Safeguarding Hub on [01752 668000](tel:01752668000).

Torbay Domestic Abuse Service (TDAS) provides support for men, women and children across Torbay who need advice and protection from domestic abuse. Through confidential advice, support,

Child Protection and Safeguarding Policy

and crisis accommodation, we can help you to make informed decisions about your future, safety, health, housing and other concerns. [TDAS](#) 0800 2000 247

Devon Domestic Abuse FearFree - [Contact us - FearFree](#)

1st Floor. Buckland House. Pavilion 3. Park 5 Business Centre. Harrier Way. Exeter. EX2 7HU.

Devon, Tel: 0345 155 1074 (landline call rate)

For professionals using a secure email address: referrals.devon@fearfree.org.uk.cjsm.net

For clients or those who do not use secure emails: admin.devon@fearfree.org.uk

Plymouth Domestic Abuse Service (PDAS) and refuge

If you need support and protection from abuse call the [Plymouth Domestic Abuse Service](#) on 01752 252033 or the Plymouth refuge on 01752 562286.

National Domestic Abuse Helpline Refuge runs the National Domestic Abuse Helpline, available 24hour a day 0808 2000 247 and its website offers guidance and support for potential victims.

[Refuge Against Domestic Violence - Help for women & children.](#)

Operation Encompass helps police and colleges work together to provide emotional and practical help for children. Police will inform the 'key adult' within schools if they have been called to an incident of domestic abuse, where there are children in the household before registration the next day.

National Operation Encompass Teachers' Helpline

From 1st September 2020 the National Operation Encompass Teachers' Helpline is once again available. Funded by the Home Office, the advice line is free, and calls are answered by trained Educational and Clinical Psychologists.

You can call the helpline on 0204 513 9990 (Weekdays 8 - 11.00am) Website: [Operation Encompass](#)

Appendix 7

INDICATORS OF VULNERABILITY TO RADICALISATION

1. Radicalisation refers to the process by which a person comes to support terrorism and forms of extremism leading to terrorism.
2. Extremism is defined by the Government in the Prevent Strategy as:

Vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs. We also include in our definition of extremism calls for the death of members of our armed forces, whether in this country or overseas.

3. Extremism is defined by the Crown Prosecution Service as:
The demonstration of unacceptable behaviour by using any means or medium to express views which:
 - Encourage, justify, or glorify terrorist violence in furtherance of particular beliefs.
 - Seek to provoke others to terrorist acts.
 - Encourage other serious criminal activity or seek to provoke others to serious criminal acts; or
 - Foster hatred which might lead to inter-community violence in the UK.

There is no such thing as a “typical extremist”: those who become involved in extremist actions come from a range of backgrounds and experiences, and most individuals, even those who hold radical views, do not become involved in violent extremist activity.

Learners may become susceptible to radicalisation through a range of social, personal, and environmental factors - it is known that violent extremists exploit vulnerabilities in individuals to drive a wedge between them and their families and communities. It is vital that Eat That Frog staff can recognise those vulnerabilities.

Indicators of vulnerability include:

- Identity Crisis – the student / learner is distanced from their cultural / religious heritage and experiences discomfort about their place in society.
- Personal Crisis – the student / learner may be experiencing family tensions; a sense of isolation; and low self-esteem; they may have dissociated from their existing friendship group and become involved with a new and different group of friends; they may be searching for answers to questions about identity, faith and belonging.
- Personal Circumstances – migration; local community tensions; and events affecting the student / learner’s country or region of origin may contribute to a sense of grievance

Child Protection and Safeguarding Policy

that is triggered by personal experience of racism or discrimination or aspects of Government policy.

- Unmet Aspirations – the student / learner may have perceptions of injustice; a feeling of failure; rejection of civic life.
- Experiences of Criminality – which may include involvement with criminal groups, imprisonment, and poor resettlement / reintegration.
- Special Educational Need – students / learners may experience difficulties with social interaction, empathy with others, understanding the consequences of their actions and awareness of the motivations of others.

However, this list is not exhaustive, nor does it mean that all young people experiencing the above are at risk of radicalisation for the purposes of violent extremism.

More critical risk factors could include:

- Being in contact with extremist recruiters.
- Accessing violent extremist websites, especially those with a social networking element.
- Possessing or accessing violent extremist literature.
- Using extremist narratives and a global ideology to explain personal disadvantage.
- Justifying the use of violence to solve societal issues.
- Joining or seeking to join extremist organisations; and
- Significant changes to appearance and / or behaviour.
- Experiencing a high level of social isolation resulting in issues of identity crisis and / or personal crisis.

The Prevent duty ensures colleges have 'due regard' to the need to prevent people from being susceptible to terrorism.

Channel is the voluntary, confidential support programme which focuses on providing support at an early stage to individuals that have been identified as being vulnerable to radicalisation. Prevent referrals may be passed to the multi-agency Channel panel to determine whether individuals require support.

[Revised Prevent duty guidance: for England and Wales - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/publications/prevent-duty-guidance-for-england-and-wales) (school specific paras 57-76)

[The Prevent Duty, for Further Education Institutions](https://www.gov.uk/government/publications/channel-guidance)

Guidance on Channel <https://www.gov.uk/government/publications/channel-guidance>

Further information can be obtained from the Home Office website.

Appendix 8

Police and Criminal Evidence Act (1984) – Code C

The Designated Safeguarding Lead (and deputy) are aware of the requirement for children to have an appropriate adult when in contact with Police officers who suspect them of an offence.

PACE states that anyone who appears to be under 18, shall, in the absence of clear evidence that they are older, be treated as a child for the purposes of this Code and any other Code.

PACE also states that If at any time an officer has any reason to suspect that a person of any age may be vulnerable, then that person is entitled to be accompanied by an appropriate adult at any point.

The Designated Safeguarding (or deputy) will communicate any vulnerabilities known by the school to any police officer who wishes to speak to a pupil about an offence they may suspect. This communication will be recorded on the Safeguarding site.

If having been informed of the vulnerabilities, the designated safeguarding lead (or deputy) does not feel that the officer is acting in accordance with PACE, they should ask to speak with a supervisor or contact 101 to escalate their concerns.

A person whom there are grounds to suspect of an offence must be cautioned⁷ before questioned about an offence⁸, or asked further questions if the answers they provide the grounds for suspicion, or when put to them the suspect's answers or silence, (i.e. failure or refusal to answer or answer satisfactorily) may be given in evidence to a court in a prosecution.

A Police Officer must not caution a juvenile or a vulnerable person unless the appropriate adult is present. If a child or a vulnerable person is cautioned in the absence of the appropriate adult, the caution must be repeated in the appropriate adult's presence.

The appropriate adult⁷ means, in the case of a child:

- V. the parent, guardian or, if the juvenile is in the care of a local authority or voluntary organisation, a person representing that authority or organisation.
- VI. a social worker of a local authority

Failing these, some other responsible adult aged 18 or over who is not:

⁷ The police caution is: *"You do not have to say anything. But it may harm your defence if you do not mention when questioned something which you later rely on in Court. Anything you do say may be given in evidence."*

⁸ A person need not be cautioned if questions are for other necessary purposes, e.g.: (a) solely to establish their identity or ownership of any vehicle; to obtain information in accordance with any relevant statutory requirement; in furtherance of the proper and effective conduct of a search, e.g. to determine the need to search in the exercise of powers of stop and search or to seek co-operation while carrying out a search; or to seek verification of a written record.

Child Protection and Safeguarding Policy

- I. a police officer;
- II. employed by the police;
- III. under the direction or control of the chief officer of a police force; or
- IV. a person who provides services under contractual arrangements (but without being employed by the chief officer of a police force), to assist that force in relation to the discharge of its chief officer's functions,

Further information can be found in the Statutory guidance - [PACE Code C 2019](#).

<https://www.gov.uk/government/publications/pace-code-c-2019/pace-code-c-2019-accessible>

Appendix 9 Resources

Further advice on child protection is available from:

The Lucy Faithfull Foundation has developed a HSB toolkit [What is harmful sexual behaviour - Lucy Faithfull Foundation](#), which amongst other things, provides support, advice and information on how to prevent it, links to organisations and helplines, resources about HSB by children, internet safety, sexual development and preventing child sexual abuse

The Lucy Faithfull Foundation in collaboration with the Home Office, has developed 'Shore Space', an online resource which works to prevent harmful sexual behaviour. Shore Space offers a confidential chat service supporting young people who are concerned about their own or someone else's sexual thoughts and behaviour. [Home - Shore](#)

Preventing Child Sexual Exploitation – The Children's Society and Home Office [Preventing Child Sexual Exploitation | The Children's Society](#)

CSA Centre's Resources for education settings | CSA Centre [Resources for education settings | CSA Centre](#)

NSPCC: <http://www.nspcc.org.uk/>

Childline: <http://www.childline.org.uk/pages/home.aspx>

Anti-Bullying Alliance: <http://anti-bullyingalliance.org.uk/>

Beat Bullying: <http://www.beatbullying.org/>

Childnet International - making the internet a great and safe place for children. Includes resources for professionals and parents <http://www.childnet.com/>

Thinkuknow (includes resources for professionals and parents) <https://www.thinkuknow.co.uk/>

Safer Internet Centre <http://www.saferinternet.org.uk/>

Transgender <http://www.mermaidsuk.org.uk/>

[Intercom trust transgender guidance](#)

Guidance on online safety

DfE advice for schools: teaching online safety in schools

- UK Council for Internet Safety (UKCIS)37 guidance: Education for a connected world
- UKCIS guidance: Sharing nudes and semi-nudes: advice for education settings working with children and young people
- The UKCIS external visitors guidance will help schools and colleges to ensure the maximum impact of any online safety sessions delivered by external visitors
- National Crime Agency's CEOP education programme: Thinkuknow
- Public Health England: Every Mind Matters
- Harmful online challenges and online hoaxes - this includes advice on preparing for any online challenges and hoaxes, sharing information with parents and carers and where to get help and support.

Other useful resources

- A **video on supporting children** who are victims of sexual abuse.
- A link to **South West Grid for Learning**, a charity that provides support regarding abuse and technology.
- A **county lines toolkit for professionals**.
- Government guidance on **forced marriage**.
- LGFL "**Undressed**" - a website that features a video and song that schools can use to teach young children about the risk of being tricked into getting undressed online

Appendix 10 - Safeguarding contacts including MASH

In an emergency call 999 – non-emergency: 101

Torbay, please contact the [Multi Agency Safeguarding Hub](#) on 01803 208100 or email mash@torbay.gov.uk

Devon, completing an online [request for support form](#) calling on [0345 155 1071](tel:03451551071) emailing mashsecure@devon.gov.uk and giving as much information as you can

Plymouth, please complete a [MASH Contact Form](#). If you have an urgent child protection concern then please call Plymouth Multi Agency Safeguarding Hub on *01752 668000*.

For all LADO enquiries: **LADO: Torbay** - 01803 208541 **Devon** - 01392 384964 **Plymouth** - 01752306758