



**Five
Rivers®**

**FIVE RIVERS
CHILD CARE LTD**

Park House -
Child Protection
and
Safeguarding
Policy &
Procedure

'Five Rivers is committed to safeguarding and promoting the welfare of children and young people and expects all staff and volunteers to share this commitment'

Policy Owner	Headteacher
Authoriser	Head of Education
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1. Education Child Protection and Safeguarding Policy

1.1 Policy Statement

- 1.1.1 It is the company's responsibility to safeguard and promote the welfare of children. Children who are and feel safe make more successful learners. Policies will be reviewed annually, unless an incident or new legislation or guidance suggests the need for an earlier date of review.
- 1.1.2 We recognise our moral and statutory responsibility to safeguard and promote the welfare of all children. We endeavour to provide a safe and welcoming environment where children are respected and valued. We are alert to the signs of abuse and neglect and follow our procedures to ensure that children receive effective support, protection and justice.
- 1.1.3 Every person who works with children and young people has a responsibility under child protection to take any action necessary to protect the child. In terms of any member of staff, this will usually extend to the passing over of information to someone in a more senior position and they will co-ordinate matters from there on: however staff at any time independently can contact the local authority duty service with any concerns they may have regarding the safety and well-being of a young person. It is the responsibility of the local authority social care to initiate any action in conjunction with local police where an incident or investigation is required. Five Rivers should relay the information to the placing authority and attend any of the follow-up meetings as requested.

1.2 Terms and Definitions

- 1.2.1 The below table sets out a number of terms and definitions used within this document:

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

1.3.1 Five Rivers Child Care supports the objectives of the General Data Protection Regulation (GDPR) and the Data Protection Act 2018 and other legislation relating to Data Processing, including the Human Rights Act 1998, Regulation of Investigatory Powers Act 2000 and the Freedom of Information Act 2000. Five Rivers Child Care has a statutory obligation to process personal data in accordance with the provisions of the General Data Protection Regulation (GDPR) and the Data Protection Act 2018

1.3.2 Every member of Five Rivers Child Care has an obligation to ensure that the information they process (use) is collected, maintained and disclosed in accordance with the General Data Protection Regulation (GDPR) and the Data Protection Act 2018 and the Five Rivers Child Care Data Protection Policy.

1.4 Disclosure of Information

1.4.1 Any use or disclosure of information held within Five Rivers Child Care, without there being a legitimate purpose or legal basis, will be classed as unauthorised and is a criminal offence under Section 55 of the Act Right of Access (Subject Access Requests).

1.5 Further Information

1.5.1 This guidance is issued under:

- Section 157 and 175 of the Education Act 2002.
- Section 7 of the Local Authority Social Services Act 1970, which requires local authorities in their social services functions to act under the general guidance of the Secretary of State;
- Section 11 (4) of the Children Act 2004 which requires each person or body to which the section 11 duty applies to have regard to any guidance given to them by the Secretary of State; and Section 16 of the Children Act 2004, which states that local authorities and each of the statutory partners must, in exercising their functions relating to Local Safeguarding Children Boards, have regard to any guidance given to them by the Secretary of State.
- Female Genital Mutilation Act 2003

- Counter-Terrorism and Security Act 2015

1.5.2 The school will act in accordance with the above legislation and the guidance offered in:

- "Working together to safeguard children" 2018
- "What to do if you are worried a child is being abused – advice for practitioners"
- "Keeping Children Safe in Education September 2018"
- "The Prevent duty" 2015
- "Children missing education" 2015

1.5.3 All staff must ensure that they have read all policies relating to the safeguarding of children and sign the document at the end of this policy. Child Protection contacts: A number of staff are available to act as contact points in case of queries:

Safeguarding Contact Details

Please see supporting document linked to the school listed below

Appendix A – Reporting Safeguarding Concerns – Park House

2. Education Child Protection and Safeguarding Procedure

2.1 Child Protection and Safeguarding

- 2.1.1 Safeguarding, and promoting the welfare of children, is a broader term than child protection. It encompasses protecting children from maltreatment, preventing impairment of children's health or development, and ensures children grow up in safe circumstances.
- 2.1.2 Child protection is part of this definition and refers to activities undertaken to prevent children suffering, or likely to suffer, significant harm.
- 2.1.3 Each Local Safeguarding Children Board (LSCB) has a detailed set of safeguarding procedures which includes actions to be taken in all child protection matters. The procedure that follows extracts the relevant messages from these comprehensive procedures and applies to them to the context of the work at Five Rivers.
- 2.1.4 **Staff** refers to all those working for or on behalf of the company, school, full time or part time, in either a paid or voluntary capacity.
- 2.1.5 **Child** refers to all young people who have not yet reached their 18th birthday.
- 2.1.6 Parent refers to birth parents and other adults who are in a parenting role, for example step-parents, foster carers and adoptive parents.
- 2.1.7 Staff should remember the fundamental rule in child protection, which is that they never promise the child secrecy to information they may share and that they should continue to remind young people of their duty to share information where they feel the child may be at risk should they fail to do so.

2.2 School Commitment

2.2.1 “We recognise that for children high self-esteem, confidence, supportive friends and clear lines of communication with a trusted adult helps prevention.”

2.2.2 Our school will therefore:

- Establish and maintain an ethos where children feel secure and are encouraged to talk and are listened to through.
- Ensure that children know that there are adults in the school who they can approach if they are worried or in difficulty by making ourselves openly available, and prepared to give time to listen to children. There is also a clear procedure in place should the young person or staff member feel uncomfortable with any presenting one-to-one situation.
- Include in the curriculum activities and opportunities for PSE, which equip children with the skills they need to, stay safe from abuse.
- Include in the curriculum material, which will help children develop realistic attitudes to the responsibilities of adult life, particularly with regard to childcare and parenting skills.

2.3 Aims and Objectives

2.3.1 These procedures ensure that all staff and parents/carers in our school are clear about the actions necessary with regard to a child protection issue. Its aims are:

- To raise the awareness of all staff and identify responsibility in reporting possible cases of abuse
- To ensure effective communication between all staff when dealing with child protection issues and
- To lay down the correct procedures for those who encounter an issue of child protection.

2.3.2 The school will strive to create an atmosphere in which children feel able and safe to talk about their worries and fears. Staff will listen carefully to anything children want to tell them. They will:

- **not** ask leading questions
- **not** promise to keep the matter secret
- **not** attempt to investigate a situation themselves.

2.4 Good Practice Guidelines

2.4.1 To meet and maintain our responsibilities towards children, the school agrees to the following standards of good practice.

2.5 Duty of Care

2.5.1 All staff are accountable for the way in which they exercise authority; manage risk; use resources; protect students from discrimination and avoidable harm.

2.5.2 This means that staff should:

- understand the responsibilities, which are part of their employment or role, and be aware that sanctions will be applied if these provisions are breached
- always act, and be seen to act, in the students' best interests
- avoid any conduct which would lead any reasonable person to question their motivation and intention; take responsibility for their own actions and behaviour.

2.6 Exercise of Professional Judgement

2.6.1 This guidance cannot provide a complete checklist of what is, or is not, appropriate behaviour for staff. It does highlight however, behaviour that is illegal, inappropriate or inadvisable. Individuals are expected to make judgements about their behaviour in order to secure the best interests and welfare of the students in their charge and in so doing, will be seen to be acting reasonably.

2.6.2 This means that where no specific guidance exists staff should:

- discuss the circumstances that informed their action, or their proposed action, with a senior colleague. This will help to ensure that the safest practices are employed and reduce the risk of actions being misinterpreted
- always discuss any misunderstanding, accidents or threats with a senior manager
- record discussions and actions taken, giving justification where appropriate.

2.7 Power and Positions of Trust

2.7.1 As a result of the authority invested in their role, all adults working with children, young people and vulnerable adults in education settings are in positions of trust in relation to the young people in their care. A relationship between a member of staff and a student cannot be a relationship between equals. There is potential for exploitation and harm of vulnerable young people, and staff have a responsibility to ensure that an unequal balance of power is not used for personal advantage or gratification. Wherever possible, staff should avoid behaviour which might be misinterpreted by others, and report and record any incident with this potential.

2.7.2 Where a person aged 18 or over is in a position of trust with a student under 18, it is an offence for that person to engage in any sexual activity with or in the presence of that student, or to cause or incite that student to engage in or watch sexual activity.

2.7.3 This means that staff should not:

- use their position to gain access to information for their own advantage and/or a student or family's detriment; use their power to intimidate, threaten, bully, coerce or undermine students
- use their status and standing to form or promote relationships with students, which are of a sexual nature
- display behaviour that may be viewed as favouritism.

2.8 Confidentiality

- 2.8.1 Members of staff may have access to confidential information about students in order to undertake their everyday responsibilities. In some circumstances staff may be given additional highly sensitive or private information. They should never use confidential or personal information about a student or his/her family for their own, or others' advantage (including that of partners, friends, relatives or other organisations). Information must never be used to intimidate, humiliate, or embarrass the student.
- 2.8.2 Confidential information about a child or young person should never be used casually in conversation or shared with any person other than on a need to know basis. In circumstances where the student's identity does not need to be disclosed, the information should be used anonymously.
- 2.8.3 There are some circumstances in which a member of staff may be expected to share information about a student, for example when abuse is alleged or suspected. In such cases, individuals have a duty to pass information on, without delay, to the staff with designated child protection responsibilities. If a member of staff is in any doubt about whether to share information or keep it confidential he or she should seek guidance from a senior member of staff. Any media or legal enquiries should be passed to senior management.
- 2.8.4 This means that staff:
- are expected to treat information they receive about children and young people in a
 - are discreet and confidential manner
 - who are in any doubt about sharing information they hold or which has been requested of them, should seek advice from a senior member of staff
 - need to be cautious when passing information to others, even a parent, about a child/young person
 - need to be vigilant that they do not inadvertently betray confidences in casual conversations with colleagues in staff rooms, corridors and in emails.
- 2.8.5 All staff have a responsibility to maintain public confidence in their ability to safeguard the welfare and best interests of children and young people. They should adopt high standards of personal conduct in order to maintain the confidence and respect of their peers, students and the public in general. There are risks involved with social networking sites.
- 2.8.6 This means that staff should not:
- behave in a manner which would lead any reasonable person to question their suitability to work with students or act as a role model. This applies both within and outside the working environment
 - make sexual remarks to a student (including email, text messages, phone, letter or other)
 - discuss their own sexual relationships with, or in the presence of, students
 - discuss student sexual relationships in inappropriate settings or contexts
 - have students as "friends" on social networking sites, as their propriety could be.

2.9 Dress and Appearance

2.9.1 A person's dress and appearance are matters of personal choice. However staff should consider the manner of dress and appearance appropriate to their professional role, which may be different to that adopted in their personal life. Staff should ensure they are dressed decently, safely and appropriately for the tasks they undertake. Those who dress or appear in a manner, which could be considered as inappropriate, could render themselves vulnerable to criticism or allegation.

2.9.2 This means that staff should wear clothing which:

- promotes a positive and professional image
- is appropriate to their role
- is not likely to be viewed as offensive, revealing, or sexually provocative
- does not distract, cause embarrassment or give rise to misunderstanding
- is not considered to be discriminatory.

2.10 Infatuations

2.10.1 Staff need to be aware that it is not uncommon for students to be strongly attracted to a member of staff and/or develop a heterosexual or homosexual infatuation. All situations should be responded to sensitively to maintain the dignity of all concerned. Staff should also be aware that such circumstances always carry a high risk of words or actions being misinterpreted and for allegations to be made against staff.

2.10.2 A member of staff, who becomes aware that a student may be infatuated with themselves or a colleague, should discuss this at the earliest opportunity with a senior colleague so that appropriate action can be taken. In this way, steps can be taken to avoid hurt and distress for all concerned.

2.10.3 This means that staff should:

- report any indications (verbal, written or physical) that suggest a student may be infatuated with a member of staff. This applies regardless of your relationship with the member of staff or the student. If you do not report such an incident, you are putting yourself in a vulnerable situation by observing incidents, which could be misconstrued, but not acting upon it, and therefore condoning it
- be careful when providing support to students that it is not being misconstrued.

2.11 Social Contact

2.11.1 Staff should not establish or seek to establish social contact with students for the purpose of securing a friendship or to pursue or strengthen a relationship. Even if a young person seeks to establish social contact, or if this occurs coincidentally, the member of staff should not enter into any social contact.

2.11.2 This means that staff should:

- report and record any situation which could be interpreted as compromising the school.

2.12 Physical Contact

- 2.12.1 There are occasions when it is entirely appropriate and proper for staff to have physical contact with students, but it is crucial that they only do so in ways appropriate to their professional role.
- 2.12.2 A 'no touch' approach is impractical for some situations and may in some circumstances be inappropriate. When physical contact is made with students this should be in response to their needs at the time, of limited duration and appropriate given their age, stage of development, gender, ethnicity, disability and background. Staff should therefore use their professional judgement at all times. Staff should be particularly aware of the possible implications of making physical contact in a situation when they are alone with the student.
- 2.12.3 If a member of staff believes that an action could be misinterpreted, the incident and circumstances should be recorded as soon as possible and discussed with their line manager.
- 2.12.4 Extra caution may be required where it is known that a student has suffered previous abuse or neglect. In the student's view, physical contact might be associated with such experiences and lead to staff being vulnerable to allegations of abuse.
- 2.12.5 This means that staff should:
- be aware that even well intentioned physical contact may be misconstrued by the student, an observer or by anyone to whom this action is described;
 - never touch a student in a way which may be considered indecent;
 - always be prepared to explain actions and accept that all physical contact be open to scrutiny.

2.13 Disclosures About Personal Life, Background and Opinions

- 2.13.1 Staff should be cautious when speaking to students about their personal life, background and opinions. This does not mean that any disclosures are inappropriate.
- 2.13.2 This means that staff should:
- never discuss their sex life with students
 - not cause students to feel at all responsible for a member of staff's personal situation or uncomfortable about the level of detail being disclosed
 - present balanced view points when discussing politically or socially sensitive issues.

2.14 Pupils in Distress

- 2.14.1 There may be occasions when a distressed student needs comfort and reassurance. This may include physical contact. Staff should remain self-aware at all times in order that their contact is not threatening, intrusive or subject to misinterpretation. If staff are concerned that a student may cause themselves harm please contact DSP AND DEPUTY for advice.
- 2.14.2 This means that staff should:
- consider the way in which they offer comfort to a distressed student

- always tell a colleague when and how they offered comfort to a distressed student
- record situations which may give rise to concern.

2.15 Behaviour Management

2.15.1 All students have a right to be treated with respect and dignity. The use of humour can help to defuse a situation. The use of sarcasm, demeaning or insensitive comments towards students is not acceptable in any situation.

2.15.2 This means that staff should:

- use TCI practice
- not use force as a form of punishment
- try to defuse situations before they escalate
- keep parents/carers informed of any sanctions as appropriate.

2.16 Sexual Contact with Young People

2.16.1 Any sexual behaviour by a member of staff with or towards a child or young person is both inappropriate and illegal. Children and young people are protected by the same laws as adults in relation to non-consensual sexual behaviour. They are additionally protected by specific legal provisions regardless of whether the child or young person consents or not. The Sexual Offences Act 2003 makes it a criminal offence for a person over the age of 18, in a position of trust, to engage in any sexual activity with a child under 18. This applies even if the member of staff does not teach or support the child directly. This includes the prohibition on adults in a position of trust.

2.16.2 The sexual activity referred to does not just involve physical contact including penetrative and non-penetrative acts. It may also include non-contact activities, such as causing students to engage in or watch sexual activity or the production of pornographic material.

2.16.3 Staff should be aware that conferring special attention and favour upon a student might be construed as being part of a 'grooming' process, which is an offence.

2.16.4 This means that staff should:

- not pursue sexual relationships with children and young people either in or out of school
- avoid any form of communication with a child or young person which could be interpreted as sexually suggestive or provocative i.e. verbal comments, letters, notes, electronic mail, phone calls, texts, physical contact.

2.17 Educational Visits and After School Activities

2.17.1 Staff should take particular care when supervising students on any activity. During school activities that take place off the school site or out of school hours, a more relaxed discipline or informal dress and language code may be acceptable. However, staff remain in a position of trust and need to ensure that their behaviour cannot be interpreted as seeking to establish an inappropriate relationship or friendship.

2.17.2 Health and Safety arrangements require members of staff to keep colleagues/employers aware of their whereabouts, especially when involved in an out of school activity.

2.17.3 This means that staff should:

- conduct a risk assessment, signed and agreed by your manager
- always have another adult present in out of school activities, unless otherwise agreed with senior staff in school
- ensure that their behaviour remains professional at all times
- staff should never drink alcohol when supervising students.

2.18 Photography, Videos, Creative Arts

- 2.18.1 Many school activities involve recording images. These may be undertaken as part of the curriculum, extra school activities, for publicity, or to celebrate achievement. Staff should remain sensitive to any students who appear uncomfortable and should recognise the potential for misinterpretation.
- 2.18.2 Certain photos or images of individuals we use in school would be considered as “personal data” under the Data Protection Act – particularly where the individual is the focus of the image and the image includes biographical facts about that individual. Staff must ensure that such images are handled properly, in line with the School’s Data Protection Policy. In particular, staff are expected to:
- think about the individuals concerned - ensuring that the way the image is obtained or used is fair to them and is not likely to cause them distress
 - be aware of the potential for misuse of personal data by others – particularly if it is put on the website
 - ensure images are securely stored and used only by those authorised to do so.
- 2.18.3 This means that staff should:
- be clear about the purpose of the activity and about what will happen to the photographs when the lesson/activity is concluded
 - ensure that a senior member of staff is aware that the photography/image equipment is being used and for what purpose
 - ensure that all images are available for scrutiny in order to screen for acceptability;
 - be able to justify images of students in their possession
 - avoid using DVD / film footage with age ratings above the teaching group age
 - This means that staff should not: take, display or distribute images of students unless they have consent to do so.

2.19 Mobile phones and cameras

- 2.19.1 Pupils are not allowed to use mobile phones in school.
- 2.19.2 Staff are allowed to bring their personal phones to school for their own use, but will limit such use to non-contact time when pupils are not present. Staff members’ personal phones will remain in their bags or cupboards during contact time with pupils.
- 2.19.3 Staff will not take pictures or recordings of pupils on their personal phones or cameras.
- 2.19.4 We will follow the General Data Protection Regulation and Data Protection Act 2018 when taking and storing photos and recordings for use in the school.

2.20 Internet Use

- 2.20.1 Infrastructure/equipment, filtering and monitoring: The school will be responsible for ensuring that the school infrastructure/network is as safe and secure as is reasonably possible and that policies and procedures approved within this policy are implemented.

2.20.2 Each school has a clear policy regarding the use of ICT. Under no circumstances should adults or young people in school access inappropriate images, nor should school equipment be used for this at any time.

2.20.3 This means that staff should:

- follow the school guidelines on the use of IT equipment.

2.21 Site Security

2.21.1 All employees have an ID badge. All employees must sign in when entering the school.

2.21.2 All visitors to the school must sign in the Visitors book. This includes any contractors. No visitor must be left unsupervised at any time.

2.22 First Aid and Administration of Medication

2.22.1 Each school has a trained first aiders/appointed person. Staff should receive appropriate training before administering first aid or medication. When administering first aid, wherever possible, staff should ensure that another adult is present, or aware of the action being taken. Parents/carers should always be informed when first aid has been administered.

2.22.2 This means that staff should:

- adhere to the school guidelines on these matters;
- make other staff aware of the task being undertaken;
- explain to the child what is happening.

2.23 Physical Intervention by Staff

2.23.1 There may be times when adults in our school, in the course of their duty, use physical intervention to restrain children. This should be exercised in line with the school policy and guidance on appropriate restraint. The Headteacher requires the adult involved in any such incident to report this to him/her immediately (unless it was them who has exercised the restraint), and to record it in on a Critical Incident form. These will be sent to the Head of Education who will send on for governance. Any witnesses to the incident must be identified.

2.23.2 When applying disciplinary measures such as restraint or isolation in response to incidents involving children with SEN and disabilities, staff consider all risks carefully and are trained in TCI. To safeguard a pupil or student and others, it may be necessary to use restraint and yet restraint is likely to impact on the well-being of the child. All children have a behaviour management plan and an individual risk assessment.

2.24 Whistleblowing

2.24.1 Whistleblowing is the mechanism by which staff can voice their concerns, made in good faith, without fear of repercussion – see the Whistleblowing policy.

2.24.2 This means that staff should:

- report any behaviour by colleagues that raises concern.

2.24.3 All staff have a duty to report any child protection concerns to the Headteacher (if any staff are involved) or Designated safeguarding lead for child protection for child issues. They must never investigate situations themselves. This applies regardless of the relationship with the member of staff or the student. If staff do not report such an incident, they are putting themselves in a vulnerable situation. By observing incidents, which could be misconstrued, but not acting upon it, staff could be regarded as condoning the behaviour.

2.24.4 Child protection concerns may often arise when staff may notice a change in a child's behaviour, physical or emotional state. Suspicion or evidence of a child protection matter could result from:

- A child disclosing that they have been abused or injured.
- Staff observing unusual behaviour from the child.
- Staff observing suspicious injuries on a child.
- Direct observation of an act against a child, which appears to be abusive.
- Direct or indirect information from another raising concerns about a child being abused.

2.24.5 The child protection concern could include physical, emotional, sexual abuse or neglect. There are various expert sources of advice on the signs of abuse and neglect. Each area's Local Safeguarding Children Board (LSCB) should be able to advise on useful material, including training options.

2.25 Types of Abuse and Neglect

2.25.1 Safeguarding is everybody's business. In law, young people are children until their 18th birthday. Child abuse can occur at any age from birth onwards. There can also be serious concerns pre-birth.

2.25.2 Abuse and neglect can affect a child at any age. The abuse can be so damaging that some children may take a long time to recover. In some cases the effects of the abuse will remain with the person forever.

2.25.3 Abuse: a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others (e.g. via the internet). They may be abused by an adult or adults or another child or children. There are many different forms of child abuse. Children can be abused by the direct actions of an adult, such as a physical beating or because an adult fails to act, for example, by failing to provide proper food or clothing for a child.

2.25.4 Child abuse usually falls into one or more of four categories: physical abuse, emotional abuse, sexual abuse and neglect.

- Physical abuse
- Emotional abuse
- Sexual abuse

- Neglect

Physical Abuse

2.25.5 Most children will collect cuts and bruises in their daily life. These are likely to be in places where there are bony parts of their body, like elbows, knees and shins. Some children however, will have bruising which can almost only have been caused non-accidentally. An important indicator of physical abuse is where bruises or injuries are unexplained or the explanation does not fit the injury. A delay in seeking medical treatment for a child when it is obviously necessary is also a cause for concern. Bruising may be more or less noticeable on children with different skin tones or from different racial groups and specialist advice may need to be taken.

2.25.6 Patterns of bruising that are suggestive of physical child abuse include:

- bruising in children who are not independently mobile
- bruising in babies
- bruises that are seen away from bony prominences
- bruises to the face, back, stomach, arms, buttocks, ears and hands
- multiple bruises in clusters; multiple bruises of uniform shape
- bruises that carry the imprint of an implement used, hand marks or fingertips
- although bruising is the commonest injury in physical abuse, fatal non-accidental head injury and non-accidental fractures can occur without bruising. Any child who has unexplained signs of pain or illness should be seen promptly by a doctor.

2.25.7 Other physical signs of abuse may include:

- cigarette burns
- adult bite marks
- broken bones
- scalds.

2.25.8 Changes in behaviour, which can also indicate physical abuse:

- fear of parents being approached for an explanation
- aggressive behaviour or severe temper outbursts
- flinching when approached or touched
- reluctance to get changed, for example wearing long sleeves in hot weather
- depression
- withdrawn behaviour
- running away from home.

Emotional Abuse

2.25.9 Emotional abuse is the persistent emotional ill treatment of a child to cause severe and persistent effects on the child's emotional development, and may involve:

- Telling a child that they are worthless, unloved, inadequate, or valued only to meet the needs of another person.

- Imposing developmentally inappropriate expectations, for example interactions beyond the child's developmental capability, overprotection, limitation of exploration and learning, preventing the child from participation in normal social interaction.
- Causing a child to feel frightened or in danger, for example witnessing domestic violence, seeing or hearing the ill treatment of someone else.
- Exploitation or corruption of a child.
- Online bullying.

2.25.10 Some level of emotional abuse is involved in most types of ill treatment of children, though emotional abuse may occur alone. Emotional abuse can be difficult to measure, and often children who appear well cared for may be emotionally abused by being taunted, put down or belittled. They may receive little or no love, affection or attention from their parents or carers. Emotional abuse can also take the form of children not being allowed to mix/play with other children.

2.25.11 The signs of emotional abuse may include:

- a failure to thrive or grow, particularly if the child puts on weight in other circumstances, e.g., in hospital or away from their parents' care
- sudden speech disorders
- developmental delay, either in terms of physical or emotional progress.

2.25.12 Changes in behaviour, which can also indicate emotional abuse include:

- neurotic behaviour, e.g., sulking, hair twisting, rocking
- being unable to play;
- fear of making mistakes;
- self-harm;
- fear of parent being approached regarding their behaviour.

Sexual Abuse

2.25.13 Adults who use children to meet their own sexual needs abuse both girls and boys of all ages, including infants and toddlers.

2.25.14 Usually, in cases of sexual abuse, it is the child's behaviour which may cause you to become concerned, although physical signs can also be present. In all cases, children who talk about sexual abuse do so because they want it to stop. It is important, therefore, that they are listened to and taken seriously.

2.25.15 The physical signs of sexual abuse may include:

- pain or itching in the genital/anal areas
- bruising or bleeding near genital/anal areas
- sexually transmitted disease
- vaginal discharge or infection
- stomach pains discomfort when walking or sitting down
- pregnancy.

2.25.16 Changes in behaviour, which can also indicate sexual abuse include:

- sudden or unexplained changes in behaviour e.g. becoming aggressive or withdrawn;
- fear of being left with a specific person or group of people;
- having nightmares, running away from home;
- sexual knowledge which is beyond their age or developmental level;
- sexual drawings or language;
- bedwetting;
- eating problems such as overeating or anorexia;
- self-harm or mutilation, sometimes leading to suicide attempts;
- saying they have secrets they cannot tell anyone about;
- substance or drug abuse;
- suddenly having unexplained sources of money;
- not allowed to have friends (particularly in adolescence);
- acting in a sexually explicit way towards adults.

Neglect

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

Examples include failure:

- during pregnancy as a result of maternal substance misuse;
- to provide adequate food, clothing or shelter;
- to protect from physical and emotional harm or danger;
- to meet or respond to basic emotional needs;
- to ensure adequate supervision including the use of adequate care-takers;
- to ensure access to appropriate medical care or treatment;
- to make sure their educational needs are met; or
- to make sure their opportunities for intellectual stimulation are met.

2.25.18 Neglect can be a difficult form of abuse to recognise, yet have some of the most lasting and damaging effects on children. The physical signs of neglect may include:

- constant hunger, sometimes stealing food from other children
- constantly dirty or smelly
- loss of weight, or being constantly underweight
- inappropriate dress for the conditions.

2.25.19 Changes in behaviour which can also indicate neglect may include:

- complaining of being tired all the time
- not requesting medical assistance and/or failing to attend appointments
- having few friends
- mentioning their being left alone or unsupervised.

2.25.20 If you suspect child abuse:

- **Do** listen to the child.
- **Do** take what the child says seriously.
- **Do** act quickly.

- **Do** share your worries with Children's Social Care, the police or the NSPCC - they are there to help you.
- **Do** continue to offer support to the child.
- **Don't** delay.
- **Don't** probe or push the child for explanations.
- **Don't** assume that someone else knows and will help the child. You must act.
- **Don't** be afraid to voice your concerns, the child may need urgent protection and help.

2.25.21 The above list is not meant to be definitive but as a guide to assist you. It is important to remember that many children and young people will exhibit some of these indicators at some time, and the presence of one or more should not be taken as proof that abuse is occurring.

2.25.22 All staff should be aware that abuse, neglect and safeguarding issues are rarely standalone events that can be covered by one definition or label. In most cases multiple issues will overlap with one another.

2.25.23 Some incidents of harm to a child are easily recognisable; many are not. Babies, young children and children with disabilities are particularly vulnerable when subject to abuse.

2.25.24 It is not possible to list all the circumstances that may result in the likelihood of significant harm. However, the following circumstances would normally indicate the need for a referral:

- Any allegation of sexual abuse.
- Parents whose behaviour may present a high risk to children because of:
 - Domestic violence.
 - Drug and alcohol abuse.
 - Mental health problems.
- Physical injury caused by assault or neglect, which requires medical attention.
- Repeated incidents of physical harm that are unlikely to constitute significant harm in themselves but collectively may do so.
- Contact with a person assessed as presenting a risk to children.
- Children who live in a low warmth, high criticism environment which is likely to have an adverse impact on their emotional development.
- Children who suffer from persistent neglect.
- Children living in a household where there is domestic violence likely to lead to physical or emotional hardship.
- A child living in a household or having significant contact with a person convicted of an offence listed in Schedule 1 of the Children and Young Persons Act 1933 (as amended).
- Children who may be involved in exploitation.
- Other circumstances where professional judgement and/or evidence suggests that a child's health, development or welfare may be significantly harmed.
- Extreme bullying.
- Physical or emotional hardship.

2.26 Abuse & Neglect Support

- 2.26.1 We have a statutory duty to make enquiries where we have reasonable cause to suspect that a child is suffering or is likely to suffer significant harm, or is subject to an emergency protection order or police protection. Children's Social Care carries out these responsibilities on behalf of Somerset County Council. We do not do this alone. We consult with other agencies and professionals. We take a lead role in managing individual cases but also rely on the assistance and co-operation of professionals in other agencies.
- 2.26.2 All children have a right to be safe from harm. Everyone is responsible for helping to keep children safe. If someone tells us that they are concerned about a child we need to find out more. The law says that children's services must ask questions to find out if a child is at risk of harm. If a child or young person appears to be at risk because of neglect or abuse, we will investigate and make sure that the child is safe. We will carry out a thorough investigation, talking with families, doctors, health visitors, teachers and people who may be able to help us find a way to keep a child safe.
- 2.26.3 If we have special concerns about the child, we may hold a Child Protection Conference. This is a meeting with the family, Social Worker and other professionals to try to find a solution to the difficulties at home. We will always try to work with families to support and help them cope.
- 2.26.4 If we assess that abuse has, or may have taken place, the agencies involved will always consider what is best for the child - how to protect them and keep them safe.

2.27 Specific Safeguarding Issues

- 2.27.1 All staff should be aware that behaviours linked to the likes of drug taking, alcohol abuse, truanting and sexting put children in danger.
- 2.27.2 All staff should be aware safeguarding issues can manifest themselves via peer on peer abuse. This is most likely to include, but not limited to: bullying (including cyber bullying), gender based violence/sexual violence, sexual harassment and sexting. Staff should be clear as to our policy and procedures with regards to peer on peer abuse.
- 2.27.3 Expert and professional organisations provide up-to-date guidance and practical support on specific safeguarding issues. For example information for schools and colleges can be found on the TES, MindEd and the NSPCC websites. All staff can access government guidance as required on the issues listed below via GOV.UK and other government websites. Staff should particularly be vigilant where there have been instances of:
- Bullying
 - Problems following a parents visit
 - Running away
 - Knowledge of young people being involved in sexual activity
 - Domestic violence
 - Female genital mutilation (FGM)
 - Forced marriage

- Faith abuse
- Substance misuse
- Gang activity
- Knowledge of young people being involved in any radicalization or extremist behaviour
- A child going missing from education is a potential indicator of abuse or neglect. Staff members should follow Five Rivers procedures for dealing with children who go missing from education, particularly on repeat occasions, to help identify the risk of abuse and neglect including sexual abuse or exploitation and to help prevent the risks of their going missing in future.

Please see separate appendices for guidance

- 2.27.4 Within the curriculum, pupils will be taught how to understand, respond and calculate risk effectively and to be aware of support available to them.
- 2.27.5 Work experience: all placements are vetted according to current guidelines. Most students receive a visit from a member of staff part-way through their placement and all are provided with contact numbers for the school in case they need to call for assistance.

2.28 Missing from Education

- 2.28.1 All of our schools will inform each local authority of any pupil who is going to be deleted from the admission register where they:
- have been taken out of school by their parents and are being educated outside the school system e.g. home education
 - have ceased to attend school and no longer live within reasonable distance of the school at which they are registered
 - have been certified by the school medical officer as unlikely to be in a fit state of health to attend school before ceasing to be of compulsory school age, and neither he/she nor his/her parent has indicated the intention to continue to attend the school after ceasing to be of compulsory school age
 - are in custody for a period of more than four months due to a final court order and the proprietor does not reasonably believe they will be returning to the school at the end of that period, or,
 - have been permanently excluded.
- 2.28.2 The school will inform the local authority of any pupil who fails to attend school regularly, or has been absent without the school's permission for a continuous period of 10 school days or more.
- 2.28.3 We will ensure appropriate safeguarding responses to children who go missing from education, particularly on repeat occasions, to help identify the risk of abuse and neglect including sexual abuse or exploitation and to help prevent the risks of their going missing in future.
- 2.28.4 The government's missing children and adults strategy and the department's children missing education guidance provides information that governing bodies and proprietors

might find useful when considering children who go missing from education. Further guidance: Children missing education, September 2018.

2.29 Contextual safeguarding

- 2.29.1 Contextual Safeguarding has been developed by Carlene Firmin at the University of Bedfordshire over the past six years to inform policy and practice approaches to safeguarding adolescents. Contextual Safeguarding is an approach to understanding, and responding to, young people's experiences of significant harm beyond their families. It recognises that the different relationships that young people form in their neighbourhoods, schools and online can feature violence and abuse. Parents and carers have little influence over these contexts, and young people's experiences of extra-familial abuse can undermine parent-child relationships.
- 2.29.2 Therefore children's social care practitioners need to engage with individuals and sectors who do have influence over/within extra-familial contexts, and recognise that assessment of, and intervention with, these spaces are a critical part of safeguarding practices. Contextual Safeguarding, therefore, expands the objectives of child protection systems in recognition that young people are vulnerable to abuse in a range of social contexts.

2.30 The Designated Safeguarding Lead

- 2.30.1 There is a named senior person in each of our schools who is the designated teacher for child protection, who is responsible for co-ordinating child protection issues within the school and for liaising with other services.
- 2.30.2 The Designated safeguarding lead for Child Protection will be released to attend specialised child protection training, which will be up-dated at least every two years.
- 2.30.3 Staff working for Five Rivers need to be clear on the fact that it is not their responsibility to investigate any concerns.
- 2.30.4 The broad areas of responsibility for the designated safeguarding lead are:

2.31 Managing referrals

- 2.31.1 Refer all cases of suspected abuse to the local authority children's social care and:
- 2.31.2 The local authority designated officer (LADO) for child protection concerns (all cases which concern a staff member);
- 2.31.3 Disclosure and Barring Service (cases where a person is dismissed or left due to risk/harm to a child); and/or Police (cases where a crime may have been committed).
- 2.31.4 Liaise with the Headteacher to inform them of issues especially ongoing enquiries under section 47 of the Children Act 1989 and police investigations Act as a source of support, advice and expertise to staff on matters of safety and safeguarding and when deciding whether to make a referral by liaising with relevant agencies.

2.32 Training

2.32.1 The designated safeguarding lead will receive appropriate training carried out every two years in order to:

- Understand the assessment process for providing early help and intervention, for example through locally agreed common and shared assessment processes such as early help assessments
- Have a working knowledge of how local authorities conduct a child protection case conference and a child protection review conference and be able to attend and contribute to these effectively when required to do so
- Ensure each member of staff has access to and understands the company's child protection policy and procedures, especially new and part time staff
- Be alert to the specific needs of children in need and those with special educational needs and young carers
- Be aware that children with SEN and disabilities are more prone to peer group isolation than other children
- Be able to keep detailed, accurate, secure written records of concerns and referrals
- Obtain access to resources and attend any relevant or refresher training courses
- Encourage a culture of listening to children and taking account of their wishes and feelings, among all staff, in any measures the school or college may put in place to protect them.

2.32.2 All staff members will read the Safeguarding Policy in addition to Part One of Keeping Children Safe in Education 2018 (KCSIE) and sign to say they have done so. All staff complete online safeguarding and child protection training, which will be carried out annually. In addition all staff members will receive safeguarding and child protection updates (for example, via email and staff meetings), as required, but at least annually, to provide them with relevant skills and knowledge to safeguard children effectively.

2.32.3 All staff will be aware of the early help process, and understand their role in it. This includes identifying emerging problems, liaising with the designated safeguarding lead, sharing information with other professionals to support early identification and assessment and, in some cases, acting as the lead professional in undertaking an early help assessment.

2.32.4 All staff will be aware of the process for making referrals to children's social care and for statutory assessments under the Children Act 1989, especially section 17 (children in need) and section 47 a child suffering, or likely to suffer, significant harm) that may follow a referral, along with the role they might be expected to play in such assessments.

2.32.5 All staff working in school are trained in Prevent Awareness.

2.33 Raising Awareness

2.33.1 The designated safeguarding lead will ensure the company's policies are known and used

appropriately:

- Ensure the school's child protection policy is reviewed annually and the procedures and implementation are updated and reviewed regularly, and work with the proprietors regarding this
- Ensure the child protection policy is available publicly and parents are aware of the fact that referrals about suspected abuse or neglect may be made and the role of the school
- Link with the local authority LSCB to make sure staff are aware of training opportunities and the latest local policies on safeguarding
- Where children leave, ensure their child protection file is copied for any new placement as soon as possible but transferred separately from the main pupil file.
- Where reasonably possible, hold more than one emergency contact number for each pupil.

2.34 Records Kept by the Designated Safeguarding Lead

- 2.34.1 They will include all original notes in the child's own language and, where necessary, relevant drawings, clothing or a young person's writing. This should be handed to the Police if there is an investigation.
- 2.34.2 Records are kept in a file in a room locked by the Designated Teacher. Child protection records should be separate from pastoral records. Child protection records should be passed to a child's new school by the Designated Person– again separate from the pastoral records. Child protection records should only be shared with colleagues on a "need to know" basis.
- 2.34.3 Child protection records should not be shared with parents/carers without first seeking legal advice from a LA, from Social Services or from a school's legal advisor. These records may contain third party and other confidential information.
- 2.34.4 There will be occasions when you suspect that a child may be at serious risk, but you have no 'real' evidence. The child's behaviour may have changed, their artwork could be bizarre or you may have noticed other physical but inconclusive signs. In these circumstances, you should try to give the child the opportunity to talk. The signs you have noticed may be due to a variety of factors and it is fine to ask the child if they are alright or if you can help in any way.
- 2.34.5 Any member of staff who has knowledge of, or a suspicion that, a child is or has been suffering harm must refer their concern to the Designated Safeguarding Lead as soon as possible.
- 2.34.6 If your concerns relate to the behaviour of a member of staff in the school, contact should be made with the Headteacher or Head of Education. All allegations will be taken seriously and dealt with according to the guidance given in 'Safeguarding Children and Safer Recruitment in Education'. The relevant disciplinary procedures will be invoked and advice taken from the Local Authority.

2.34.7 The DSP AND DEPUTY will ensure a pupil's child protection file is transferred to their new school or college should they move on. This will be transferred separately from the main pupil file, ensuring secure transit, and confirmation of receipt should be obtained.

2.35 What School and College Staff Should do if a Child is in Danger or at Risk of Harm

2.35.1 If, a child is in immediate danger or is at risk of harm a referral should be made to children's social care and/or the police immediately. Anyone can make a referral. Where referrals are not made by the designated safeguarding lead the designated safeguarding lead should be informed, as soon as possible, that a referral has been made.

2.36 Early Help

2.36.1 Staff may be required to support other agencies in an early help assessment, in some cases acting as the lead professional. Any such cases should be kept under constant review and consideration given to a referral to children's social care for assessment for statutory services if the child's situation does not appear to be improving or is getting worse

2.37 General Advice on Whistleblowing

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

2.38.1 Staff can also refer to the company Whistleblowing Policy and Procedure

2.38 Notifying parents/carers

2.38.1 Where appropriate, we will discuss any concerns about a child with the child's parents/carers. The DSP AND DEPUTY will normally do this in the event of a suspicion or disclosure.

2.38.2 Other staff will only talk to parents/carers about any such concerns following consultation with the DSP AND DEPUTY.

2.38.3 If we believe that notifying the parents/carers would increase the risk to the child, we will discuss this with the local authority children's social care team before doing so.

2.38.4 In the case of allegations of abuse made against other children, we will normally notify the parents/carers of all the children involved.

2.39 Further Guidance: Sexting in Schools: Responding to Incidents and Safeguarding Young People.

2.39.1 This advice only covers the sharing of sexual imagery by young people. Creating and sharing sexual photos and videos of under-18s is illegal and therefore causes the greatest complexity for schools and other agencies when responding. It also presents a range of risks, which need careful management.

2.39.2 On this basis this advice introduces the phrase ‘youth produced sexual imagery’ and uses this instead of ‘sexting.’ This is to ensure clarity about the issues this advice addresses.

- ‘Youth produced sexual imagery’ best describes the practice because:
- ‘Youth produced’ includes young people sharing images that they, or another young person, have created of themselves.
- ‘Sexual’ is clearer than ‘indecent.’ A judgement of whether something is ‘decent’ is both a value judgement and dependent on context.
- ‘Imagery’ covers both still photos and moving videos.

2.39.3 The types of incidents, which this advice covers are:

- 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.

2.39.4 This advice does not cover:

- The sharing of sexual imagery of people under 18 by adults as this constitutes child sexual abuse and schools should always inform the police.
- Young people under the age of 18 sharing adult pornography or exchanging sexual texts which don’t contain imagery.

2.39.5 The department provides searching screening and confiscation advice for schools. Child Exploitation Online Protection Centre (CEOP) has recently updated their sexting guidance:

2.39.6 All staff must be aware of the different gender issues that can be prevalent when dealing with peer on peer abuse. This could for example include girls being sexually touched/assaulted or boys being subject to initiation/hazing type violence.

2.40 Managing Peer on Peer Allegations

2.40.1 Within our schools, there is an established ethos of respect, friendship, courtesy and kindness with clear expectations and consequences for unacceptable behaviour together with visible staff presence. Our schools seek to educate all pupils on healthy relationships through the curriculum, however we recognise despite this we need to be alert to peer on peer abuse.

2.40.2 It is important to recognise that children do engage in sexual play and experimenting, which is usually age appropriate. Child sexual abuse is a subject many people find very difficult to talk about.

2.40.3 However, the idea that children can sexually abuse others is still very hard for us to accept. The presence of one or more of the following points in situations where there has been sexual activity between children should always trigger some concern:

- There is an age difference of two years or more between the children
- One of the children is significantly more dominant than the other
- One of the children is significantly more vulnerable than the other eg. in terms of disability, confidence, physical strength
- There has been some use of threats, bribes or coercion to secure compliance or to maintain secrecy.

2.40.4 Different forms of peer on peer abuse can take, such as:

- Sexual violence and sexual harassment [sexual violence and sexual harassment guidance - Search - GOV.UK](#)
- Physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm;
- Sexting
- Initiating/hazing type violence and rituals.

2.40.5 Any peer on peer allegation must be referred to the DSL immediately, using our child protection procedures as set in this policy. Where a concern regarding peer on peer abuse has been disclosed to the DSL(s) advice and guidance will be sought from Children Social Services and where it is clear a crime has been committed or there is a risk of crime being committed the Police will be contacted. Working with external agencies there will usually be a school response to the unacceptable behaviour, for example, if a pupil's behaviour negatively impacts on the safety and welfare of other pupils then safeguards will be put in place to promote the well-being of the pupils affected, the victim and perpetrator will be provided with support to prevent any reoccurrence of improper behaviour.

Abuse is abuse and should never be tolerated or passed off as 'banter', 'just having a laugh' or 'part of growing up.'

2.41 Teenage Relationship Abuse

2.41.1 Teenagers experience as much relationship abuse as adults. Several independent studies have shown that 40% of teenagers are in abusive dating relationships. Domestic violence is still a 'hidden' issue in our society; and it is even more so for teenagers. This is exacerbated by the fact that adolescents can be more accepting of, and dismissive about, this form of behaviour than adults.

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/623895/Preventing_and_tackling_bullying_advice.pdf

2.42 If a Child Discloses Information to You

2.42.1 It takes a lot of courage for a child to disclose that they are being neglected and or abused. They may feel ashamed, particularly if the abuse is sexual, their abuser may have threatened what will happen if they tell, they may have lost all trust in adults, or they may believe, or have been told, that the abuse is their own fault.

2.42.2 If a child talks to you about any risks to their safety or wellbeing you will need to let them know that **you must** pass the information on – you are not allowed to keep secrets. The point at which you do this is a matter for professional judgement. If you jump in immediately the child may think that you do not want to listen, if you leave it till the very end of the conversation, the child may feel that you have misled them into revealing more than they would have otherwise.

2.42.3 During your conversation with the child:

- Allow them to speak freely.
- Remain calm and do not over react – the child may stop talking if they feel they are upsetting you.
- Give reassuring nods or words of comfort – ‘I’m so sorry this has happened’, ‘I want to help’, ‘This isn’t your fault’, ‘You are doing the right thing in talking to me’.
- Do not be afraid of silences – remember how hard this must be for the child.
- Under no circumstances ask investigative questions – such as how many times this has happened, whether it happens to siblings too, or what does the child’s mother think about all this.
- At an appropriate time tell the child that in order to help them you must pass the information on.
- The teacher should then record quickly what the child has said in the words they used and seek advice. As a rule of thumb, cases of physical and sexual abuse will always be referred to social services on the same day and they have a duty to investigate under section 47 of the Children Act 1989. Staff should not discuss their concerns with the child or the parents/carers without first seeking advice in these circumstances.

2.43 Safeguarding Disabled Children

2.43.1 Disabled children have exactly the same human rights to be safe from abuse and neglect, to be protected from harm and achieve the Every Child Matters outcomes as non-disabled children.

2.43.2 Disabled children do however require additional action. This is because they experience greater risks as a result of negative attitudes and ‘created vulnerability’. This may lead to disabled children having unequal access to services and resources, and because they may have additional needs relating to physical, sensory, cognitive and/ or communication impairment.

2.43.3 At Five Rivers, we will ensure that our disabled children are listened to and responded to appropriately where they have concerns regarding abuse. In order to do this we will ensure that our staff and volunteers receive the relevant training to raise awareness and have

access to specialist staff in the event they have concerns regarding the abuse of a disabled child.

2.44 Private Fostering

2.44.1 Private fostering occurs when a child under the age of 16 (under 18, if disabled) is provided with care and accommodation by a person who is not a parent, person with parental responsibility for them or a relative in their own home. A child is not privately fostered if the person caring for and accommodating them has done so for less than 28 days and does not intend to do so for longer. Such arrangements may come to the attention of school staff through the normal course of their interaction, and promotion of learning activities, with children. Where a member of staff or volunteer at a school or college identifies that a private fostering arrangement is planned, or is in place, this should be raised with the designated safeguarding lead (or deputy). The school should then notify the local authority to allow the local authority to check the arrangement is suitable and safe for the child.

2.45 Confidentiality and Sharing Information

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

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

2.45.3 Child protection information will be stored and handled in line with [Data Protection Act 2018](#) principles. Information is:

- processed for limited purposes
- adequate, relevant and not excessive
- accurate
- kept no longer than necessary
- processed in accordance with the data subject's rights
- secure.

2.45.4 Staff should never promise a child that they will not tell anyone about an allegation- as this may ultimately not be in the best interests of the child.

2.45.5 Record of concern forms and other written information will be stored in a locked facility and any electronic information will be password protected and only made available to relevant individuals.

2.45.6 Every effort should be made to prevent unauthorised access and sensitive information should not be stored on laptop computers, which, by the nature of their portability, could be lost or stolen. If it is necessary to store child protection information on portable media, such as a CD or flash drive, these items should also be kept in locked storage. Child protection

information will be stored separately from the child's school file and the school file will be 'tagged' to indicate that separate information is held.

- 2.45.7 Child protection records are normally exempt from the disclosure provisions of the Data Protection Act, which means that children and parents do not have an automatic right to see them. If any member of staff receives a request from a child or parent to see child protection records, they should refer the request to the head teacher.
- 2.45.8 The Data Protection Act does not prevent school staff from sharing information with relevant agencies, where that information may help to protect a child.

2.46 Multi-agency Working

- 2.46.1 Five Rivers will ensure each school contributes to inter-agency working in line with statutory guidance Working together to safeguard children. We work with social care, the police, health services and other services to promote the welfare of children and protect them from harm. This includes providing a co-ordinated offer of early help when additional needs of children are identified and contributing to inter-agency plans to provide additional support to children subject to child protection plans.
- 2.46.2 Five Rivers schools will ensure that their safeguarding arrangements take into account the procedures and practice of the local authority as part of the inter-agency safeguarding procedures set up by the LSCB. For example, understanding and reflecting local protocols for assessment and the LSCB's threshold document along with supplying information as requested by the LSCB.
- 2.46.3 Further details on information sharing can be found in Chapter one of Working together to safeguard children and at Information sharing: Advice for practitioners providing safeguarding services to children, young people, parents and carers.

3. Secretary of State Prohibitions

3.1 Teacher Prohibition Orders

- 3.1.1 Teacher prohibition orders prevent a person from carrying out teaching work in schools, sixth form colleges, 16 to 19 academies, relevant youth accommodation and children's homes in England. A person who is prohibited from teaching will not be appointed to work as a teacher in any of our settings. A check of any prohibition will be carried out using the Teacher Services' system.
- 3.1.2 The Teacher Services' system also verifies any award of Qualified Teacher Status (QTS)
- 3.1.3 Teacher prohibition orders are made by the Secretary of State following consideration by a professional conduct panel convened by NCTL. Pending such consideration, the Secretary of State may issue an interim prohibition order if it is considered to be in the public interest to do so.

3.2 Section 128 Direction

- 3.2.1 A section 128 direction prohibits or restricts a person from taking part in the management of an independent school, including academies and free schools. A person who is prohibited, is unable to and will not participate in any management of our independent schools. A check for a section 128 direction will be carried out using the Teacher Services' system. Where the person will be engaging in regulated activity, a DBS barred list check will also identify any section 128 direction.

Appendix A – Reporting Safeguarding Concerns – Park House

Reporting Safeguarding Concerns

1ACE Somerset (School)

Name	Role	Email	Mobile
Teresa Brown	Acting Headteacher	Teresa.Brown@five-rivers.org	07563381870
Kristina Baker	School Administrator	Kristina.Baker@five-rivers.org	07889417413
Shellie Barcroft	Head of Education	Shellie.barcroft@five-rivers.org	07718571525

Somerset

For more information, please see the [Somerset Safeguarding Children Board website](#).

The site includes:

- Information for parents and carers
- Information for Professionals
- Publications

You can find out more about online services and publications at these related websites:

[South West Child Protection Procedures](#)

[NSPCC](#)

[Department for Education \(DFE\)](#)

Working Together Partnership Protocol 2016-17

The partner organisations of the Somerset Health and Wellbeing Board (HWBB), Somerset Children's Trust (SCT), Somerset Safeguarding Children Board (SSCB), Somerset Safeguarding Adults Board (SSAB), Somerset Corporate Parenting Board (SCPB) and the Safer Somerset Partnership (SSP) are committed to working together at every level to keep Somerset people safe from harm and improve their health and wellbeing.

A [joint protocol has been signed](#) to ensure that the Boards are working together to support each other, avoid duplication and provide effective leadership for Somerset.

LSCB@somerset.gov.uk

Somerset Safeguarding Children Board PP2 B3W, County Hall, Taunton TA1 4DY

If you are worried about a child or young person who could be in danger please contact

- Children's Social Care on **0300 123 2224**
- by email at childrens@somerset.gov.uk
- or the police

You can contact the police directly by dialling 101 and they will discuss with Children's Social Care what action should be taken. **In an emergency always contact the police by dialling 999.**

If you would like to speak to a social worker outside of office hours please phone the Emergency Duty Team (EDT) on **0300 123 2327** We will always deal with any calls in the strictest confidence.

Contacts

Contact: Children and Young People's Team

Address: Customer Contact, PO Box 618, Taunton, Somerset TA1 3WF

Email: childrens@somerset.gov.uk

Phone: 0300 123 2224

Fax: 01823 321187

Opening Hours: Monday to Friday 8am to 6pm, Saturday and Sunday closed.

If you are worried about a child or young person who could be in danger please contact

- Children's Social Care on **0300 123 2224**
- by email at childrens@somerset.gov.uk
- or the **police**

You can contact the police directly by dialling 101 and they will discuss with Children's Social Care what action should be taken. In an emergency always contact the police by dialling 999.

If you would like to speak to a social worker outside of office hours please phone the Emergency Duty Team (EDT) on 0300 123 23 27

Dorset

If you are concerned about a child's welfare or worried they are being abused, you can make a referral to Children's Social Care.

If the child lives in Dorset contact:

Telephone: 01202 228866

Email: MASH@dorsetcc.gov.uk

If the child lives in Poole, contact:

Telephone: 01202 735046

Email: MASH@poole.gov.uk

If the child lives in Bournemouth, contact

Telephone: 01202 458101

Email: MASH@bournemouth.gov.uk

If your concern requires immediate advice out of normal office hours please contact the **Out of Hours Team on Tel: 01202 657279**

To inform your contact or referral, please refer to the following local documents:

[Dorset Threshold Tool](#)

[Dorset Inter-Agency Referral Form](#)

[Safeguarding Concerns Referral Advice and Information](#)

[Child Protection Enquiry and Local Office Checks](#)

Plymouth

To get in touch please either:

01752 307535 pscb@plymouth.gov.uk

Email

Plymouth Safeguarding Children Board Business Manager: simon.white@plymouth.gcsx.gov.uk.

Phone

01752 307535

Write

Plymouth Safeguarding Children Board, Floor 3, Midland House, Notte Street, Plymouth PL1 2EJ

Devon

If you have an urgent safeguarding concern contact MASH (Multi Agency Safeguarding Hub) on **0345 155 1071** or email mashsecure@devon.gcsx.gov.uk

To contact the DSCB office (not to report safeguarding concerns), please call 01392 386067

Appendix B - Managing Allegations Against Staff or Volunteers

Initial Considerations

The procedures for dealing with allegations will be applied with common sense and judgement. Many cases may well either not meet the criteria set out above or may do so without warranting consideration of either a police investigation or enquiries by local authority children's social care services. In these cases, local arrangements should be followed to resolve cases without delay.

Some rare allegations will be so serious they require immediate intervention by children's social care services and/or police.

The designated officer(s) should be informed of all allegations that come to a school's attention and appear to meet the criteria, so they can consult police and children's social care services as appropriate.

The following definitions should be used when determining the outcome of allegation investigations:

- Substantiated: there is sufficient evidence to prove the allegation;
- Malicious: there is sufficient evidence to disprove the allegation and there has been a deliberate act to deceive;
- False: there is sufficient evidence to disprove the allegation;
- Unsubstantiated: there is insufficient evidence to either prove or disprove the allegation. The term, therefore, does not imply guilt or innocence;
- Unfounded: to reflect cases where there is no evidence or proper basis which supports the allegation being made.

Any allegation against a member of staff or including the Headteacher will be taken very seriously and will be referred immediately by the Designated Safeguarding Lead.

The designated officer will inform the accused person about the allegation as soon as possible. The accused will have provided them with as much information as possible at that time.

However, where a strategy discussion is needed, or police or children's social care services need to be involved, the DSP will not do that until those agencies have been consulted and have agreed what information can be disclosed to the accused. Employers must consider carefully whether the circumstances of a case warrant a person being suspended from contact with children at the school or college or whether alternative arrangements can be put in place until the allegation or concern is resolved. All options to avoid suspension will be considered prior to taking that step.

A risk assessment will be completed to decide whether the member of staff should be suspended

Whilst the Investigation Takes Place.

The allegation will **not** be investigated in school, other than to establish the facts. The LADO will liaise with Social Care and the Police to determine if the allegation should be investigated internally or dealt with by Social Care / Police. 'When agreed, the LADO will arrange a Strategy Meeting, which

should take place at the earliest opportunity.' This will be a meeting held between professionals to determine an outcome.

Where an allegation is made against the Head of the School, the Proprietor at Five Rivers will be advised and will liaise with the LADO. When agreed, an Initial Action Meeting (IAM) should take place at the earliest opportunity but within at least 5 working days of the referral.

Guidance taken from KCSIE 18:

If there is cause to suspect a child is suffering or is likely to suffer significant harm, a strategy discussion should be convened in accordance with the statutory guidance Working together to safeguard children. If the allegation is about physical contact, the strategy discussion or initial evaluation with the police should take into account that teachers and other school and college staff are entitled to use reasonable force to control or restrain children in certain circumstances, including dealing with disruptive behaviour.

Where it is clear that an investigation by the police or children's social care services is unnecessary, or the strategy discussion or initial evaluation decides that is the case, the designated officer(s) should discuss the next steps with the case manager. In those circumstances, the options open to the school or college depend on the nature and circumstances of the allegation and the evidence and information available. This will range from taking no further action to dismissal or a decision not to use the person's services in future. Suspension should not be the default position: an individual should be suspended only if there is no reasonable alternative. In some cases, further enquiries will be needed to enable a decision about how to proceed. If so, the designated officer(s) should discuss with the case manager how and by whom the investigation will be undertaken. In straightforward cases, the investigation should normally be undertaken by a senior member of the school or college's staff. However, in other circumstances, such as lack of appropriate resource within the school or college, or the nature or complexity of the allegation, the allegation will require an independent investigator. Many local authorities already provide for an independent investigation of allegations, often as part of the personnel services that maintained schools and colleges can buy in from the authority. It is important that local authorities ensure that schools and colleges have access to an affordable facility for independent investigation where that is appropriate.

Supporting those involved

Employers have a duty of care to their employees. A support plan will then be completed with the member of staff and a support person identified to keep them informed of the progress of the case and consider what other support is appropriate for the individual.

The individual will be advised to contact their trade union representative, if they have one, or a colleague for support. They will also be given access to welfare counselling or medical advice where this is provided by the employer.

Guidance re informing parents and carers

Parents or carers of the child or children involved will be told about the allegation as soon as possible if they do not already know of it. However, where a strategy discussion is required, or police or children's social care services need to be involved, the case manager should not do so until those agencies have been consulted and have agreed what information can be disclosed to the parents or carers. Parents or carers should also be kept informed about the progress of the case and told the

outcome where there is not a criminal prosecution, including the outcome of any disciplinary process. The deliberations of a disciplinary hearing, and the information taken into account in reaching a decision, cannot normally be disclosed but the parents or carers of the child should be told the outcome in confidence.

Parents and carers should also be made aware of the requirement to maintain confidentiality about any allegations made against teachers whilst investigations are ongoing as set out in section 141F of the Education Act 2002 (see paragraph 192). If parents or carers wish to apply to the court to have reporting restrictions removed, they should be told to seek legal advice.

In cases where a child may have suffered significant harm, or there may be a criminal prosecution, children's social care services, or the police as appropriate, should consider what support the child or children involved may need.

In deciding what information to disclose, careful consideration should be given to the provisions of the Data Protection Act 1998, the law of confidence and, where relevant, the Human Rights Act 1998.

Confidentiality

The designated officer(s), police and children's social care services will meet to agree the following:

- Who needs to know and, importantly, exactly what information can be shared;
- How to manage speculation, leaks and gossip;
- What, if any, information can be reasonably given to the wider community to reduce speculation; and
- How to manage press interest if, and when, it should arise.

Managing the situation and exit arrangements

Resignations and 'settlement agreements'

If the accused person resigns, or ceases to provide their services, this should not prevent an allegation being followed up in accordance with this guidance.

A referral will be made to the DBS, if the criteria are met - see paragraphs 143-144 of KCSIE 18.

If the accused person resigns or their services cease to be used and the criteria are met, it will not be appropriate to reach a settlement/compromise agreement. Any settlement/compromise agreement that would prevent a school or college from making a DBS referral even though the criteria for referral are met, is likely to result in a criminal offence being committed. This is because the school or college would not be complying with its legal duty to make the referral.

Guidance from KCSIE 18

It is important that every effort is made to reach a conclusion in all cases of allegations bearing on the safety or welfare of children, including any in which the person concerned refuses to cooperate with the process. Wherever possible, the accused should be given a full opportunity to answer the allegation and make representations about it. But the process of recording the allegation and any supporting evidence and reaching a judgement about whether it can be substantiated on the basis of all the information available, should continue even if that cannot be done or the accused does not cooperate. It may be difficult to reach a conclusion in those circumstances, and it may not be possible

to apply any disciplinary sanctions if a person's period of notice expires before the process is complete, but it is important to reach and record a conclusion wherever possible.

'Settlement agreements' (sometimes referred to as compromise agreements), by which a person agrees to resign if the employer agrees not to pursue disciplinary action, and both parties agree a form of words to be used in any future reference, should not be used in cases of refusal to cooperate or resignation before the person's notice period expires. Such an agreement will not prevent a thorough police investigation where that is appropriate.

Record keeping

Details of allegations that are found to have been malicious should be removed from personnel records. However, for all other allegations, it is important that a clear and comprehensive summary of the allegation, details of how the allegation was followed up and resolved, and a note of any action taken, and decisions reached, is kept on the confidential personnel file of the accused, and a copy provided to the person concerned.

The purpose of the record is to enable accurate information to be given in response to any future request for a reference, where appropriate. It will provide clarification in cases where future DBS checks reveal information from the police about an allegation that did not result in a criminal conviction and it will help to prevent unnecessary re-investigation if, as sometimes happens, an allegation re-surfaces after a period of time. The record should be retained at least until the accused has reached normal pension age or for a period of 10 years from the date of the allegation if that is longer.

References

Cases in which an allegation was proven to be false, unsubstantiated or malicious should not be included in employer references. A history of repeated concerns or allegations which have all been found to be false, unsubstantiated or malicious should also not be included in any reference. See paragraphs 124-127 for further information on references.

Timescales

It is in everyone's interest to resolve cases as quickly as possible consistent with a fair and thorough investigation. All allegations should be investigated as a priority to avoid any delay. Target timescales are shown below: the time taken to investigate and resolve individual cases depends on a variety of factors including the nature, seriousness and complexity of the allegation, but these targets should be achieved in all but truly exceptional cases. It is expected that 80 per cent of cases should be resolved within one month, 90 per cent within three months, and all but the most exceptional cases should be completed within 12 months.

For those cases where it is clear immediately that the allegation is unsubstantiated or malicious, they should be resolved within one week. Where the initial consideration decides that the allegation does not involve a possible criminal offence it will be for the employer to deal with it, although if there are concerns about child protection, the employer should discuss them with the designated officer(s). In such cases, if the nature of the allegation does not require formal disciplinary action, the school will instigate appropriate action within three working days. If a disciplinary hearing is required and can be held without further investigation, the hearing will be held within 15 working days.

Oversight and monitoring.

The designated officer(s) has overall responsibility for oversight of the procedures for dealing with allegations, for resolving any inter-agency issues, and for liaison on the subject with those responsible for local multi-agency safeguarding arrangements.

The designated officer(s) will provide advice and guidance, in addition to liaising with the police and other agencies and monitoring the progress of cases to ensure that they are dealt with as quickly as possible consistent with a thorough and fair process. Reviews should be conducted at fortnightly or monthly intervals, depending on the complexity of the case.

Suspension

The possible risk of harm to children posed by an accused person should be evaluated and managed in respect of the child(ren) involved in the allegations. In some rare cases that will require the case manager to consider suspending the accused until the case is resolved. Suspension will not be an automatic response when an allegation is reported: all options to avoid suspension should be considered prior to taking that step. If the designated officer is concerned about the welfare of other children in the community or the teacher's family, those concerns will be reported to the designated officer(s), children's social care or the police.

Guidance from KCSIE 18

Suspension should be considered only in a case where there is cause to suspect a child or other children at the school or college is/are at risk of harm or the case is so serious that it might be grounds for dismissal. However, a person should not be suspended automatically: the case manager must consider carefully whether the circumstances warrant suspension from contact with children at the school or college or until the allegation is resolved, and may wish to seek advice from their personnel adviser and the designated officer(s). In cases where the school or college is made aware that the Secretary of State has made an interim prohibition order in respect of an individual at the school or college, it will be necessary to immediately suspend that person from teaching pending the findings of the NCTL investigation. The case manager should also consider whether the result that would be achieved by immediate suspension could be obtained by alternative arrangements. In many cases an investigation can be resolved quickly and without the need for suspension. If the designated officer(s), police and children's social care services have no objections to the member of staff continuing to work during the investigation, the case manager should be as inventive as possible to avoid suspension.

Based on assessment of risk, the following alternatives will be considered by the designated officer before suspending a member of staff:

- Redeployment within the school so that the individual does not have direct contact with the child or children concerned;
- Providing an assistant to be present when the individual has contact with children;
- Redeploying to alternative work in the school so the individual does not have unsupervised access to children;

- Moving the child or children to classes where they will not come into contact with the member of staff, making it clear that this is not a punishment and parents have been consulted; or
- Temporarily redeploying the member of staff to another role in a different location, for example to an alternative school or work for the local authority or academy trust.

These alternatives allow time for an informed decision regarding the suspension and possibly reduce the initial impact of the allegation. This will, however, depend upon the nature of the allegation. The case manager should consider the potential permanent professional reputational damage to employees that can result from suspension where an allegation is later found to be unsubstantiated or maliciously intended. If immediate suspension is considered necessary, the rationale and justification for such a course of action will be agreed and recorded by both the case manager and the designated officer(s). This should also include what alternatives to suspension have been considered and why they were rejected.

Where it has been deemed appropriate to suspend the person, written confirmation will be dispatched within one working day, giving as much detail as appropriate for the reasons for the suspension. It is not acceptable for an employer to leave a person who has been suspended without any support. The person will be informed at the point of their suspension who their named contact is within the organisation and provided with their contact details.

Children's social care services or the police cannot require the case manager to suspend a member of staff or a volunteer, although they should give appropriate weight to their advice. The power to suspend is vested in the proprietor of the school, or governing bodies of the school or college who are the employers of staff at the school or college. However, where a strategy discussion or initial evaluation concludes that there should be enquiries by the children's social care services and/or an investigation by the police, the designated officer(s) should canvass police and children's social care services for views about whether the accused member of staff needs to be suspended from contact with children in order to inform the school or college consideration of suspension. Police involvement does not make it mandatory to suspend a member of staff; this decision should be taken on a case-by-case basis having undertaken a risk assessment.

Information sharing

In a strategy discussion or the initial evaluation of the case, the agencies involved should share all relevant information they have about the person who is the subject of the allegation, and about the alleged victim.

Where the police are involved, wherever possible the employer the school will the police to obtain consent from the individuals involved to share their statements and evidence for use in the employer disciplinary process. This should be done as their investigation proceeds and will enable the police to share relevant information without delay at the conclusion of their investigation or any court case.

On conclusion of a case

If the allegation is substantiated and the person is dismissed or the employer ceases to use the person's services, or the person resigns or otherwise ceases to provide his or her services, the designated officer(s) should discuss with the case manager and their personnel adviser whether the

school or college will decide to make a referral to the DBS for consideration of whether inclusion on the barred lists is required; and, in the case of a member of teaching staff, whether to refer the matter to the NCTL to consider prohibiting the individual from teaching.

There is a legal requirement for employers to make a referral to the DBS where they think that an individual has engaged in conduct that harmed (or is likely to harm) a child; or if a person otherwise poses a risk of harm to a child. *See paragraph 143 of KCSIE 18*

Where it is decided on the conclusion of a case that a person who has been suspended can return to work, the designated officer will consider how best to facilitate that. Most people will benefit from some help and support to return to work after a stressful experience. Depending on the individual's circumstances, a phased return and/or the provision of a mentor to provide assistance and support in the short term may be appropriate. The designated officer will also consider how the person's contact with the child or children who made the allegation can best be managed if they are still a pupil at the school or college.

In respect of malicious or unsubstantiated allegations

If an allegation is determined to be unsubstantiated or malicious, the designated officer(s) will refer the matter to the children's social care services to determine whether the child concerned is in need of services or may have been abused by someone else. If an allegation is shown to be deliberately invented or malicious, the headteacher will consider whether any disciplinary action is appropriate against the pupil who made it; or whether the police should be asked to consider if action might be appropriate against the person responsible, even if he or she were not a pupil.

Learning lessons

At the conclusion of a case in which an allegation is substantiated, the designated officer(s) will review the circumstances of the case with the case manager to determine whether there are any improvements to be made to the school or college's procedures or practice to help prevent similar events in the future. This will include issues arising from the decision to suspend the member of staff, the duration of the suspension and whether or not suspension was justified. Lessons will also be learnt from the use of suspension when the individual is subsequently reinstated. The designated officer(s) will consider how future investigations of a similar nature could be carried out without suspending the individual.

Appendix C - Safer Recruitment and DBS checks

(For further details see the company Recruitment & Selection Policy & Procedure)

Central Register

We will record all information on the checks carried out in the school's single central record (SCR). Copies of these checks, where appropriate, will be held in individuals' personnel files. We follow requirements and best practice in retaining copies of these checks, as set out below.

Appointing new staff

When appointing new staff, we will:

- Verify their identity
- Obtain (via the applicant) an enhanced Disclosure and Barring Service (DBS) certificate, including barred list information for those who will be engaging in regulated activity (see definition below). We will not keep a copy of this for longer than 6 months
- Obtain a separate barred list check if they will start work in regulated activity before the DBS certificate is available
- Verify their mental and physical fitness to carry out their work responsibilities
- Verify their right to work in the UK. We will keep a copy of this verification for the duration of the member of staff's employment and for 2 years afterwards
- Verify their professional qualifications, as appropriate
- Ensure they are not subject to a prohibition order if they are employed to be a teacher
- Carry out further additional checks, as appropriate, on candidates who have lived or worked outside of the UK, including (where relevant) any teacher sanctions or restrictions imposed by a European Economic Area professional regulating authority, and criminal records checks or their equivalent
- Check that candidates taking up a management position are not subject to a prohibition from management (section 128) direction made by the secretary of state
- Ask for written information about previous employment history and check that information is not contradictory or incomplete
- We will seek references on all short-listed candidates, including internal candidates, before interview. We will scrutinise these and resolve any concerns before confirming appointments.
- *Schools with pupils aged under 8 add:* We will ensure that appropriate checks are carried out to ensure that individuals are not disqualified under the Childcare Disqualification (Regulations) 2009 and Childcare Act 2006. Where we take a decision that an individual falls outside of the scope of these regulations and we do not carry out such checks, we will retain a record of our assessment on the individual's personnel file. This will include our evaluation of any risks and control measures put in place, and any advice sought.
- Regulated activity means a person who will be:
- Responsible, on a regular basis in a school or college, for teaching, training, instructing, caring for or supervising children

- Carrying out paid, or unsupervised unpaid, work regularly in a school or college where that work provides an opportunity for contact with children
- Engaging in intimate or personal care or overnight activity, even if this happens only once and regardless of whether they are supervised or not

If we have concerns about an existing member of staff's suitability to work with children, we will carry out all the relevant checks as if the individual was a new member of staff. We will also do this if an individual moves from a post that is not regulated activity to one that is.

We will refer to the DBS anyone who has harmed, or poses a risk of harm, to a child or vulnerable adult:

- Where the 'harm test' is satisfied in respect of the individual (i.e. that no action or inaction occurred but the present risk that it could was significant)
 - Where the individual has received a caution or conviction for a relevant offence
 - If there is reason to believe that the individual has committed a listed relevant offence, under the [Safeguarding Vulnerable Groups Act 2006 \(Prescribed Criteria and Miscellaneous Provisions\) Regulations 2009](#)
 - If the individual has been removed from working in regulated activity (paid or unpaid) or would have been removed if they had not left
 - Agency and third-party staff
 - We will obtain written notification from any agency or third-party organisation that it has carried out the necessary safer recruitment checks that we would otherwise perform. We will also check that the person presenting themselves for work is the same person on whom the checks have been made.
 - Contractors
 - We will ensure that any contractor, or any employee of the contractor, who is to work at the school has had the appropriate level of DBS check. This will be:
 - An enhanced DBS check with barred list information for contractors engaging in regulated activity
 - An enhanced DBS check, not including barred list information, for all other contractors who are not in regulated activity but whose work provides them with an opportunity for regular contact with children
 - We will obtain the DBS check for self-employed contractors.
 - We will not keep copies of such checks for longer than 6 months.
 - Contractors who have not had any checks will not be allowed to work unsupervised or engage in regulated activity under any circumstances.
 - We will check the identity of all contractors and their staff on arrival at the school.

Volunteers

We will:

- Never leave an unchecked volunteer unsupervised or allow them to work in regulated activity
- Obtain an enhanced DBS check with barred list information for all volunteers who are new to working in regulated activity
- Obtain an enhanced DBS check without barred list information for all volunteers who are not in regulated activity, but who have an opportunity to come into contact with children on a regular basis, for example, supervised volunteers
- Carry out a risk assessment when deciding whether to seek an enhanced DBS check for any volunteers not engaging in regulated activity

Governance Individuals

- All governors [*in academies: trustees and local governors*] will have an enhanced DBS check without barred list information and section 128 check [*section 128 checks are only required for local governors if they have been delegated any management responsibilities*]
- . They will have an enhanced DBS check with barred list information if working in regulated activity.
- The chair of the board of Directors will have their DBS check countersigned by the secretary of state.
- All trustees, proprietors and local governors will also have the following checks:
 - Right to work in the UK
 - Other checks deemed necessary if they have lived or worked outside the UK

Alternative provision

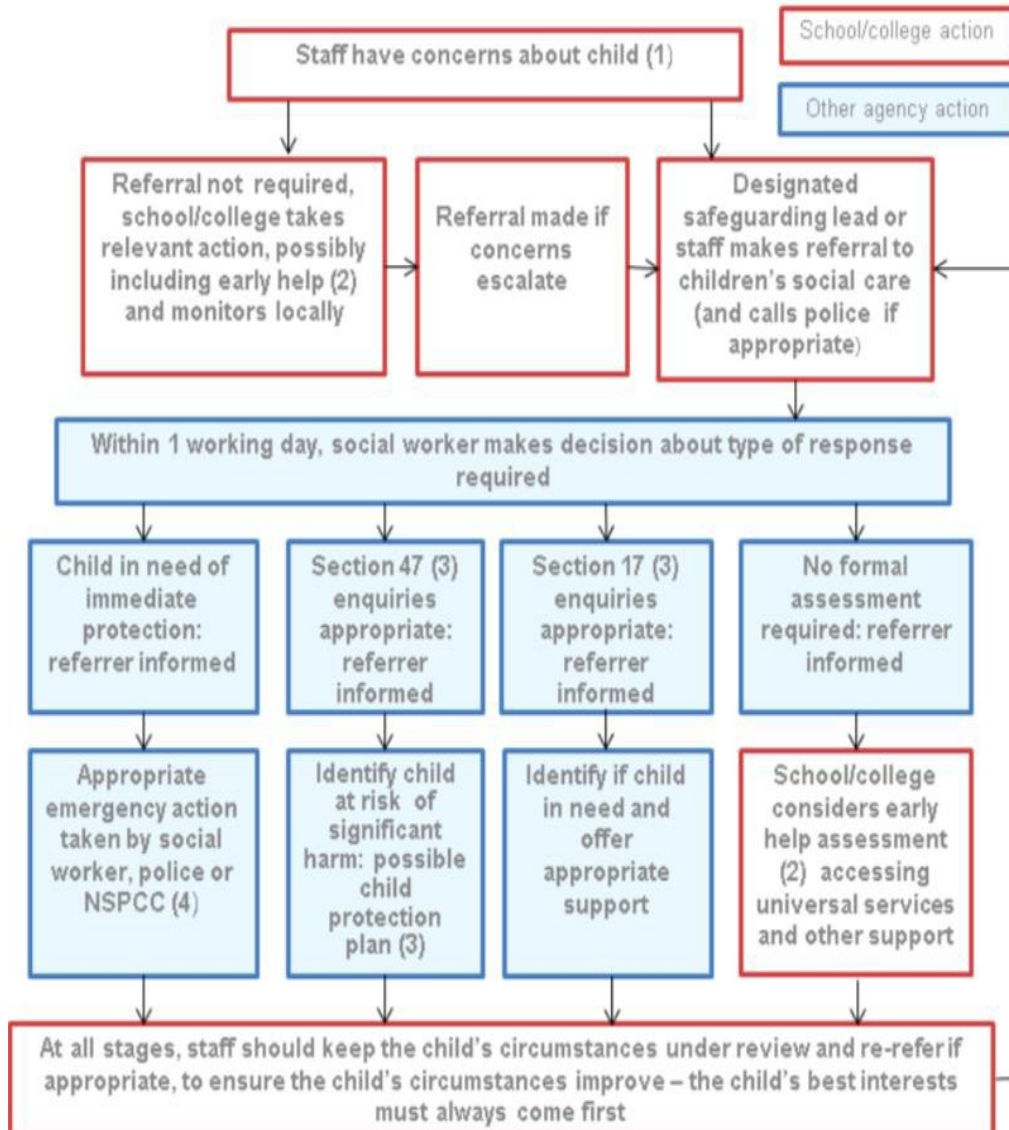
If a child is placed at an Alternative provision for some of their education, we continue to be responsible for the safeguarding of that pupil. We will obtain written confirmation from the alternative provider that appropriate safeguarding checks have been carried out on all individuals working at the establishment.

Further Guidance Links

- [Actions where there are concerns about a child process map](#)
- [Guidance on Domestic Violence](#)
- [Guidance relating to FGM HBV Forced Marriage](#)
- [Guidance relating to Child Sexual Exploitation](#)
- [Guidance relating to Children Missing in Education](#)
- [Guidance relating to On-line Safety](#)
- [Guidance relating to Preventing Radicalisation](#)
- [Guidance relating to Sexual Violence and Sexual Harassment](#)

Actions where there are concerns about a child Process Map

Actions where there are concerns about a child



Guidance on Domestic Violence

Domestic Violence

Domestic violence has an enormous impact on children and young people.

What is meant by domestic violence?

The Government defines domestic violence as: "Any incident of threatening behaviour, violence or abuse (psychological, physical, sexual, financial or emotional) between adults who are or have been intimate partners or family members, regardless of gender or sexuality."

This includes issues of concern to black and minority ethnic (BME) communities such as so called 'honour based violence', female genital mutilation (FGM) and forced marriage.

An adult is defined as any person aged 18 years or over. Family members are defined as mother, father, son, daughter, brother, sister, and grandparents, whether directly related, in laws or stepfamily.

Domestic abuse is rarely a one-off incident, and should instead be seen as a pattern of abusive and controlling behaviour through which the abuser seeks power over their victim. Typically the abuse involves a pattern of abusive and controlling behaviour, which tends to get worse over time. The abuse can begin at any time, in the first year, or after many years of life together. It may begin, continue, or escalate after a couple have separated and may take place not only in the home but also in a public place.

Domestic abuse occurs across society, regardless of age, gender, race, sexuality, wealth, and geography. The figures show, however, that it consists mainly of violence by men against women. Children are also affected, both directly and indirectly and there is also a strong correlation between domestic violence and child abuse suggesting overlap rates of between 40-60%. There are different types of domestic abuse, including emotional, psychological, physical, sexual, and financial abuse. Many abusers behave in ways that include more than one type of domestic violence, and the boundaries between some of these behaviours are often quite blurred.

Domestic abuse is not limited to adults; there is an increasing awareness of domestic violence within teen relationships.

Domestic abuse can happen to anyone regardless of whether they are heterosexual, gay, lesbian, bisexual or transgender.

Every individual's experience of domestic abuse will be unique. However gay, lesbian, bisexual and transgender individuals are likely to face additional concerns around homophobia and gender discrimination. They may also be concerned that they will not be recognised as victims or believed and taken seriously. Abusers may also be able to control their victims through the threat of 'outing'.

Impact upon children living in households with abusers

Children have historically been considered as the "hidden victims" of domestic abuse as many agencies focus upon the needs of adults. However, evidence has shown that there are significant implications for children in the household.

- In households where domestic violence occurs 50% of children are also being directly abused by the same person.
- In families with children where domestic violence occurs 90% of children are in the same or next room during an incident.
- 75% of children on the 'at risk' register live in households where domestic violence occurs.
- Mothers who are beaten are more likely to physically abuse their children than mothers who are not abused. Sometimes this is to avoid the perpetrator from punishing their children more severely.
- Domestic abuse can be perpetrated by wider family members through forced marriage, female genital mutilation and honour-based violence.

There is a direct correlation between domestic abuse and child abuse, which means that professionals should always consider the possibility of the co-existence of both types of abuse if one is identified.

Safeguarding Children

If it is believed that children are at risk, Child Protection Guidelines must be adhered to, and the need to follow these procedures should be discussed with the non-abusive parent and their consent obtained, if possible. However, the interests of the child are paramount, and initiating child protection procedures is not conditional on obtaining consent.

The experience of domestic violence can have a damaging effect on health, educational attainment and emotional wellbeing and development of children and young people. The DfES Consultation Document: Safeguarding Children (Jan, 2004) states that; "The effect of domestic violence on children is such that it must be considered as abuse. Either witnessing it or being subjected to it is not only traumatic in itself but likely to adversely impact on a child's behaviour and performance at school".

It is worth stressing that the effects of domestic violence on a child will vary, as it will depend on their age, gender, maturity, personality and family circumstances. However, many children affected by domestic violence report that they feel:

- Stress
- Confusion
- Lack of trust
- Guilt
- Isolation
- Shame
- Anger
- Loss of confidence
- Anxiety

Warning Signs of Domestic Violence

- As a result of living with or witnessing domestic abuse, children or young people may:
- Exhibit signs of physical abuse (either inflicted by self or others)
- Become a victim or perpetrator of bullying
- Present violent and disruptive behaviour
- Experience difficulty in concentrating on school work
- Focus on school and attaining good results as a way of blocking out difficulties at home
- Experience difficulty in making friends at school
- Become withdrawn
- Use drugs or alcohol as a way of escaping from their problems at home
- Become involved in inappropriate or exploitative sexual relationships in an attempt to find comfort and security
- Develop an eating disorder

The indicators above are not conclusive evidence that a child is affected by domestic violence but the presence of one or more should alert staff to the possibility that domestic violence may be the root cause.

Parents have a duty to ensure their child attends school regularly. Poor attendance can be one of the first signs that a child is experiencing abuse or neglect as a result of domestic violence. It is important that any concerns about absence are referred to the home school liaison worker (if your school has one) or the educational social worker.

If you suspect that a child or young person is being abused, either directly or indirectly, such as witnessing the abuse of their parent, you should report the matter to the designated child protection officer who will make the appropriate referrals.

It is important to make children and young people aware that violent behaviour towards them or around them is not acceptable and teach them how they can keep themselves safe.

Schools can support individual children and young people by:

- Improving the self-esteem and confidence of children and young people by:
- Offering them opportunities to take on new roles and responsibilities;
- Offering tasks which are achievable and giving praise and encouragement;
- Monitoring their behavior and setting clear limits;
- Criticizing the action, not the person;
- Helping them to feel a sense of control in their school lives;
- Involving them in decision making;
- Helping them to be more assertive;
- Respecting them as individuals;
- Encouraging involvement in extra-curricular activities.

Gangs and Youth Violence

We will endeavor to protect our children and young people from exposure to gang activity and exploitation by having robust attendance and behaviour policies and to act on relevant information or allegations. We will take all reports seriously and will share this information appropriately with other agencies to safeguard our pupils from harm.

Gender based violence/violence against women and girls (VAWG)

www.gov.uk/government/policies/violence-against-women-and-girls

Further information on domestic abuse (KCSIE 2018)

The cross-government definition of domestic violence and abuse is:

Any incident or pattern of incidents of controlling, coercive, threatening behaviour, violence or abuse between those aged 16 or over who are, or have been, intimate partners or family members regardless of gender or sexuality.

The abuse can encompass, but is not limited to:

- psychological
- physical
- sexual
- financial
- emotional

Exposure to domestic abuse and/or violence can have a serious, long lasting emotional and psychological impact on children. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result.

Advice on identifying children who are affected by domestic abuse and how they can be helped is available at: [NSPCC- UK domestic-abuse signs symptoms effects](#)

[Refuge what is domestic violence/effects of domestic violence on children](#)

Guidance on Female genital mutilation (FGM), Honour Based Violence (HBV) and Forced Marriage

Female genital mutilation (FGM) is 'a collective term for all procedures involving the partial or total removal of external female genitalia for cultural or other nontherapeutic reasons'.

In the UK, where it is considered to be child abuse, FGM is illegal. It is also illegal to take a child abroad for FGM purposes.

FGM is a surprisingly common form of abuse – and one that Ofsted inspectors will now expect heads and their designated staff to know something about

There are four types of FGM:

- **Clitoridectomy** – partial or total removal of the clitoris
- **Excision** – partial or total removal of the clitoris and the labia minora, with or without the excision of the labia majora
- **Infibulation** – narrowing of the vaginal opening
- All other harmful non-medical procedures** to female genitalia.
- The practice is normally carried out on girls between the ages of 4 and 13, although the majority of cases are thought to take place between the ages of 5 and 8.

Countries where FGM is practised

FGM is practised in 28 African countries and in parts of the Middle East and the Far East. It continues to be practised in some communities in Western Europe. One of the difficulties is that FGM-practising families may not see it as an act of abuse. It is accepted practice in some communities, and this can make it very difficult for a girl or any other member of her family to come forward. Not having undergone FGM can be considered to make a girl unsuitable for marriage.

The impact on girls

The procedure has no health benefits and can cause:

- severe bleeding
- infection
- problems urinating
- potential childbirth complications leading to deaths of newborn babies.

The impact of undergoing FGM is not only physical; the fact that the procedure has been inflicted on the girl by her family makes it particularly traumatic.

How to identify FGM

The time when FGM is most likely to take place is at the start of the summer holidays, as there is then sufficient time for the girl to recover before returning to school.

Risk factors

Schools should be particularly alert for signs when a girl comes from a community where FGM is practised.

Other risk factors include:

- where the family is less integrated within UK society
- where the mother or other women in the extended family have also been subject to FGM
- where a girl has been withdrawn from sex education lessons and there is a reluctance for her to be informed about her body and her rights.

Indicators that FGM is imminent

Indicators that it might be about to take place include:

- being a girl between the ages of 5 to 8 within a community where FGM is practised
- when a female family elder visits, particularly if she arrives from another country
 - a girl talking about a 'special procedure' or saying that she is attending a special ceremony to become a woman
- a girl being taken out of the country for a prolonged period.

Indicators that it has taken place

Indications that FGM has already taken place include:

- a girl having difficulty walking, sitting or standing
- she spends longer than normal going to the toilet
- she spends long periods of time away from the classroom during the day because of bladder or menstrual problems
- prolonged or repeated absences from school or college
- withdrawal or depression when a girl returns to school after a prolonged period of absence
- reluctance to undergo normal medical examinations.

Procedures For Referrals

It is vital for all staff to be constantly vigilant and to refer any concerns through the appropriate channels (via Designated Safeguarding Person).

Do not reveal that any enquiries might be related to FGM, as this could increase the risk to the girl. Do not engage at this stage with the student's family or others within the community.

Contact social care

Your designated senior person must share any concerns that the school has with social care. Children's social care may approach the police for assistance and there might be a joint investigation. Particular attention may be given to other family members who might also be at risk.

Support the girl

If a girl does make a disclosure, it is important to note that it must be reported to social care even if it is against the girl's wishes, as it is child abuse and against the law. However, the reasons for this should be explained.

Counselling and other forms of support that the school might have should be made available.

Make a referral

If you discover that an act of Female Genital Mutilation appears to have been carried out on a girl under the age of 18 you must report this to the police.

If you suspect that a student has been removed from school as a result of FGM, you should refer your concerns to children's social care and the police.

Once a referral has been made by a school, a strategy meeting will be arranged as soon as possible. It will include health providers or voluntary organisations with specific expertise in FGM.

Social care providers are advised that they should first determine whether the parents or the girl are aware of the harmful aspects of FGM and the law in the UK. The main focus is to prevent the child from experiencing FGM, rather than the removal of the child from the family. However, if it is felt that there is immediate risk of FGM taking place, then an Emergency Protection Order might be sought.

Encourage an open environment in school

Schools are requested to ensure that:

- they have an 'open environment', where students feel able to discuss issues that they may be facing
- the designated senior person is aware of the issues surrounding FGM
- materials explaining FGM are available for staff and students
- advice and signposts are available for accessing additional help, e.g. the NSPCC's Helpline, ChildLine services and appropriate black and minority ethnic women's groups
- girls have access to a private telephone, should they wish to use it
- training about FGM is incorporated in the school's safeguarding training.

Mandatory Reporting Duty

Section 5B of the Female Genital Mutilation Act 2003 (as inserted by section 74 of the Serious Crime Act 2015) will place a statutory duty upon teachers, along with social workers and healthcare professionals, to report to the police where they discover (either through disclosure by the victim or visual evidence) that FGM appears to have been carried out on a girl under 18. Those failing to report such cases will face disciplinary sanctions. It will be rare for teachers to see visual evidence, and they should not be examining students, but the same definition of what is meant by "to discover that an act of FGM appears to have been carried out" is used for all professionals to whom this mandatory reporting duty applies.

Teachers must report to the police cases where they discover that an act of FGM appears to have been carried out. Unless the teacher has a good reason not to, they should still consider and discuss any such case with the school's designated safeguarding lead and involve children's social care as appropriate.

HBV

Honour based violence" is a crime or incident, which has or may have been committed to protect or defend the honour of the family and/or community". It is important to be alert to signs of distress and indications such as self-harm, absence from school and truancy, infections resulting from female genital mutilation, isolation from peers, being monitored by family, not participating in school activities, unreasonable restrictions at home or forced marriage.

Where it is suspected that a child/young person is at risk from Honour based violence Five Rivers School Provisions will report those concerns to the appropriate agency in order to prevent this form of abuse taking place.

Further information on so-called 'honour-based' violence (KCSIE 2018)

So-called 'honour-based' violence (HBV) encompasses incidents or crimes which have been committed to protect or defend the honour of the family and/or the community, including female genital mutilation (FGM), forced marriage, and practices such as breast ironing. Abuse committed in the context of preserving "honour" often involves a wider network of family or community pressure and can include multiple perpetrators. It is important to be aware of this dynamic and additional risk factors when deciding what form of safeguarding action to take. All forms of HBV are abuse (regardless of the motivation) and should be handled and escalated as such. If in any doubt, staff should speak to the designated safeguarding lead (or deputy). Professionals in all agencies, and

individuals and groups in relevant communities, need to be alert to the possibility of a child being at risk of HBV, or already having suffered HBV.

Actions:

If staff have a concern regarding a child that might be at risk of HBV, they should activate local safeguarding procedures, using existing national and local protocols for multiagency liaison with police and children's social care.

Forced marriage

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

Ritualistic Abuse linked to spirit possession

Some faiths believe that spirits and demons can possess people (including children). What should never be considered is the use of any physical or psychological violence to get rid of the possessing spirit. This is abusive and will result in a criminal conviction of those using this form of abuse even if the intention is to help the child.

[https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/175437/Action Plan - Abuse linked to Faith or Belief.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/175437/Action_Plan_-_Abuse_linked_to_Faith_or_Belief.pdf)

Actions

If you have a concern regarding a child that might be at risk of HBV or Forced Marriage you should activate local safeguarding procedures, using existing national and local protocols for multi-agency liaison with police and children's social care.

If in any doubts staff should speak to the designated safeguarding lead. Professionals in all agencies, and individuals and groups in relevant communities, need to be alert to the possibility of a child being at risk of HBV, or already having suffered HBV.

Guidance on Child Sexual Exploitation

Child Sexual Exploitation

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

Child Exploitation and Online Safety (e-Safety)

Children and young people can be exploited through their use of modern technology such as the internet, mobile phones and social networking sites. In order to minimise the risks to our children and young people, Five Rivers will ensure that we have in place appropriate measures such as security filtering, and an Acceptable Use Policy linked to our e-Safety policy.

We will ensure that staff are aware of how not to compromise their position of trust in or outside of the school and are aware of the dangers associated with the internet and other mobile technology.

Our e-Safety policy clearly states that mobile phone or electronic communications with a student at our school is not acceptable other than for approved school business e.g. coursework, mentoring. Where it is suspected that a child is at risk from internet abuse or cyber bullying we will report our concerns to the appropriate agency. We will follow the e-safety flow chart in our Acceptable Use Policy to follow up and report incidents of e-safety.

Cyberbullying, like all forms of bullying, is not tolerated at Five Rivers. Cyberbullying will be investigated using our procedures as laid out in our Anti-Bullying Policy.

Other guidance documents

Mental Health

<https://www.gov.uk/government/publications/the-mental-health-strategy-for-england>

Drugs

<https://www.gov.uk/government/publications/drugs-advice-for-schools>

Guidance on a child missing from education

All children, regardless of their circumstances, are entitled to a full time education, which is suitable to their age, ability, aptitude and any special educational needs they may have. Local authorities have a duty to make arrangements to establish, as far as it is possible to do so, the identity of children of compulsory school age who are missing education in their area. Effective information sharing between parents, schools, colleges and local authorities is critical to ensuring that all children are safe and receiving suitable education. A child going missing from education is a potential indicator of abuse or neglect and such children are at risk of being victims of harm, exploitation or radicalisation. School and college staff should follow their procedures for unauthorised absence and for dealing with children that go missing from education, particularly on repeat occasions, to help identify the risk of abuse and neglect, including sexual or criminal exploitation, and to help prevent the risks of going missing in future. Schools and colleges should put in place appropriate safeguarding policies, procedures and responses for children who go missing from education, particularly on repeat occasions. It is essential that all staff are alert to signs to look out for and the individual triggers to be aware of when considering the risks of potential safeguarding concerns such as travelling to conflict zones, female genital mutilation and forced marriage.

Further information about children at risk of missing education can be found in the Children Missing Education guidance.

The law requires all schools to have an admission register and, with the exception of schools where all pupils are boarders, an attendance register. All pupils must be placed on both registers. Schools must place pupils on the admission register at the beginning of the first day on which the school has agreed, or been notified, that the pupil will attend the school. If a pupil fails to attend on the agreed or notified date, the school should consider notifying the local authority at the earliest opportunity to prevent the child from going missing from education.

It is important that the admission register is accurate and kept up to date. Schools should regularly encourage parents to inform them of any changes whenever they occur. This can assist the school and local authority when making enquiries to locate children missing education.

Schools should monitor attendance and address it when it is poor or irregular. All schools must inform the local authority of any pupil who fails to attend school regularly, or has been absent without the school's permission for a continuous period of 10 school days or more, at such intervals as are agreed between the school and the local authority.

Where a parent notifies a school that a pupil will live at another address, all schools are required to record in the admission register:

- the full name of the parent with whom the pupil will live;
- the new address; and
- the date from when it is expected the pupil will live at this address.

Where a parent of a pupil notifies the school that the pupil is registered at another school or will be attending a different school in future, schools must record in the admission register:

- the name of the new school; and
- the date on which the pupil first attended or is due to start attending that school.

Schools are required to notify the local authority within five days when a pupil's name is added to the admission register. Schools will need to provide the local authority with all the information held within the admission register about the pupil. This duty does not apply to pupils who are registered at the start of the school's youngest year, unless the local authority requests for such information to be provided.

Schools must also notify the local authority when a pupil's name is to be deleted from the admission register under any of the grounds set out in the Education (Pupil Registration) (England) Regulations 2006 as amended, as soon as the ground for deletion is met and no later than the time at which the pupil's name is deleted from the register. This duty does not apply where the pupil has completed the school's final year, unless the local authority requests for such information to be provided.

A pupil's name can only be deleted from the admission register under regulation 8(1), sub-paragraph (f)(iii) or (h)(iii) if the school and the local authority have failed to establish the pupil's whereabouts after jointly making reasonable enquiries. Advice on carrying out reasonable enquiries can be found in the Children Missing Education guidance.

Where a school notifies a local authority that a pupil's name is to be deleted from the admission register, the school must provide the local authority with:

- the full name of the pupil;
- the full name and address of any parent with whom the pupil lives;
- at least one telephone number of the parent with whom the pupil lives;
- the full name and address of the parent with whom the pupil is going to live, and the date the pupil is expected to start living there, if applicable;
- the name of pupil's destination school and the pupil's expected start date there, if applicable; and
- the ground in regulation 8 under which the pupil's name is to be deleted from the admission register.

Schools and local authorities should work together to agree on methods of making returns. When making returns, the school should highlight to the local authority where they have been unable to obtain the necessary information from the parent, for example in cases where the child's destination school or address is unknown. Schools should also consider whether it is appropriate to highlight any contextual information of a vulnerable child who is missing education, such as any safeguarding concerns.

It is essential that schools comply with these duties, so that local authorities can, as part of their duty to identify children of compulsory school age who are missing education, follow up with any child who might be at risk of not receiving an education and who might be at risk of being harmed, exploited or radicalised. The department provides a secure internet system - School2School, to allow schools to transfer pupil information to another school when the child moves. All schools maintained by local authorities are required, when a pupil ceases to be registered at their school and becomes a registered pupil at another school in England, Wales, Scotland or Northern Ireland to send a Common Transfer File (CTF) to the new school. Academies (including free schools) are also

strongly encouraged to send CTFs when a pupil leaves to attend another school. Independent schools can be given access to School2School by the department.

The School2School website also contains a searchable area, commonly referred to as the 'Lost Pupil Database', where schools can upload CTFs of pupils who have left but their destination or next school is unknown or the child has moved abroad or transferred to a non-maintained school. If a pupil arrives in a school and the previous school is unknown, schools should contact their local authority who will be able to search

Guidance relating to On-Line Safety

Online safety:

The use of technology has become a significant component of many safeguarding issues. Child sexual exploitation; radicalisation; sexual predation: technology often provides the platform that facilitates harm. An effective approach to online safety empowers a school or college to protect and educate the whole school or college community in their use of technology and establishes mechanisms to identify, intervene in and escalate any incident where appropriate.

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

- content: being exposed to illegal, inappropriate or harmful material;
- contact: being subjected to harmful online interaction with other users; and
- conduct: personal online behaviour that increases the likelihood of, or causes, harm.

Filters and monitoring:

Governing bodies and proprietors should be doing all that they reasonably can to limit children's exposure to the above risks from the school or college's IT system. As part of this process, governing bodies and proprietors should ensure their school or college has appropriate filters and monitoring systems in place. Whilst considering their responsibility to safeguard and promote the welfare of children, and provide them with a safe environment in which to learn, governing bodies and proprietors should consider the age range of their pupils, the number of pupils, how often they access the IT system and the proportionality of costs vs risks.

The UK Safer Internet Centre has published guidance as to what "appropriate" might look like: UK Safer Internet Centre: appropriate filtering and monitoring

Guidance on e-security is available from the National Education Network. Support for schools is available via the: schools' buying strategy with specific advice on procurement here: buying for schools.

Whilst filtering and monitoring are an important part of the online safety picture for schools and colleges to consider, it is only one part. Governors and proprietors should consider a whole school approach to online safety. This will include a clear policy on the use of mobile technology in the school. Many children have unlimited and unrestricted access to the internet via 3G and 4G in particular and the school and college should carefully consider how this is managed on their premises.

Whilst it is essential that governing bodies and proprietors ensure that appropriate filters and monitoring systems are in place, they should be careful that "over blocking" does not lead to unreasonable restrictions as to what children can be taught with regard to online teaching and safeguarding.

Staff training

Governors and proprietors should ensure that, as part of the requirement for staff to undergo regularly updated safeguarding training (paragraph 74) and the requirement to ensure children are

taught about safeguarding, including online (paragraph 78), that online safety training for staff is integrated, aligned and considered as part of the overarching safeguarding approach.

Information and support

There is a wealth of information available to support schools and colleges to keep children safe online. The following is not exhaustive but should provide a useful starting point:

- www.thinkuknow.co.uk
- www.disrespectnobody.co.uk
- www.saferinternet.org.uk
- www.internetmatters.org
- www.childnet.com/cyberbullying-guidance
- www.pshe-association.org.uk
- <http://educateagainsthate.com/>
- www.gov.uk/government/publications/the-use-of-social-media-for-onlineradicalisation
- [www.gov.uk/UKCCIS- external visitors and online safety](http://www.gov.uk/UKCCIS-external-visitors-and-online-safety)

Guidance relating to Preventing Extremism & Radicalisation

Preventing Extremism and Radicalisation (additional guidance)

Extremism and radicalisation is another part of safeguarding students and young people. As with any concern, the risk of harm is raised when young people are vulnerable and is often noticed when students change their behaviour, clothing or attitudes. One aspect of safeguarding students and young people from radicalisation is to set out in 'Promoting fundamental British values as part of SMSC in schools'. This guidance sets out British values as:

- Democracy
- The rule of law
- Individual liberty
- Mutual respect
- The tolerance of those with different faiths and values

The Government Prevent Strategy, inclusive is the approach to reducing the risk of terrorism, this is called 'CONTEST' and has four parts:

- Protect; to strengthen protection against a terrorist attack
- Prepare; to mitigate the impact of a attack
- Pursue; to stop terrorist attacks
- Prevent; to stop people becoming terrorists or supporting terrorism

Links to other policies

The Preventing Extremism and Radicalisation Policy links to the following Five Rivers School policies;

- Child Protection and Safeguarding policy
- Safer Recruitment policy
- Equal Opportunity Policy
- Anti-bullying Policy
- E-Safety Policy

Objectives

The Preventing Extremism and Radicalisation Policy is intended to provide a framework for dealing with issues relating to vulnerability, radicalisation and exposure to extreme views.

The objectives are that:

All senior managers, teachers, and non-teaching staff will have an understanding of what radicalisation and extremism are and why we need to be vigilant in our school.

All senior managers, teachers, and non-teaching staff will understand how tackling extremism and radicalisation fits in with guidance and act swiftly when issues arise.

All members of staff are able to identify students who may be vulnerable to radicalisation and respond by following whole school safeguarding procedures with immediate effect.

All students will understand the dangers of radicalisation and exposure to extremist views; learning about key British values to build resilience against these views and knowing what to do if they experience them.

Definition of Radicalisation

Radicalisation – ‘the process by which a person comes to support terrorism and forms of extremism leading to terrorism’ (Prevent Strategy)

Definition of terrorism

Extremism is 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. Calls for the death of members of the British armed forces is also included in this definition.

Extremism takes many forms and all ideologies are included in this area of safeguarding:

- Islamic extremism
- Left wing extremism
- Right wing extremism
- Animal rights extremism

Definition of Extremism

Extremism – ‘vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty and mutual respect tolerance of different faith and beliefs; and/or calls for the death of members in our armed forces, whether in this country or overseas’ (Prevent)

There are different forms of extremist organisations in the UK and the world, ie – ISIL (Islamic State), Al-Qaeda, Boko Haram, British Defence League, Animal Rights extremist groups such as SPEAK, Irish Republican Army (IRA), Anti-Abortion groups, to name a few.

Indicators of vulnerability (signs and symptoms) include:

- Identity
- The student is distanced from their cultural/religious heritage and experiences
- Discomfort about their place in society
- Personal crises, the student may be experiencing family tensions
- A sense of isolation
- Low self-esteem
- They may be disassociated 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 their identity, faith and belonging
- Personal Circumstances
- Migration
- Local community tensions and events affecting the student's country of origin may contribute to a sense of grievance that is triggered by a personal experience of racism or discrimination or aspects of Government policy

More Critical Risk factors could include;

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

There is no single way of identifying an individual who is likely to be susceptible to a terrorist ideology. As with managing other safeguarding risks, staff should be alert to changes in students' behaviour, which could indicate that they may be in need of help or protection.

Students at risk of radicalisation may display different signs or seek to hide their views.

School staff should use their professional judgement in identifying students who might be at risk of radicalisation and act proportionately.

Even very young students may be vulnerable to radicalisation by others, whether in the family or outside, and display concerning behaviour.

All concerns should be reported to the DSP AND DEPUTY who will follow the necessary guidance.

To support de-radicalisation, we promote:

- All inclusive ethos
- Create doubt or disillusionment
- Question ideas
- Safe discussions
- Range of views

Within the Curriculum

Our curriculum promotes respect, tolerance and diversity. Students are encouraged to share their views and recognise that they are entitled to have their own different beliefs, which should not be used to influence others.

Our PSHE (Personal, Social and Health Education), and SMSC (Spiritual, Moral, Social and Cultural) provision is embedded across the curriculum, and underpins the ethos of the school.

It is recognised that students with low aspirations are more vulnerable to

Students are regularly taught about how to stay safe when using the Internet and are encouraged to recognise that people are not always who they say they are online. They are taught to seek adult help if they are upset or concerned about anything they read or see on the Internet.

Staff Training

All of our staff have received training in Prevent Awareness.

Procedures For Referrals

It is vital for all staff to be constantly vigilant. Staff are reminded to suspend any professional disbelief that instances of radicalisation 'could not happen here' and to refer any concerns through the appropriate channels (via Designated Safeguarding Person).

As a school, we will work with latest guidance summarised below.

Prevent (summary of guidance for all staff)

From 1 July 2015 specified authorities, including all schools as defined in the summary of this guidance, are subject to a duty under section 26 of the Counter-Terrorism and Security Act 2015 ("the CTSA 2015"), in the exercise of their functions, to have "due regard to the need to prevent people from being drawn into terrorism". **This duty is known as the Prevent duty.**

Schools are expected to assess the risk of students being drawn into terrorism, including support for extremist ideas that are part of terrorist ideology. This means being able to demonstrate both a general understanding of the risks affecting students and young people in the area and a specific understanding of how to identify individual students who may be at risk of radicalisation and what to do to support them. Schools and colleges should have clear procedures in place for protecting students at risk of radicalisation. These procedures may be set out in existing safeguarding policies. It is not necessary for schools and colleges to have distinct policies on implementing the Prevent duty. The Prevent duty builds on existing local partnership arrangements. For example, governing bodies and proprietors of all schools should ensure that their safeguarding arrangements take into account the policies and procedures of Local Safeguarding Students Boards (LSCBs).

The Prevent guidance refers to the importance of Prevent awareness training to equip staff to identify students at risk of being drawn into terrorism and to challenge extremist ideas. Individual schools are best placed to assess the training needs of staff in the light of their assessment of the risk to students at the school of being drawn into terrorism. As a minimum, however, schools should ensure that the designated safeguarding lead undertakes Prevent awareness training and is able to provide advice and support to other members of staff on protecting students from the risk of radicalisation.

Schools must ensure that students are safe from terrorist and extremist material when accessing the internet in schools. Schools should ensure that suitable filtering is in place. It is also important that schools teach students about online safety more generally.

Channel

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

Section 36 of the CTSA 2015 places a duty on local authorities to ensure Channel panels are in place. The panel must be chaired by the local authority and include the police for the relevant local authority area. Following a referral the panel will assess the extent to which identified individuals are vulnerable to being drawn into terrorism, and, where considered appropriate and necessary consent is obtained, arrange for support to be provided to those individuals. Section 38 of the CTSA 2015 requires partners of Channel panels to co-operate with the panel in the carrying out of its functions and with the police in providing information about a referred individual. Schools and colleges which are required to have regard to Keeping Students Safe in Education are listed in the CTSA 2015 as partners required to cooperate with local Channel panels

Listed below is the data that MASH needs to help them do their work. It would be helpful if you could give as much information as you have when making a referral.

- Full names and dates of birth of the child, carers and any other family members
 - Child's full address and telephone number
- Daytime address and contact telephone numbers for parents/carers
- Ethnic origin, religion and cultural background
- Reason for the referral, including description of any injuries observed, details of allegations made, discussions with the child or others, details of any witnesses. Including any relevant dates/times/ places of alleged incidents
- Any immediate or impending danger to the child
- Based on your knowledge of the child and family, you may well have an opinion about how the family are likely to react to the referral and any subsequent child protection enquiries, including any factors which may place the child or others at further risk (e.g. where there is domestic violence)
- Are the parents or child aware of the referral to MASH

Sexual Violence and Sexual Harassment

Context Sexual violence and sexual harassment can occur between two children of any sex. They can also occur through a group of children sexually assaulting or sexually harassing a single child or group of children. Children who are victims of sexual violence and sexual harassment will likely find the experience stressful and distressing.

This will, in all likelihood, adversely affect their educational attainment. Sexual violence and sexual harassment exist on a continuum and may overlap, they can occur online and offline (both physical and verbal) and are never acceptable. It is important that all victims are taken seriously and offered appropriate support. Schools and colleges should consider the following:

- It is more likely that girls will be the victims of sexual violence and more likely that sexual harassment will be perpetrated by boys. Schools and colleges should be aware of the importance of:
- making clear that sexual violence and sexual harassment is not acceptable, will never be tolerated and is not an inevitable part of growing up;
- not tolerating or dismissing sexual violence or sexual harassment as “banter”, “part of growing up”, “just having a laugh” or “boys being boys”; and
- challenging behaviours (which are potentially criminal in nature), such as grabbing bottoms, breasts, vaginas and penises. Dismissing or tolerating such behaviours risks normalising them.
- Children with Special Educational Needs and Disabilities (SEND) can be especially vulnerable. Disabled and deaf children are three times more likely to be abused than their peers. Additional barriers can sometimes exist when recognising abuse in SEND children (see paragraph 96 in Part 2 of this guidance).

Evidence shows girls, children with SEND and LGBT children are at greater risk.

What do we mean by sexual violence and sexual harassment between children?

The departmental advice, when referring to sexual violence refers to sexual offences as described under the Sexual Offences Act 2003. This includes: rape, assault by penetration and sexual assault. The advice sets out that sexual harassment is ‘unwanted conduct of a sexual nature’ that can occur online and offline. It is likely to violate a child’s dignity, and/or makes them feel intimidated, degraded or humiliated and/or creates a hostile, offensive or sexualised environment.

Schools and colleges should be aware of their obligations under the Human Rights Act 1998 (HRA).

Schools and colleges are required to comply with relevant requirements as set out in the Equality Act 2010 (the Equality Act): advice-for-schools and advice for further-and-higher education.

Introduction:

Reports of sexual violence and sexual harassment are likely to be complex and require difficult professional decisions to be made, often quickly and under pressure. Preplanning, effective training and effective policies will provide schools and colleges the foundation for a calm, considered and appropriate response to any reports. Support for schools and colleges Effective safeguarding practice is for schools and colleges to be clear, in advance, as to what local processes are in place and what local support can be accessed when sexual violence or sexual harassment has occurred. It

is important to prepare for this in advance of a reported incident and review this information on a regular basis to ensure it is up to date. As such:

- if required, the designated safeguarding lead (or a deputy) should discuss the local response to sexual violence and sexual harassment with police and children's social care colleagues in order to prepare the school or college's policies (especially the child protection policy) and responses; and
- the designated safeguarding lead (and their deputies) should be confident as to what local specialist support is available to support all children involved (including the victims and perpetrators) in sexual violence and sexual harassment and be confident as to how to access this support when required.

Detailed information on support for schools and colleges is included in the departmental advice.

Prevention

As a school we will minimise the risk of allegations against other pupils by:-

- Providing a developmentally appropriate PSHE syllabus which develops students understanding of acceptable behaviour and keeping themselves safe
- Having systems in place for any student to raise concerns with staff, knowing that they will be listened to, believed and valued
- Delivering targeted work on assertiveness and keeping safe to those pupils identified as being at risk
- Developing robust risk assessments & providing targeted work for pupils identified as being a potential risk to other pupils.

Managing the disclosure:

The school or college's initial response to a disclosure from a child is important. It is essential that victims are reassured that they are being taken seriously and that they will be supported and kept safe. A victim should never be given the impression that they are creating a problem by reporting sexual violence or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report.

Anonymity

Where an allegation of sexual violence or sexual harassment is progressing through the criminal justice system, schools and colleges should be aware of anonymity, witness support and the criminal process in general so they can offer support and act appropriately.

In addition to the legal protections, as a matter of effective safeguarding practice, schools and colleges should do all they reasonably can to protect the anonymity of any children involved in any report of sexual violence or sexual harassment. Amongst other things this will mean carefully considering, based on the nature of the report, which staff should know about the report and any support that will be in place for the children involved.

Action following a report:

The designated officer should make an immediate risk and needs assessment, considering:

- The victim
- The alleged perpetrator

All other Children

What to consider

Schools and colleges should carefully consider any report of sexual violence and/or sexual harassment. The designated safeguarding lead (or deputy) is likely to have a complete safeguarding picture and be the most appropriate person to decide on the school or college's initial response. Important considerations will include:

- the wishes of the victim in terms of how they want to proceed. This is especially important in the context of sexual violence and sexual harassment. Victims should be given as much control as is reasonably possible over decisions regarding how any investigation will be progressed and any support that they will be offered.
- the nature of the alleged incident(s), including: might a crime have been committed and consideration of harmful sexual behaviour; • the ages of the children involved;
- the developmental stages of the children involved;
- any power imbalance between the children (e.g. is the alleged perpetrator significantly older);
- is the alleged incident a one off or a sustained pattern of abuse;
- are their ongoing risks; and
- other related issues and wider context.

Where incidents and or behaviours are associated with factors outside the school or college and/or occur between children outside the school or college the designated safeguarding lead (or deputy) should be considering contextual safeguarding. This simply means assessments of children in such cases should consider whether wider environmental factors are present in a child's life that are a threat to their safety and/or welfare. Children's social care assessments should consider such factors and so, it is important that schools and colleges provide as much information as possible as part of the referral process. This will allow any assessment to consider all the evidence and the full context of any abuse.

Options to manage the report

Four scenarios for school to consider when managing any reports:

1. Manage internally
2. Early Help – multi-agency early help
3. Referrals to children's social care
4. Reporting to the police – in parallel to children's social care

Children sharing a classroom:

Initial considerations when the report is made:

Any report of sexual violence is likely to be traumatic for the victim. However, reports of rape and assault by penetration are likely to be especially difficult with regard to the victim and close proximity with the alleged perpetrator is likely to be especially distressing. Whilst the school or college establishes the facts of the case and starts the process of liaising with children's social care and the police, the alleged perpetrator should be removed from any classes they share with the

victim. The school or college should also consider how best to keep the victim and alleged perpetrator a reasonable distance apart on school or college premises and on transport to and from the school or college where appropriate. These actions are in the best interests of both children and should not be perceived to be a judgment on the guilt of the alleged perpetrator.

For other reports of sexual violence and sexual harassment the proximity of the victim and alleged perpetrator and considerations regarding shared classes, sharing school or college premises and school or college transport, should be considered immediately. In all cases the initial report should be carefully evaluated, reflecting the considerations set out in the “Action following a report” section above. The wishes of the victim, the nature of the allegations and the protection of all children in the school or college will be especially important when considering any immediate actions.

Safeguarding and supporting the victim

The following principles are based on effective safeguarding practice and should help shape any decisions regarding safeguarding and supporting the victim.

- Consider the age and the developmental stage of the victim, the nature of the allegations and the potential risk of further abuse. Schools and colleges should be aware that by the very nature of sexual violence and sexual harassment a power imbalance is likely to have been created between the victim and alleged perpetrator.
- The needs and wishes of the victim should be paramount (along with protecting the child) in any response. It is important they feel in as much control of the process as is possible. Wherever possible, the victim, if they wish, should be able to continue in their normal routine. Overall, the priority should be to make the victim’s daily experience as normal as possible, so that the school or college is a safe space for them.
- The victim should never be made to feel they are the problem for making a report or made to feel ashamed for making a report.
- Consider the proportionality of the response. Support should be tailored on a case-by-case basis. The support required regarding a one-off incident of sexualised name-calling is likely to be vastly different from that for a report of rape.

Ongoing Considerations:

Victim and alleged perpetrator sharing classes considered the immediate response to a report. Once the designated safeguarding lead (or a deputy) have decided what the next steps will be in terms of progressing the report, they should consider again, the question of the victim and alleged perpetrator sharing classes and sharing space at school or college. This will inevitably involve complex and difficult professional decisions, including considering their duty to safeguard children and their duty to educate them. It is important each report is considered on a case-by-case basis and risk assessments are updated as appropriate. As always when concerned about the welfare of a child, the best interests of the child should come first. In all cases, schools and colleges should follow general safeguarding principles. Where there is a criminal investigation into a rape, assault by penetration or sexual assault the alleged perpetrator should be removed from any classes they share with the victim. The school or college should also consider how best to keep the victim and alleged perpetrator a reasonable distance apart on school or college premises and on transport to and from school or college where appropriate. This is in the best interests of both children and should not be perceived to be a judgement on the guilt of the alleged perpetrator. Close liaison with the police is

essential. Where a criminal investigation into a rape or assault by penetration leads to a conviction or caution, the school or college should take suitable action, if they have not already done so. In all but the most exceptional of circumstances, the rape or assault is likely to constitute a serious breach of discipline and lead to the view that allowing the perpetrator to remain in the same school or college would seriously harm the education or welfare of the victim (and potentially other pupils). Where a criminal investigation into sexual assault leads to a conviction or caution, the school or college should, if it has not already, consider any suitable sanctions in light of their behaviour policy, including consideration of permanent exclusion. Where the perpetrator is going to remain at the school or college, the principle would be to continue keeping criminal investigation into sexual assault leads to a conviction or caution, the school or college should, if it has not already, consider any suitable sanctions in light of their behaviour policy, including consideration of permanent exclusion.

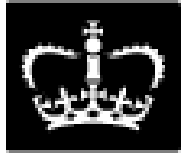
Where the perpetrator is going to remain at the school or college, the principle would be to continue keeping the victim and perpetrator in separate classes and continue to consider the most appropriate way to manage potential contact on school and college premises and transport. The nature of the conviction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

In all cases, schools and colleges should record and be able to justify their decision making.

Safeguarding and supporting the alleged perpetrator

The following principles are based on effective safeguarding practice and should help shape any decisions regarding safeguarding and supporting the alleged perpetrator:

- The school or college will have a difficult balancing act to consider. On the one hand to safeguard the victim (and the wider student body) and on the other hand providing the alleged perpetrator with an education, safeguarding support as appropriate and implementing any disciplinary sanctions.
- Consider the age and the developmental stage of the alleged perpetrator and nature of the allegations. Any child will likely experience stress as a result of being the subject of allegations and/or negative reactions by their peers to the allegations against them.
- Consider the proportionality of the response. Support (and sanctions) should be considered on a case-by-case basis. An alleged perpetrator may potentially have unmet needs (in some cases these may be considerable) as well as potentially posing a risk of harm to other children. Harmful sexual behaviour in young children may be a symptom of either their own abuse or exposure to abusive practices and or materials. Advice should be taken, as appropriate, from children's social care, specialist services and the police.



NCA

National Crime Agency

County Lines Violence, Exploitation & Drug Supply 2017

National Briefing Report

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Introduction

This briefing report provides a national overview on the threat of 'county lines' drug supply, violence and exploitation. It supports Home Office, NPCC and wider stakeholder priorities including those of the Ending Gang Violence and Exploitation (EGVE) programme. In particular, this report contributes towards the EGVE objective of 'Tackling County Lines'.

It is the third annual NCA report on this threat, following an initial assessment in 2015 and subsequent update report in 2016. The report also forms part of the NCA's briefing requirement to the quarterly Gangs Inter-Ministerial Group (IMG).

For the purposes of this report, a typical county lines scenario is defined by the following components:

- a. A group (not necessarily affiliated as a gang) establishes a network between an urban hub and county location, into which drugs (primarily heroin and crack cocaine) are supplied.
- b. A branded mobile phone line is established in the market, to which orders are placed by introduced customers. The line will commonly (but not exclusively) be controlled by a third party, remote from the market.
- c. The group exploits young or vulnerable persons, to achieve the storage and/or supply of drugs, movement of cash proceeds and to secure the use of dwellings (commonly referred to as cuckooing).
- d. The group or individuals exploited by them regularly travel between the urban hub and the county market, to replenish stock and deliver cash.
- e. The group is inclined to use intimidation, violence and weapons, including knives, corrosives and firearms.

This report does not address wider drug markets or supply issues and has sought to distinguish county lines from more conventional drugs supply methodologies.

The information assessed for this report was provided by 43 territorial forces across England & Wales (100%). British Transport Police and Police Scotland also provided information, but this has not been included for statistical analysis in order to be consistent with the two previous NCA reports on county lines, plus Police Scotland have their own threat assessment and BTP's perspective is different from that of regional police forces.

This report adopts the United Nations Convention on the Rights of the Child definition of a child, which is everyone under the age of 18.

Key Findings

1. County lines groups have a proven ability to adapt their operating methods and practices, including changing their use of phones, transport, accommodation or vulnerable people. This is to evade law enforcement intervention as well as strengthen their criminal enterprise.
2. County lines groups impose high levels of violence, including the prevalent use of weapons and firearms to intimidate and control members of the group and associated victims.
3. Although the exploitation of children continues to be reported, the true scale of abuse remains an intelligence gap in many parts of the country. It is often difficult to assess accurately, requiring focused and systematic data capture, as well as multi-sector collaboration to develop and maintain reliable data. A clear national picture cannot be determined currently.
4. County lines groups continue to pose a significant threat to vulnerable people and explore a range of opportunities to identify potential new victims. Victims are exposed to varying levels of exploitation including physical, mental and sexual harm, with some over protracted periods. Some vulnerable individuals are trafficked into remote markets to work whilst others are falsely imprisoned in their own homes, which have been taken over (cuckooed) using force or coercion.
5. Whilst London continues to be the dominant urban source of county lines offending, a number of other export hubs are now being reported across the country, reflecting the threat's growth and evolution.
6. The use of anonymised mobile phones remains an essential feature of county lines, as well as other forms of drug supply. However county lines groups increasingly operate more than one branded line. Some use multiple telephone numbers which all connect back to the core deal line, whilst other groups use cloned phones, which mimic the identity of the main county line phone number. This increases the resilience of the criminal groups to law enforcement intervention.

Information base

This report draws on returns from UK police forces (including Police Scotland and British Transport Police).

The intelligence collection period for this report is Oct 2016 to Jun 2017.

Purpose

This report aims to inform the response to gang violence and exploitation linked to county lines drug supply and provide insight into the current national situation.

This report is the third of three, which refreshes the understanding of the threat, identifies new trends and maps the scope of the issue across England and Wales. It builds on the 2015 and 2016 assessments, with specific focus on highlighting significant changes and new or emerging trends.

The report informs the cross-government 'Ending Gang Violence & Exploitation' initiative, as well as the work of Home Office, police and wider partners, with a combination of national overview and regional / local context.

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1. County Lines Methodology

1.1 This report focuses on the specific method of drug supply commonly referred to as county lines. County lines relates to the supply of class A drugs (primarily crack cocaine and heroin) from an urban hub into rural towns or county locations. This is facilitated by a group who may not necessarily be affiliated as a gang, but who have developed networks across geographical boundaries to access and exploit existing drugs markets in these areas.

1.2 A key feature of county lines drug supply is the use of a branded mobile phone line which is established in the marketplace and promoted throughout the existing customer base. Group messages are sent out periodically to the customer base to advertise the availability of drugs and orders are placed back to this line in response. A relay system (another phone) is then used to pass orders onto dealers in the rural marketplace. The branded phone line is generally controlled by senior group members who are traditionally located in the urban hub. However, we are increasingly seeing incidents of the phone being held closer to the rural marketplace. Some phones are reported to move periodically between these market locations.

1.3 The exploitation of young and vulnerable persons is a common feature in the facilitation of county lines drugs supply, whether for the storage or supply of drugs, the movement of cash, or to secure the use of dwellings held by vulnerable people in the rural marketplace (commonly referred to as cuckooing).

1.4 County lines groups use high levels of violence and intimidation to establish and maintain markets, whether that's forcing existing suppliers out, as a means to enact some form of retribution, controlling vulnerable individuals or as a general show of strength. Levels of violence vary considerably but it often includes the use of knives, corrosives, firearms and other weapons. It may also include sexual violence and sexual exploitation.

1.5 The group, or individuals exploited by them, travel regularly between the urban hub and the rural marketplace, to replenish stock and deliver cash. This movement is not unique to county lines drug supply but is generally more frequent and in smaller deal amounts compared to most other drug supply methods.

2. New & Emerging County Lines Trends

2.1 23% of forces (10) report county lines groups using accommodation other than that acquired by cuckooing in the rural marketplace. This includes the use of serviced apartments, holiday lets, budget hotels and caravan parks. This could indicate groups are beginning to move away from using cuckooing in its traditional form. County lines groups prefer to pay cash where possible and often use network associates to arrange these facilities, as a means of distancing themselves from the criminality.

2.2 County lines networks are increasingly operating from more than one phone number. This can indicate the emergence of a new spin-off line (separately branded line run by the same county lines network) but generally it involves the use of different phone numbers which all relate to/work for the same branded county line. 26% of

forces (11) note evidence of county lines groups changing phone numbers/deal lines, including some on a regular basis. There is some indication of regional variation here; reporting indicates that Liverpool-based lines tend to change frequently whereas London lines tend to stay the same for longer.

2.3 18% of force returns (8) reference potentially complicit companies providing services to county lines groups, including taxis, fast food outlets and car hire firms. Most concern suspicions of complicity rather than confirmed reports. Such facilitators would generally be used to distance the group from criminality i.e. to hide travel patterns, methods and the identity of county line nominals.

2.4 Traditionally a stash house is established in the rural area to facilitate efficient supply. However, at least one force reports that drugs are increasingly being kept by various people at different addresses in the rural marketplace. Drugs are often transported frequently in small quantities i.e. batches of wraps, but the number of wraps being transported seems to vary considerably.

2.5 30% of force (13) reports include references to 'plugging' (concealing drugs internally) with both males and females involved. Historically, the plugging of drugs is a common tactic used for the transport of drugs between the urban hub and rural marketplace, but plugging is also now commonly used for the storage of drugs as well. This poses significant health risks, as those concealing the drugs will often do so for extended periods of time. This is often in unhygienic and unsafe conditions with the individuals who are secreting the drugs also potentially being subject to violence and intimidation.

2.6 There is some indication that county lines nominals are aware of law enforcement seizure requirements and limitations, so will do all they can to factor this into their practises. County lines suspects often utilise a little and often approach to the supply of drugs and movement of cash and will vary and limit their use of bank accounts, ensuring proceeds are cashed out in the urban hub soon after being deposited.

2.7 The replacing or rotating of county lines operatives in rural marketplaces is referenced in 12% of forces (5). This is done to prevent these individuals becoming known to local police.

2.8 The widespread and frequent use of violence and carrying of weapons is noted in 2017 returns. This is either as a mechanism to enforce recovery of drug debts, to obtain retribution for drug losses or to settle turf wars. Knives, baseball bats, ammonia/corrosives and other weapons are used to enforce these threats. There is also notable evidence of firearms being seen or used to threaten in connection to county lines activity.

'County line networks often bring their own nominals into the rural marketplace in pairs. They will stay for a month or so before returning home and being replaced by others –this is done to hinder police detection and/or familiarity with these nominals.' - NPCC force.

2.9 13% of forces (6) note the emergence of county lines groups conducting franchise style operations, renting county lines and customer contacts to other criminal

groups. In some cases, the line owners also facilitate the supply of drugs to these groups. There is also some reporting of lines being up for sale or sold.

2.10 Some local drug users offer their services to a number of different county lines networks, offering to run drugs to and from the urban hub for payment in money or drugs. 58% of forces (25) report that local drug users are used to transport drugs. However, this figure does not differentiate between those who are complicit and those who are coerced.

'Once a vulnerable young person becomes sufficiently embedded in the criminality and begins to act on their own volition, their affiliation to a defined London gang sometimes becomes blurred with them often crossing over and dealing for multiple gangs who are active in their county.' - NPCC force.

2.11 Some county lines groups use existing criminal families/networks located within the rural marketplace as a means of assisting the group to conduct their activity and to open up a network. Others are reported to take over existing local drug supply lines and turn them into county lines.

2.12 County lines groups are able to adapt their methods with ease and frequency. Changeable methods include their use/exploitation of:

- Transport; including method, route, frequency, payment, person travelling
- Phones; including changing handsets, SIM cards, numbers (sometimes frequently), varying the line's location and those who control it
- Accommodation; including the exploitation of a wider set of vulnerable people, use of hotels, holiday lets, serviced apartments, caravans
- Children; including 'clean skins' (those without a record), missing persons, children in care, children exposed to broader vulnerable issues
- Vulnerable; including drug users, those with mental health issues, those with physical health issues, those at a point of crisis
- Complicit individuals; including different businesses or individuals
- Money laundering; including running cash, depositing proceeds into bank accounts of multiple network associates.

3. Scope and Scale of County Lines

3.1 There is evidence of county lines activity in 88% of force returns (38). 12% of forces (5) report no evidence. 81% of forces (35) report as definite importers of county lines and 30% of forces (13) report as definite exporters.

3.2 43% of forces (19) provided data on the actual numbers of county lines in their area. From this, and on the basis that there must be at least one line present in each force that reported evidence of county lines activity, a conservative estimate is that there are at least 720 lines across England and Wales. The actual number may well be considerably higher, as many of these areas are likely to have more than one line. It

should also be noted that there was evidence, albeit limited, of lines closing, therefore it is possible that not all of these lines will necessarily remain running long term.

3.3 We estimate that there are at least 283 lines originating in London. Again, this number should be considered as a conservative estimate given that some forces were not able to confirm sufficiently detailed or accurate data on the total number of county lines in their area.

3.4 Forces were asked whether lines were established or had emerged in 2017. For the majority of lines (371 of the 720) this information was not provided, often citing a lack of sufficiently detailed coverage or resource to monitor the changing picture to this extent. For the forces that did provide this data, 172 lines were established and 177 were emerging. The high proportion of emerging lines may indicate that county lines activity is increasing. However, with limitations around the data i.e. the difficulties distinguishing between a county line and 'conventional' drug supply lines, and lack of more detailed and accurate information, it is not possible to confirm that assessment at this time. The data does indicate that county lines markets can change considerably from year to year.

3.5 33% of forces (14) reported having established lines in their area, 19% of forces (8) reported having emerging lines and a further 49% of forces (21) reported having county lines activity but could not distinguish whether it was established or emerging.

3.6 Motivating factors for setting up / utilising the county lines methodology include huge profits, reduced competition from other drugs OCG's, receptive customer bases, less intimidation or resistance from local dealers and a lesser risk of being known by local police.

3.7 Not all county lines operate 24 hours a day, 365 days a year. Some operate more sporadically, such as when they have a commodity to sell. One perpetrator was reported to save up money in the rural market before moving back to the urban hub to spend the proceeds.

3.8 The Metropolitan Police force area is mentioned as the exporting hub of county lines going into 65% of other forces (28). Merseyside is the second highest exporter affecting 42% of forces (18) nationally. County lines originating from London predominantly impact forces in the south and east but some also affect forces further north. County lines originating from Merseyside have a greater impact on forces in the north west but also impact forces in the south east.

3.9 The true scale of county lines activity is difficult to determine with accuracy as its nature is fluid and the intelligence surrounding the threat is not always clear, nor is it recorded consistently. Elements of county lines drug supply are likely to exist in all forces across England and Wales. It is also likely that the number of forces with exporting lines will increase as more criminal groups adopt the county lines methodology.

4. Drugs

4.1 The most commonly reported drug being supplied via the county lines methodology is heroin, with 79% of forces (34) reporting it being sold. This is followed by crack cocaine, with 70% of forces (30) recording it being supplied. This aligns to the traditional county lines model which predominantly catered to the addicted daytime economy drug markets supplying heroin and crack cocaine. However, some force returns noted evidence to suggest groups were now targeting different drugs scenes, including the night time economy (club scene) and selling other class A drugs. This could indicate an evolution of the model. Alternatively it could indicate that other types of drugs line have been incorrectly included in the data capture for this report.

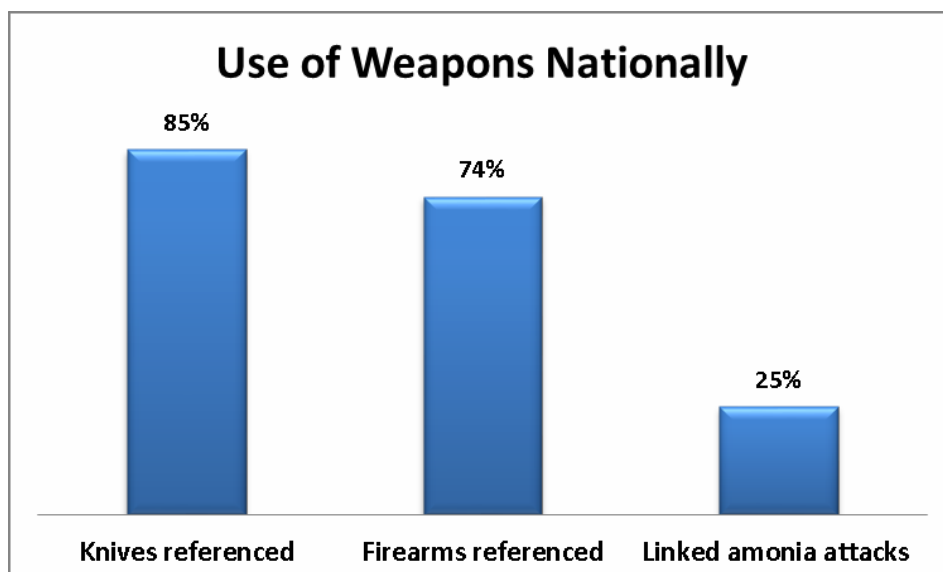
4.2 The synthetic cannabinoid commonly referred to as Spice was reported by 9% of forces (4) as being supplied by county lines groups. One force also mentioned new psychoactive substances (NPS) being supplied.

4.3 More than a third of forces (35%) reference the supply of cannabis by county lines groups. However, this is generally referenced as a secondary drug and there is some suggestion that it is supplied by runners as an independent supplementary side-line to generate additional income.

5. Violence and Weapons

5.1 Virtually all forces that reported county lines activity also referenced that the individuals responsible were involved with carrying weapons. Knives were mentioned by 85% of forces (35) and firearms were mentioned by 74% of forces (32). Approximately a quarter of forces reported intelligence relating to the use of firearms to threaten, however there were no reported incidents of guns being discharged in relation to county lines activity.

Figure 1. Graph outlining the use of weapons nationally.



5.2 Other violence-related crimes reported by forces included kidnapping, robbery, assault, and aggravated burglary. There were also reports of exploited victims being forced to strip and then being scalded with boiling water.

5.3 The use of acid or ammonia was noted in the 2016 NCA County Lines report as a potential emerging trend. This year, 25% of forces (11) reported evidence of possession or use of acid, corrosives, noxious substances in relation to vitriolage (acid throwing attacks), with one force reporting potential evidence. About half of the cases referred to ammonia rather than acid as the substance used.

'Over 50% of the acid attacks could be attributed to county lines activity. Nearly 70% of these acid attacks also involved other forms of violence ie GBH, stabbing etc.' NPCC force.

5.4 42% of forces (18) mentioned homicide in their returns. These relate to a total of 19 separate deaths including two homicides which were mentioned by one force. However, it is often not clear whether these homicides were directly connected to county lines activity. Deaths were referenced by two other forces, although it's not clear if these were killings or not. Our judgement is that there are definite connections to county lines in at least 21% (9) of the cases reported.

5.5 'Taxing' is a newly-reported term which describes the infliction of violence in order to obtain control i.e. the marking or injuring of a gang member who has done wrong, as a show of strength to others. It is thought to be used in a similar way to the

'A male's hand was severed and both legs broken. The victim was male, with intelligence supporting that the incident was a drug taxing. The victim is believed to be part of a county lines network with the offenders being a local drug line. It's suggested to be a punishment attack by the persons the victim was running drugs for, for having used drugs/spent proceeds himself.' - NPCC force.

term 'debt bondage' i.e. the creation of a drugs debt, perhaps through fake robbery, which the victim then has to pay off. Evidence of taxing was reported by 35% of forces (15) with a further 5% of forces (2) noting potential evidence.

5.6 5% of forces (2) reported the discovery of numerous knives, generally kitchen knives, being hidden in various places throughout properties being used for supply. They were generally out of plain sight but concealed amongst furniture in different rooms for ease of access if required.

5.7 Although a number of forces have anecdotally reported an increase in violence and knife crime (including the presence of knives and knife wounding), there is little evidence or detail in the returns to confirm either the raw data which reflects such 'increases', or the sufficiently detailed reporting to confirm attribution to county lines activity.

5.8 Numerous incidents of serious violence have been reported and often describe the slashing, stabbing, beating and breaking bones of victims. There are also reports of limbs being severed, skull fractures and attacks by numerous gang members simultaneously. Sexual violence was referenced by 21% of forces (9), often with female drug users being forced into sex to pay off drug debts, or nominals being raped as a form of punishment.

5.9 58% of forces (25) reported county lines related turf wars occurring in the past year. These include violent and destructive conflicts between rival groups/lines competing for market dominance, using violence and intimidation to force rival groups out and impose control. Anecdotal reporting suggests these turf wars are a major cause of the increasing incidents of violence in rural areas. However, more focused and detailed analysis of related incidents would need to be carried out before this could be confirmed.

5.10 Reasons given for the use of violence were diverse but included competition between county lines groups and local dealers, revenge violence (often due to robbery or intimidation of runners) and robberies to enforce/create drug debts. They also included violence due to unpaid drug debts, a general show of strength, to intimidate individuals into working for the line, to obtain control over an address (cuckooing) or to punish unacceptable behaviour e.g. consuming drugs rather than selling them.

5.11 Whilst the statistics highlighted in this report around the use of violence and weapons to facilitate county lines activity are very concerning, it is necessary to build a better understanding around the real causes behind this apparent propensity for violence. More proactive prevention work is required to stop young people becoming involved in this criminality. Conventional judicial outcomes are not only challenging and resource intensive for law enforcement, victims are often not willing to assist in the prosecution through fear of further reprisals.

6. Cuckooing

6.1 In 2017, 77% of forces (33) documented incidents of cuckooing that were associated to county lines activity. Cuckooing clearly remains the dominant method of obtaining access to suitable premises to operate and deal from. Virtually every force that reported the presence of a county line end-point reported cuckooing. The vulnerable adults targeted are predominantly class A drug addicts but also include the elderly, those with mental or physical health impairments, female sex workers and single mothers.

6.2 County lines groups will target new premises by pursuing vulnerable individuals who attend recovery groups, dependency units and areas associated with those experiencing problems. They are seeking to establish relationships with vulnerable individuals for access to their homes. Once they gain control over the victim, whether through drug dependency, debt or as part of their relationship, groups move in. Once this happens the risk of domestic abuse, sexual exploitation and violence increases. In some instances, drug users may appear to be complicit in allowing their home to be used, however the issue of true consent is questionable, as many drugs users will not necessarily see themselves as being vulnerable.

6.3 It is common for county lines networks to have access to several cuckooed addresses at any one time. They will move quickly between vulnerable peoples' homes and will stay for just a few hours, a couple of days or sometimes longer. This helps groups evade detection, especially as intelligence gathered by law enforcement is often unclear and is quickly out of date. Conversely, some forces also mentioned that

individuals from the urban hub appeared to have settled down in the rural marketplace.

6.4 There is an emergence of cuckooed addresses being used by multiple county lines groups simultaneously. This scenario is

'This cuckooing model was initially used by county lines groups originating from London. County line dealing 'franchises' then spread throughout the country, taking the cuckooing model with them. However, due to the success of this method, cuckooing has now been adopted by other drug supply networks.' - NPCC force.

described in a number of returns but there is insufficient detail to confirm how complicit or collaborative groups might be. What is worthy of note is that there were no reports of violence in these cases. County lines run by a mixture of subjects from different urban hubs have also been referenced, although it is not known whether this is an anomaly or an emerging model.

6.5 The victims of cuckooing are most commonly class A drug users, however there have been numerous cases of victims with learning difficulties/mental health issues and, to a lesser extent, those with physical disabilities.

Victims will often also suffer from other forms of addiction i.e. alcohol.

6.6 The use of premises associated to sex workers by county lines groups is reported in 33% of force returns (14). There were also reports of sex workers being used as recruiters for further business, forced prostitution and acting as drug couriers.

'Some police forces have a well-documented success rate of engaging with known vulnerable drug users and carrying out Misuse of Drugs Act warrants at problematic addresses. This persistent approach may have contributed towards the emerging use of alternative addresses i.e. hotels.' - NPCC force.

6.7 23% of forces (10) report county lines groups using other forms of accommodation in the rural marketplace to facilitate their business. This includes the use of serviced apartments, holiday lets, budget hotels and caravan parks. One force reported that as county lines groups have begun to work more remotely, the use of violence has reduced. There was insufficient detail in the return to confirm if this was as a direct result of moving away from cuckooing.

'The group were consuming and selling drugs from within the property and prevented the victim from leaving the address or going to the toilet areas.' - NPCC force.

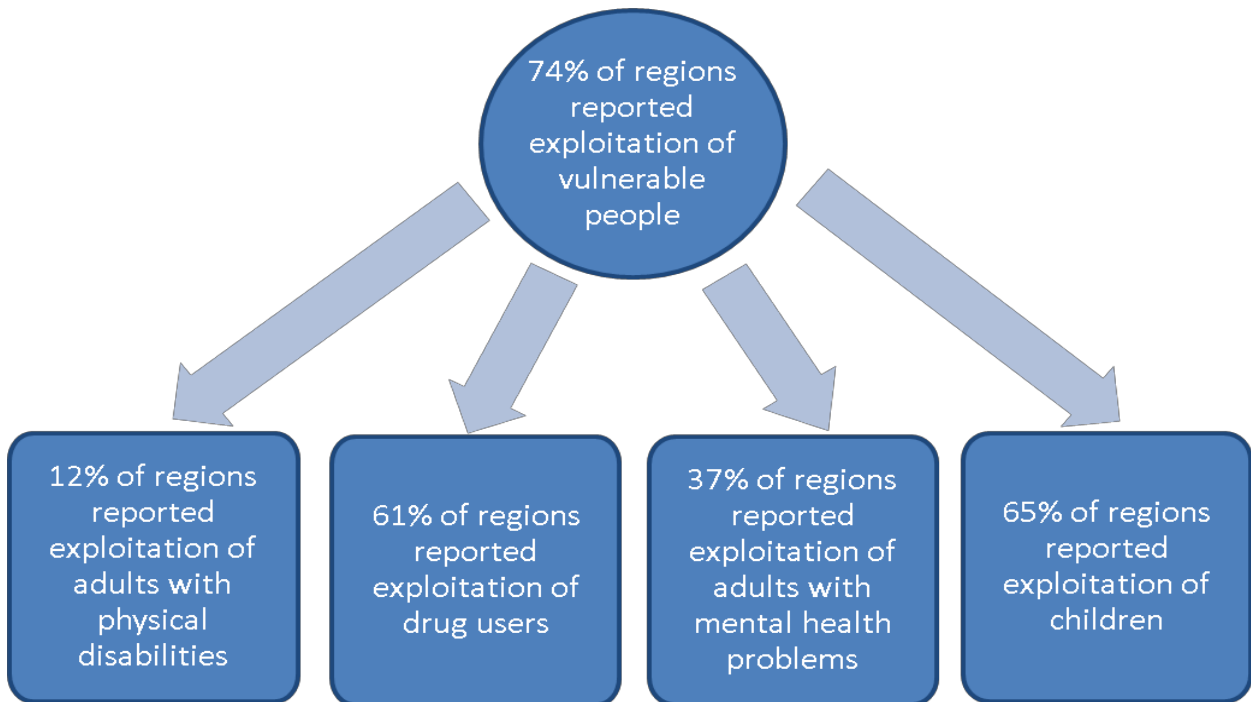
6.8 Of the 33 forces which reported incidents of cuckooing, 21% (7) reported possible instances of imprisonment/modern slavery, where vulnerable people were detained against their will and/or denied access to areas within their home. Some vulnerable adults even take the extreme measure of leaving their own property, making themselves voluntarily homeless, and leaving the network free reign over their accommodation. Although, as one force reported, there is likely to be an element of

forced labour (drug running to pay off debts) or forced imprisonment (cuckooing) in relation to every county line.

7. Exploitation of Vulnerable People

7.1 74% of forces (32) noted exploitation of vulnerable people. 37% of forces (16) reported exploitation of persons with mental health issues and 12% of forces (5) reported exploitation of persons with physical health issues. 65% of forces (28) reported that county lines activity was linked to exploitation of children.

Figure 2. Exploitation of people with different vulnerabilities



7.2 In 2017, 58% of forces (25) mentioned vulnerable people dealing drugs as part of county lines enterprises. Vulnerable people are also coerced into running errands on behalf of county lines groups, acting as street dealers or runners, arranging accommodation, hiring cars, booking train tickets etc. One force mentioned that vulnerable individuals were exploited for money laundering purposes, including one person who had £22,000 in drug revenue put through his account. Victims can often become scared and may not wish to continue working for the group but do not want to involve the police for fear of self-incrimination or retribution by the perpetrators. 28% of forces (12) report victims are coerced through debt enforcement/debt bondage.

'Children assessed as vulnerable due to missing episodes do appear to be more regularly linked directly or through association to drug networks operating in the areas they reside.' - NPCC force.

7.3 Methods used to recruit children and vulnerable adults are not fully understood, but it appears many children are lured by the promise of earnings and/or valuable assets (designer clothing/jewellery). One reported method involves a member of the gang attending drug rehabilitation centres to seek out potential drug users who could be utilised by the network as runners or for their home address. Young women are often involved in recruiting other young women and county lines groups are often

deliberately targeting vulnerable people in crisis. There is also intelligence indicating that social media is being used to recruit members into the group. Some forces mentioned a cycle of exploitation in which exploited individuals went on to recruit other vulnerable people to be exploited.

7.4 The use of missing persons (MISPERs) is a commonly reported feature of county lines activity with many being encountered during police stops and warrant searches. Many of those encountered are children, but it is often very difficult to get young missing people to engage with the police or partner agencies. The true correlation between missing persons and county line drug dealing is reported by many forces as an intelligence gap, as it has not yet been fully established or understood.

7.5 The exploitation of vulnerable people is an essential aspect of county lines drugs supply. The actual numbers of victims being exploited is difficult to assess due to a lack of sufficiently detailed intelligence, although we expect it to be significant, given 72% of forces reported exploitation of the vulnerable. Methods of exploitation do not appear to have changed significantly; however, with more groups adopting the county lines model, the risk to these individuals of further and more serious forms of exploitation is high.

7.6 Another factor is that intelligence relating to vulnerable individuals, children and MISPERs is held on a range of systems across a variety of different partner agencies. A more coordinated and collaborative approach is required, where information and intelligence can be shared efficiently and effectively by relevant stakeholders. This will ensure that the appropriate identification and safeguarding of vulnerable individuals can be achieved soon after they are encountered.

8. The use of Children

8.1 65% of forces (28) reported the exploitation of children. This broadly covers all types of exploitation i.e. drug running, child sexual exploitation (CSE) and human trafficking. 42% of forces (18) specifically reported evidence of children 'running' (moving drugs/money) on behalf of drug lines. The youngest reported child was 12 years old. Many forces quoted them being as young as 14, although some younger children (including pre-school) were found residing at addresses believed to have been cuckooed by county lines nominals.

'Vulnerable young people aged between 13 to 18 years are being recruited to be drug runners/dealers. Most of these young people have accrued drug debts and the networks are using fear tactics, threatening them with violence in order to force them into working for the line.' - NPCC force.

8.2 County lines groups tend to use younger members to identify and target other children, either through personal or social media links. They focus on those who are particularly vulnerable or at a crisis point in their lives. They are groomed and enticed by gang members to work within the drugs distribution network. Further infiltration can happen through drug debts which are often inflated or staged in order to coerce young people into further county lines activities. Groups will sometimes threaten family members of new recruits, using violence and intimidation to ensure engagement and

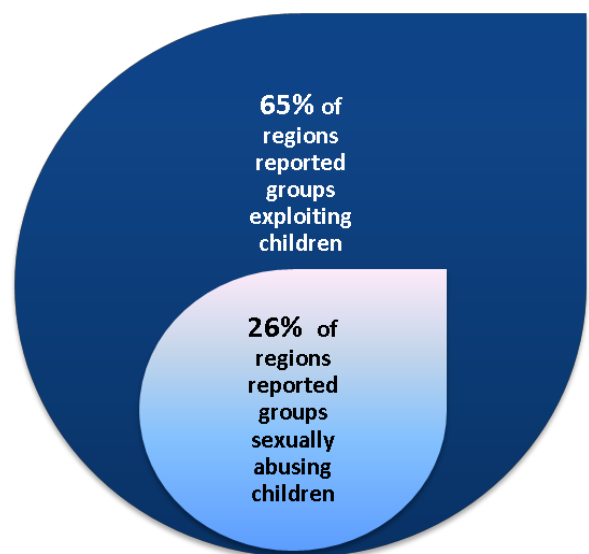
cooperation with the network. Young males are often used as 'watchers,' with some being given small quantities of drugs to deal.

8.3 The majority of children being recruited by county lines networks are 15-17 years old and are male. Anecdotal evidence suggests children are often used for supply and to run drugs/money between the urban hub and rural marketplace. This is because they are less likely to be known to police and more likely to receive lenient sentences if caught.

8.4 A number of the children used are vulnerable, not only because of their age. Many have also been identified as having broader mental health issues, coming from broken homes, experienced chaotic/traumatic lives, or have been reported as missing. They may also be drug users. Almost half the forces mentioned that individuals involved with county lines came from care homes and 15% (3) of those had evidence relating to care homes being actively targeted by county lines nominals for the recruitment of vulnerable individuals.

8.5 Not all forces reported the use of children as part of county lines activity. 5% of forces (2) reported no exploitation of children. One force reported that 1% of OCG associated nominals were under 18, whilst another force reported that there were no obvious signs that children were routinely used by county lines networks. However, 19% of forces (8) reported the exploitation of children as an intelligence gap.

8.6 There are some significant information gaps around the level of exploitation in children. One reason for this is that there is often no consistent or proactive way of identifying if a vulnerable person/child has entered another force or region. Safeguarding opportunities rely on the child being subject to a stop check or being present when warrants or safeguarding visits are conducted, which could be too late to adequately protect the child. Elements of the picture will be held on a range of different partner agencies systems, therefore there is scope for increased intelligence sharing and coordination to improve the collaborative response.



9. Sexual Exploitation

9.1 Although class A drugs continue to be the main driver of this criminality, sexual exploitation can be highlighted as a significant risk factor associated to county lines. It is used either as a means of control/exploitation, for the gratification of gang nominals, or even as a commodity to be sold. 35% of forces (15) reported some evidence of sexual exploitation in relation to county lines, and a further 9% of forces (4) had possible evidence that was unconfirmed. 26% of forces (11) reported evidence of child sexual exploitation and a further 7% of forces (3) reported possible child sexual

exploitation. It is unclear exactly how victims begin their association with those who exploit them, but once girls become accessible to gang members the risk of sexual exploitation and trafficking becomes significantly higher.

9.2 Grooming can take place in local communal areas such as parks, where prospective victims are given alcohol and drugs to establish their 'relationship'. Groups then exploit them sexually and coerce them to take and deal drugs. There are also reports of young women being pimped out by their partners to settle drugs debts.

9.3 2017 returns identified the first possible example of the sexual exploitation of a young boy, where a 17 year old runner of a line from Liverpool is suspected to have been sexually abused by the group. The level to which boys are exploited for sexual purposes is unknown, nor is the extent to which it is being considered, i.e. if boys are treated as potential victims and offered an appropriate opportunity to disclose sensitive/personal information.

9.4 Sexual exploitation continues to be a significant risk factor associated to county lines. There are numerous reports of 'girlfriends' being offered to and abused by other gang members for their gratification. One force reported that a county lines group had filmed a female victim being sexually assaulted by multiple male group members. The footage was then used to humiliate the male partner of the victim. Girls who are being exploited to hold and deal drugs are vulnerable to becoming more accessible to gang members wishing to sexually exploit them.

9.5 It is difficult to confirm an accurate threat picture regarding the level of sexual exploitation of victims as part of county lines activity, predominantly due to the lack of intelligence. Victims may initially present as part of the criminal network and may appear to be a potential perpetrator of harm i.e. by carrying a weapon. Therefore they may not always be given the best opportunity to disclose their vulnerability. Also, they may not feel they could be adequately protected from the perpetrators if they did report to police.

9.6 Better education is needed to provide children with an awareness of what grooming is, what it might look like and how they might be at risk. It is important to demystify some of the hype and arm children with the necessary skills to identify what might be happening and how to respond effectively and positively.

10. Money

10.1 58% of forces (25) provided some information on the amount of money that is associated with county lines in their area. However this information was not consistent and many forces indicated that the figures provided were estimates only and that intelligence was generally limited in this area.

10.2 The amount of revenue obtained from a county line will vary significantly depending on the size of the market and the level of competition. However reporting indicated a typical line can make in the region of £3,000 per day with some more prominent lines possibly making in excess of £5,000 per day.

10.3 The accounts into which the criminal cash deposits are made are often held by persons in the originating county line force area and are frequently family members or associates of the group. Proceeds are often cashed out by senior group members in the urban hub, soon after the deposits are made. This distances the key nominals from the money trail and has the additional benefit of runners not needing to carry large amounts of cash whilst travelling, minimising the risk of being robbed, or having the cash seized if identified by police.

10.4 In terms of assessing the value of a county line, one force reported that a 'drug line/customer base' had been sold for £50,000, whilst another indicated a 'cocaine supply line' was purchased for £30,000. There was also a report of a county line network which appeared to be leasing a drug line at a cost of £10,000 a month, promoting a potential revenue stream of around £5,000 per day.

10.5 Specific details regarding the laundering and movement of county lines proceeds remains an intelligence gap for many forces. One force reported a potential emergence around the use of virtual currency cash machines. However this was not corroborated by any other force.

10.6 Much of the reporting regarding the money associated to county lines is inconsistent and/or based on anecdotal reporting. Very little is known about how money is laundered, or what senior county lines members do with the proceeds. Money generally changes hands quickly and is therefore difficult to trace, often being moved on a little and often basis. This restricts the impact potential and likelihood of law enforcement intervention.

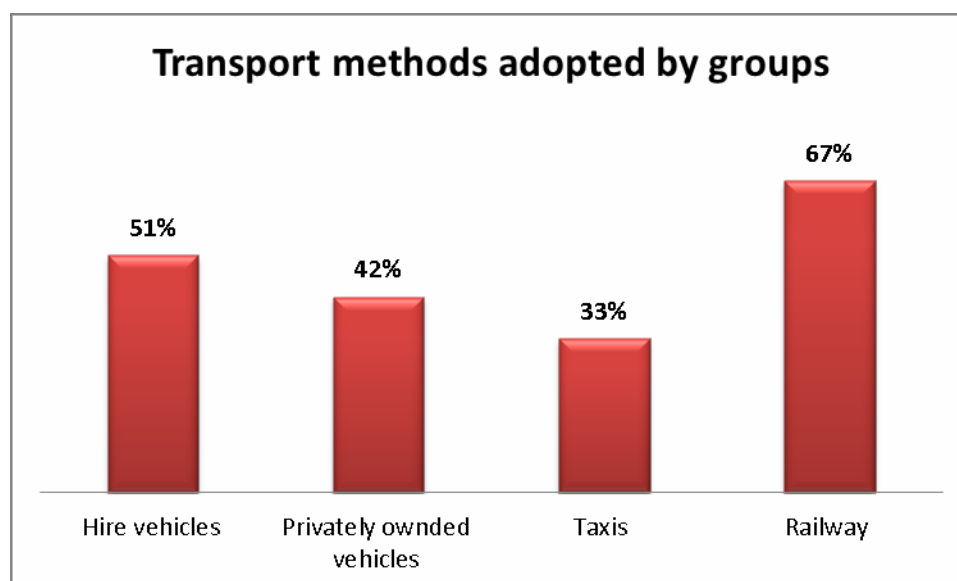
10.7 County lines drug supply generally involves regional (mid-market) to local (retail) supply, at levels which are commonly measured in ounces or grams rather than kilos. The profit margins are such that the cost (price paid) of seizure to county lines groups can be recovered quickly by profits from subsequent supply deals. The groups will also impose a debt associated to the loss of profit (resale value) from the seizure onto the individual who was holding the drugs at that point, which they will be forced to pay or work off over time.

11. Transport

11.1 In terms of the mode of transport being used by county lines groups, 67% of forces (29) reported use of rail, 51% of forces (22) reported use of hire vehicles, 42% (18) reported owned vehicles being used and 33% (14) reported use of taxis. Two forces reported the use of stolen cars and one reported the use of a coach. Four forces also reported that the use of hire cars was increasing. (See figure 3)

11.2 The full extent to which those involved in county lines use the railway is not yet fully understood. British Transport Police (BTP) remain reliant on force and wider stakeholder intelligence and collaboration to contextualise and fully understand railway incidents involving individuals and groups believed to be involved in county lines.

Figure 3. Chart reflecting the extent to which differing methods of transport are used:



11.3 Cars belonging to group members, associates, girlfriends or vulnerable individuals are frequently used. Pool cars registered in fake names or in the details of local residents, who may not be well known to police, are also reported.

11.4 Both the rail and road networks remain components in the facilitation of county lines drug supply, used to transport drugs and money between the urban hub and rural marketplace. Both methods present significant risks due to the associated levels of violence, use of weapons and the exploitation of young and vulnerable people. Challenges include the identification of those travelling, assessing if those encountered are vulnerable, a perpetrator of harm or potentially both, and confirmation of potential links to county lines activity.

11.5 Effective responses often involve the close collaboration between different forces and the effective use of monitoring techniques such as ANPR and CCTV to identify, track and potentially interdict potential county lines suspects.

12. Ethnicity

12.1 The information supplied about the nationality/ethnicity of county lines individuals was extremely mixed. In general, most forces who provided information, suggested that county lines nominals' ethnicity (as opposed to cuckoo victims) varied according to their urban origin. London county line nominals were mostly black, whereas nominals from Liverpool and Manchester were mainly white. Asians were mentioned predominantly in relation to lines from Birmingham.

12.2 The most common non-British nationality mentioned was Somali, which was referenced by 33% of forces (14). These were predominantly forces with lines originating in London, but not in all cases. Somalis were also mentioned in relation to lines from Manchester.

12.3 Reports of Western Balkan crime groups being linked to county lines drugs supply were referenced in 9% of force (4) returns but only one group was believed to

meet the essential criteria for a county line, albeit they may only deal in powder cocaine.

12.4 Although the ethnicity of county lines nominals may provide some indication as to the upstream origins of their supply chain, it is important to acknowledge that this may not necessarily be accurate. The changing more diverse nature of drugs supply networks means that it is perhaps more worthwhile to maintain a focus on urban origins, potential gang affiliations and possible collaboration between different groups.

13. Challenges

13.1 One key challenge acknowledged in a number of the returns is the difficulty involved in confirming whether the identified criminality is a county line rather than another form of drug supply. Those encountered often provide false details to officers; some may claim to be acting alone, others fall silent for fear of self-incrimination or reprisal by the county lines group.

13.2 Although the Home Office has a definition for county lines, there appears to be some variation in the application of this definition. This causes a potential blurring of the county lines threat picture and may account for some perceived discrepancy in activity.

13.3 The use of mobile phones, the use of children, the crossing of geographical boundaries to access a marketplace and the supply of class A drugs are all common features of different forms of drug supply methods. However the presence of these features alone is not sufficient to confirm the presence of a county line.

13.4 There needs to be a more consistent approach to capturing and utilising county lines intelligence to ensure it can be accessed by relevant stakeholders in a more efficient and effective way.

13.5 The limitations of this report predominantly relate to data capture and the impact this has on analysis and the resulting picture of threat. Force returns referenced a general lack of capacity/resource to conduct full data collection on county lines given the volume of potential intelligence and challenges around relevant data retrieval i.e. complexity of potential search terms that could be used, and limitations of data storage system to conduct searches.

13.6 Another challenge in assessing the true scale of a county line problem lies in the fact that it can often only be measured by the perceived and actual impact on the community, and resulting policing response. For example, police may be unaware of problems until one or more of the indicators are triggered, which is often sometime after the event has occurred and associated harms are initiated.