



Safeguarding and Child Protection Policy (Summer Programmes)

2024

Contents

1	Key contacts.....	4
1.1	Dusemond Safeguarding Team.....	4
1.2	Key external contacts for specific centres.....	5
1.3	Key external contacts – national organisations and agencies.....	6
2	Introduction.....	7
3	Aims.....	7
4	Key Principles.....	8
5	Contextual safeguarding.....	8
6	Teaching children and young people about safeguarding.....	9
7	Online safety.....	9
7.1	Categories of online risk.....	9
7.2	Filtering and monitoring.....	9
8	Wellbeing and mental health.....	9
9	Roles and responsibilities.....	10
9.1	Role of the Designated Safeguarding Lead (DSL).....	10
9.2	Deputy Designated Safeguarding Lead (DDSL).....	10
9.3	Staff responsibilities.....	11
10	Training.....	11
11	Safer recruitment.....	11
12	Monitoring and review.....	11
13	Procedures.....	12
13.1	What to do if you have a concern about a child or young person.....	12
13.2	Guidance on receiving a disclosure.....	12
13.3	Asking for advice.....	13
13.4	Action by the DSL.....	13
13.5	Making a referral.....	13
13.6	What to do if staff have concerns about someone else’s welfare.....	14
13.7	Allegations against students/students - peer on peer / child on child abuse.....	14
13.8	Allegations against staff.....	14
13.8.1	Allegations that may meet the harms threshold.....	15
13.8.2	Concerns that do not meet the harm threshold – Low level concerns (neutral notifications).....	15
14	Disclosure and Barring Service.....	16
15	Visitors and Contractors.....	16
16	Propriety and Behaviour.....	16
17	Infatuations.....	17
18	Sexual Contact.....	17
19	Dress and Appearance.....	17
20	Behaviour Management.....	18
21	Physical Contact.....	18
22	Communication with Children and Young People.....	18

23	Favouritism and Gifts.....	19
	Appendix 1: Types and Signs of Abuse.....	20
	Appendix 2: Child-on-Child Abuse.....	25
	Appendix 3: Cause for Concern Form	29
	Appendix 4: Neutral Notification Form	30

SAFEGUARDING AND PROMOTING THE WELFARE OF CHILDREN IS EVERYONE'S RESPONSIBILITY

1 Key contacts

Everyone who comes into contact with children and their families and carers has a role to play in safeguarding children. All professionals should ensure that their approach is child centred: this means considering at all times what is in the best interests of the child.

Staff members must raise any safeguarding concerns with the designated safeguarding lead or deputies without delay.

If the designated safeguarding lead or deputies are not available, staff should phone the Dusemond 24-hour emergency number (**0203 286 7525**).

Where a child is suffering, or is likely to suffer from harm, it is important that a referral to children's social care at MASH (Multi-Agency Safeguarding Hub) or equivalent (and if appropriate the police **999**) is made immediately. Anyone can make a referral to children's social care. Contact details for each centre's local children's social care teams are provided below.

Staff members should ensure they are prepared for the referral with clear details of their concern and the child's name, DoB, address and contact details for parents/carers. There is no need for parental consent for referrals to statutory agencies.

Any action taken by staff should be shared with the DSL or DDSL as soon as possible.

1.1 Dusemond Safeguarding Team

Designated Safeguarding Lead (DSL)	
Robin Fry	safeguarding@dusemond.co.uk 07939 536105
Deputy Designated Safeguarding Lead (DDSL)	
Clie van Helsdingen Welfare Manager, Uppingham	07539949352 (alternative 07930906996)
Katie Stallard Welfare Manager/Cheltenham	07432453554 (alternative 07432453594)
Designated Safeguarding Officers (DSO)	
Afiqah Syahirah Welfare Manager/Rugby	07432453620 (alternative 07432453572)
Julia Filip Welfare Manager/Rugby	07432453620 (alternative 07432453572)
Clie van Helsdingen Welfare Manager/Uppingham	07539949352 (alternative 07930906996)
Sofia Grace Villavicencio Clayton Welfare Manager/Bedales	07903147509 (alternative 07903147505)
Nishanthini Ganesan Welfare Manager/York	07903147546 (alternative 07903147520)
Katie Stallard DSO Welfare Manager/Cheltenham	07432453554 (alternative 07432453594)
Aysha Sheikh Welfare Manager, Goldsmiths, University of London	07562197729 (alternative 07562197728)
Alexandra Burns Welfare Manager/Heriot-Watt	07903147549 (alternative 07539949402)

University	
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1.2 Key external contacts for specific centres

Rugby	
Rugby School Designated Safeguarding Lead	Mrs Liz Sale Email: els@rugbyschool.net Telephone number (term time): 01788 556350 Mobile number (term time): 07917 550976 Holiday contact number: Mobile number as above
Warwickshire children's social care department Warwickshire Multi-Agency Safeguarding Hub (MASH) now known as the Children and Families Front Door	Telephone number (Monday to Thursday 8.30am - 5.30pm, Friday 8.30am - 5.00 pm): 01926 414144 Email: triagehub@warwickshire.gov.uk Out of hours emergency duty team: 01926 886922
Designated Officer(s) of the local authority (LADO)	Telephone number: 01926 745376 Email: lado@warwickshire.gov.uk
Uppingham	
Uppingham School Designated Safeguarding Lead	Carmela Senogles cls@uppingham.co.uk Telephone number: 01572 820608
Rutland Referral, Assessment & Intervention Service (RAIS) Team	Telephone number: 01572 758 407 Email: childrensreferrals@rutland.gov.uk Report a concern about a child or young person Rutland County Council https://www.rutland.gov.uk/children-young-people-families/report-concern-about-child-or-young-person
Rutland Local Authority Designated Officer (LADO)	Telephone number: 01572 758 454 Email: LADO@rutland.gov.uk
Bedales	
Bedales Designated Safeguarding Lead	Ana Simmons Safeguarding@bedales.org.uk Mobile: 07884 665434 Telephone number: 01730 711700
Children's social care, Hants Direct	Telephone: 0300 555 1384 (or 08456 035620) Out of Hours contact: 0300 555 1373 Online referral: Contact Children's Services Children and Families Hampshire County Council (hants.gov.uk)
Hampshire Local Authority Designated Officers (LADOs)	Barbara Piddington, Fiona Armfield and Mark Blackwell Telephone: 01962 876265
York	

Queen Margaret's School Designated Safeguarding Lead	Tania Davidson Telephone number: 01904 727614 Mobile: 07889 592414 tdavidson@queenmargarets.com dsl@queenmargarets.com
North Yorkshire Safeguarding Children Partnership	- Contact Us If you believe the situation is urgent but does not require the police, please call 0300 131 2 131 to make a telephone contact. Outside Office Hours (Monday – Friday / 9am-5pm) Call 0300 131 2 131 to speak to the Emergency Duty Team.
North Yorkshire Local Authority Designated Officer (LADO)	Telephone number: 01609 533080
Cheltenham	
Cheltenham College Designated Safeguarding Lead	Mrs Anna Cutts Email: a.cutts@cheltenhamcollege.org Telephone number: 07973 684894
Gloucestershire County Council children's social care department Gloucestershire Multi-Agency Safeguarding Hub (MASH)	Telephone number: 01452 426565 Email: childrenshelpdesk@gloucestershire.gov.uk Out of hours duty team telephone number: 01452 614 194
Gloucestershire Local Authority Designated Officer (LADO)	Nigel Hatten Telephone number: 01452 426994 Email: nigel.hatten@gloucestershire.gov.uk
Goldsmiths, University of London	
Goldsmiths Designated Safeguarding Lead	
Local Authority Designated Officer (LADO)	LewishamLADO@lewisham.gov.uk Telephone number: 020 8314 7280
Heriot-Watt University	
Heriot-Watt University Designated Safeguarding Lead	SafeGuarding@hw.ac.uk Telephone number: 0131 451 3500
Edinburgh Social Care Direct	Telephone number: 0131 200 2327

Commented [RF1]: Insert contact details

1.3 Key external contacts – national organisations and agencies

NSPCC Reporting abuse in education	0800 136 663 help@nspcc.org.uk
NSPCC Female Genital Mutilation (FGM)	0800 028 3550 help@nspcc.org.uk
NSPCC Radicalisation	0808 800 5000 help@nspcc.org.uk
NSPCC Gangs	help@nspcc.org.uk
NSPCC Whistleblowing	0800 028 0285 help@nspcc.org.uk

Reporting suspected extremism online	Report suspicious activity to MI5 - GOV.UK (www.gov.uk)
For non-emergency advice: contact DfE dedicated helpline	0800 011 3764 counter-extremism@education.gsi.gov.uk
FGM reporting - non-emergency police contact number	101
UK Safer Internet Centre	0344 800 2382 About - UK Safer Internet Centre

2 Introduction

Safeguarding and promoting the welfare of children is defined as:

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

At Dusemond we are committed to safeguarding children and young people and we expect everyone who works for the company to share this commitment. Adults involved with our programmes take all welfare concerns seriously and encourage children and young people to talk to us about anything that worries them. We will always act in the best interest of the child. Reference to staff includes all those who work for or on behalf of Dusemond, regardless of their employment status, including contractors, group leaders and suppliers.

Dusemond believes that it should provide a caring, positive, safe and stimulating environment in which students can learn and which promotes the social, physical, mental health and emotional wellbeing of each individual student, and which takes a child-centred approach.

Dusemond recognises its responsibilities and duties to report child protection (CP) concerns to the social work service within Children’s Services and to assist Children’s Services in child protection enquiries and in supporting children in need.

Our policies and procedures are written with reference to the Children Act (1989), the Children Act (2004), the Equality Act 2010, the Protection of Freedoms Act 2012, the Children and Social Work Act 2017, the Data Protection Act 2018 and General Data Protection Regulation and the guidance documents, “Working Together to Safeguard Children’ July 2018, “Keeping Children Safe in Education” September 2023, ‘Revised Prevent Duty Guidance for England and Wales’ December 2023, Accreditation UK Inspection Criteria 2018-2021 (March 2019 edition) and ‘Multi-agency statutory guidance on female genital mutilation’ April 2016.

3 Aims

- To actively promote and safeguard the welfare of students, staff and others taking part in Dusemond programmes
- To raise awareness of all adults working with children of the need to safeguard all children and of their roles and responsibilities in respect of identifying and reporting possible cases of abuse
- To ensure all staff receive appropriate training
- To emphasise the need for good communication between all members of staff on matters relating to safeguarding and child protection
- To promote safe practice and challenge poor and unsafe practice
- To ensure appropriate action is taken in the event of incidents, concerns of abuse and support is provided to the individual(s) who raise or disclose the concern
- To ensure that confidential, detailed and accurate records of all safeguarding concerns are maintained and securely

stored

- To ensure that all adults working within Dusemond centres and its offices have been checked as to their suitability to work with children, in line with current guidance
- To integrate opportunities in Dusemond's programmes for children to develop the skills they need to recognize and stay safe from abuse
- To take account of policy in related areas such as anti-bullying, health and safety, FGM, anti-radicalisation, child sexual exploitation, sexual violence and harassment between children, procedures for dealing with allegations against staff and recruitment practice

4 Key Principles

- Dusemond believes that all children have a right to be protected from harm and/or abuse
- Dusemond will take reasonable steps to ensure that its students and others who come into contact with Dusemond do not, as a result, come to harm or are exposed to abuse
- Dusemond recognises that abuse and neglect are complex issues and rarely stand-alone events and therefore require a culture of vigilance, professional curiosity and respectful challenge and effective recording and monitoring systems
- Dusemond recognises that abuse occurs in all cultures, religions and social classes and that staff need to be sensitive to the many differing factors which need to be taken into account depending on the child's cultural and social background when dealing with CP issues. However, Dusemond also recognises that the needs of the child are paramount and any concerns will be referred on appropriately whatever the family background of the child concerned
- Dusemond recognises that a child who is abused or witnesses abuse or violence may find it difficult to develop and maintain a sense of self-worth, they may feel helpless and humiliated and may feel self-blame
- Dusemond recognises that although it offers short courses, it may provide the only environment where children who have been abused or are at risk of harm can talk to an adult about their experiences
- Dusemond accepts that research shows that the behaviour of a child in these circumstances may range from that which is perceived as normal to that which is overtly aggressive, disturbed or withdrawn
- Dusemond knows that it is important that children feel secure, are encouraged to talk and are sensitively listened to, and that children know that there are adults working on our programmes whom they can approach if they are worried or unhappy
- Dusemond acknowledges that (although all designated/key staff have been appointed to respond to a variety of situations and issues) there may be occasions where it will be appropriate to consider whether specific or additional arrangements need to be put in place where an issue is particularly sensitive due to gender issues or cultural or faith issues. This ensures that in cases of sexual abuse in particular, a student can be spoken to by a same sex member of staff (who has received enhanced training) if this is felt to be appropriate
- Dusemond adheres to the principles of working in partnership with those who hold parental responsibility for each child
- The prime concern at all times must be the welfare and safety of the child. Where there is a conflict between the needs of the child and the parent/carer, the interests of the child must be paramount
- The ethos of Dusemond supports open practice, good communication and a safe culture in which children can thrive and learn
- All staff should feel able to raise concerns about poor or unsafe practice or potential failures in Dusemond's safeguarding practice and know that these concerns will be taken seriously by the leadership team and dealt with sensitively and appropriately
- All staff should only involve those who need to be involved when a child tells them he/she/they is/are being abused or neglected

5 Contextual safeguarding

- Safeguarding incidents and / or behaviours can be associated with factors outside the centre and / or can occur

between children outside the centre

- All staff should consider the context within which such incidents and / or behaviours occur, for example where wider environmental factors are present in a child's life that may be a threat to their safety and / or welfare
- Children's social care should be informed of all such information to allow any assessment process to consider all available evidence and the full context of any abuse

6 Teaching children and young people about safeguarding

Children and young people following Dusemond's programmes will be informed about how they can report concerns and what happens when they do as part of their induction.

7 Online safety

All staff should be aware that technology is a significant component in many safeguarding and wellbeing issues. Children are at risk of abuse online as well as face to face. In many cases abuse will take place concurrently via online channels and in daily life.

7.1 Categories of online risk

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

Content: being exposed to illegal, inappropriate or harmful content, for example: pornography, fake news, racism, misogyny, self-harm, suicide, anti-Semitism, radicalisation and extremism.

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

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

Commerce: risks such as online gambling, inappropriate advertising, phishing and or financial scams. If students or staff are at risk, it should be reported to the [Anti-Phishing Working Group](#).

7.2 Filtering and monitoring

In order to meet the requirements of KCSIE partner schools will have in place filtering and monitoring systems to protect students from illegal, inappropriate and harmful materials online (content risk), the risk of children being subjected to harmful online interaction with other users (contact risk), risks such as online gambling, phishing or financial scams (commerce risk) and to help manage online behaviour that can increase the likelihood of, or causes, harm (conduct risk).

Dusemond recognises however that students have unlimited and unrestricted access to the internet via their mobile phone networks (i.e. 3G, 4G and 5G) which means that they may consensually and/or non-consensually share indecent images, sexually harass, bully and control their peers via mobile and smart technology, and view and share pornography and other harmful content.

8 Wellbeing and mental health

In order to help students fully enjoy and engage with Dusemond's programme, we recognise that we can play an

important role in supporting them to be resilient and mentally healthy. Some children are more at risk of developing mental health problems than others and these risks can relate to the child, their family or to community and life events.

International students can face unique stressors when attending courses: language barrier, culture shock, unrealistic expectations, crisis back home, illness.

9 Roles and responsibilities

9.1 Role of the Designated Safeguarding Lead (DSL)

Dusemond has appointed a DSL with the appropriate qualifications and experience to carry out the duties of the role. Responsibilities of the DSL include:

Managing referrals

- Referring cases of suspected abuse to the local authority as required
- Support staff who make referrals
- Refer cases where a person is dismissed or left due to risk/harm to a child to the Disclosure and Barring Service as required
- Refer cases where a crime may have been committed to the police as required

Working with others

- Act as a source of support, advice and expertise for staff
- Act as a point of contact with safeguarding partners
- Liaise with staff on matters of safety and safeguarding and when deciding whether to make a referral by liaising with the relevant agencies

Raising awareness

- Ensure the organisation's child protection policy is known and understood
- Ensure the organisation's child protection policy and procedures are reviewed at least annually

Training

The DSL and deputies attend the necessary enhanced training courses to enable them to carry out their role effectively.

The DSL and deputies should undergo training at an appropriate level to provide them with the knowledge and skills to carry out the role. This training should be updated at least every 2 years.

Their knowledge and skills should be refreshed regularly so that they understand and keep up with any developments in safeguarding and child protection.

Recordkeeping

All concerns, discussions and decisions made and the reasons for those decisions should be recorded in writing.

The records created may contain personal data. Such records will be kept secure such that only the DSL and deputies may have access to.

All records created will be managed in accordance with Dusemond's data privacy policies.

9.2 Deputy Designated Safeguarding Lead (DDSL)

The DDSL's responsibilities are to:

- Deputise for the DSL in their absence
- Support the DSL in responding to and managing safeguarding concerns as necessary
- Conduct investigations into safeguarding concerns

- Liaise with partner schools and external agencies as necessary

9.3 Staff responsibilities

All staff have a duty to:

- Report any concerns they may have about the safety and/or wellbeing of students
- Report any concerns they may have about the safety and/or wellbeing of other persons associated with Dusemond
- Report any safeguarding concerns about staff or anyone else associated with Dusemond
- Staff working with children are advised to maintain an attitude of 'it could happen here' where safeguarding is concerned. When concerned about the welfare of a child staff should always act in the best interests of the child
- Knowing what to look for is vital for early identification of abuse and neglect. If they are unsure, they should always speak to a designated safeguarding lead
- All staff should be aware of the indicators of abuse and neglect. See Appendix 1
- Any member of staff who has a safeguarding concern should follow the reporting and referral processes below
- Where a staff member has concerns about poor or unsafe practices or potential failures in the organisation's safeguarding processes, these concerns will be taken seriously and dealt with sensitively and appropriately. Staff may follow Dusemond's Whistleblowing Policy or alternatively contact the NSPCC whistleblowing helpline. Contact details are provided above.

All staff have a responsibility to read this policy carefully and to be aware of their role in these processes.

10 Training

All staff will receive appropriate training. All staff receive basic safeguarding awareness training relevant to their role as part of their induction. Designated safeguarding staff will additionally receive advanced safeguarding training and the DSL and DDSL's will have completed further specialist safeguarding training.

Staff will also receive safeguarding and child protection updates via email and staff meetings as necessary.

This policy will be available to all staff by email prior to their first day of employment. Copies will also be available at each Dusemond centre.

11 Safer recruitment

As part of the Dusemond's holistic approach to safeguarding, it is committed to safer recruitment processes to create a culture that safeguards and promotes the welfare of children in its centres whilst deterring and preventing people who are unsuitable to work with children from applying or securing employment. These processes are in line with part 3 of Keeping Children Safe in Education 2023.

Members of staff are subject to the necessary statutory child protection checks before starting work, for example, right to work checks, additional overseas checks (if necessary), verifying identity, taking up references and checking work history. An enhanced DBS check with 'barred list' information is appropriate for all roles with Dusemond.

12 Monitoring and review

The DSL will ensure that the procedures set out in this policy and the implementation for these procedures are updated and reviewed regularly. Minimally, this will be annually.

Any safeguarding incidents will be followed by a review of these procedures by the DSL and, if appropriate, with the support of an external agency.

Where an incident involves a member of the staff, the LADO will be asked to assist in the review.

Any deficiencies or weaknesses in regard to safeguarding arrangements at any time will be remedied without delay.

13 Procedures

13.1 What to do if you have a concern about a child or young person

All staff members have a responsibility to safeguard and promote the welfare of children studying on Dusemond's programmes.

If a staff member has a concern about student or receives information that leads them to be concerned that a student has been harmed or is at risk of harm or their welfare is being compromised, they are required to act appropriately and immediately to ensure action can be taken to protect the student.

It is important to understand that students may not find it easy to tell staff about abuse verbally. Students can show signs or act in ways that they hope adults will notice and react to. If staff have any concerns about a child's welfare, they should act on them immediately rather than wait to be told. Staff should never assume that somebody else will take action and share information that might be critical in keeping children safe; they should always maintain an "it could happen here" attitude and always act in the best interests of the child when concerned about their welfare.

The member of staff must report the concern to the DSL or deputy.

If the concern involves an allegation against staff, a supplier or contractor, this must be reported in accordance with the procedures set out below.

Staff **must** report known cases of female genital mutilation (FGM) to the police.

Further information about FGM and the reporting duty can be found in Appendix 1.

13.2 Guidance on receiving a disclosure

The concern may be as a result of a disclosure from a student, a parent, agent or a third party or may arise due to behavior that has caused the staff member to become concerned.

When listening to a child, staff must:

- Listen carefully to what the student is telling them without interrupting
- Ideally listen to the child first and then make notes
- Not promise confidentiality
- Remain non-judgemental and keep an open mind
- Not ask leading questions or more questions than needed
- Be honest with the child and explain what will happen next
- Keep a sufficient written record of the conversation. All other evidence, for example, scribbled notes, mobile phones containing text messages, clothing, computers, must be kept securely with the written record

Records should be factual and signed and dated, with the name of the signatory clearly printed in writing. Records should include:

- The student's details: name; date of birth; address and family details
- Date and time of the event / concern / conversation
- A clear and comprehensive summary of the event/concern / conversation
- Details of how the concern was followed up and resolved
- A note of any action taken and by whom, decisions reached and the outcome

- The name and position of the person making the record

When reporting a concern staff must:

- Record the information fully using the Cause for Concern Record Form. See Appendix 3
- If the form is not accessible, staff must not delay in informing the DSL or deputy
- Note the facts in the child's own words
- Pass the form by hand personally or via email (marked Confidential) to the DSL or deputies immediately

The DSL should be informed as soon as practically possible if the DSL is not involved in the initial report.

Staff should be able to reassure the victim(s) that they are being taken seriously and that they will be supported and kept safe. A victim should never be given the impression that they are creating a problem by reporting abuse, sexual violence or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report. It is important to explain that the law is in place to protect children and young people rather than criminalise them, and this should be explained in a way that avoids alarming or distressing them.

Abuse that occurs online or outside of a centre should not be downplayed and should be treated equally seriously.

Parents/Carers of the child (including Group Leaders) will always be informed of allegations of abuse made by a child unless this puts the child or the subsequent investigation at risk (e.g. if they are the subject of the allegation).

13.3 Asking for advice

Staff should remember the DSL is available to offer help, advice and guidance to staff and children. If staff have a concern or problem and are unclear how to proceed, they should ask for advice.

The DSL will seek advice from external agencies if they are unsure how to proceed with a child protection situation.

13.4 Action by the DSL

On receipt of a concern, the DSL will consider the appropriate course of action. Such action may include:

- Managing any support internally using Dusemond's own resources or the resources of a partner school, seeking advice from children's social care where required
- A multi-agency referral
- A referral to statutory services

The views of the child will be taken into account when considering the appropriate course of action but will not be determinative.

Where the concern relates to the welfare of a student who is aged 18 or over, the DSL will consider whether it is necessary to refer such concerns to the Safeguarding Adults Board.

If it is decided that a referral is not required, the DSL will keep the matter under review and give ongoing consideration to a referral.

13.5 Making a referral

Where a child is suffering or is likely to suffer from harm, a referral to children's social care (and if appropriate the

police) should be made immediately.

Children in need: A child in need is a child who is unlikely to achieve or maintain a reasonable level of health or development, or whose health and development is likely to be significantly or further impaired, without the provision of services; or a child who is disabled. Children in need may be assessed under section 17 of the Children Act 1989.

Children suffering or likely to suffer significant harm: Local authorities have a duty to make enquiries under section 47 of the Children Act 1989 if they have reasonable cause to suspect that a child is suffering, or is likely to suffer significant harm.

If a referral is made by phone, this should be followed up in writing. If the referral is made by someone other than the DSL, the DSL should be informed of the referral as soon as possible.

Once a referral is made, if a response is not received within one working day, the DSL or person making the referral will contact the appropriate agency to follow up.

13.6 What to do if staff have concerns about someone else's welfare

Staff who have concerns about the welfare of others or any other safeguarding issue not expressly covered by this policy, should report them.

In the absence of an express procedure about reporting, they should report such concerns to their line manager in the first instance.

13.7 Allegations against students/students - peer on peer / child on child abuse

Allegations against students should be reported in accordance with the procedures set out in this policy in Appendix 2.

If harmful sexual behaviour is alleged to have occurred, the DSL will have regard to Part 5 of KCSIE and the non-statutory guidance Sexual Violence and Sexual Harassment between children in schools (DfE, September 2021) and take into account the local response of the police and children's social care to these issues.

The views of the alleged victim will be taken into account but will not be determinative.

All those involved in such allegations will be treated as being at risk and in need of support and the safeguarding procedures in accordance with this policy will be followed. Appropriate support will be provided to all students involved, including support from external services as necessary.

13.8 Allegations against staff

Dusemond recognizes that there will be occasions when a student attending one of its programmes, or a parent or another person may make an allegation against a member of staff (including a supplier or contractor) currently working for Dusemond.

Allegations against a member of staff who is no longer working for Dusemond should be referred to the police and LADO. Historical allegations of abuse should also be referred to the police.

Concerns and allegations that may meet the harms test will be addressed as set out in section two of Part four of KCSIE. 'Lower level' concerns and allegations that do not meet the harms test will be addressed as set out in section two of Part four of KCSIE.

If it is determined the concern is a low-level concern, then the concern will be addressed as appropriate. This will usually involve making the individual aware of the concern against them, undertaking any investigation that may be required and may include giving management guidance and advice or invoking the capability or disciplinary

procedures. In borderline cases, Dusemond may take advice from the LADO in order to establish whether the concern is a low-level concern or an allegation that potentially meets the harm threshold. This may include conducting an initial "no names" conversation with the LADO about whether the harm threshold is met.

13.8.1 Allegations that may meet the harms threshold

The term allegation refers to concerns reported or raised that might indicate a person has caused harm to a child, acted in a way that created potential serious risk to a child or would pose a risk of harm if they continue to work in regular or close contact with children in their present position or in any capacity.

This means it has been alleged that a member of staff has:

- Behaved in a way that has, or may have harmed a child
- Possibly committed a criminal offence against or related to a child
- Behaved towards a child or children in a way that indicates he or she would pose a risk of harm to children
- Behaved in a way that indicates they may not be suitable to work with children

When the allegation meets the above criteria:

- Inform the DSL immediately, who will inform the LADO immediately
- Where the DSL is the subject of the allegation, the Deputy DSL must be informed, who will in turn contact the LADO
- Where there is a conflict of interest in informing the DSL and Deputy DSL, inform the LADO directly without informing either DSL or DDSL

All such allegations must be dealt with as a priority without delay.

13.8.2 Concerns that do not meet the harm threshold – Low level concerns (neutral notifications)

Dusemond uses a system of low level (neutral) notifications to log all low level-concerns. Staff are required to self-report in any situation where they feel their behaviour towards a student could be misinterpreted or misconstrued or leave them vulnerable. Staff are also required to report any behaviour by an adult towards a student that may have concerned them.

All low level concerns are reviewed by the DSL and acted upon where there is a concern over the behaviour. The DSL will share low level concerns relating to staff behaviour with the proprietor. By having a formalised method of reporting low-level concerns, it allows for the identification of patterns of behaviour that might be concerning and allows staff to reflect and self-report on their behaviour to strengthen the culture of safeguarding at Dusemond.

Concerns may be graded low-level if the concern does not meet the criteria for an allegation. Staff are required to report these using safeguarding@dusemond.co.uk email address. The term 'low level' concern does not mean that it is insignificant. A 'low level' concern is any concern - no matter how small, and even if no more than causing a sense of unease or 'nagging doubt' - that an adult working with Dusemond may have 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, contrary to Dusemond policy
- Engaging with a child on a one-to-one basis in a secluded area or behind a closed door
- Using inappropriate sexualised, intimidating or offensive language
- Humiliating a student or students
- Any use by an adult of sexually inappropriate language, references or jokes to a student

If the concern has been raised via a third party, the DSL 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 suppliers 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. See Appendix 4 for the Low Level (Neutral) Notification Form. This should be sent to safeguarding@dusemond.co.uk

Records should be reviewed so that potential patterns of concerning, problematic or inappropriate behaviour can be identified. If a concerning pattern of behaviour is identified and now meets the criteria for an allegation, then the matter should be referred to the LADO.

The records' review might identify that there are wider cultural issues within the organisation that enabled the behaviour to occur. This might mean that policies or processes could be revised or extra training delivered to minimise the risk of it happening again.

14 Disclosure and Barring Service

Dusemond will make a referral to the DBS where they remove an individual from regulated activity (or would have removed an individual if they had not left), and they believe the individual has:

- Engaged in relevant conduct in relation to children and/or adults
- Satisfied the harm test in relation to children and/or vulnerable adults
- Been cautioned or convicted of a relevant (automatic barring either with or without the right to make representations) offence

15 Visitors and Contractors

All visitors must sign in at centre's main office upon arrival where they will be provided with a visitor lanyard and badge.

All visitors must be supervised at all times and never left unsupervised. They must also sign out when leaving the premises.

16 Propriety and Behaviour

There may be times, for example, when a person's behaviour or actions in their personal life come under scrutiny from their work environment, local community or public authorities. This could be because their behaviour is considered to compromise their position working on Dusemond programmes or indicate an unsuitability to work with children and young people. Misuse of drugs, alcohol or acts of violence would be examples of such behaviour.

People in contact with children and young people should therefore understand and be aware that safe practice also involves using judgement and integrity about behaviours in places other than the work setting. This means that staff should not:

- Smoke or drink alcohol whilst in the company of, or whilst responsible for, students
- Behave in an aggressive, violent or forceful manner which would lend any reasonable person to question your

suitability to work with children and young people or act as a role model

17 Infatuations

Occasionally, a child/young person may develop an infatuation with a staff member. Staff should deal with these situations sensitively and appropriately to maintain the dignity and safety of all concerned. They should remain aware, however, that such infatuations carry a high risk of words or actions being misinterpreted and should therefore make every effort to ensure that their own behaviour is above reproach. In this situation a staff member who becomes aware that a child/ young person is developing an infatuation should discuss this at the earliest opportunity with a senior member of staff so appropriate action can be taken to avoid any hurt, distress or embarrassment.

This means that staff should not:

- be in a one-to-one situation with the young person
- encourage the obsession

18 Sexual Contact

Staff should clearly understand the need to maintain appropriate boundaries in their contact with children and young people. Intimate or sexual relationships between children/young people and the people who work with them will be regarded as a grave breach of trust. Allowing or encouraging a relationship to develop in a way which might lead to a sexual relationship is also unacceptable.

Any sexual activity between an adult and the child or young person with whom they work will be regarded as criminal offence and reported accordingly. Additionally, this will always be a matter for disciplinary action.

Children and young people are protected by specific legal provisions regardless of whether the child or young person consents or not. The sexual activity referred to does not just involve physical contact including penetrative and non-penetrative acts. It may also include non-contact activities, such as causing children to engage in or watch sexual activity or the production of pornographic material.

There are occasions when a person may embark on a course of behaviour known as 'grooming' where the sole purpose is to gain the trust of a child or adult at risk, and manipulate that relationship so sexual abuse can take place. Adults should be aware that consistently conferring inappropriate special attention and favour upon a child might be construed as being part of a 'grooming' process and as such will give rise to concerns about their behaviour.

This means that staff must not:

- Have sexual relations with young people
- Engage in any communication which could be interpreted as sexually suggestive or provocative – either verbal, letters, notes, email, text, calls or contact
- Talk about their own sexual relationships
- Make sexual remarks about the young person

Relationships should be professional, healthy and respectful at all times. Language, demeanor attitudes and conduct all require careful thought when dealing with adolescents.

19 Dress and Appearance

Staff should dress in ways which are appropriate to their role and this may need to be different to how they dress when not at work. People who work with children and young people should take care to ensure they are dressed

appropriately for the tasks and the work they undertake. Those who dress in a manner which could be considered inappropriate could render themselves vulnerable to criticism or allegations.

Staff should wear clothing appropriate to the role which:

- Is not viewed as offensive, revealing or sexually provocative
- Does not distract, cause embarrassment or give rise to misunderstanding
- Is absent of any political or otherwise contentious slogan
- Is not considered discriminatory and is culturally sensitive

20 Behaviour Management

- All children and young people have a right to be treated with respect and dignity even in those circumstances where they display difficult or challenging behaviour
- Staff should not use any form of degrading treatment to punish a child or adult at risk. The use of sarcasm, demeaning or insensitive comments towards children and young people is not acceptable in any situation. Any sanctions or rewards used should be part of a behaviour management policy which is widely publicised and regularly reviewed
- The use of corporal punishment for children and young people is not acceptable
- Where a child may display difficult or challenging behaviour, a person must follow the behaviour policy outlined by their place of work, and use strategies appropriate to the circumstance and situation. The use of physical intervention can only be justified in exceptional circumstances and must be used as a last resort when other behaviour management strategies have failed

21 Physical Contact

There are occasions when it may be appropriate for staff to have physical contact with children, but it is crucial that they only do so in ways appropriate to their professional role. The general culture of 'limited touch' should be adapted and staff should use their professional judgement at all times. Physical contact should take place only when it is necessary in relation to a particular situation. Some of these situations are:

- During certain activities such as drama, sports and outdoor activities
- When a child is in distress
- Personal Care
- For restraint and physical intervention
- Medical and First Aid

This means that staff should not:

- Use physical force as a means of punishment and discipline. The use of unwarranted physical force is likely to constitute a criminal offence
- Never touch a child in a way which may be considered indecent
- Indulge in horse-play

22 Communication with Children and Young People

Communication between children and young people by whatever method, should take place within clear and explicit professional boundaries. This includes the wider use of technology such as mobile phones, text messaging, e-mails, digital cameras, videos, web-cams, websites and blogs. Staff should not share any personal information with a child or young person and should not use their personal mobile to communicate with any young person or on a personal level take photographs/videos. A person should ensure that all communications are transparent and open to scrutiny.

This means that staff should:

- Not give their personal contact details to children or young people, including their mobile
- Inform the DSL immediately if contacted by a young person on a personal mobile and only use equipment e.g. mobile phones, provided by the organisation
- Only make contact with children for professional reasons and in accordance with any organisation policy
- Recognise that text messaging is not an appropriate way to respond to a child
- Not use internet or web-based communication channels to send personal messages to a child/young person
- Not use a social network site to complain about or criticise colleagues/Dusemond programmes/children, etc.

23 Favouritism and Gifts

Teachers and other staff should make sure they treat all students equally so as to avoid the perception that they have “favourites”.

Appendix 1: Types and Signs of Abuse

A Abuse and neglect

Staff should be aware that abuse, neglect and safeguarding issues are rarely standalone events that can be covered by one definition or label and in most cases, multiple issues will overlap with one another, therefore staff should always be vigilant and always raise any concerns with the DSL (or deputy).

Children can also abuse their peers online, this can take the form of abusive, harassing, and misogynistic messages, the non-consensual sharing of indecent images, especially around chat groups, and the sharing of abusive images and pornography, to those who do not want to receive such content.

Abuse is a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others. 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.

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

Emotional abuse: the persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. It may involve conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the child opportunities to express their views, deliberately silencing them or "making fun" of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability as well as overprotection and limitation of exploration and learning, or preventing the child from participating in normal social interaction. It may involve seeing or hearing the ill treatment of another. It may involve serious bullying (including cyberbullying and prejudiced-based or discriminatory bullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.

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

Neglect: the persistent failure to meet a child's basic physical and / or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy, for example, as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to: provide adequate food, clothing and shelter (including exclusion from home or abandonment); protect a child from physical and emotional harm or danger; ensure adequate supervision (including the use of inadequate care-givers); or ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

B Potential signs of abuse

Possible signs of abuse include, but are not limited to:

- The student says he / she has been abused or asks a question or makes a comment which gives rise to that inference;
- There is no reasonable or consistent explanation for a student's injury, the injury is unusual in kind or location or there have been a number of injuries and there is a pattern to the injuries;
- The student's behaviour stands out from the group as either being extreme model behaviour or extremely challenging behaviour, or there is a sudden or significant change in the student's behaviour;
- The student asks to drop subjects with a particular teacher and seems reluctant to discuss the reasons;
- The student's development is delayed, the student loses or gains weight or there is deterioration in the student general well-being;
- The student appears neglected, e.g. dirty, hungry, inadequately clothed;
- The student is reluctant to go home, or has been openly rejected by his / her parents or carers; and
- Inappropriate behaviour displayed by other members of staff or any other person working with children, for example inappropriate sexual comments; excessive one-to-one attention beyond the requirements of their usual role or responsibilities; or inappropriate sharing of images.

C Specific forms of abuse

Child sexual exploitation

(CSE) involves exploitative situations, contexts and relationships where young people receive something (for example food, accommodation, drugs, alcohol, gifts, money or in some cases simply affection) as a result of engaging in sexual activities. Sexual exploitation can take many forms ranging from the seemingly 'consensual' relationship where sex is exchanged for affection or gifts, to serious organised crime by gangs and groups. What marks out exploitation is an imbalance of power in the relationship. The perpetrator always holds some kind of power over the victim which increases as the exploitative relationship develops. Sexual exploitation involves varying degrees of coercion, intimidation or enticement, including unwanted pressure from peers to have sex, sexual bullying including cyberbullying and grooming. However, it also important to recognise that some young people who are being sexually exploited do not exhibit any external signs of this abuse.

The victim may have been sexually exploited even if the sexual activity appears consensual. CSE does not always involve physical contact; it can also occur through the use of technology. CSE can affect any child under the age of 18 years (including 16 and 17 year olds who can legally consent to have sex) who has been coerced into engaging in sexual activities. It can include both contact (penetrative and non-penetrative acts) and non-contact sexual activity and may occur without the child's immediate knowledge (e.g., through others copying videos or images they have created and posted on social media). Some children may not realise they are being exploited e.g. they believe they are in a genuine romantic relationship. CSE can be a one-off occurrence or a series of incidents over time and range from opportunistic to complex organised abuse. It may occur alone, or may overlap with CCE, and/or county lines, as well as other forms of abuse.

Indicators of child sexual exploitation may include:

- Acquisition of money, clothes, mobile phones, etc. without plausible explanation
- Gang-association and/or isolation from peers/social network
- Exclusion or unexplained absences from school, college or work
- Leaving home/care without explanation and persistently going missing or returning late
- Excessive receipt of texts/phone calls
- Returning home under the influence of drugs/alcohol
- Inappropriate sexualised behaviour for age/sexually transmitted infection;
- Evidence of/suspicions of physical or sexual assault
- Relationships with controlling or significantly older individuals or groups
- Multiple callers (unknown adults or peers)
- Frequenting areas known for sex work
- Concerning use of internet or other social media
- Increasing secretiveness around behaviours

- Self-harm or significant changes in emotional well-being

If you suspect a child is at risk of CSE or that this has already taken place, this should be reported to the DSL or Deputy as soon as possible.

County Lines

County lines is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs, using dedicated mobile phone lines or other form of “deal line”. The activity can happen locally as well as across the UK – no specified distance of travel is required.

Exploitation is an integral part of the county lines offending model with children and vulnerable adults exploited to move [and store] drugs and money. Offenders will often use coercion, intimidation, violence (including sexual violence) and weapons to ensure compliance of victims. Children can be targeted and recruited into county lines in a number of places including schools and online using social media.

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

Several identifying indicators for CSE and CCE may be applicable to where children are involved in county lines but may also include children who:

- Go missing and are subsequently found in areas away from their home
- That have been the victim or perpetrator of serious violence (e.g. knife crime)
- Are involved in receiving request for drugs via a phone line, moving drugs, handing over and collecting money for drugs
- are found in accommodation that they have no connection with
- Owe a debt bond to their exploiters
- Have their bank accounts used to facilitate drug dealing

Child-on-Child (peer-on-peer) Abuse

Staff and other adults should recognise that children and young people are capable of abusing their peers. Dusemond takes any concerns of this nature very seriously and concerns should be raised in the same way as other concerns, directly to the Designated Safeguarding Lead or a deputy. Peer-on-peer abuse can take the form of bullying (including cyber bullying), sexting and any other form of sexual or physical abuse.

Female genital mutilation (FGM)

Female genital mutilation includes procedures that intentionally alter or injure the female genital organs for non-medical reasons. It is a surprisingly common form of abuse in the UK – over 1700 victims were referred to specialist clinics in the UK during the last 2 years. Many more cases are believed to go unreported.

Dusemond takes these concerns seriously and staff will be made aware of the possible signs and indicators that may alert them to the possibility of FGM.

A girl or woman who has undergone FGM may:

- Have difficulty walking, sitting or standing
- Spend longer than normal in the bathroom or toilet
- Have unusual behaviour after an absence from her studies
- Be particularly reluctant to undergo normal medical examinations
- Ask for help, but may not be explicit about the problem due to embarrassment or fear

Any indication that FGM is a risk, is imminent, or has already taken place should be reported to the Designated Person

or their Deputy, or, in cases where the Designated Person or their Deputy are not available, to the DSL.

Breast Ironing

In this procedure hot objects, including stones and hammers are used to pound and beat girls' breasts to stop them growing in the belief that it makes them less desirable to men and discourages pre-marital pregnancy. Any concerns about this affecting anyone should be directed to the DSL or Deputy.

Child drug exploitation

Gangs pose a significant threat to vulnerable adults and children who they rely on to conduct and / or facilitate this criminality. Exposure to gang exploitation has the potential to generate emotional and physical harm. A more recent trend identified is the targeting of adults with mental health problems. The use of mobile phones to maintain 'deal lines' between customers and gang members is a key feature. Although CSE is not the driving factor, there are clear links between drug exploitation and CSE. Girls who are being exploited to hold and deal drugs are vulnerable to becoming more accessible to gang members wishing to sexually exploit them. Any concerns should be directed to the DSL or Deputy.

Honour-based violence

This is a form of domestic abuse which is perpetrated in the name of so-called 'honour'. The honour code it refers to is set at the discretion of male relatives and women who do not abide by the rules may then be punished for bringing shame on the family. For example, HBV might be committed against people who become involved with a boyfriend / girlfriend from a different culture or religion, want to get out of an arranged or forced marriage, wear clothes or take part in activities that might not be considered traditional within a particular culture. Women and girls are the most common victims of HBV but it can also affect men and boys. Any concerns should be directed to the DSL or Deputy.

Forced marriage

A marriage where one or both of the parties is married without their consent or against their will. It is illegal in the UK and is recognised as a form of violence against women and men, girls and boys and a serious abuse of human rights. The pressure put on people to marry against their will can be physical (including threats and actual physical or sexual violence) or emotional and psychological. Financial abuse (taking or not giving money) can be a factor. The Forced Marriage Unit has been set up by the FCO and Home Office to help stop forced marriages or to help people leave a marriage they have been forced into.

Forced Marriage Unit
fm@fco.gov.uk
02070080151

Any concerns should be passed immediately to the DSL or Deputy.

Modern slavery

It is estimated there are many thousands of people in modern slavery in the UK today. Most commonly people are trafficked into forced labour in industries such as agriculture, construction, hospitality, manufacturing and car washes. Many women and girls are trafficked for sexual exploitation or end up in domestic slavery. The Modern Slavery Act 2015 is designed to tackle slavery in the UK. Any concerns about students should be passed to the DSL.

Fabricated illness

Fabricated or induced illness is a rare form of child abuse. It occurs when a parent or carer (usually the child's biological mother) exaggerates or deliberately causes symptoms of illness in the child. It is also known as Munchausen's Syndrome by Proxy (not to be confused with Munchausen's Syndrome where a person pretends to be ill or causes illness or injury to themselves). If you suspect that someone you know may be fabricating or inducing illness in their child, you should not confront them directly, but inform the DSL immediately.

Extremism & Radicalisation

The Counter-Terrorism and Security Act places a duty on service providers to have due regard to the need to prevent people from being drawn into terrorism ("the Prevent duty").

Radicalisation is a form of abuse and is addressed within our safeguarding procedures. Dusemond values:

- Democracy
- The rule of law
- Individual liberty
- Mutual respect and tolerance of different faiths and beliefs

All Dusemond staff receive training to both support their awareness of the Prevent Strategy and their ability to identify and support individuals who are vulnerable to being drawn into terrorism.

Bullying

Teachers should ensure that all students have an opportunity, during tutorial time, to discuss bullying, its causes, student strategies to deal with it and Dusemond Policy on it. Increasingly, bullying takes place online (cyber-bullying) and there are tutorials and e-safety advice to help students deal with this too.

If you do become aware of a case of bullying, inform the DSL or Deputy immediately.

Appendix 2: Child-on-Child Abuse

Dusemond recognises that children of any age are capable of abusing other children and that this can happen inside and/or outside of the centre (including online) and works to minimise the risk of child-on child abuse and will deal with any allegations robustly.

Dusemond will adopt a zero-tolerance approach to abuse. Abuse is abuse and should never be tolerated or passed off as 'banter', 'just having a laugh' or 'part of growing up' as downplaying certain behaviours can lead to a culture of unacceptable behaviours, an unsafe environment for children and at its worst to a culture that normalises abuse. Behaviour such as initiation violence or any form of sexual violence or sexual harassment is not acceptable.

It is recognised that even if there are no reported cases of child-on-child abuse at the school, such abuse may still be taking place; it may be the case that it is just not being reported. Where needed risk assessments will be carried out and strategies put in place to protect the child who has suffered abuse and to offer them support. Concerns raised will be treated seriously and followed up in a timely and sensitive fashion in accordance with the procedures in this policy.

Managing situations where children have been abused by other children can be complex and stressful. For the purpose of this section of the policy, 'child' refers to any child or young person up to the age of 18 years.

All staff should have an awareness of safeguarding issues that can put children at risk of harm. Behaviours linked to issues such as drug taking, alcohol abuse, deliberately missing education and sexting (also known as youth produced sexual imagery) put children in danger. Safeguarding issues can manifest themselves via child-on-child abuse. This is most likely to include, but may not be limited to:

- Bullying (including cyberbullying, prejudice-based and discriminatory bullying)
- Abuse in intimate personal relationships (teenage relationship abuse)
- Physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (this may include an online element which facilitates, threatens and/or encourages physical abuse)
- Sexual violence such as rape, assault by penetration and sexual assault (see 'Harmful Sexual Behaviour' below) possibly with an online element which encourages sexual violence
- Sexual harassment such as sexual comments, remarks, jokes and online sexual harassment, which may be stand-alone or part of a broader pattern of abuse (see 'Harmful Sexual Behaviour' below);
- Causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party
- Upskirting, which typically involves taking a picture under a person's clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause victim humiliation, distress or alarm
- Consensual and non-consensual sharing of nude and semi-nude images and/or videos (also previously known as sexting or youth produced sexual imagery) meaning the taking and sending or posting of nude or semi-nude images, videos or live streams by young people under the age of 18 online. This could be via social media, gaming platforms, chat apps or forums. It can also involve sharing between devices offline, for example via Apple's AirDrop (see below)
- Initiation/hazing type violence and rituals (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element)

All staff should challenge inappropriate behaviour between students and anyone who suffers, witnesses or hears of abuse of any form between students is asked to report it in accordance with this policy and/or Dusemond's behaviour and anti-bullying policies so that appropriate action can be taken.

Appropriate action will involve supporting all members of the Dusemond community who may be involved as a priority. This may require investigation by Dusemond or other agencies. Until investigations have been undertaken and findings made, the Dusemond will work on the basis that the allegations may or may not be true and undertake careful risk assessment of the welfare of those involved to determine how best to manage the situation.

Harmful Sexual Behaviour

Harmful sexual behaviour is an umbrella term that includes sexual violence and sexual harassment. Dusemond recognises that problematic, abusive and violent sexual behaviours are inappropriate and may cause developmental damage. Harmful sexual behaviour can occur online or offline (both physical and verbal) or simultaneously between the two, and the Dusemond recognises the gendered nature such behaviour can take. Harmful sexual behaviour, like all child-on-child abuse, is never acceptable and will be taken seriously.

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

Children who are victims of sexual violence and sexual harassment are likely to find the experience stressful and distressing. Sexual violence and sexual harassment exist on a continuum and may overlap, they can occur online and offline (both physical and verbal) and are never acceptable. The school will respond to allegations seriously and all victims will be offered appropriate support.

Dusemond is aware of the importance of:

- Maintaining an attitude of 'it could happen here', particularly with regards to child-on-child abuse
- Making it clear to students that sexual violence and sexual harassment is not acceptable, will never be tolerated and is not an inevitable part of growing up
- Not tolerating or dismissing sexual violence or sexual harassment as "banter", "part of growing up", "just having a laugh" or "boys being boys"
- Challenging behaviours (which are potentially criminal in nature), such as grabbing bottoms, breasts and genitalia, flicking bras and lifting up skirts. Dismissing or tolerating such behaviours risks normalising them

References to sexual violence are references to sexual offences under the Sexual Offences Act 2003, specifically rape, assault by penetration and sexual assault.

References to sexual harassment mean "unwanted conduct of a sexual nature" that can occur online and offline. In the context of child-on-child sexual harassment, it 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.

Dusemond recognises that sexual violence and sexual harassment occurring online (either in isolation or in connection with face-to-face incidents) can introduce a number of complex factors including widespread abuse or harm across a number of social media platforms that leads to repeat victimisation. Dusemond will always consider support from UK Safer Internet Centre, Internet Watch Foundation, Childline/IWF (Report Remove), ThinkUKnow and other organisations.

Incidents of Nudes and Semi-Nudes Being Shared

All members of staff have a duty to recognise and refer any incidents involving nudes and semi-nudes. Sharing nudes and semi-nudes means the sending or posting of nude or semi-nude images, videos or live streams by children under the age of 18. This could be via social media (including Snapchat), gaming platforms, chat apps (incl. WhatsApp/iMessage) or forums. It could also involve sharing between devices via services like Apple's AirDrop which works offline. The sharing of nudes and semi-nudes may happen publicly online, in 1:1 messaging or via group chats and/or via closed social media accounts. The images, videos or live streams may include more than one child.

Consensual and non-consensual sharing of nude images and/or videos can be signs that children are at risk. Consensual image sharing, especially between older children of the same age, may require a different response. It might not be abusive - but children still need to know it is illegal - whilst non-consensual is illegal and abusive.

Any direct disclosure by a child will be taken seriously and staff will ensure the child is feeling comfortable and will only ask appropriate and sensitive questions, in order to minimise further distress or trauma to them.

If staff are notified or become aware of an incident of nudes or semi-nudes being shared by a student or of a student, they should refer the incident to the DSL as soon as possible.

Dusemond follows the guidance given by the UK Council for Internet Safety (UKCIS): Sharing Nudes and Semi-Nudes (December 2020) when responding to a report of sharing nudes and/or semi-nudes. This will include:

- Holding an initial review meeting with appropriate staff. This may include the staff member(s) who heard the disclosure and members of the safeguarding team
- Carrying out interviews with the children involved (if appropriate)
- Informing parents at an early stage and keep them involved in the process in order to best support the student unless there is a good reason to believe that involving them would put the child at risk of harm. Any decision not to inform them will be made in conjunction with other services such as children's social care and/or the police
- Carrying out a risk assessment to determine whether there is a concern that a child has been harmed or is at risk of immediate harm at any point of the process. If not, the incident can be handled in accordance with the UKCIS guidance and Dusemond's internal policies. If it is determined that there is a risk of harm, the DSL will make a referral to children's social care and/or police immediately

All incidents relating to nudes and semi-nudes being shared will be recorded, whether they have been referred externally or not. Dusemond will record the reason for not reporting incidents externally and ensure it is signed off by the proprietor.

Records will be kept in line with statutory requirements set out in KCSIE and local safeguarding procedures. No copies of imagery will be taken or retained.

This guidance does not apply to the sharing of images of children under 18 by an adult as this constitutes child sexual abuse. In the event that staff become aware of such an incident, they should notify the DSL immediately, who should always inform the police as a matter of urgency.

It is important to be conscious that any child who is engaging in abusive behaviour towards others may have been subject to abuse from other children or from adults. All those involved in such allegations will be treated as being at risk and in need of support and the safeguarding procedures in accordance with this policy will be followed. Appropriate support will be provided to all students involved, including support from external services as necessary.

Children who abuse others should be held responsible for their abusive behaviour, whilst being identified and responded to in a way which meets their needs as well as protecting others. All child-on-child abuse is unacceptable and will be taken seriously. There is significant research evidence which indicates that abuse is likely to be repeated without appropriate intervention and treatment. This must be considered throughout the planning stages of managing cases of abuse perpetrated by children. Where an allegation is made regarding alleged abuse perpetrated by another child, the age and understanding of the alleged perpetrator must be considered throughout decision making. The circumstances of the alleged perpetrator must be assessed separately from those of the alleged victim and must include exploration of why this behaviour has occurred.

Process

When an instance of child-on-child abuse comes to light, is disclosed or where there is evidence to indicate it has occurred, staff should contact the DSL or deputies. The DSL (or deputy) will make a referral to children's social care, CAMHS and police as appropriate in respect of both children concerned. The interests of the identified victim must always be the paramount consideration.

If harmful sexual behaviour is alleged to have occurred, the DSL will have regard to Part 5 KCSIE and take into account the local response of the police and children's social care to these issues.

Where the allegation relates to an incident that took place within the centre, or relates to students attending the same centre, Dusemond will take all appropriate action to ensure the safety and welfare and continued education of all students including the alleged perpetrator. The following are examples of action Dusemond may take:

- Take advice from children's social care and / or the police, as appropriate, on when and how to inform the student and his / her parents about the allegations and how investigation of such allegations will be conducted
- Keep the involved children separate while the investigation is taking place to avoid collusion or intimidation. A student against whom an allegation of abuse has been made may be suspended from the school as a neutral measure during the investigation
- Having established what is alleged to have taken place, avoid talking to the children any further about the incident (s)
- Keep a detailed log of actions, discussions and decisions
- Assess the risk and implement a student safety plan as necessary – ensure that non-teaching times are considered, especially times when students are moving around the centre as the child who has been harmed may feel very vulnerable at such times
- Be aware that whether the incident(s) happened in a centre or elsewhere, other students may know what has happened (or is alleged to have happened). Other students may have been involved, either directly or indirectly. Other students may be judgemental or make unkind, or even threatening comments
- Consider whether the situation warrants information being shared with other parents (e.g. where press coverage is likely) and seek advice from relevant agencies.

The decision as to whether or not behaviour directed at another child should be categorised as harmful is clearly dependent on the individual circumstances of the case. It may be helpful to consider the following factors:

- The relative chronological and developmental age of the two children
- Whether the alleged abuser is supported or joined by other children
- Any differential in power or authority (e.g. related to race, gender, physical, emotional or intellectual vulnerability of victim)
- The actual behaviour (consider all factors)
- Whether the behaviour could be described as age appropriate or involves inappropriate sexual knowledge or motivation
- The degree of coercion, physical aggression, intimidation or bribery
- The victim's experience of the behaviour and the impact it is having on them
- Attempts to ensure secrecy
- Duration and frequency of behaviour

Dusemond will take advice from children's social care and/or the police, as appropriate, on how the investigation of such allegations will be conducted.

Appropriate support will be provided to all students involved, including from external services.

Appendix 3: Cause for Concern Form

Student first name(s)	
Student family name(s)	
Group name(s) if known	
Group leader name(s) if known	
Name of person noting concern	
Role / connection with Dusemond <i>(for example teacher / AL ?)</i>	
Date and time when concern happened	
Location where concern happened	
Concern <i>(please give as much detail as possible)</i> If you are reporting a disclosure or an allegation made by a student, please use this space to describe what happened using the student's own words (or as close as you can remember). Please use the other side of this form and additional sheets to write more. Securely fix any extra sheets together. If relevant and visible, state the part of the body affected.	
Signed	
Date	

You must not expect or ask a student to either undress or show areas of their body for evidence which cannot be seen under normal clothing.

Discretion is very important in these cases and, once the incident has been reported, colleagues should not discuss the matter any further with other parties, either now or at any point in the future.

Response to concern: this section to be completed by the DSL or deputy
Do parents / Group Leader / Agent / Homestay / Other need to be informed?

Response	By whom (full name)	When (time and date)

Send the completed form to safeguarding@dusemond.co.uk or pass directly to the DSL.

Appendix 4: Low Level (Neutral) Notification Form

Please complete this form if you wish to make a low level (neutral) notification. This may relate to your own behaviour or actions where you feel it could be misconstrued or misinterpreted, or to report any behaviour by an adult towards a student or another child that may have concerned you. If you are unsure as to whether or not to complete this form, you should seek advice from the DSL or a member of the safeguarding team.

Name	
Please outline what you have seen or what has happened, providing all the details you think are relevant. Please also include relevant dates and the names of any colleagues or students involved or who may also have witnessed what happened.	
Any other information that may be relevant	

Send the completed form to safeguarding@dusemond.co.uk or pass directly to the DSL.