



Child Protection and Safeguarding Policy

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Designated Safeguarding Lead:
Status & Review Cycle:
Next Review Date:

Elisabeth Wigley
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Merton Music Foundation

Child Protection and Safeguarding Policy

Revised and updated – September 2021

Terminology

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.

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.

Early Help means the providing support as soon as additional needs and support emerge at any point in a child's life.

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

Child includes everyone under the age of 18 and applies to pupils/ students at MMF; however, the policy will extend to visiting children and students from other establishments.

Parents refers to birth parents and other adults who are in a parenting role, e.g. step-parents, foster carers, adoptive parents and those adults caring for children with a Special Guardianship Order.

Social Care refers to Children's Services in the area in which the child is resident, unless a child is a Child Looked After then this will be the Children's Services in their home authority.

MASH refers to the Multi Agency Safeguarding Hub and Children's Consultation Line. This will be updated to the Children and Families Hub and include a triage service.

Key Personnel

Designated Safeguarding Lead (DSL) is: Elisabeth Wigley (Chief Executive)
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Deputy DSLs are: Soo Bishop (Creative Director)
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Safeguarding Statement 2021

“It could happen here”

At Merton Music Foundation (MMF) we recognise our moral and statutory responsibility to safeguard and promote the welfare of all pupils.

We make every effort to provide an environment in which children, young people and adults feel safe, secure, valued and respected, and feel confident to talk if they are worried, believing they will be effectively listened to.

We are alert to the signs of abuse and neglect and follow our procedures to ensure that children receive effective support, protection and justice. Child protection forms part of MMF’s safeguarding responsibilities. We expect all tutors, staff, trustees and volunteers to share this commitment to safeguarding our pupils.

We follow the **Merton Children’s Safeguarding Partnership** procedures and have several policies and procedures in place which contribute to our safeguarding commitment, including our Child Protection & Safeguarding Policy. A copy of this policy is available on our website.

The purpose of this policy is to provide tutors, staff, volunteers and trustees with the framework they need in order to keep children safe and secure at MMF. The policy also informs parents and carers how we will safeguard their young people whilst they are in our care.

Introduction

This policy has been developed in accordance with the principles established by the Children Acts 1989 and 2004; The Education Act 2002, and in line with government publications: 'Working Together to Safeguard Children' 2018, Revised Safeguarding Statutory Guidance 2 'Framework for the Assessment of Children in Need and their Families' 2000, 'What to do if You are Worried a Child is Being Abused' 2015.

The policy also reflects, both statutory guidance 'Keeping Children Safe in Education' 2021 (KCSIE), and [Merton Children's Safeguarding Partnership \(MCSP\) Procedures](#).

The Trustee Board takes seriously its responsibility under section 175/157 of the Education Act 2002 to safeguard and promote the welfare of children; and to work together with other agencies to ensure adequate arrangements within our organisation to identify, assess, and support those children who are suffering harm.

This policy applies to all members of the MMF community – tutors, staff and trustees.

Guidance and documents referred to in this policy

- [Working Together to Safeguard Children \(2018\)](#)
- [Keeping Children Safe in Education 2021 \(KCSIE\)](#)
- [Disqualification under the Childcare Act 2006 \(updated 2018\)](#)
- [FGM Act 2003 Mandatory Reporting Guidance 2016](#)
- ['What to do if you are worried a child is being abused' 2015](#)
- [Teacher Standards 2011 \(updated 2021\)](#)
- [Information Sharing Advice for Practitioners' guidance 2018](#)
- [The Equality Act 2010](#)
- [National Police Chiefs Council – When to call the police](#)
- [Revised Prevent Duty Guidance for England and Wales 10 April 2019](#)
- [Sexual Violence and Sexual Harassment in Schools and Colleges 2021](#)
- [Relationships Education, Relationships and Sex Education and Health Education 2019](#)

Policy Principles & Values

The welfare of the child is paramount.

We maintain an attitude that “It could happen here.”

Children have a right to feel safe and secure; they cannot learn effectively unless they do so.

All children have a right to be protected from harm and abuse.

All staff have a role in the prevention of harm and abuse and an equal responsibility to act immediately on any suspicion or disclosure that may indicate a child is at risk of harm, either at MMF or in the community, taking into account risks outside of the home, in accordance with statutory guidance.

All staff are aware that safeguarding incidents and/or behaviours can be associated with factors outside of MMF and/or can occur between children outside of MMF. All staff, but especially the DSLs will consider whether children are at risk of abuse or exploitation in situations outside of their families, recognising that extra-familial harms include, but are not limited to, sexual exploitation, criminal exploitation, and serious youth violence.

We acknowledge that working in partnership with other agencies protects children and reduces risk and so we will engage in partnership working to protect and safeguard children.

Whilst MMF will work openly with parents as far as possible, it reserves the right to contact Social Care or the police, without notifying parents if this is believed to be in the child’s best interests.

Policy Aims

To demonstrate MMF’s commitment about safeguarding and child protection to pupils, parents and other partners.

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

To enable MMF to effectively contribute to Early Help, assessments of need and support for those children.

To provide robust systems and procedures that are followed by all members of the MMF community in cases of suspected abuse.

To develop and promote effective working relationships with other agencies, in particular Early Help providers, the Police, Health and Social Care.

To ensure that all staff working within the organisation who have substantial access to children have been checked as to their suitability, including verification of their identity, qualifications, and a satisfactory enhanced DBS check (according to KCSIE guidance), and a Single Central Record is kept for audit.

We comply with the Disqualification under the Childcare Act 2006 guidance issued in February 2015.

Supporting Children

We recognise that MMF may provide a safe place and stability in the lives of children who have been abused or who are at risk of harm.

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

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.

MMF will support all children:

- We will promote a caring, safe and positive environment within and across MMF.
- We will encourage self-esteem and self-assertiveness, through our activities and through positive relationships within the MMF community.
- We understand that schools will be ensuring that children are taught to understand and manage risk through Relationships and Sex Education (RSE) and through all aspects of school life. This includes online safety and anti-bullying, road safety, pedestrian and cycle training. As well as focussed work in Year 6 to prepare for transition to Secondary school and more personal safety/independent travel.
- We will respond sympathetically to any requests for time out to deal with distress and anxiety.
- We will offer details of helplines, counselling or other avenues of external support.
- We will liaise and work in partnership with other support services and agencies involved in Early Help and the safeguarding of children.
- We will notify Social Care immediately if there is a significant concern.
- We will provide continuing support to a child about whom there have been concerns by liaising with the school DSL, ensuring that information is shared under confidential cover to the child's current school.
- We will encourage the use of strategies to encourage children to share concerns as well as access to ELSA. Children know who they can talk to if they do not feel safe.
- We will reassure all children who are victims of abuse that they will be taken seriously and will be supported. They should never be made to feel ashamed or that they are creating a problem by reporting abuse, sexual violence, or sexual harassment.
- We will ensure that following any safeguarding concern the child's wishes and feelings are taken into account when determining what action to take and what services to provide.

Prevention / Protection

We recognise that MMF may play a significant part in the prevention of harm by providing children with good lines of communication with trusted adults, supportive friends and an ethos of protection.

MMF will:

- Establish and maintain an ethos where children feel safe and secure, are encouraged to talk and are always listened to.
- Include regular consultation with children e.g. through the Youth Board, questionnaires, asking children to report whether they have enjoyed activities.
- Ensure that all children know there is and can access an adult at MMF whom they can approach if they are worried or in difficulty.
- Include safeguarding across the MMF offer, including opportunities which equip children with the skills they need to stay safe from harm and to know to whom they should turn for help.
- Ensure all staff are aware of MMF guidance for their use of mobile technology and have discussed safeguarding issues around the use of mobile technologies and their associated risks.

Safe MMF, Safe Staff

We will ensure that:

- MMF operates safer recruitment procedures that includes statutory checks on staff suitability to work with children. Disqualification under the Childcare Act 2006 still applies to staff themselves. All staff have a responsibility to inform MMF where their relationships and associations, both within and outside of the workplace (including online), may have implications for the safeguarding of children in the organisation. An enhanced DBS check is carried out for all new employees and staff have a responsibility to inform the Chief Executive if their circumstances change whilst employed/contracted to MMF. This statement is in the Staff Behaviour Policy, which all staff/self-employed tutors have signed and agreed to adhere to.
- All staff receive information about MMF's safeguarding arrangements, safeguarding statement, Staff Behaviour Policy (code of conduct), Child Protection and Safeguarding Policy, the role and names of the Designated Safeguarding Lead and their deputy(s), and [Keeping Children Safe in Education 2021 part 1 and annex B](#). Part 2 of this guidance relates to "The Management of Safeguarding" and will be issued to all Governors. Any staff who do not directly work with children will be issued with Annex A of Keeping Children Safe in Education 2021.
- All staff receive safeguarding training at induction in line with advice from Merton Children's Safeguarding Partnership which is regularly updated and receive safeguarding updates (for example, via email, and staff meetings), as required, but at least annually.
- All members of staff are trained in and receive regular updates in online safety.

- All tutors, staff and trustees have regular safeguarding 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 MMF website. Hard copies of this policy can be viewed by request at MMF.
- We provide a coordinated offer of Early Help when additional needs of children are identified and contribute to early help arrangements and inter-agency working and plans.
- We will seek to ensure the suitability of adults working with children on site at any time and this includes any persons or organisations using/sharing our buildings or outside spaces in a letting/hiring project partnership agreement.
- MMF, as a community user organising activities for children is aware of the host school's Child Protection and Safeguarding Policy, guidelines and procedures.
- The name of the Designated Safeguarding Lead and deputies are clearly advertised in MMF sites with a statement explaining MMF's role in referring and monitoring cases of suspected harm and abuse.

Roles and Responsibilities

All MMF Staff:

All staff have a key role to play in identifying concerns and in providing help for children. To achieve this, they will:

- Provide a safe environment in which children can learn.
- Establish and maintain an environment where children feel secure, are encouraged to talk and are listened to.
- Ensure children know that there are adults at MMF who they can approach if they are worried or have concerns.
- Plan opportunities within the MMF offer for children to develop the skills they need to assess and manage risk appropriately and keep themselves safe.
- Attend training to be aware of, and alert to the signs of abuse.
- Maintain an attitude of "it could happen here" with regards to safeguarding.
- Know how to respond to a pupil who discloses or alleges harm or abuse following training of 'Working together to Safeguard Children' (2018), and 'What to do if you are worried a child is being Abused' (2015).
- Report their concerns to the DSL immediately and on that day if they are worried a child is being abused and record their concerns. If the DSL is not contactable immediately, a Deputy DSL should be informed.

- Be prepared to refer directly to the MASH and the police if there is a risk of significant harm and the DSL or their Deputy is not available.
- Follow the allegations procedures and inform the Chief Executive if the disclosure is an allegation against a member of staff, tutor or volunteer or is a low-level concern.
- Follow the procedures set out by the Merton Children’s Safeguarding Partnership and take account of guidance issued by the Department for Education.
- Treat information with confidentiality but never promising to “keep a secret”.
- Understand Early Help and be prepared to identify and support children who may benefit.
- Know who the DSL and Deputy DSLs are and know how to contact them.
- Have an awareness of the role of the DSL, part 1 and annex B of Keeping Children Safe in Education 2021, the schools Child Protection & Safeguarding Policy, Staff Behaviour Policy (Code of Conduct), MMF Behaviour Policy, and procedures relating to the safeguarding response for children who go missing from education.
- All staff must be aware that they have a professional responsibility to share information with other agencies in order to safeguard children and that the Data Protection Act 1998 and General Data Protection Regulations are not a barrier to sharing information where a failure to do so would place a child at risk of harm. There is a lawful basis for child protection concerns to be shared with agencies who have a statutory duty for child protection.
- All staff must be aware that they cannot promise a child to keep secrets which might compromise the child’s safety or wellbeing. However, staff are aware that matters relating to child protection and safeguarding are personal to children and families, in this respect they are confidential and the Chief Executive or DSLs will only disclose information about a child to other members of staff on a need-to-know basis.
- Staff should know how to manage the requirement to maintain an appropriate level of confidentiality. This means only involving those who need to be involved, such as the DSL (or a deputy) and children’s social care.
- Be mindful that the Teacher Standards states that teachers should safeguard children’s wellbeing and maintain public trust in the teaching profession as part of their professional duties.
- Assist the Trustee Board and Chief Executive in fulfilling their safeguarding responsibilities set out in legislation and statutory guidance.

The Chief Executive

In addition to the role and responsibilities of all tutors and staff, the Chief Executive will ensure that:

- MMF fully contributes to inter-agency working in line with Working Together to Safeguard Children 2018 guidance.
- The Child Protection and Safeguarding Policy and procedures are implemented and followed by all staff.
- All staff are aware of who the DSL is and their role.
- Sufficient time, training, support, funding, resources, is allocated to the DSL to carry out their role effectively, including the provision of advice and support to MMF staff on child welfare and child protection matters, to take part in strategy discussions/meetings and other inter-agency meetings and/or support other staff to do so; and to contribute to the assessment of children.
- Provide opportunities for a co-ordinated offer of Early Help when additional needs of children are identified.
- Ensure Deputy DSLs are trained to the same standard as the DSL and the role is explicit in their job description.
- With the DSL ensure adequate and appropriate cover arrangements are in place for all MMF out of hours/out of term activities.
- 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.
- Child-centred systems and processes are in place for children to express their views and give feedback.
- 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.
- That pupils are provided with opportunities throughout the MMF offer to learn about safeguarding, including keeping themselves safe online.
- Ensure that allegations or concerns against staff, tutors or volunteers are dealt with in accordance with guidance from Department for Education (DfE) and Merton Children Safeguarding Partnership.
- Ensure that statutory requirements are met to make a referral to the Disclosure and Barring Service and additionally in the case of teaching staff the Teacher Regulation Agency where an individual has engaged in conduct that harmed (or is likely to harm) a child; or if the person otherwise poses a risk of harm to a child.

The Designated Safeguarding Lead

In addition to the role and responsibilities of all staff the DSL will:

- Hold the lead responsibility for safeguarding and child protection (including online safety) at MMF. This responsibility is not able to be delegated.
- Have an “**it could happen here**” approach to safeguarding.
- Liaise with the local authority, other safeguarding partners and work in partnership with other agencies in line with Working Together to Safeguard Children. National Police Chiefs’ Council guidance *When to call the police* should help DSLs understand when they should consider calling the police and what to expect when they do.
- Encourage a culture of listening to children and taking account of their wishes and feelings, among all staff, and in any measures that MMF may put in place to protect them.
- Report concerns that a child may be at risk of radicalisation or involvement in terrorism, following the Prevent Referral Process and use the Prevent Referral Form to refer cases by email. If the matter is urgent, the Police must be contacted by dialling 999. In cases where further advice from the Police is sought, dial 101. The Department of Education has also set up a dedicated telephone helpline for staff and trustees to raise concerns around Prevent (020 7340 7264).
- Refer cases where a crime may have been committed to the Police as required.
- Liaise with the “case manager” and Local Authority Designated Officer for child protection concerns in cases which concern a member of staff or a volunteer; and refer cases where a person is dismissed or left service due to risk/harm to a child to the Disclosure and Barring Service and Teaching Regulation Agency, as required.
- Follow DfE and KCSIE 2021 guidance on ‘Peer on Peer Abuse’ when a concern is raised that there is an allegation of a pupil abusing another pupil within the organisation.
- Be available during MMF operational time (during MMF hours) for staff at MMF to discuss any safeguarding concerns. Appropriate and adequate cover arrangements will be arranged by the DSL and the SLT for any additional out of hours/term activities.
- Act as a source of support and expertise in carrying out safeguarding duties for the whole MMF community.
- Encourage and promote a culture of listening to children and taking account of their wishes and feelings, amongst all staff.
- Access training and support to ensure they have the knowledge and skills required to carry out the role. DSL training should be updated at least every two years and knowledge and skills refreshed at regular intervals but at least annually.

- Have a secure working knowledge of Merton Children’s Safeguarding Partnership procedures and understand the assessment process for providing Early Help and statutory intervention, including the local authority levels of need criteria and referral arrangements. Have a clear understanding of access and referral to the Merton Early Help offer.
- Liaise with school staff (especially pastoral support, behaviour leads, school health colleagues and the SENDCo) on matters of safety and safeguarding and consult the MCSP *Levels of Need* document to inform decision making and liaison with relevant agencies.
- Be alert to the specific needs of children in need, those with SEND and young carers.
- Understand the risks associated with online activity and be confident that they have the up-to-date knowledge and capability to keep children safe whilst they are online at MMF; in particular understand the additional risks that children with SEND face online and the associated and appropriate support they require.
- Keep detailed, accurate records (either written or using appropriate secure online software), that includes all concerns about a child even if there is no need to make an immediate referral and the rationale for decisions made and action taken. Records also require a clear and comprehensive summary and details on how the concern was followed up and resolved.
- Ensure that there is a Child Protection file which is kept up to date.
- Work with the DSL team, Local Authority and Social Care Teams to make informed decisions in the best interests of the child, for instance the child’s safety, educational outcomes and welfare. This should be a matter of routine.
- Help promote educational outcomes by sharing the information about the welfare, safeguarding and child protection issues that children, including children with a social worker, are experiencing, or have experienced, with staff and tutors and to ensure that relevant members of staff, know who these children are, understand their musical progress and attainment and maintain a culture of high aspirations for this cohort; supporting teaching staff to identify the challenges that children in this group might face and the additional support and adjustments that they could make to best support these children.
- Report to the Chief Executive any significant issues for example enquiries under section 47 of the Children’s Act 1989 and police investigations.
- Ensure that the case holding Social Worker is informed of any child currently with a Child Protection Plan who is absent without explanation.
- Ensure that all staff and tutors, within 3 months of employment at MMF and updated once a year thereafter, sign to say they have read, understood and agree to work within MMF’s Child Protection Policy, Staff Behaviour Policy (code of conduct), Pupil Behaviour Policy and Keeping Children Safe in Education 2021 (KCSIE) Part 1 and annex B and ensure that the policies are used effectively.
- Organise child protection and safeguarding induction, regularly updated training, following the training guidance published by the London Borough of Merton, Safeguarding in Schools Officer, and a minimum

of annual updates (including online safety) for all MMF staff, keep a record of attendance and address any absences.

- Ensure that in collaboration with the MMF SLT and Trustees, the Child Protection Policy is reviewed annually, and the procedures and implementation are updated and reviewed regularly.
- Ensure that the Child Protection Policy is available publicly and that parents are aware that referrals about suspected harm and abuse will be made and the role of MMF in this.
- Establish and maintain links with safeguarding partners to make sure staff are aware of training opportunities and the latest policies on local safeguarding arrangements.
- Will ensure that the name of the designated members of staff for Child Protection, the Designated Safeguarding Lead and deputies, are clearly advertised across MMF, with a statement explaining our role in referring and monitoring cases of suspected abuse.
- Ensure that the Single Central Record is compliant with Keeping Children Safe in Education 2021.
- Meet all other responsibilities as set out for DSLs in Keeping Children Safe in Education 2021.

The Deputy Designated Safeguarding Leads:

In addition to the role and responsibilities of all staff, the Deputy DSLs will:

- Be trained to the same standard as the Designated Safeguarding Lead and the role is explicit in their job description.
- Provide support and capacity to the DSL in carrying out delegated activities of the DSL; however, the lead responsibility of the DSL cannot be delegated.
- (In the absence of the DSL,) carry out the activities necessary to ensure the ongoing safety and protection of children. In the event of the long-term absence of the DSL, the deputy will assume all the functions above.

All members of The Trustee Board understand and fulfil their responsibilities to ensure that:

- They facilitate a collegiate approach to safeguarding at MMF.
- Where there is a safeguarding concern, children's wishes, and feelings should be taken into account when determining what action to take and what services to provide. Systems should be well promoted, understood and easily accessible for children to confidently report abuse, knowing that their concerns will be treated seriously.
- That MMF has effective safeguarding policies and procedures including a Child Protection and Safeguarding Policy, a Staff Behaviour Policy or Code of Conduct, a Behaviour Policy and a response to children who go missing from education. Ensure policies are consistent with Merton Children's

Safeguarding Partnership and statutory requirements, are reviewed annually and that the Child Protection policy is available on MMF's website.

- That MMF operates safer recruitment procedures that include statutory checks on staff suitability to work with children and by ensuring that there is at least one person on every recruitment panel who has completed safer recruitment training.
- Recommend that at least one member of the Trustee Board has completed safer recruitment training to be repeated every five years.
- Staff have been trained appropriately and this is updated in line with guidance and all staff have read Keeping Children Safe in Education (2021) part 1 and Annex B and that mechanisms are in place to assist staff in understanding and discharging their roles and responsibilities as set out in the guidance.
- There are effective procedures for dealing with allegations of peer on peer abuse.
- All staff, tutors and volunteers are provided with the MMF's Child Protection and Safeguarding Policy and Staff Behaviour Policy.
- MMF has procedures for dealing with allegations of abuse by staff (including, tutors, Chief Executive and volunteers) against children and that a referral is made to the DBS and/or the Teaching Regulation Agency (as applicable) if a person in regulated activity has been dismissed or removed due to safeguarding concerns.
- A nominated trustee for safeguarding (including Online Safety) is identified.
- A member of the Senior Leadership Team has been appointed as the Designated Safeguarding Lead (DSL) who will take lead responsibility for safeguarding and child protection and that the role is explicit in the role holder's job description.
- On appointment, the DSL and deputies undertake DSL 'New to Role' and then 'Update' training every two years as well as attending DSL network events and meetings.
- Appropriate online filtering and monitoring systems are in place.
- Enhanced DBS checks (without barred list checks, unless the trustee is also a volunteer at MMF) are in place for all Trustees.
- Any weaknesses in Safeguarding are remedied immediately.
- MMF is aware that OFSTED inspections will always report on whether arrangements for safeguarding children and learners are effective in schools.

Multi-agency Working

MMF has a role to play in multi-agency safeguarding arrangements. The Trustee Board, SLT and DSLs need to ensure that MMF contributes to multi-agency working in line with statutory guidance Working Together to Safeguard Children 2018. New safeguarding partnerships and child death partner arrangements are now in place. Agencies will work together to safeguard and promote the welfare of children, including identifying and responding to their needs.

We will ensure that we will fully contribute to all social care assessments concerning pupils attending MMF if appropriate.

Confidentiality and Sharing Information

All matters relating to child protection will be treated as confidential and only shared as per the [‘Information Sharing Advice for Practitioners’ \(DfE 2018\) guidance](#).

Information will be shared with staff within MMF who ‘need to know’.

All staff must be aware that they have a professional responsibility to share information with other agencies in order to safeguard children and that the Data Protection Act 1998 and General Data Protection Regulations are not a barrier to sharing information where a failure to do so would place a child at risk of harm. There is a lawful basis for safeguarding concerns to be shared with agencies who have a statutory duty for child protection.

All staff must also be aware of the provisions in MMF’s current Data Protection and Subject Access Request Policy.

All staff must be aware that they cannot promise a child to keep secrets which might compromise the child’s safety or wellbeing. However, staff are aware that matters relating to child protection and safeguarding are personal to children and families and in this respect are confidential and the Chief Executive or DSLs will only disclose information about a child to other members of staff on a need to know basis.

All staff will always undertake to share our intention to refer a child to Social Care with their parents /carers consent unless to do so could put the child at greater risk of harm or impede a criminal investigation.

Child Protection Procedures

The following procedures apply to all staff working at MMF and will be covered by training to enable staff to understand their role and responsibility.

The aim of our procedures is to provide a robust framework which enables staff to take appropriate action when they are concerned that a child is being harmed or abused or is at risk of harm or abuse.

The primary concern at all stages must be the interests and safety of the child. Where there is a conflict of interest between the child and an adult, the interests of the child must be paramount.

All staff are aware that very young children and those with disabilities, Special Educational Needs or with language delay may be more likely to communicate concerns with behaviours rather than words. Additionally, staff will question the cause of knocks and bumps in children who have limited mobility.

If a member of staff suspects abuse, spots signs or indicators of abuse, or they have a disclosure of abuse made to them they must:

1. Make an initial record of the information related to the concern.
2. Report it to the DSL immediately.
3. The DSL will consider if there is a requirement for immediate medical intervention, however urgent medical attention should not be delayed if the DSL is not immediately available.
4. Make an accurate record (which may be used in any subsequent court proceedings) as soon as possible and within 24 hours of the occurrence, of all that has happened, including details of:
 - Dates and times of their observations
 - Dates and times of any discussions in which they were involved.
 - Any injuries identified on a body map
 - Explanations given by the child / adult
 - Rationale for decision making and action taken
 - Any actual words or phrases used by the child
5. Records of concerns must be logged on the MMF system by emailing the DSL. (Any additional paper records must be signed and dated by the author. The record needs to be completed by the adult who received the information.)
6. In the absence of the DSL or the deputies, staff must be prepared to refer directly to the MASH, and the police if appropriate, if there is the potential for immediate significant harm.

Following a report of concerns the DSL must:

1. Decide whether there are sufficient grounds for suspecting significant harm, in which case a referral must be made to the MASH and the police if it is appropriate.
2. Try to discuss any concerns about a child's welfare with the family and where possible to seek their agreement before making a referral to the MASH. However, this should only be done when it will not place the child at increased risk or could impact a police investigation. The child's views should also be considered.
3. Contact the MASH if there are grounds to suspect a child is suffering, or is likely to suffer, significant harm or abuse. If a child is in immediate danger and urgent protective action is required, the Police (dial 999) must be called. The DSL must also notify MASH of the occurrence and what action has been taken.
4. Phone the MASH to discuss concerns if the DSL feels unsure about whether a referral is necessary. If there is not a risk of significant harm, the DSL will either actively monitor the situation or consider Early Help.

When a pupil needs urgent medical attention and there is suspicion of abuse the DSL or their Deputy should take the child to the accident and emergency unit at the nearest hospital, having first notified the MASH. The DSL should seek advice about what action the MASH will take and about informing the

parents, remembering that parents should normally be informed that a child requires urgent hospital attention.

The exception to this process will be in those cases of known FGM where there is a mandatory requirement for the teacher to report directly to the police. The DSL should also be made aware.

Dealing with disclosures

All staff

A member of staff who is approached by a child should listen positively and try to reassure them. They cannot promise complete confidentiality and should explain that they may need to pass information to other professionals to help keep the child or other children safe. The degree of confidentiality should always be governed by the need to protect the child.

Additional consideration needs to be given to children with communication difficulties and for those whose preferred language is not English. It is important to communicate with them in a way that is appropriate to their age, understanding and preference.

All staff must know who the DSL is and who to approach if the DSL is unavailable. All staff have the right to make a referral to the MASH or Police directly and must do this if, for whatever reason, there are difficulties following the agreed protocol, for example, they are the only adult on MMF hired premises/concert venue at the time and have concerns about sending a child home.

Talking to and listening to children

If a child chooses to disclose, you SHOULD:

- Listen and reassure
- be accessible and receptive
- listen carefully and uncritically at the child's pace
- take what is said seriously
- tell the child that you must pass this information on
- explain what will happen next
- make a careful record of what was said in the child's words
- sign, date and record the time on records

You should NEVER:

- take photographs of injuries
- examine marks/ injuries solely to assess whether they may have been caused by abuse (there may be a need to give appropriate first aid)
- investigate or probe, aiming to prove or disprove possible abuse – never ask leading questions
- make promises to children about confidentiality or keeping 'secrets'
- assume that someone else will take the necessary action
- jump to conclusions or react with shock, anger or horror
- speculate or accuse anybody
- confront another person (adult or child) allegedly involved

- offer opinions about what is being said or about people allegedly involved
- forget to record what you have been told
- delay or fail to pass the information on to the correct person
- ask a child to sign a written copy of the disclosure or a 'statement'.

For children with communication difficulties or who use alternative/augmented communication systems, staff may need to take extra care to ensure that signs of abuse and neglect are identified and interpreted correctly, but concerns should be reported in exactly the same manner as for other children.

Guiding principles, the seven Rs

Receive

- Listen to what is being said, without displaying shock or disbelief
- Accept what is said and take it seriously
- Make a note of what has been said as soon as practicable

Reassure

- Reassure the pupil, but only so far as is honest and reliable
- Do not make promises you may not be able to keep e.g. 'I'll stay with you' or 'everything will be alright now' or 'I'll keep this confidential'
- Do reassure, for example, you could say: 'I believe you', 'I am glad you came to me', 'I am sorry this has happened', 'We are going to do something together to get help'

Respond

- Respond to the pupil only as far as is necessary for you to establish whether you need to refer this matter, but do not interrogate for full details
- Do not ask 'leading' questions i.e. 'did he touch your private parts?' or 'did she hurt you?' Such questions may invalidate your evidence (and the child's) in any later prosecution in court
- Do not ask the child why something has happened.
- Do not criticize the alleged perpetrator; the pupil may care about him/her, and reconciliation may be possible
- Do not ask the pupil to repeat it all for another member of staff. Explain what you must do next and whom you have to talk to. Reassure the pupil that it will be a senior member of staff.

Report

- Share concerns with the DSL immediately.
- If you are not able to contact your DSL or the Deputy DSL, and the child is at risk of immediate harm, contact the MASH or Police, as appropriate directly.
- If you are dissatisfied with the level of response you receive following your concerns, you should press the DSL for re-consideration.

Record

- If possible, make some very brief notes at the time, and write them up as soon as possible. The original notes need to be kept secure and included in the Child Protection file.
- Record the date, time, place, person or people present and noticeable nonverbal behaviour, and the words used by the child. If the child uses sexual 'pet' words, record the actual words used, rather than translating them into 'proper' words.
- If appropriate, complete a body map to indicate the position of any noticeable bruising.
- Record facts and observable things, rather than your 'interpretations' or 'assumptions'.

Remember

- Support the child: listen, reassure, and be available.
- Complete confidentiality is essential. Share your knowledge only with appropriate professional colleagues.
- Get some support for yourself if you need it.

Review (led by DSL)

- Has the action taken provided good outcomes for the child?
- Did the procedure work?
- Were any deficiencies or weaknesses identified in the procedure? Have these been remedied?
- Is further training required?

What happens next?

It is important that concerns are followed up and it is everyone's responsibility to ensure that they are. The member of staff should be informed by the DSL what has happened following a report being made. If they do not receive this information, they should seek it out. Ensure the incident is recorded.

Receiving a disclosure can be upsetting for the member of staff and MMF should have a procedure for supporting them after the disclosure. This might include reassurance that they have followed procedure correctly and that their swift actions will enable the allegations to be handled appropriately.

In some cases, additional counselling might be needed, and staff should be encouraged to recognise that disclosures can have an impact on their own emotions.

Allegations against adults who work with children

Procedure

Keeping Children Safe in Education 2021 part 4 is now in 2 sections.

Section 1 deals with allegations against staff which meets the threshold of being investigated by the Local Authority Designated Officer (LADO).

This procedure must be used in all cases in which it is alleged a member of staff, tutor or volunteer in an organisation, or another adult who works with children has:

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

In dealing with allegations or concerns against an adult, staff must:

- Report any concerns about the conduct of any member of staff, tutor or volunteer to the Chief Executive immediately.
- If an allegation is made against the Chief Executive, the concerns need to be raised with the Chair of Trustees as soon as possible. If the Chair of Trustees is not available, then the LADO should be contacted directly.
- There may be situations when the Chief Executive or Chair of Trustees will want to involve the police immediately if the person is deemed to be an immediate risk to children or there is evidence of a possible criminal offence.
- Once an allegation has been received by the Chief Executive or Chair of Trustees they will contact the LADO immediately and before taking any action or investigation.
- Following consultation with the LADO inform the parents of the allegation unless there is a good reason not to.

In liaison with the LADO, MMF will determine how to proceed and if necessary, the LADO will refer the matter to Children's Social Care via the MASH and/or the police.

Section 2 of part 4 of Keeping Children Safe in Education 2021 deals with low level concerns. These will not be treated as insignificant but will require a report to the Chief Executive or the LADO.

A low-level concern is any concern, no matter how small, and even if no more than causing a sense of unease or a 'nagging doubt' - that an adult working in or on behalf of MMF may have acted in a way that is inconsistent with the staff code of conduct, including inappropriate conduct outside of work.

Examples of such behaviour could 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
- using inappropriate sexualised, intimidating, or offensive language.

The purpose of this policy is to create and embed a culture of openness, trust and transparency in which MMF's values and expected behaviour which are set out in the staff code of conduct are constantly lived, monitored and reinforced by all staff.

Low-level concerns about a member of staff should be reported to the Chief Executive. Where a low-level concern is raised about the Chief Executive, it should be shared with the Chair of Trustees.

If a report is determined to be unsubstantiated, unfounded, false or malicious, the Designated Safeguarding Lead should consider whether the child and/or the person who has made the allegation is in need of help or may have been abused by someone else and this is a cry for help. In such circumstances, a referral to children's social care may be appropriate.

If a report is shown to be deliberately invented or malicious, we will consider whether any disciplinary action is appropriate against the individual who made it as per our behaviour policy.

What is child abuse?

The following definitions are taken from *Working Together to Safeguard Children* HM Government (2018). In addition to these definitions, children can also be abused by being sexually or criminally exploited, honour-based abuse, forced marriage or female genital mutilation.

What is abuse and neglect?

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

Physical abuse

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

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

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

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

Indicators of physical abuse / factors that should increase concern

- Multiple bruising or bruises and scratches (especially on the head and face)
- Clusters of bruises – e.g., fingertip bruising (caused by being grasped)
- Bruises around the neck and behind the ears – the most common abusive injuries are to the head
- Bruises on the back, chest, buttocks, or on the inside of the thighs

- Marks indicating injury by an instrument – e.g., linear bruising (stick), parallel bruising (belt), marks of a buckle
- Bite marks
- Deliberate burning may also be indicated by the pattern of an instrument or object – e.g., electric fire, cooker, cigarette
- Scalds with upward splash marks or *tide marks*
- Untreated injuries
- Recurrent injuries or burns
- Bald patches

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

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

You should be concerned if a child:

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

Emotional abuse

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

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

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

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

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

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

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

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

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

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

Indicators of emotional abuse

Developmental issues

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

Behaviour

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

Social issues

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

Emotional responses

- Extreme fear of new situations
- Inappropriate emotional responses to painful situations (“I deserve this”)
- Fear of parents being contacted
- Self-disgust
- Low self-esteem
- Unusually fearful with adults
- Lack of concentration, restlessness, aimlessness
- Extremes of passivity or aggression

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 the child is aware of what is happening.

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

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

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

Child Sexual Exploitation is seen as a separate category of sexual abuse.

Characteristics of child sexual abuse:

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

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

Indicators of sexual abuse

Physical observations:

- Damage to genitalia, anus or mouth
- Sexually transmitted diseases
- Unexpected pregnancy, especially in noticeably young girls
- Soreness in genital area, anus or mouth and other medical problems such as chronic itching
- Unexplained recurrent urinary tract infections and discharges or abdominal pain

Behavioural observations:

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

Neglect

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

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

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

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

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

Far more children are registered to the category of neglect on Child in Need and Child Protection plans than to the other categories. As with abuse, the number of children experiencing neglect is likely to be much higher than the numbers on the plans.

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

- frequently going hungry
- frequently having to go to school in dirty clothes

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

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

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

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

It is important to recognise that indicators alone cannot confirm whether a child is being abused. Each child should be seen in the context of their family and wider community and a proper assessment carried out by appropriate persons. What is important to keep in mind is that if you feel unsure or concerned, do something about it. Don't keep it to yourself.

Physical indicators of neglect

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

Behavioural indicators of neglect

- Constant tiredness
- Frequent absence from school or lateness
- Missing medical appointments
- Isolated among peers
- Frequently unsupervised
- Stealing or scavenging, especially food
- Destructive tendencies
- Poor attachment to caregivers and emerging mental health difficulties

Peer on Peer (Child on Child) Abuse

In most instances, the conduct of pupils towards each other will be covered by our behaviour policy. However, some allegations may be of such a serious nature that they may raise safeguarding concerns. MMF recognises that children can abuse their peers.

The forms of peer on peer abuse are outlined below:

- Bullying (including cyberbullying, prejudice-based and discriminatory bullying).
- Abuse in intimate personal relationships between peers.
- Physical abuse which can include hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm.
- Sexual Violence and Sexual Harassment.
- Consensual and non-consensual sharing of nudes and semi-nude images and/or videos (also known as sexting or youth produced sexual imagery).
- 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 the victim humiliation, distress, or alarm.
- Initiation/hazing type violence and rituals.

The term peer-on-peer abuse can refer to all these definitions and a child may experience one or multiple facets of abuse at any one time. Therefore, our response will cut across these definitions and capture the complex web of their experiences.

There are also different gender issues that can be prevalent when dealing with peer on peer abuse (i.e. girls being sexually touched/assaulted, or boys being subjected to initiation/hazing type violence). It is more likely that girls will be victims and boys' perpetrators, but that all peer on peer abuse is unacceptable and will be taken seriously.

We believe that all children have a right to learn in a safe environment. Children should be free from harm by adults and other children at MMF.

It will not be passed off as 'banter', 'boys being boys' or 'part of growing up', and staff will challenge inappropriate behaviour between children. Any downplaying of certain conduct can lead to a culture of unacceptable behaviour which will lead to children not reporting or normalising abuse causing an unsafe environment. We are clear that there will be a zero-tolerance approach to any form of abuse including peer on peer abuse.

MMF understands that even if there are no reports of peer-on-peer abuse, this does not mean that it is not happening.

We will minimise the risk of peer on peer abuse by:

- Taking a whole-service approach to safeguarding & child protection through our safeguarding policy and practices.
- All staff being trained and highly vigilant and aware of specific characteristics which may indicate peer on peer abuse, for example, vulnerability and controlling behaviour.
- Providing a values-based musical offer, underpinned by MMF's behaviour policy and pastoral support.
- Working in partnership with parents and carers.
- Engaging with specialist support and interventions.

Responding to reports of Sexual Violence and Sexual Harassment

- Children making a report of sexual violence or sexual harassment will be taken seriously, kept safe and be well supported.
- Staff taking the report will inform the DSL or a Deputy DSL immediately.
- Staff taking a report will never promise confidentiality.
- Parents or carers should usually be informed (unless this would put the child at greater risk).
- If a child is at risk of harm, is in immediate danger, or has been harmed, a referral will be made to the MASH.

Action: The DSL will consider: -

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

Options:

- Manage internally
- Early Help intervention
- Refer to MASH
- Report to the police all cases of sexual violence (generally in parallel with a referral to MASH)

Risk Assessment:

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

The risk assessment will consider:

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

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

Support regarding risk assessments can be accessed from Ian McGraw, Safeguarding in Schools Officer, email: Ian.McGraw@merton.gov.uk

Ongoing Response:

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

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

The DSL will consider how best to keep the victim and perpetrator a reasonable distance apart on MMF premises.

Where a criminal investigation into a rape or assault by penetration leads to a conviction or caution, MMF will take suitable action. In all but the most exceptional of circumstances, the rape or assault is likely to constitute a serious breach of discipline and may lead to the view that allowing the perpetrator to remain at MMF would seriously harm the education or welfare of the victim (and potentially themselves and other pupils).

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

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

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

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

Physical Abuse

While a clear focus of peer on peer abuse is around sexual abuse and harassment, physical assaults and initiation violence and rituals from pupils to pupils can also be abusive. These are equally not tolerated and if it is believed that a crime has been committed, will be reported to the police. The principles from the anti-bullying policy will be applied in these cases, with recognition that any police investigation will need to take priority.

References:

[*DfE Keeping Children Safe in Education 2021*](#)

[*DfE Sexual Violence and Sexual Harassment between Children in Schools and Colleges May 2021*](#)

Harmful Sexual Behaviour

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" (HSB). The term has been widely adopted in child protection and is used in Keeping Children Safe in Education 2021. HSB can occur online and/or face to face and can also occur simultaneously between the two. HSB should be considered in a child protection context.

Sexual behaviour between children will be considered harmful if one of the children is much older, if there is more than 2 years difference in age or one child is in puberty and the other is not. A younger child can abuse an older child, particularly if one has power over the other, for example, with a disability or Special Educational Needs.

Anti-Bullying/Cyberbullying

MMF 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.

We keep a record of known bullying incidents which is shared with SLT and the Chair of Trustees. All staff are aware that children with SEND and/or differences/perceived differences are more susceptible to being bullied/victims of child abuse.

When there is 'reasonable cause to suspect that a child is suffering, or is likely to suffer, significant harm' a bullying incident should be addressed as a child protection concern. If the anti-bullying procedures are seen to be ineffective, the Chief Executive and the DSL will also consider child protection procedures.

Online Safety

MMF has a risk assessment and an online policy which explains how we try to keep pupils safe and how we respond to online safety incidents. Further information can be found in 'Teaching online safety in school', Guidance supporting schools to teach their pupils how to stay safe online, within new and existing school subjects ([Teaching Online Safety in Schools, June 2019](#)) to guide practice.

Children increasingly use electronic equipment, including at home, on a daily basis to access the internet, share and view content and images via social media sites such as Facebook, Twitter, Instagram, Snapchat and Tiktok and for online gaming.

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 extremist or sexual behaviour such as webcam photography or face-to-face meetings.

Pupils 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.

Government supported online safety websites provide information to support governing bodies to keep children safe online (including when children are at home). Please see below list of links on the section

entitled **Further advice on safeguarding and child protection is available** for guidance and information. We have a named Online Safety Leader and a system to log any Online Safety incidents.

Staff may lawfully search electronic devices, without consent or parental permission, if there is a suspicion that the pupil has a device prohibited by MMF rules, or the staff member has good reason to suspect the device may be used to:

- cause harm
- disrupt teaching
- break MMF rules
- commit an offence
- cause personal injury
- damage property

Any data, files or images that are believed to be illegal must be passed to the police as soon as practicable, including pornographic images of children, without deleting them.

Any data, files or images that are not believed to be unlawful, may be deleted or kept as evidence of a breach of MMF's behaviour policy. This would be reported to the child's school DSL. MMF would follow DFE ['Searching, screening and confiscation at school'](#) guidance.

MMF's policy on the use of mobile phones

Children attending lessons/ensembles at Music Centres may bring a phone, but lessons in schools will be subject to specific school policies.

Staff may use their personal mobile phones to take photographs but the photographs must be downloaded to the MMF network and deleted from the mobile phone on the same day.

Racist Incidents

Our policy on racist incidents is set out separately and acknowledges that repeated racist incidents or a single serious incident may lead to consideration under child protection procedures. We keep a record of racist incidents.

Radicalisation and Extremism

[The Prevent Duty for England and Wales \(2015\)](#) 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 drawn into terrorism.

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. ([Revised Prevent Duty Guidance for England and Wales 10 April 2019](#)).

Some children are at risk of being radicalised; adopting beliefs and engaging in activities which are harmful, criminal or dangerous. This can happen both online and offline.

MMF 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 drawn into terrorism.

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

Staff receive training to help identify early signs of radicalisation and extremism.

MMF follows the [DfE advice Promoting Fundamental British Values as part of SMSC \(spiritual, moral, social and cultural education\) in Schools \(2014\)](#).

When any member of staff has concerns that a pupil may be at risk of radicalisation or involvement in terrorism, they should speak with the DSL in the first instance.

They should then follow the safeguarding procedures and refer cases by e-mail to the MASH. If the matter is urgent then Police must be contacted by dialling 999. In cases where further advice from the Police is sought dial 101 or contact the Anti-terrorism hotline on 0800 789 321

The Department for Education has also set up a dedicated telephone helpline for staff and trustees to raise concerns around Prevent (020 7340 7264).

Indicators of vulnerability to radicalisation

Radicalisation refers to the process by which a person comes to support terrorism and forms of extremism leading to terrorism.

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 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.

Pupils 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 MMF staff can recognise those vulnerabilities.

Indicators of vulnerability include:

- Identity Crisis – the student / pupil is distanced from their cultural / religious heritage and experiences discomfort about their place in society.
- Personal Crisis – the student / pupil 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 / pupil's country or region of origin may contribute to a sense of grievance that is triggered by personal experience of racism or discrimination or aspects of Government policy.
- Unmet Aspirations – the student / pupil may have perceptions of injustice or a feeling of failure.
- Experiences of Criminality – which may include involvement with criminal groups, imprisonment, and poor resettlement / reintegration.
- Special Educational Needs and Disability – students / pupils 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 and observed behaviours 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.
- Significant changes to appearance and / or behaviour.
- Experiencing a high level of social isolation resulting in issues of identity crisis and / or personal crisis.

Domestic Abuse

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

We use the term domestic abuse to reflect that several abusive and controlling behaviours are involved beyond violence. Slapping, punching, kicking, bruising, rape, ridicule, constant criticism, threats, manipulation, sleep deprivation, social isolation, and other controlling behaviours all count as abuse.

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, including impacting upon their own personal, intimate relationships. Children who witness domestic abuse are at risk of significant harm and staff are alert to the signs and symptoms of a child suffering or witnessing domestic abuse.

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

To talk through your concerns, call the MASH or talk to your local outreach service.

Child Sexual Exploitation (CSE)

Child sexual exploitation is a form of child abuse and occurs where an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a child into sexual activity. Whilst age may be the most obvious, this power imbalance can also be due to range of other factors including gender, sexual identity, cognitive ability, physical strength, status and access to economic and other resources. In some cases, the abuse will be in exchange for something the victim needs or wants and will be to the financial benefit or other advantage, such as increased 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 one off occurrence or a series of incidents over time. It can range from opportunistic to complex organised abuse. It can 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 activity appears to be consensual and exploitation as well as being physical can be facilitated and/or take place online.

All staff are aware of the link between online safety and vulnerability to exploitation.

Any concerns that a child is being or is at risk of being sexually exploited should be passed immediately to the DSL.

MMF is aware there is a clear link between regular non-attendance at school and CSE. Staff will consider a child to be at potential CSE risk in the case of regular non-attendance at MMF and make reasonable enquiries with the school, child and parents to assess this risk.

MMF 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. As a consequence, 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. Children also rarely self-report CSE so staff must be particularly vigilant to potential indicators of risk.

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

Signs include:

- underage sexual activity
- inappropriate sexual or sexualised behaviour
- sexually risky behaviour, 'swapping' sex
- repeated sexually transmitted infections
- in girls, repeat pregnancy, abortions, miscarriage
- receiving unexplained gifts or gifts from unknown sources
- having multiple mobile phones and worrying about losing contact via mobile
- having unaffordable new things (clothes, mobile) or expensive habits (alcohol, drugs)
- changes in the way they dress
- going to hotels or other unusual locations to meet friends
- seen at known places of concern
- moving around the country, appearing in new towns or cities, not knowing where they are
- getting in/out of different cars driven by unknown adults

- having older boyfriends or girlfriends
- contact with known perpetrators
- involved in abusive relationships, intimidated and fearful of certain people or situations
- hanging out with groups of older people, or anti-social groups, or with other vulnerable peers
- associating with other young people involved in sexual exploitation
- recruiting other young people to exploitative situations
- truancy, exclusion, disengagement with school, opting out of education altogether
- unexplained changes in behaviour or personality (chaotic, aggressive, sexual)
- mood swings, volatile behaviour, emotional distress
- self-harming, suicidal thoughts, suicide attempts, overdosing, eating disorders
- drug or alcohol misuse
- getting involved in crime
- police involvement, police records
- involved in gangs, gang fights, gang membership
- injuries from physical assault, physical restraint, sexual assault.

Child Criminal Exploitation & Gangs

There are a number of areas in which young people are put at risk by gang activity, both through participation in, and as victims of, gang violence which can be in relation to their peers or to a gang-involved adult in their household.

A child who is affected by gang activity or serious youth violence may have suffered, or may be likely to suffer, significant harm through physical, sexual and emotional abuse or neglect.

The risk or potential risk of harm to the child may be as a victim, a gang member or both - in relation to their peers or to a gang-involved adult in their household. Teenagers can be particularly vulnerable to recruitment into gangs and involvement in gang violence. This vulnerability may be exacerbated by risk factors in an individual's background, including violence in the family, involvement of siblings in gangs, poor educational attainment, or poverty or mental health problems.

Criminal exploitation of children is a typical feature of county lines criminal activity with children being exploited to move and store drugs and money. "County lines" is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs (primarily crack cocaine and heroin) into one or more importing areas within the UK, using dedicated mobile phone lines or other form of "deal line". Children might be involved in violence, be pressured into doing things like stealing, carrying drugs or weapons or be abused, exploited and put into dangerous situations. Key identifying features of involvement in county lines are when children are missing, when the victim may have been trafficked for transporting drugs, a referral to the National Referral Mechanism should be considered with Social Care and Police colleagues.

A child who is affected by gang activity, criminal exploitation or serious youth violence can be at risk of significant harm through physical, sexual and emotional abuse. Girls may be particularly at risk of sexual exploitation.

Any concerns that a child is being or is at risk of being criminally exploited will be passed without delay to the DSL. MMF is aware there is a clear link between regular non-attendance at school and exploitation. Staff will consider a child to be at potential risk in the case of regular non-attendance at school and make reasonable enquiries with the child and parents to assess this risk.

A referral to the MASH will be made when any concern of harm to a child because of gang activity including child criminal exploitation becomes known. Any member of staff who has concerns that a child may be at risk of harm should immediately inform the DSL. The DSL will contact the MASH. If there is concern about a child's immediate safety, the Police will be contacted on 999.

Children at Risk or Involved in Serious Violent Crime

Serious violent youth crime' is defined by the Home Office Assessment of Policing and Community Safety (APACS) as 'any offence of most serious violence or weapon enabled crime, where the victim is aged 1-19' Indicators:

- Unexplained gifts/new possessions – these can indicate children have been approached by/involved with individuals associated with criminal networks/gangs
- Increased absence from school
- Change in friendship/relationships with others/groups
- Significant decline in performance
- Signs of self-harm/significant change in wellbeing
- Signs of assault/unexplained injuries

Additional risk factors include:

- being male
- having been frequently absent or permanently excluded from school
- having experienced child maltreatment
- been involved in offending, such as theft or robbery.

Sharing Nudes and semi-nudes

The practice of children sharing nudes and semi nudes (formerly known as sexting or Youth produced Sexual Imagery) 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 unlawful.

Nudes and semi nudes refer 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.
- A person under the age of 18 is in possession of sexual imagery created by another person under the age of 18.

- Voyeurism Act 2019 – Upskirting is now a criminal act in the UK. The response to this in schools need to be the same as peer on peer sexual abuse and may including contacting the police. The Criminal Prosecution Service (CPS) defines 'upskirting' as a colloquial term referring to the action of placing equipment such as a camera or mobile phone beneath a person's clothing to take a voyeuristic photograph without their permission. It is not only confined to victims wearing skirts or dresses and equally applies when men or women are wearing kilts, cassocks, shorts or trousers. It is often performed in crowded public places, for example on public transport or at music festivals, which can make it difficult to notice offenders. “

All incidents of this nature should be treated as a safeguarding concern and in line with the UKCCIS guidance [Sharing nudes and semi-nudes](#).

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.

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 immediately.

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 must not view, copy or print the youth produced sexual imagery.

The DSL should hold an initial review meeting with appropriate MMF 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 the MASH or the Police as appropriate.

Immediate referral at the initial review stage should be made to Children's Social Care/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.

If none of the above apply then the DSL will use their professional judgement to assess the risk to pupils involved and may decide, with input from the Chief Executive, to respond to the incident without referral to the MASH or the Police.

During the decision making 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 vulnerable, for example subject to Child in Need, Child Protection or Early Help plans, Looked After, SEND.
- 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.
- The children have been involved in incidents relating to youth produced imagery before.
- Voyeurism occurred.

If any of these circumstances are present the situation will be referred according to our child protection procedures, including referral to the MASH or the Police.

The DSL will record all incidents of sharing nudes and semi-nudes, including the actions taken, rationale for actions and the outcome.

Honour-Based Abuse

Honour based abuse (HBA) encompasses incidents or crimes which have been committed to protect or defend the honour of the family and/or the community, including female genital mutilation (FGM), forced marriage, and practices such as breast ironing. They are 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 violence can occur when perpetrators perceive that a relative has shamed the family and/or community by breaking their honour code.

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

It is considered a violation of human rights and may be a form of domestic and/or sexual abuse.

Female Genital Mutilation (FGM)

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.

The duty applies to all persons in MMF who are employed or engaged to carry out 'teaching work' in the organisation, 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 Designated Safeguarding Lead; however, the DSL should be informed.

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 immediately.

MMF staff are trained to be aware of risk indicators of FGM.

Concerns about FGM outside of the mandatory reporting duty should be reported using MMF's and the school's child protection procedures. Staff should be particularly alert to suspicions or concerns expressed by female pupils about going on a long holiday during the summer holiday.

There should also be consideration of potential risk to other girls in the family and practicing community. 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.

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

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

4 types of procedure:

- Type 1 Clitoridectomy – partial/total removal of clitoris
- Type 2 Excision – partial/total removal of clitoris and labia minora
- Type 3 Infibulation - entrance to vagina is narrowed by repositioning the inner/outer labia
- Type 4 all other procedures that may include: pricking, piercing, incising, cauterising and scraping the genital area.

Why is it carried out?

Belief that: FGM brings status/respect to the girl – social acceptance for marriage

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

This procedure is also known as cutting, sunna, gudnin (Somali) and Tahur (Sudanese).

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

Forced Marriage

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.

Forced marriage 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.

A forced marriage is not the same as an arranged marriage which is common in many 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.

Staff should never attempt to intervene directly or through a third party. Contact should be made with the MASH.

One Chance Rule

All staff are aware of the 'One Chance Rule' in relation to forced marriage, FGM and HBA. Staff recognise they may only have 'one chance' to speak to a child who is a potential victim and have just one chance to save a life.

MMF is aware that if the victim is not offered support following disclosure 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 HBV cases.

Private Fostering Arrangements

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 years old or 18 years old if the child is disabled.

Children looked after by the local authority or who are placed in residential schools, children's homes or hospitals are not considered to be privately fostered.

Private fostering occurs in all cultures and children may be privately fostered at any age.

MMF recognises 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.

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

Children Looked After (LAC) and Previously Looked After

The most common reason for children becoming looked after is as a result of abuse and neglect.

MMF ensures that staff have the necessary skills and understanding to keep looked after children safe. Appropriate staff have information about a child's looked after 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.

In schools, the designated teacher for children looked after will have the appropriate level training to equip them with the knowledge and skills to undertake their role.

The designated teacher for children looked after and the DSL have details of the child's social worker and the name and contact details of the Merton Council's Head of Virtual School.

MMF is aware that the designated teacher for children looked after and children previously looked after will work in partnership with the Virtual School Assistant Headteacher to discuss how Pupil Premium Plus funding can be best used to support the progress of children looked after in the school and meet the needs of the child within their personal education plan.

Previously looked after children are those who immediately after being in care (as defined above) became subject to an adoption order, child arrangements order or special guardianship order.

Contextual Safeguarding – Risks outside of the home

As well as threats to the welfare of children from within their families, children may be vulnerable to abuse or exploitation from influences outside of their families. MMF recognises that these extra-familial threats might arise from within their peer groups, from within the wider community and/or online. These threats can take a variety of different forms and children can be vulnerable to multiple threats, including:

- exploitation by criminal gangs and organised crime groups such as county lines
- trafficking
- online abuse
- sexual exploitation
- extremism leading to radicalisation. Extremist groups make use of the internet to radicalise and recruit and to promote extremist materials.

Staff are trained on contextual influences and follow MMF procedures for reporting concerns.

The DSL will ensure that information is shared in the referral process to help social care assessments consider contexts outside of the home.

Children with special educational needs and disabilities

MMF recognises that children with special educational needs (SEN) and disabilities can face additional safeguarding challenges. Additional barriers that can exist when recognising abuse and neglect in this group of children include:

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

MMF addresses these additional challenges by considering extra pastoral support for children with SEN and disabilities.

Alternative Provision

Alternative Provision is education arranged by local authorities for pupils who, because of exclusion, illness or other reasons, would not otherwise receive suitable education. Examples include education arranged by schools for pupils on a fixed period exclusion; and pupils being directed by schools to off-site provision to improve their behaviour.

Children Missing Education

All children, regardless of their circumstances, are entitled to an efficient, full-time education which is suitable to their age, ability, aptitude and any special educational needs they may have.

MMF recognises that children missing education are at significant risk of underachieving, being victims of abuse and harm, exploitation or radicalisation, and becoming NEET (not in education, employment or training) later in life.

Where possible MMF will hold more than one emergency contact number for each pupil.

MMF will ensure that there is a record of joiners and leavers at MMF.

Elective Home Education

Where a parent/carer expresses their intention to remove a child from school with a view to educating at home, schools work together with key professionals to coordinate a meeting with parents/carers where possible. Ideally, this would be before a final decision has been made, to ensure the parents/carers have considered what is in the best interests of each child. This is particularly important where a child has SEND, is vulnerable, and/or has a social worker. The Elective Home Education Advisor for LBM is Maryanne Rogers 020 8545 3974.

Pupils Missing Out of Education

Most children engage positively with school and attend regularly. However, in order to flourish, some children require an alternative education offer or may require a modified timetable to support a return to full time education provision. It is recognised that children accessing alternative provision, or a reduced or modified timetable may have additional vulnerabilities. Ofsted refer to these as Pupils Missing Out On Education (PMOOE), because they are not accessing their education in school in the 'usual way'. This is a school responsibility.

Children who need the support of a Social Worker

Children may need a social worker due to safeguarding or welfare needs, such as abuse, neglect and complex family circumstances.

These experiences can leave children vulnerable to further harm, as well as potentially creating barriers to attendance, learning, behaviour and mental health.

The local authority should inform the school if a child has a social worker, and the DSL should hold and use this information in the best interests of the child's safety, welfare and educational outcomes, such as when decisions are made on:

- Responding to unauthorised absence or missing education where there are known safeguarding risks
- The provision of pastoral and/or academic support

See <https://www.gov.uk/government/publications/review-of-children-in-need/review-of-children-in-need>

School Attendance and Behaviour responsibilities (included although not directly relevant to MMF)

Additional policies and procedures are in place regarding school attendance and behaviour.

The school recognises that absence from school and exclusion from school may be indicators of abuse and neglect, including the exploitation of children. The DSL will regularly liaise with members of school staff with responsibility for behaviour and attendance to ensure risk is identified and appropriate intervention is in place to protect children from harm.

The school will work in partnership with Merton Police and other partners for reporting children that go missing from the school site during the school day. Staff will be alert to signs of children at risk of travelling to conflict zones, female genital mutilation and forced marriage.

Restrictive Physical Intervention in schools

We acknowledge that staff must only ever use physical intervention as a last resort, when a child is or at immediate risk of harming him/herself or others, and that at all times it must be the minimal force necessary to prevent injury to another person. Such events should be fully recorded and signed by a witness.

Staff who are likely to need to use physical intervention will be appropriately trained in “Positive Options” techniques.

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

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 boundaries.

When applying disciplinary measures such as physical intervention or isolation for children with SEND, MMF will consider the risks, given the additional vulnerabilities of these children.

Health (including Mental Health)

Mental Health

School and MMF have an important role to play in supporting the mental health and wellbeing of our pupils. All staff are aware that mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation. Although it is only appropriately trained professionals who can diagnose mental health problems, staff observe children day-to-day and identify those whose behaviour suggests that they may be experiencing mental health problems or be at risk of developing one.

Where children have suffered abuse and neglect and other potentially traumatic adverse childhood experiences, this can have a lasting impact throughout childhood, adolescence and into adulthood. It is key that staff are aware of how these children’s experiences can impact on mental health, behaviour and education.

If staff have a mental health concern about a child that is also a safeguarding concern, immediate action should be taken by speaking with the MMF DSL. The DSL will access a range of advice to help them identify

children in need of extra mental health support; this includes working with external agencies. School has access to [Mental Health and Behaviour in Schools Guidance](#)

Any child with a significant health condition requiring regular medication or treatment will require an Individual Health Care Plan which will be completed with the parent and school nurse. It is vital that parents inform MMF if their child has a health condition of this nature to enable us to ensure that their child's health needs are managed appropriately whilst they are at MMF. Information from this plan will be shared with key staff members to ensure that they are alert to the child's individual needs.

Whistleblowing

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

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 MMF's safeguarding arrangements. If it becomes necessary to consult outside the school, they should speak in the first instance, to the LADO in accordance with the Whistleblowing Policy.

The NSPCC whistleblowing helpline is available for staff who do not feel able to raise concerns regarding child protection failures internally or have concerns about a way a concern is being handled by MMF. 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.

Whistle-blowing regarding the Chief Executive should be made to the Chair of the Trustee Body, whose contact details are readily available to staff. edward.hickman@mmf.org.uk

Links with other MMF policies and key documents:

- *Staff handbook*
- *Staff Behaviour (Code of Conduct)*
- *Whistleblowing*
- *Health & Safety*
- *Complaints*
- *Online Learning*
- *IT Policy*
- *Risk Assessment*
- *Safer Recruitment*
- *Data Protection & Privacy Policy*

Further advice on safeguarding and child protection is available from:

Contextual Safeguarding Network <https://www.contextualsafeguarding.org.uk/>

<https://www.gov.uk/government/groups/uk-council-for-child-internet-safety-ukccis>

Statutory Guidance to Relationships, education and sex education (RSE) and health education (2020)

<https://www.gov.uk/government/publications/relationships-education-relationships-and-sex-education-rse-and-health-education>

OFSTED publication on safeguarding during inspections <https://www.gov.uk/government/publications/inspecting-safeguarding-in-early-years-education-and-skills>

UK Council for Child Internet Safety (UKCIS) guidance: <https://www.gov.uk/government/publications/education-for-a-connected-world>

Additional advice and support

Abuse

- [What to do if you're worried a child is being abused](#) – DfE advice
- [Domestic abuse: Various Information/Guidance](#) - Home Office (HO)
- [Faith based abuse: National Action Plan](#) - DfE advice
- [Relationship abuse: disrespect nobody](#) - Home Office website

Bullying

- Anti-Bullying Alliance: <http://anti-bullyingalliance.org.uk/>
- [Preventing and Tackling Bullying](#) - DfE advice
- [Cyber bullying: advice for headteachers and school staff](#) - DfE advice

Children missing from education, home or care

- [Children missing education](#) - DfE statutory guidance
- [Child missing from home or care](#) - DfE statutory guidance
- [Children and adults missing strategy](#) - Home Office strategy

Children with family members in prison

- [National Information Centre on Children of Offenders](#) - Barnardo's in partnership with HM Prison and Probation Service

Child Exploitation

- [Trafficking: safeguarding children](#) - DfE and HO guidance

Drugs

- [Drugs: advice for schools](#) – DfE and ACPO advice

- [Drug strategy 2017](#) - Home Office strategy
- [Information and advice on drugs](#) - Talk to Frank website
- [ADEPIS platform sharing information and resources for schools: covering drug \(& alcohol\) prevention](#) - Website by Mentor UK

“Honour Based Abuse” (so called)

- [Female genital mutilation: information and resources](#)- Home Office guidance
- [Female genital mutilation: multi agency statutory guidance](#) - DfE, DH, and HO statutory guidance

Health and Well-being

- [Fabricated or induced illness: safeguarding children](#) - DfE, DH, HO
- [Rise Above: Free PSHE resources on health, wellbeing and resilience](#) - Public Health England
- [Medical-conditions: supporting pupils at school](#) - DfE statutory guidance
 - [Mental health and behaviour](#) - DfE advice

Homelessness

[Homelessness: How local authorities should exercise their functions](#) - Ministry of Housing, Communities & Local Government guidance

Private fostering

- [Private fostering: local authorities](#) - DfE statutory guidance

Radicalisation

- [Prevent duty guidance](#)- Home Office guidance
- [Prevent duty: additional advice for schools](#) and childcare providers - DfE advice
- [Educate Against Hate website](#) - DfE and Home Office advice
- [Prevent for FE and Training](#) - Education and Training Foundation (ETF)

Upskirting

- [Upskirting know your rights](#) – UK Government

Violence

- [Gangs and youth violence: for schools and colleges](#) - Home Office advice
- [Ending violence against women and girls 2016-2020 strategy](#) - Home Office strategy
- [Violence against women and girls: national statement of expectations for victims](#) - Home Office guidance
- [Sexual violence and sexual harassment between children in schools and colleges](#) - DfE advice
- [Serious violence strategy](#) - Home Office Strategy

Advice for governing bodies/proprietors and senior leaders

- [Childnet](#) provide guidance for schools on cyberbullying

- [Educateagainsthat](#) provides practical advice and support on protecting children from extremism and radicalisation
- [London Grid for Learning](#) provides advice on all aspects of a school or college’s online safety arrangements
- [NSPCC](#) provides advice on all aspects of a school or college’s online safety arrangements
- [Safer recruitment consortium](#) “guidance for safe working practice”, which may help ensure staff behaviour policies are robust and effective
- [Searching screening and confiscation](#) is departmental advice for schools on searching children and confiscating items such as mobile phones
- [South West Grid for Learning](#) provides advice on all aspects of a school or college’s online safety arrangements
- [Use of social media for online radicalisation](#) - A briefing note for schools on how social media is used to encourage travel to Syria and Iraq
- UK Council for Internet Safety have provided advice on [Sharing nudes and semi nudes](#) and [using-external-visitors-to-support-online-safety-education](#)

Remote education, virtual lessons and live streaming

- [Case studies](#) on remote education practice are available for schools to learn from each other
- [Departmental guidance on safeguarding and remote education](#) including planning remote education strategies and teaching remotely
- [London Grid for Learning](#) guidance, including platform specific advice
- [National cyber security centre](#) guidance on choosing, configuring and deploying video conferencing
- [National cyber security centre](#) guidance on how to set up and use video conferencing
- [UK Safer Internet Centre](#) guidance on safe remote learning

Support for children

- [Childline](#) for free and confidential advice
- [UK Safer Internet Centre](#) to report and remove harmful online content
- [CEOP](#) for advice on making a report about online abuse

Parental support

- [Childnet](#) offers a toolkit to support parents and carers of children of any age to start discussions about their online life, to set boundaries around online behaviour and technology use, and to find out where to get more help and support
- [Commonsensemedia](#) provide independent reviews, age ratings, & other information about all types of media for children and their parents
- [Government advice](#) about protecting children from specific online harms such as child sexual abuse, sexting, and cyberbullying
- [Government advice](#) about security and privacy settings, blocking unsuitable content, and parental controls
- [Internet Matters](#) provide age-specific online safety checklists, guides on how to set parental controls on a range of devices, and a host of practical tips to help children get the most out of their digital world
- [Let’s Talk About It](#) provides advice for parents and carers to keep children safe from online radicalisation
- [London Grid for Learning](#) provides support for parents and carers to keep their children safe online, including tips to keep primary aged children safe online

- [Lucy Faithfull Foundation StopItNow](#) resource can be used by parents and carers who are concerned about someone's behaviour, including children who may be displaying concerning sexual behaviour (not just about online)
- [National Crime Agency/CEOP Thinkuknow](#) provides support for parents and carers to keep their children safe online
- [Net-aware](#) provides support for parents and carers from the NSPCC and O2, including a guide to social networks, apps and games
- [Parentzone](#) provides help for parents and carers on how to keep their children safe online
- [Parent info](#) from Parentzone and the National Crime Agency provides support and guidance for parents from leading experts and organisations
- [UK Safer Internet Centre](#) provide tips, advice, guides and other resources to help keep children safe

Annex A – Responding to lockdown procedures and Remote Learning if required.

This additional policy and risk assessment for online learning should be read alongside MMF's Child Protection and Safeguarding Policy and the Department of Education guidance when issued to all schools.

Merton Council has issued emergency arrangements during lockdown periods. Details of which are:

- The Multi Agency Safeguarding Hub (MASH) will continue to function as normal.
- First Response will continue to run as a Duty Team for incoming work.
- Family Wellbeing Duty will be set up to respond to open and high need families in their service to prevent escalation to social care. The team will also offer parenting guidance and advice via phone support to the families of all children open to Children's Social Care.
- A Central Duty Team will undertake visits for High Risk children.
- MMF has an Online Learning Policy