



NEWCASTLE UNDER LYME SCHOOL

Safeguarding Policy

This policy relates to Newcastle-under-Lyme School, including the EYFS. This policy is available upon request to parents and prospective parents and is published to parents and prospective parents on the School's website.

The Designated Safeguarding Lead and Deputy Designated Safeguarding Leads are:

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Chair of Governors and Designated Safeguarding Governor: Mr David Wallbank

Contents	Page
1. Statement of Intent	4
2. Transparency	4
3. Related Policies	5
4. Definitions and Types of Child Abuse and Neglect	5
5. Symptoms and signs of Child Abuse	7
6. Multi-Agency Procedures	10
7. Designated Persons	11
8. Governing Body	12
9. Child Protection and Safeguarding Records	14
10. How to deal with a disclosure by a child	14
11. Record Keeping	15
12. When Staff Have a Suspicion of Possible Abuse; the duty to report to the DSL	15
13. Action Taken in the Event of Alleged or Suspected Abuse: Referrals, Early Help and Multi-Agency Working	16
14. Allegations Against Those Not Employed by the School	19
15. Use of School for Non School Activities	19
16. Handling Allegations of Abuse against all Staff including Supply Staff, Volunteers and Contractors	20
17. Information Sharing	24
18. The School's Staff Code of Conduct	25
19. Allegations of abuse made against other children	28
20. Pupils with SEND	28
21. Looked after children	29
22. Training	29
23. Staff Obligations	31
24. Safeguarding children and whistleblowing	31
25. Safer Employment Practices	31
26. Promoting Awareness amongst pupils about safeguarding and online safety	32
27. Review	35
Appendix 1: Specific safeguarding issues	36
Appendix 2: Policy and Procedures for Child on Child Abuse (including Child on Child Sexual Violence and Sexual Harassment)	46
Appendix 3: Policy and Procedures for Child Missing from Education	62
Appendix 4: Role of the DSL	64
Appendix 5: Children staying with host families (homestay)	67
Appendix 6: COVID-19 Safeguarding Policy Addendum	69

This policy complies with the DfE statutory guidance, *'Keeping Children Safe in Education: information for all school and college staff'* (published September 2023). The School has regard to *KCSIE* (September 2023) when carrying out our duties to safeguard and promote the welfare of children meaning it will be complied with except where exceptional circumstances arise. The School also has regard to the Prevent Duty Guidance (2023) and the use of social media for on line radicalisation.

This policy (the Safeguarding Policy (which includes the policy and procedures to deal with child on child abuse, the policy for Children Missing from Education and the role of the DSL) should be read alongside the following:

- Part One of *KCSIE* (including Annex A and B)
- Staff Code of Conduct
- Whistleblowing Policy
- Behaviour Rewards and Sanctions Policy
- Anti Bullying and Anti Cyber Bullying Policy
- Missing Pupil Policy
- Social Media Policy for Staff
- Staff Handbook
- Positive Mental Health Policy

In this policy the term 'staff' refers those who work with children as an adult in our School.

As well as being familiar with this document all staff at the School will be sent each year (digitally), *'Keeping Children Safe in Education: Part One* (published September 2023). As well as receiving annual training they will confirm that they have read *KCSIE: Part 1* (including Annex A and B) and are helped to understand and discharge their responsibilities as outlined in *Part 1 of KCSIE* (including Annex A and B).

In all matters relating to child protection, the School will follow the procedures laid down by our own local safeguarding partnership which is Staffordshire Children's Advice and Support (SCAS) together with DfE guidance contained in *Working Together to Safeguard Children* (December 2023) and *What to do if you are worried a child is being abused: advice for practitioners and Keeping Children Safe in Education: <https://www.gov.uk/government/publications/keeping-children-safe-in-education>* (*KCSIE*).

This policy is applicable to the whole school community (whether paid or voluntary or directly employed by the School or a third party). Governors, all members of staff and volunteers have duty to safeguard our pupils' welfare and must therefore familiarise themselves and comply at all times with this policy, along with the School's ***Staff Code of Conduct Policy***. They must also read and retain a copy of *KCSIE: (Part 1)* (including Annex A and B).

The School recognises that its duty is to safeguard and promote the welfare of all its pupils. This includes a duty to both 'children in need' (Section 17: Children's Act 1989) and to 'children at risk of harm' (Section 47: Children's Act 1989). All School staff, should be aware that safeguarding incidents, and particularly referrals in cases of suspected abuse and neglect, can happen at any time and anywhere and are required to be alert to any possible concerns.

Safeguarding and promoting the welfare of children is everyone's responsibility and we must maintain a professional attitude of 'it could happen here' where safeguarding is concerned. Everyone who comes into contact with children and their families and carers has a role to play in safeguarding children and we must always act without delay. All School staff, including frequent volunteers, club providers and students, should make sure that their approach is child centred. This means that what is in the best interest of the child is paramount. No single professional can have a full picture of a child's needs and circumstances. If children and families are to receive the right help at the right time, everyone who comes into contact with them has a role to play in identifying concerns, sharing information and taking prompt action. Children includes everyone under the age of 18 years.

1. Statement of Intent

The safety and well-being of all our pupils at Newcastle-under-Lyme School is our highest priority. Our business is to know everyone as an individual and to provide a secure and caring environment, so that every pupil can learn in safety.

We expect respect, good manners and fair play to be shown by everyone so that every pupil can develop his/her full potential and feel positive about him/herself as an individual. All pupils should care for and support each other.

2. Transparency

Newcastle-under-Lyme School prides itself on its respect and mutual tolerance. Parents and guardians have an important role to play in supporting the School in safeguarding children. Copies of this policy, together with other policies relating to issues of child protection are on our website. We hope that parents and guardians will always feel able to take up any issues or worries that they may have with the School. Allegations of child abuse or concerns about the welfare of any child will be dealt with consistently in accordance with this policy. Open communications are essential. We will never ignore an allegation of child abuse and will always deal with any concerns appropriately. All victims of all forms of abuse will be taken seriously, given reassurance and support and kept safe.

Wherever possible, we will always seek consent and be open and honest with the family from the outset as to why, what, how and with whom, their information will be shared. However, there may be some circumstances where it is not appropriate to seek consent, either because the individual cannot give consent, it is not reasonable to obtain consent, or because to gain consent would put a child or young person's safety or well-being at risk.

3. Related Policies

This Safeguarding Policy should be read together with the School's *Anti-Bullying and Anti Cyber Bullying Policy, Behaviour Rewards and Sanctions Policy, Missing Pupil Policy, Preventing Extremism and Radicalisation Policy, the Positive Mental Health Policy* and *Safer Recruitment Policy*, which can be accessed on the School's website. Staff, including frequent volunteers, club providers, must also read the *Staff Code of Conduct* and the *Staff Handbook*, the *Whistleblowing Policy*, and *Social Media Policy for Staff* which are available on the School's intranet. Staff are also required to read the *Online Safety and ICT Acceptable Use Policy* which includes information on the filtering and monitoring systems in school.

4. Definitions and Types of Child Abuse and Neglect

Safeguarding children consists of the following:

- Protecting children from maltreatment, including abuse and neglect
- Preventing impairment of children's mental and physical health and development
- Ensuring that they are safely and effectively cared for, and
- Taking action to ensure that they have the best outcomes.

Child abuse is a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm, or by failing to act to protect a child from harm. A child might be abused by an adult or adults, or another child or children. Children may be abused in a family or in an institutional setting by those known to them, or by others. They may be abused by an adult or adults or another child or children. Abuse can take place online and abuse online can be used to facilitate off line abuse.

Child abuse can take a number forms, all of which can cause long term damage to a child: physical abuse, emotional abuse, neglect, and child sexual abuse. Bullying and domestic violence are also forms of child abuse. All staff should be aware that abuse, neglect and safeguarding issues are rarely stand-alone events that can be covered by one definition or label. In most cases multiple issues will overlap with one another. Some of the main forms of child abuse are set out below:

- **Physical abuse:** a form of abuse which may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm. It may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child.
- **Emotional Abuse:** the persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. It may involve conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability as well as over-protection and limitation of exploration and learning,

or preventing the child participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another for example, through acts of domestic violence. It may involve serious bullying (including cyberbullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.

- **Sexual abuse:** involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (eg. rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (including via the Internet). Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.
- **Sexual harassment between children;** when referring to sexual harassment we mean 'unwanted conduct of a sexual nature' that can occur online and offline. When we reference sexual harassment, we do so in the context of child on child sexual harassment. Sexual harassment is likely to: violate a child's dignity, and/or make them feel intimidated, degraded or humiliated and/or create a hostile, offensive or sexualised environment. Whilst not intended to be an exhaustive list, sexual harassment can include: sexual comments, such as: telling sexual stories, making lewd comments, making sexual remarks about clothes and appearance and calling someone sexualised names; sexual "jokes" or taunting; physical behaviour, such as: deliberately brushing against someone, interfering with someone's clothes and displaying pictures, photos or drawings of a sexual nature; online sexual harassment. This may be standalone, or part of a wider pattern of sexual harassment and/or sexual violence. It may include: non-consensual sharing of sexual images and videos; sexualised online bullying; unwanted sexual comments and messages, including, on social media; sexual exploitation; coercion and threats
- **Neglect:** the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may also occur during pregnancy as a result of maternal substance abuse. Neglect may involve a parent or carer failing to: provide adequate food, clothing and shelter (including exclusion from home or abandonment); protect a child from physical and emotional harm or danger; ensure adequate supervision (including the use of inadequate care-givers); or ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

- **Potential abuse:** children are entitled to protection from situations where they have not been abused but where social and medical assessments indicate a high degree of risk that they might be abused in the future.

Child abuse can take other forms, including 'honour based' violence, female genital mutilation (FGM), child sexual exploitation (CSE), Child Criminal Exploitation (CCE), child on child abuse, radicalisation and violent extremism. Further details of these and other DfE identified safeguarding issues are included in greater detail in Appendix 1. Appendix 1 also offers advice on where to access further guidance.

All staff need to be aware that safeguarding incidents and / or behaviours can be associated with factors outside the school and / or can occur between children outside the school. All staff should consider whether children are at risk of abuse or exploitation in situations outside their families. Extra familial harm take a variety of different forms and children can be vulnerable to multiple harms including (but not limited to) sexual exploitation, criminal exploitation and serious youth violence.

The following signs may or may not be indicators that abuse has taken place. The lists are not exhaustive. Consequently, any person with responsibilities under this policy must share their concerns with the DSL or DDSLs.

The NSPCC gives the following possible indications that a child is being abused:

- Frequently dirty, hungry or inadequately dressed
- Left in unsafe situations, or without medical attention
- Constantly put down, insulted, sworn at or humiliated
- Seems afraid of parents or carers
- Severely bruised or injured
- Displays sexual behaviour which doesn't seem appropriate for their age
- Growing up in a home where there is domestic violence
- Living with parents or carers involved in serious drug or alcohol abuse

This list does not cover every child abuse possibility. There may be other things in a child's behaviour or circumstances that could cause concern.

Abuse is always wrong, and it is never the young person's fault.

5. Symptoms and signs of Child Abuse

Some of the signs and behaviours which may indicate that a child is being abused include:

- repeated minor injuries, such as scalds or burns
- children who are dirty, smelly, poorly clothed or who appear under-fed
- children who have lingering illnesses or injuries that are not attended to
- deterioration in school work
- significant changes in behaviour
- aggressive behaviour or severe tantrums
- an air of detachment or an attitude of indifference

- overly-compliant behaviour
- a frozen awareness (a combination of a lack of expression, lethargy and watchfulness)
- sexually explicit behaviour, such as continual open masturbation, or aggressive and inappropriate sex play
- playing games that show a sexual awareness that is inappropriate and abnormal for the child's age
- a child who is reluctant to go home or is kept away from school for no apparent reason
- a lack of trust in adults, particularly in those who are close
- stomach pains with no medical reason
- eating problems, including over-eating or a loss of appetite
- disturbed sleep, nightmares or bed-wetting
- running away from home
- mental health issues
- self-inflicted wounds
- attempts at suicide
- reverting to younger behaviour
- depression or withdrawal
- relationships between child and adults that are secretive and exclusive
- unexplained money or gifts
- pregnancy

The School is aware that these signs are not evidence in themselves, and that there may be other explanations for them. However, they may be a warning, particularly if a child exhibits several of them or if a pattern emerges. Abuse is not easy to diagnose, even for experts. Some guidance is provided here:

- **Signs of possible physical abuse:** any injuries not consistent with the explanation given for them; injuries which occur to the body in places which are not normally exposed to falls or rough games; injuries which have not received medical attention; reluctance on the part of a child to change for, or participate in, games or swimming; bruises, bites, burns and fractures which do not have an accidental explanation; object shaped bruises; inconsistent accounts given by the child for the cause of injuries.
- **Signs of possible emotional abuse:** depression, aggression, extreme anxiety, changes or regression in mood or behaviour; obsessions or phobias; sudden underachievement or lack of concentration; seeking adult attention and not mixing well with other children; negative statements made by the child about him or herself; acts of aggression or cruelty to others; extreme shyness or passivity; stealing and lying.
- **Signs of possible sexual abuse:** any allegations made by a child concerning sexual abuse; excessive preoccupation by the child with sexual matters and age-inappropriate knowledge of adult sexual behaviour; regular engagement in age-

inappropriate sexual play; sexual activity through words, play or drawing; repeated urinary infections or unexplained stomach pains; eating disorders.

- **Signs of possible neglect:** dirty skin, body smells, unwashed, uncombed hair and untreated lice; clothing that is dirty, too big or small, or inappropriate for weather conditions; frequent occurrences where the child is left alone or unsupervised; frequent diarrhoea, tiredness and/or hunger; untreated illnesses, infected cuts or physical complaints; overeating.
- **Signs of possible child sexual exploitation:** sexual exploitation can be very difficult to identify. Warning signs can easily be mistaken for 'normal' teenage behaviour. Young people who are being sexually exploited may: be involved in abusive relationships, intimidated and fearful of certain people or situations; hang out with groups of older people, or anti-social groups, or with other vulnerable peers; associate with other young people involved in sexual exploitation; get involved in gangs, gang fights, gang membership; have older boyfriends or girlfriends; spend time at places of concern, such as hotels or known brothels; not know where they are, because they have been moved around the country; go missing from home, care or education. They may also show signs of sexual abuse or grooming.
- **Signs that children might be at risk from serious crime:** The Serious Violence Strategy, introduced in 2018, sets out the government response to serious violence and recent increase in knife crime, gun crime and homicide. The impact of serious crime on the individual and the community is significant. Staff need to be aware of indicators that might suggest that a child is at risk from or involved with serious crime. These may include increased absences from school, a change in friendships or relationships with older individuals or groups, a significant decline in performance, signs of self harm or a significant change in well being or signs of assault or unexplained injuries. Unexplained gifts or possessions could also indicate that a child has been approached by or are involved with individuals associated with criminal networks or gangs.
- **Signs of possible extremism/radicalisation:** Different people display various signs of radicalisation. Some people are able to hide it so well that they are indistinguishable from anybody else, making it hard to identify them as radicalised and understand what their intentions are or could be. The following are some signs that could mean somebody could be at risk of radicalisation or is going through a radicalisation process:
 - Physical changes: sudden or gradual change in physical appearance; sudden or unexpectedly wearing religious attire; getting tattoos displaying religious or political messages; unexpectedly growing a beard; unexpectedly shaving their head (skinhead); possessing unexplained gifts and clothing (groomers will sometimes use gifts such as mobile phones and clothing to bribe a young person).
 - Social changes: cutting ties with their friends, family or community; starting to become socially withdrawn; becoming dependent on social media and the internet; beginning to associate with others who hold radical views; bullying or demonising other people freely; beginning to attend rallies and

demonstrations for extremist causes; associating with known radicals; visiting extremist websites, networks and blogs.

- Emotional and verbal changes: beginning to complain, often with anger, about governmental policies, especially foreign policy; advocating violence or criminal behaviour; beginning to believe in government conspiracies; exhibiting erratic behaviour such as paranoia and delusion; speaking about seeking revenge; starting to exhibit extreme religious intolerance; demonstrating sympathy to radical groups; displaying hatred or intolerance of other people or communities because they are different.

6. Multi-Agency Procedures

Newcastle-under-Lyme School falls within the jurisdiction of the Staffordshire Children's Advice and Support (SCAS). In compliance with *'Keeping Children Safe in Education'* (September 2023), the Safeguarding Policy of Newcastle-under-Lyme School is in accordance with local SCAS procedures.

Staffordshire Children's Advice and Support can be contacted on 0300 111 8007.

In all matters relating to safeguarding, the School will follow the procedures laid down by SCAS; together with relevant DfE guidance such as *'Working Together to Safeguard Children'* (December 2023) and *KCSIE* (September 2023). *KCSIE* can be accessed at <https://www.gov.uk/government/publications/keeping-children-safe-in-education--2>.

The School works with social care, the police, health services and other services to promote the welfare of children and protect them from harm. This includes a co-ordinated offer of early help when additional needs of children are identified and contributing to multi agency plans to provide additional support to children subject to child protection plans.

The School has a wide catchment area with the result that the relevant external agencies may be those in the counties of Cheshire, Shropshire or Staffordshire or in the unitary authority of the City of Stoke-upon-Trent, according to the address at which the pupil normally resides. In all situations involving alleged child abuse, the School works closely with the appropriate agency and follows the advice received in respect of the case.

Important contact Information:

The key agencies with which the School is involved are:

- Staffordshire Children's Advice and Support (SCAS)
0300 111 8007
Out of hours: 0345 6042886
- Local Authority Designated Officer (LADO) 0300 111 8007
- Staffordshire Education Safeguarding Advice Service (ESAS)
01785 895836

- Stoke on Trent Children’s Advice and Duty Service (CHAD)
01782 235100
Out of hours: 01782 234234
- Cheshire East Consultation Service (ChECS)
0300 1235012
Out of hours 0300 1235022
- Shropshire Safeguarding Partnership
0345 678 9021.
Out of hours 0345 6789040

Prevent and Counter Extremism

- Staffordshire Police Prevent Team
233109 or email prevent@staffordshire.police.uk
01785 232054 / 01785
- Police
101

The following numbers may be useful to pupils:

- Childline
0800 1111
- NSPCC
0808 800 5000
- Barnardo’s
0800 942 8787

7. Designated Persons

The Governing body has appointed a senior member of staff as Designated Safeguarding Lead for Newcastle-under-Lyme School. The DSL, Mrs J A Simms, is responsible for all matters related to child protection and welfare (including online safety which amongst other things includes an understanding of the expectations, applicable roles and responsibilities in relation to filtering and monitoring). The DSL is the Deputy Head Pastoral and is a member of the Senior Management Team. The School has also appointed Deputy Designated Safeguarding Leads who will carry out the duties of the DSL if she is unavailable.

The DSL and DDSLs have close links with the SCAS. The DSL reports termly to governors on safeguarding and child protection including on the suitability and workings of this policy.

The DSL and DDSLs undergo refresher training every two years and the training meets the requirements of the DfE’s Keeping Children Safe in Education. They also keep up to date with safeguarding developments. (See Appendix 4 for further details of the role of the DSL). The ultimate lead responsibility for safeguarding and child protection remains with the DSL and cannot be delegated.

The DSL (Mrs J A Simms) reports to the Headmaster (Mr M J Getty), who in turn reports to the Chair of Governors (Mr D Wallbank).

The DSL is Deputy Head Pastoral (Mrs J A Simms)

and the DDSLs are:

In the Senior School: Assistant Head pastoral (Mr I J Bousfield)

Head of 6th Form (Mr A Poole)

In the Prep School: Head of the Prep School (Mrs K Thomson)

For the EYFS: Nursery Manager (Mrs E Taylor)

During term time (during school hours) there will be a DSL / DDSL available for staff to discuss any safeguarding issues. Staff should consult with the DSL / DDSL in their section of the School. If any of the persons designated above are unavailable for any reason, then any of the others may act in their place. In the absence of the above, there should be no delay in action to be taken and staff are advised to contact the child's Social Care.

8. Governing Body

The Governing Body ensures that they facilitate a whole setting approach to safeguarding. This means ensuring that safeguarding and child protection are at the forefront and underpin all relevant aspects of process and policy development. Ultimately, all systems, processes, policies and practices, should operate with the best interests of the child at heart. Where there is a safeguarding concern the Governing Body and SMT will ensure that the child's wishes and feelings are considered in determining what action to take and what services to provide. The School Governing Body is responsible for reviewing child protection arrangements and the efficiency with which resulting duties have been discharged; approving amendments in the light of review of procedures, changing regulations or recommended best practice. Child protection and safeguarding is a standing agenda item on each termly full Governors' meeting. The Governors ensure that the policies, procedures and training in the School are effective, so that staff are appropriately trained and have the skills, knowledge and understanding necessary to safeguard and promote children's welfare.

The School has a nominated 'link Governor' (Mr D Wallbank) with responsibility for Safeguarding. The nominated governor, in conjunction with the Chair of Governors, has the following role:

- (a) To have an understanding of local safeguarding partnership procedures and guidance issued by the Department for Education.
- (b) To be a link between the DSL and the Governing Body and to liaise with the DSL on safeguarding matters.
- (c) To liaise with relevant agencies in the event of an allegation being made against the Headmaster.
- (d) To undertake training as appropriate and necessary
- (e) To maintain an awareness of how the Safeguarding Policy is being implemented in the School by meeting termly with the DSL.
- (f) To ensure that the Safeguarding Policy and child protection procedures are reviewed annually by the Governing Body.

The Governing Body will:

- (a) ensure that the School is compliant with their 175/157 audit return to the Local Authority.
- (b) ensure that all staff, including governors, receive appropriate safeguarding and child protection training (including online which, amongst other things, includes an understanding of the expectations, applicable roles and responsibilities in relation to

filtering and monitoring) at induction. This training is annual or at induction and is updated and in line with any advice from the safeguarding partners.

The training received is Level 1 and covers all aspects of safeguarding including prevent, online safety, as well as KCSIE updates and ensures that they know their personal responsibility, SSCB procedures, the need to be vigilant in identifying cases of abuse, how to support and to respond to a child who makes a disclosure (and the importance of avoiding asking leading questions and that confidentiality cannot be promised), their duty and are able to raise concerns about poor or unsafe practice in regard to children by a colleague and that such concerns are addressed sensitively and effectively in a timely manner in accordance with agreed *Whistle Blowing Policy*.

This training will equip governors with the knowledge to provide strategic challenge to test and assure themselves that the safeguarding policies and procedures in place here are effective and support the delivery of a robust whole school approach to safeguarding and this training is regularly updated.

In considering their responsibility to safeguard and promote the welfare of children and provide them with a safe environment in which to learn, the Governing Body will ensure that our school has appropriate filters and monitoring systems in place. They ensure that the SMT and relevant staff have an awareness and understanding of the provisions in place and manage them effectively and know how to escalate concerns when identified.

The Governing body will review the following standards and discuss with IT staff and service providers what more needs to be done to support our setting in meeting this standard:

- identify and assign roles and responsibilities to manage filtering and monitoring systems;
- review filtering and monitoring provision annually;
- block harmful and inappropriate content without unreasonably impacting teaching and learning;
- have effective monitoring strategies in place that meet their safeguarding needs.

The Governing Body are also aware of their responsibility to ensure that there is the appropriate level of security protection procedures are in place in order to safeguard systems, staff and learners and that there is the need to review the effectiveness of these procedures periodically to keep up with evolving cyber-crime technologies.

(c) ensure that those involved with recruitment and employment of staff to work with children have received safer recruitment training and are compliant safer recruitment procedures.

The Board of Governors receive a safeguarding update as an agenda item presented by the DSL at the termly Board of Governors Meetings. Every governor receives a copy of Part 1 of KCSIE(including Annex A and B, the *Staff Code of Conduct* and the *Safeguarding Policy*).

The Governors are aware of their obligations under the Human Rights Act (1998), the Equality Act (2010) (including the Technical Guidance on the Public Sector Equality Duty) and their local multi-agency safeguarding arrangements.

Human Rights Act (1998) and Equality Act (2010)

Being subject to harassment, violence and/or abuse, including that of a sexual nature, may breach human rights, depending on the nature of the conduct and circumstances (further information can be found at equalityhumanrights.com).

According to the Equality Act schools:

- Must not unlawfully discriminate against pupils because of their protected characteristics (including disability, sex, sexual orientation, gender reassignment and race)
- Must consider how to support pupils with protected characteristics
- Must take positive action, where proportionate, to deal with the disadvantages these pupils face.

9. Child Protection and Safeguarding Records

The School's records on child protection are kept securely and are separated from routine pupil records. Access is restricted to the Headmaster, DSL and DDSLs.

When pupils make a disclosure or when a member of staff has concern about a child's safety or welfare: instructions for staff.

We are aware that children may not feel ready or know how to tell someone that they are being abused, exploited or neglected and/or they may not recognise their experiences as harmful. They may feel embarrassed, humiliated or are being threatened. This could be due to their vulnerability, disability and/or sexual orientation or language barriers. This does not prevent all staff from having professional curiosity and speaking to the DSL if they have concerns about a child and our staff determine how best to build trusted relationships with children which facilitate this communication.

Systems are in place and are well promoted, explained properly and easily accessible for pupils to confidently report abuse, knowing their concerns will be treated seriously, and knowing they can safely express their views and give feedback.

10. How to deal with a disclosure by a child

This section summarises the advice and instructions to staff on how they should deal with a situation in which a pupil makes a disclosure.

Any member of staff who is approached by a pupil who wishes "to talk" or to make a possible disclosure about alleged abuse concerns about safety or welfare of a child **must** manage the situation in the following way:

(a) Be prepared to listen, making time to do so if necessary.

(b) Be aware of the signs of possible abuse listed in this policy.

(c) Explain at the outset the limits of confidentiality. **A promise must not be made that the information will not be shared with anybody else.** Information given to the member of staff will be treated with complete privacy and will not be shared indiscriminately, but it may have to be shared in order to enable action to be taken by other professionals. If so, the information will be shared only on a "need to know" basis.

- (d) Listen to the pupil and encourage him or her to talk.
- (e) **Do not ask the pupil any leading questions.** Any questioning must be limited to the minimum necessary for the purpose of clarification (use T.E.D.: Tell me, Explain, Describe).
- (f) Do not stop or interrupt a pupil who is freely recalling significant events.
- (g) Do not look shocked or upset by what is being said.
- (h) Make an accurate note of the discussion, taking care to record the timing, setting and people present, as well as what was said, preferably verbatim using the child's statements in their own words.
- (i) Thank the pupil, and reassure him/her that he/she has acted correctly in disclosing the information.
- (j) Advise the pupil that it will be necessary for the information to be passed to the DSL, who is an appropriate senior person able to help.
- (k) Reassure the pupil that he/she is not responsible for what has happened.
- (l) Report the incident / disclosure as soon as possible and at least within 24 hours / one working day

It is important that a child alleging abuse is treated in the first instance as speaking truthfully and the matter acted upon. Retraction is usually because of external pressure.

Historical abuse allegations should be reported to the police.

11. Record Keeping

Anyone who has concerns over a child's safety or welfare, including suspicions of child abuse, must maintain a clear and accurate record. Concerns should be noted as soon as is reasonably practical including details of particular incidents and conversations. This record should include:

- Date and time of any observation or disclosure
- Detailed factual account of any incident including verbatim comments
- Details of the child's appearance, behaviour, emotional state and actions.

Under no circumstance must a person attempt to investigate his or her concerns. Other agencies are responsible for undertaking child protection investigations and inappropriate investigation may undermine the work of these agencies.

12. When Staff Have a Suspicion of Possible Abuse; the duty to report to the DSL

Staff must be aware that they have a professional obligation to make concerns known. All staff should report any concerns that they have and not see these as insignificant and must maintain a professional attitude of 'it could happen here' where safeguarding is concerned. If in any doubt, advice should be sought from the DSL or one of the DDSLs. After receiving a disclosure from a pupil, the information must be passed immediately to the DSL (or at least within the same working day). Any member of staff who has his/her own suspicions of possible child abuse, or who has received allegations from a third party about possible child abuse, must report the information immediately to the

DSL or in their absence one of the DDSLs and must not discuss the matter with anybody else. Everyone in school is required to report as soon as possible to the DSL or a DDSL their concerns over a child's safety and welfare, regardless of whether or not they have received a disclosure.

If at any point, there is a risk of immediate serious harm to a child a referral should be made to the local safeguarding partnership immediately. If the DSL or DDSL is not available, anybody can make a referral in this circumstance. **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.** Where referrals are not made by the DSL, then the DSL should be informed as soon as possible that a referral has been made.

If the child's situation does not appear to be improving the staff member with concerns should press for re-consideration. Concerns should always lead to help for the child at some point. It is vital that, following the submission of a report to the DSL or a DDSL, the person concerned continues to monitor the child's safety and welfare. If a member of staff still has concern about the safety of a child then they should remain in contact with the DSL or contact Social Services directly.

Everyone should understand that if they are concerned that a child is suffering or likely to suffer significant harm, they can refer a child directly to children's social care. Anyone raising a concern can be confident that he or she will be always fully supported by the School.

Where a member of staff reasonably believes these reporting routes to be inappropriate, or has reported concerns and no action has been taken, they should contact the Headmaster or the Chair of Governors, refer their concerns to children's social care directly, or use the NSPCC whistleblowing helpline (see section 15 below for contact details).

If a teacher, in the course of their work in the profession, discovers that an act of Female Genital Mutilation (see Appendix 1) appears to have been carried out on a girl under the age of 18, the teacher **must report this to the police.**

13. Action Taken in the Event of Alleged or Suspected Abuse: Referrals, Early Help and Multi-Agency Working

Referrals

The School treats the safeguarding of children as its highest priority and recognises the additional role it has to play in the referral of children who are suffering or are likely to suffer significant harm.

It is important at all times to keep an open mind about a child's safety and welfare and never assume that safeguarding issues are confined to certain individuals, families or settings. It is particularly important to avoid making assumptions about a child based on

personal perceptions of his or her domestic circumstances and family members. Being familiar with the types and signs of abuse as set out above is a key part of this.

When a DSL receives information or a disclosure involving alleged child abuse, suspected child abuse or that a child may be at risk of abuse, the DSL will:

- (a) Ascertain the basic facts. (In ascertaining the basic facts the DSL may talk to the pupil(s) concerned but will only do so in the presence of another member of staff and will not ask any leading questions).
- (b) Contact the local safeguarding partnership (depending on where the child lives) to discuss the basic facts of the case and to ascertain whether a formal report needs to be made. This will be carried out within 24 hours of the initial report.
- (c) If a formal report needs to be made the School will provide social care with all available evidence in order to enable a contextual approach. Subsequent actions (such as contacting parents) will depend on the further advice and instructions received from the agency.
- (d) Inform other members of staff on a strict "need to know" basis.
- (e) Produce a written record of the details of the allegations and ensure that any member(s) of staff providing information agree(s) with the account.
- (f) Record the incident / referral on CPOMS. The record will include a clear and comprehensive summary of the concern, details of all action taken and the outcome.
- (g) If the outcome of the referral to the local safeguarding partnership is that the pupil is put on the child protection register, or is otherwise subject to child protection procedures, the DSL will make arrangements for a confidential record to be kept, together with the names of any children/families with intimate connections with such children (for example, siblings or fostered children).

If it is established, in discussion with the Safeguarding team, that the basic facts do not at that time warrant a referral, a written record of any conversations and the reasoning that led to the decision not to refer will be kept and held in the pupil's file. Staff perceptions of the child's condition will be reviewed at regular intervals. If there are signs of deterioration in the child's condition, or if there is further information that suggests that abuse is possible, then the above procedure will be followed.

If a pupil is suspected to be on the receiving end of bullying-type behaviour (as defined by the *Anti-Bullying Policy*) that may be causing that pupil significant physical, sexual or emotional harm (as defined by the *Safeguarding Policy*), then the above procedure will be followed in addition to any action taken under the *Anti-Bullying Policy*.

When a pupil, known to the School to be on the child protection register, transfers from the School to another school, a DSL will inform the new school.

The School does not impose high thresholds on referrals to the local safeguarding partnership or other relevant external agencies such as the police. Consequently, when responding to concerns over a child's safety and welfare, the School will follow the SSCB

guidance and the more detailed guidance on thresholds based on levels of need. The School will always make a referral where:

- A child is suffering or likely to suffer significant harm
- With the agreement of a person with parental responsibility, a child is likely to benefit from family support services.

A referral will be made immediately if a child is suffering or likely to suffer significant harm. Referrals will be made even where it is known that the local safeguarding partnership is already involved with the child and/or his or her family.

The content of the referral will be discussed with parents/carers where this is appropriate. In general, parents/carers should be informed about any concerns regarding their children. However, from time to time it might not be appropriate to inform them immediately of concerns where that could prejudice an investigation or place the child at further risk. Parents/carers are unlikely to be told that a referral is being made if sexual abuse or fabricated illness is suspected. In such cases, advice will be sought from the appropriate agencies. Members of staff are aware that they must not discuss any issues with parents/carers unless they are told to do so by an appropriate person.

As a School we take our commitment to attending Child Protection case conferences very seriously. In the unlikely event that we cannot attend, we will always send a written report to the conference to convey latest information and our opinions to the independent Chair.

Early Help and Multi-Agency Working

Where concerns over a child's safety and welfare do not meet the criteria for immediate referral, the School will follow guidance on early help and multi-agency working. All staff should be prepared to identify children who may benefit from early help.

Early help means providing support as soon as a problem emerges at any point in a child's life. In the first instance, staff should discuss early help requirements with the DSL. Sharing information with other professionals to support early identification and assessment may be required. Staff may also be required to support other agencies and professionals in an early help assessment or, in working with the DSL act as lead professional in undertaking an early help assessment. If early help or other support is appropriate, the case will be kept under constant review and consideration should be given to referral to the local safeguarding partnership if the child's situation does not appear to be improving.

In 'borderline' cases, i.e. where it is not immediately clear whether to make a referral, the School will consult the Education Safeguarding Advice Service at SCASS for advice. However, and regardless of the precise details of a response in any particular case, the School will always respond to concerns over a child's safety and welfare on the premise that concerns must be always shared.

Any child may benefit from early help and staff should be aware of the potential need for early help for a child who:

- is disabled or has specific additional needs
- has special educational needs
- is a young carer
- is bereaved
- is frequently missing / goes missing from care or home
- is misusing drugs or alcohol
- is in a family circumstance presenting challenges for the child such as drug and substance abuse, adult mental health problems or domestic abuse
- has returned home to their family from care
- is showing signs of being drawn into anti-social or criminal behaviour, including gang involvement and association with organised crim groups
- is at risk of being radicalised or exploited
- is at risk of modern slavery, trafficking or exploitation
- is viewing problematic and/or inappropriate online content or developing inappropriate relationships online
- is suffering from mental ill health
- is privately fostered
- is missing education or persistently absent from school
- has experienced multiple suspensions and is at risk of or has been permanently excluded

14. Allegations Against Those Not Employed by the School

Where allegations of abuse are made against an adult other than a member of staff or volunteer working at the School, the relevant arrangements set down in the local safeguarding partnership guidance will be followed. It is important to understand that the School does not constitute an investigation or intervention agency, but that it does have an important role to play at the recognition and referral stage. Where the School is not the employer of an individual, the School has a responsibility to ensure that allegations are dealt with appropriately and liaison will take place with relevant parties. In no circumstances will the School decide to cease to use a supply teacher due to safeguarding concerns without finding out the facts and liaising with the LADO to determine a suitable outcome. The School will discuss with the agency whether it is appropriate to suspend the supply teacher, or redeploy them to another part of the School whilst they carry out their investigation.

15. Use of the School for Non School Activities

When the School hires / rents out school facilities/premises to organisations or individuals (e.g. community groups, sports associations, and service providers to run community or extra-curricular activities), the School will ensure that appropriate arrangements are in place to keep children safe.

When services or activities are provided by the School, under the direct supervision or management of school staff, the School's arrangements for child protection will apply.

However, where services or activities are provided separately by another body, this is not necessarily the case.

The School will seek assurance that the provider concerned has appropriate safeguarding and child protection policies and procedures in place, including inspecting these as needed and ensure that there are arrangements in place for the provider to liaise with the School on these matters where appropriate.

16. Safeguarding concerns and allegations made about Staff including Supply Staff, Volunteers and Contractors

The responsibility of members of staff to report allegations or concerns about the behaviour of a member of staff (including supply staff and volunteers) or contractor is as follows. Contact details for the Headmaster and Chair of Governors are included in the final section of the *Staff Handbook*.

(a) Allegations that may meet the harms threshold

Any member of staff who has concerns about the behaviour of another member of staff, supply staff or volunteer or contractor, or who receives an allegation or disclosure concerning the behaviour of another member of staff, supply staff or volunteer or contractor behaved in a way that has harmed a child, or may have harmed a child, ie if they have:

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

This relates to members of staff, supply staff, volunteers and contractors who are currently working in any education setting, regardless of whether the School is where the alleged abuse took place: **Must pass this information on, to the Headmaster.**

- If the Headmaster is away, the information must be reported to the Chair of Governors.
- If the allegation is against the Headmaster, the information must be reported directly to the Chair of Governors without informing the Headmaster. The Chair will contact the LADO to seek guidance.
- Members of staff must understand that they have a professional obligation to do this. There is no discretion not to report such an allegation, and failure to report a concern or allegation is potentially a serious disciplinary matter.
- The Headmaster is advised to liaise with the DSL or DDSL (not a DSL/DDSL who is the subject of an allegation) because the DSL/DDSL will have received a higher level of child protection training.
- It is obvious that such allegations need to be treated with the utmost discretion, and the school is well aware that an allegation mistakenly made, whether or not for frivolous or malicious reasons, can jeopardise the career of a member of staff. **At the same time, the safety of the pupil is paramount and overrides all other**

considerations (in order to look after the welfare of the child, the DSL will be responsible for ensuring that the child is not at risk and that a referral is made to social care). The procedures followed will be applied with common sense and judgement.

- The Headmaster, in liaison with the DSL, will carry out an urgent initial assessment in order to establish whether the criteria has been met for an immediate referral to the LADO (see Section 12). If the allegation is that a member of staff has acted in a way that has harmed, or may have harmed a child (physically, sexually or emotionally), or has possibly committed a criminal offence against a child, or has acted towards a child in a way that would make him/her not suitable to work with children and may pose a risk to children, then the Headmaster (or Chair of Governors) or DSL **must** refer the matter to the LADO.
- **There is no discretion for the Headmaster (or Chair of Governors) or DSL to make his/her own decision about what may appear to be a borderline case.** All concerns must be discussed with the LADO.
- Subsequent actions will be as agreed with the LADO. The School **must not** do anything that might jeopardise a police investigation. In particular, the school **must not** attempt to investigate allegations of child abuse and **must not** ask pupils leading questions. Such investigations must be left to the appropriate external agencies (police, social services, medical authorities).
- During the course of the investigation the School, in consultation with the LADO, will decide what information should be given to parents, staff and other pupils, and how media enquiries are to be dealt with. Due consideration will be given to the provisions in the Education Act 2011 relating to reporting restrictions on the identification of teachers who are the subject of allegations from pupils. Parents/carers of any pupil involved will receive specific advice from the School about reporting restrictions and the importance of maintaining confidentiality. The School will support the member of staff by making every effort to maintain confidentiality, guard against unwanted publicity and keep him/her informed on a regular basis. The child's parents will be kept similarly informed throughout the process (as guided by the LADO) of the progress of the case though only in relation to their child.
- Following the initial discussion, a course of action will be agreed with the LADO. If the LADO declines further involvement, the allegation or concern will be dealt with in accordance with the School's internal procedures. Where the LADO decides that a course of action is required, the School will follow advice and instructions given by the LADO and, more generally, the guidance set down in KCSIE. This will include taking a decision as to whether the adult concerned should be suspended from his or her work at the School. It may be necessary to suspend the member of staff during any investigation. This is a neutral move that is designed to protect both pupils and the member of staff. Suspension will only be considered in a case where there is cause to suspect a child or other children at the School are at risk of harm or the case is so serious that it might be grounds for dismissal; the allegation relates to a potential criminal offence and warrants investigation by the police. Based on

assessment of risk, alternatives will be considered, such as redeployment within the School so that the individual does not have direct contact with the child concerned, providing an assistant to be present when the individual has contact with the child, redeploying to alternate work within the School, moving the child to classes where they will not come into contact with the individual. Suspension will not be an automatic response or imposed as a 'knee jerk action'; all alternatives to suspension will be properly considered. If the person concerned is suspended, he or she will be given a named contact at the School who will inform them of progress in resolving their case and assess the level of support they require. Where it has been deemed appropriate to suspend the person, written confirmation should be dispatched within one working day, giving as much detail as appropriate for the reasons for the suspension. The person should be informed at the point of their suspension who their named contact is within school. The term does, however, have an unfortunate negative connotation, and the School will therefore only suspend a member of staff from contact with pupils after careful thought and consideration. A person who is the subject of an allegation will receive effective support from the School, which will do all that it reasonably can to deal with the allegation as quickly as possible, but in a way that is both fair and consistent. The School will inform the person as soon as possible of the allegation and the likely course of action. Advice will be also provided on contacting trade union officials and other sources of support.

- If any subsequent action is necessary following the completion of the investigation they will be taken in accordance with the School's Disciplinary Procedures for staff.
- Cases in which an allegation was proven to be false, unsubstantiated or malicious will not be included in employer references. A history of repeated concerns or allegations which have all been found to be false, unsubstantiated or malicious will also not be included in any reference. Pupils who make malicious allegations will be dealt with under the School's disciplinary procedures as described in the *Behaviour, Rewards and Sanctions Policy*.
- If the School dismisses or otherwise ceases to use the services of a person because he or she has harmed a child, poses a risk of harm to children or has committed a relevant offence, it will immediately report this fact to the Disclosure and Barring Service.

In addition, if the person concerned was a member of teaching staff, the School will make a referral to the Teaching Regulation Agency (TRA), who will decide whether or not to issue a prohibition order. The School will make a serious incident report to the Charity Commission in accordance with the Commission's guidelines. If there is concern about the welfare of other children in the community or the teacher's family, those concerns should be reported to the relevant designated officers, children's social care or the police.

Where a staff member feels unable to raise an issue with their employer or feels that their genuine concerns are not being addressed, other whistleblowing channels may be open to them:

- General guidance can be found at: *Advice on whistleblowing*

- 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 028 028. This line is available from 8:00 AM to 8:00 PM, Monday to Friday, Email: help@nspcc.org.uk Allegations against a teacher who is no longer teaching and/or historical allegations of abuse will be referred to the police.

At the conclusion of the case whether substantiated or not, the School will work with the LADO to review the circumstances in order to determine whether improvements to the School's is required.

b) Allegations / concerns that do not meet the harms threshold – 'low level concerns'
(see the School's *Low Level Concerns Policy*)

The School is aware that concerns may arise in several ways and from several sources, for example: suspicion; complaint; or disclosure made by a child, parent, or other adult within or outside of our setting; or as a result of vetting checks undertaken.

The School has the appropriate policies and processes in place to manage and record any such concerns and take appropriate action to safeguard children.

As part of the School's approach to safeguarding, we promote an open and transparent culture in which all concerns about all adults working in or on behalf of our setting (including supply teachers, volunteers, and contractors) are dealt with promptly and appropriately.

The School has created a culture in which all concerns about adults (including allegations that do not meet the harms threshold) are shared responsibly and with the right person, recorded and dealt with appropriately, and this is critical.

We encourage an open and transparent culture; enabling us to identify concerning, problematic or inappropriate behaviour early; minimise the risk of abuse; and ensure that adults working in or on behalf of the School are clear about professional boundaries and act within these boundaries, and in accordance with the ethos and values of the institution.

'Low level' does not mean that it is insignificant, it means that the behaviour towards a child does not meet the harms threshold.

'Low level' concern is still a concern, no matter how small, and even if no more than causing a sense of unease or a 'nagging doubt' - that an adult working in or on behalf of the School may have acted in a way that

- is inconsistent with the staff code of conduct, including inappropriate conduct outside of work.
- and does not meet the allegations threshold or is otherwise not considered serious enough to consider a referral to the LADO.

Examples of such behaviour could include, but are not limited to:

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

- humiliating pupils

All staff have a good understanding of what constitutes a low level concern and the governing body ensure that low level concerns are included as part of our *Staff Code of Conduct* and *Safeguarding Policy* as set out in *KCSIE*. All staff are aware of how these concerns will be dealt with. The School understands how crucial it is that any such concerns, including those which do not meet the harms threshold, are shared responsibly and with the right person, and recorded and dealt with appropriately. If a member of staff has a 'low level' concern they must report it to the Headmaster. The Headmaster will collect as much evidence as possible by speaking:

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

The information collected will help to categorise the type of behaviour and determine what further action may need to be taken.

All 'low level' concerns will be recorded in writing along with the rationale for any decisions made or action taken. The record will include details of the concern, the context in which the concern arose, and action taken. The name of the individual sharing their concerns will also be noted, if the individual wishes to remain anonymous then that will be respected as far as reasonably possible. Low level concerns raised about supply staff and/or contractors will be shared with their employers so that any potential patterns of inappropriate behaviour can be identified.

Records will be reviewed so that potential patterns of concerning, problematic or inappropriate behaviour can be identified. Where a pattern of such behaviour is identified, the School will decide on a course of action, either through its disciplinary procedures or where a pattern of behaviour moves from a concern to meeting the harms threshold, in which case it should be referred to the LADO.

Low level concerns will not be included in references unless they relate to issues which would normally be included in a reference, for example, misconduct or poor performance. It follows that a low-level concern which relates exclusively to safeguarding (and not to misconduct or poor performance) will not be referred to in a reference.

However, where a low-level concern (or group of concerns) has met the threshold for referral to the LADO and found to be substantiated, it will be referred to in a reference.

Any member of staff or volunteer who does not feel confident to raise their concerns with the Headmaster or Chair of Governors should contact the LADO directly.

The School has a legal duty to refer to the Disclosure and Barring Service anyone who has harmed, or poses a risk of harm, to a child, or if there is reason to believe the member of staff has committed one of a number of listed offences, and who has been removed from working (paid or unpaid) in regulated activity or would have been removed had they not left. The DBS will consider whether to bar the person. If these circumstances arise in relation to a member of staff at the School, a referral will be made as soon as possible after the resignation or removal of the individual in accordance with advice from the LADO. The Headmaster has a responsibility to inform Barring service.

17. Information Sharing

At all times the School will work in partnership and endeavour to establish effective working relationships with parents, carers and colleagues from other agencies in line with Working Together to Safeguard Children (December 2023). The School works closely with Staffordshire Children's Advice and Support Service and, where appropriate with children's services from other counties.

Information sharing is vital in identifying and tackling all forms of abuse and neglect. As part of meeting a child's needs, it is important for governing bodies and proprietors to recognise the importance of information sharing between practitioners and local agencies. This should include ensuring arrangements are in place that set out clearly the processes and principles for sharing information within the school or college and with the three safeguarding partners, other organisations, agencies and practitioners as required. School staff should be proactive in sharing information as early as possible to help identify, assess and respond to risks or concerns about the safety and welfare of children, whether this is when problems are first emerging, or where a child is already known to the local authority children's social care.

Our Governing body are aware that among other obligations, the Data Protection Act 2018 and the GDPR place duties on organisations and individuals to process personal information fairly and lawfully and to keep the information they hold safe and secure. Our Governing body ensure relevant staff have due regard to the relevant data protection principles, which allow them to share (and withhold) personal information, as provided for in the Data Protection Act 2018 and the GDPR. This includes:

- being confident of the processing conditions which allow them to store and share information for safeguarding purposes, including information, which is sensitive and personal, and should be treated as 'special category personal data'.
- understanding that 'safeguarding of children and individuals at risk' is a processing condition that allows practitioners to share special category personal data. This includes allowing practitioners to share information without consent where there is good reason to do so, and that the sharing of information will enhance the safeguarding of a child in a timely manner but it is not possible to gain consent, it cannot be reasonably expected that a practitioner gains consent, or if to gain consent would place a child at risk.
- for schools, not providing pupils' personal data where the serious harm test under the legislation is met. For example, in a situation where a child is in a refuge or another form of emergency accommodation, and the serious harms test is met, they must withhold providing the data in compliance with schools' obligations under the Data Protection Act 2018 and the GDPR. Where in doubt schools should seek independent legal advice.

Where children leave our school, the DSL will ensure that any relevant Child Protection file is transferred to the new setting as soon as possible, ensuring secure transit, with confirmation of receipt.

In addition to the child protection file, our DSL will also consider if it would be appropriate to share any information with the new school/college in advance of the child leaving. For example, information that would allow the new setting to continue supporting the victims of abuse and have that support in place for when the child arrives.

The Data Protection Act 2018 and GDPR do not prevent the sharing of information for the purposes of keeping children safe. Fears about sharing information must not be allowed to stand in the way of the need to safeguard and promote the welfare and protect the safety of children.

18. The School's Staff Code of Conduct

A separate code of conduct for staff has been produced to guide staff and volunteers in their relationships with pupils. This policy aims to ensure both that staff neither place pupils nor themselves at risk of harm, and that they avoid conduct that might expose them to the risk of an allegation that they have harmed a child. It includes guidance on all aspects of communication with pupils, including social media. The policy is available to staff on the School's website.

Avoiding Allegations of Abuse: Guidance to Staff

Allegations of abuse of children are sometimes made against staff by children themselves or by their parents/guardians or by others close to the school. In cases such as these allegations can be malicious or unfounded. Staff have a duty, however, to ensure that they do not put themselves in a situation where it may be easier for such allegations to arise. The following guidance is provided:

- **Physical Contact with Pupils**

In general, physical contact with pupils should be avoided. However, there are situations when it is unavoidable. Displays of emotion by children should be met with a reasonable response (such as a hand on the shoulder). Kissing or cuddling (and in general hugging) a pupil is not appropriate. When a pupil is in need of consolation, great care should be taken to ensure that the consolation provided is appropriate to the circumstances and the age of the pupil. In sporting activities, especially when demonstrating exercise techniques great care should be taken to avoid contact if possible. The teacher should either demonstrate the exercise him/herself or use visual aids. If physical contact is essential then hands should be placed in a supportive position, giving preference to arms, legs and the back. **Members of staff are reminded that hitting a pupil is never acceptable and that the School does not use corporal punishment.** Where it is necessary for a member of staff to restrain a pupil physically the appropriate guidance in the *Staff Code of Conduct* must be followed.

- **One-to-One Situations**

Staff should take great care when dealing with a pupil alone. Where possible, such encounters should take place at a time when, and in a location where, there are other people in the vicinity. It makes sense to leave a door open and to have a physical barrier (such as a desk) between the pupil and the teacher. Such arrangements should, of course, be made in the context of the need to provide confidentiality where appropriate to the pupil concerned. Members of staff should avoid being on their own with a pupil in a car.

- **Electronic Communication**

Where members of staff need to communicate with pupils using e-mail, they must do so only using their staff school email addresses. It is not acceptable for members of staff to

communicate with pupils using social networking sites (such as Facebook) or instant messaging services. The School recognises that members of staff may gather the mobile telephone numbers of pupils in the course of the safe running of a school trip. However, staff must delete any pupil numbers stored in their personal mobile telephones at the conclusion of the trip. In general, communicating with pupils using mobile telephones is not acceptable, and staff should not give their personal telephone numbers to pupils or personal email addresses to pupils, nor should they communicate with them by text message or personal email. If they need to speak to a pupil by telephone, they should use the School's telephones. Great caution is also advised when communicating with recent former pupils by electronic and other means, as they may have friends or siblings who are still pupils at the School.

- **Suggestive Conversation**

Members of staff must avoid having conversations with pupils that use inappropriate language, such as swearing or sexual innuendo, or that are sexually suggestive.

- **Photographic Images**

The taking of photographs of pupils by members of staff whilst undertaking school activities is acceptable in principle, whether the images are captured on school or personal equipment. It is not, however, acceptable for members of staff to take or share images of pupils that are inappropriate (either by virtue of what the pupils are doing or by virtue of how they are dressed). All photographs of pupils taken whilst undertaking school activities must be stored on the school network and must not be stored on personal devices. Personal devices may be used for temporary storage as part of the process of transferring captured images to the school network, but images must be deleted from personal devices once the process of transferring them to the school network has been completed and this must be carried out as soon as is possible. Images stored on the school network must not be downloaded onto personal devices, and members of staff must not take or download images of pupils for personal purposes.

Members of staff working in the EYFS must not be in possession of a personal camera or personal mobile telephone whilst working in the setting. Members of staff in possession of a smart watch, must switch the device to flight mode or remove it so that images cannot be sent or received. Parents and visitors are also required to refrain from using electronic devices for the purpose of making calls or recording images in the setting. Staff should feel empowered to prevent visitors using mobile devices in the EYFS setting. Parents of pupils in the EYFS are asked to give consent to the use of Tapestry (Electronic Learning Journey) to record images that illustrate the pupils' individual development. All images should be deleted once the pupil has left the setting.

- **Physical Restraint**

Any physical restraint is only permissible when a child is in imminent danger of inflicting an injury on himself/herself or on another, and then only as a last resort when all efforts to diffuse the situation have failed. Another member of staff should, if possible, be present to act as a witness. All incidents of the use of physical restraint should be recorded in writing and reported immediately to the Headmaster who will decide on the course of action and will log the incident. Where this relates to the

School's Nursery and EYFS setting, parents will be informed of any physical restraint used on their child the same day or as soon as reasonably practicable.

- **Physical education and other activities requiring physical contact**

Where exercises or procedures need to be demonstrated, extreme caution should be used if the demonstration involves contact with pupils and, wherever possible, contact should be avoided. It is acknowledged that some staff, for example, those who teach PE and games, or who offer music tuition, will, on occasions, have to initiate physical contact with pupils in order to support a pupil so they can perform a task safely, to demonstrate the use of a particular piece of equipment/instrument or assist them with an exercise. This should be done with the pupil's agreement. Contact under these circumstances should be for the minimum time necessary to complete the activity and take place in an open environment. Staff should remain sensitive to any discomfort expressed verbally or non-verbally by the child.

- **Transporting pupils**

It is inadvisable for a teacher to give a lift in a car to a pupil alone. Wherever possible and practicable it is advisable that transport is undertaken other than in private vehicles. If there are exceptional circumstances that make unaccompanied transportation of pupils unavoidable, the journey should be made known to a senior member of staff.

- **Confidentiality**

Staff members should never give absolute guarantees of confidentiality to pupils or adults wishing to tell them about something serious. They should guarantee only that they will pass on information to the minimum number of people who must be told in order to ensure that the proper action is taken to sort out the problem and that they will not tell anyone who does not have a clear need to know. They will also take whatever steps they can to protect the informing pupil or adult from any retaliation or unnecessary stress that might be feared after a disclosure has been made.

19. Allegations of abuse made against other children

Where it is alleged that a child has been abused by another child, the School will refer the matter to Children's Social Care or the police in accordance with the relevant local Contact and Referrals Procedure. Any pupils who are involved, whether as alleged victims and/or perpetrators, will receive appropriate care from the School. Any bullying incidents which involve significant harm to a pupil will be treated as a safeguarding concern. The School's *Anti-Bullying and Anti Cyber Bullying Policy* is available on the School's website.

Children are capable of abusing their peers and child on child abuse can manifest itself in many ways. Child on child abuse can take many forms and can include (but is not limited to): abuse within intimate partner relationships, bullying (including cyberbullying), sexual violence and sexual harassment, physical abuse such as hitting, kicking, shaking, biting, hair pulling or otherwise causing physical harm, sexting and initiation / hazing type violence and rituals. It is important that all allegations of child on child abuse are investigated. This should be carried out in a sensitive manner and it should be made clear that abuse is abuse and should never be tolerated or passed off as a 'banter' or 'part of growing up'.

Any child on child abuse allegation must be referred to the DSL immediately. Where a concern regarding child on child abuse has been disclosed to the DSL advice and guidance will be sought from SCAS and if it is clear a crime has been committed or there is a risk of crime being committed the Police will be contacted. Following advice from 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. (For further information see Appendix 1)

20. Pupils with SEND

Pupils with special educational needs and disabilities, whether having an EHC Plan, legacy Statement or neither, can face additional challenges. Additional barriers can exist when recognising abuse and neglect in this group of children. This can include:

- Assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's disability without further exploration
- Being more prone to peer group isolation than other children.
- Children with SEND can be disproportionately impacted by things like bullying, without outwardly showing any signs
- Communication barriers and difficulties in overcoming these barriers.

Any causes of concern should be reported immediately to the DSL, or in their absence a DDSL, who, in discussion with the SEND Co-ordinator will investigate and report, if necessary, to the local safeguarding partnership.

21. Looked after children

The School's LAC designated teacher is the DSL. The term '**looked after**' refers to children and young people who are in the care of the Government or who are provided with accommodation for more than a continuous period of 24 hours. The most common reason for children becoming looked after is as a result of abuse and/or neglect. In the case of a pupil becoming 'looked after' then the legal status of the child's care arrangements will be kept on the pupil's file. Staff will be made aware of the care arrangements of the child. The DSL will have the details of the social worker involved with the child. If a referral is received concerning a child or young person who is 'looked after', the same procedures should be followed as for any child or young person at the School. A previously looked after child potentially remains vulnerable and will continue to be supported by the DDSL / DSL who will continue to work with agencies involved and will ensure that prompt action is taken should there be any cause for concern. The DSL is responsible for promoting the educational achievement of children who have left care through adoption, special guardianship or child arrangement orders or who were adopted from state care outside England and Wales.

22. Training

All staff and volunteers are trained appropriately, with regular updates, in accordance with procedures laid down by the local safeguarding partnership.

(a) The DSL/DDSLs are trained in child protection and in local inter-agency working in line with *'Working Together to Safeguard Children'*. The Headmaster is also trained in child protection and in local inter-agency working. This training is updated at least every two years. This training is provided by Staffordshire Children's Advice and Support Service. In addition they update knowledge and skills by emails etc at regular intervals to keep up with developments relevant to their role. This meets the requirements of *KCSIE*. They have job descriptions that include reference to their safeguarding roles and other activities.

(b) All members of staff (and part-time members of staff) and governors have received training in safeguarding and child protection procedures, the Prevent order, Online Safety, the Acceptable use of ICT (which includes an understanding of the expectations, applicable roles and responsibilities in relation to filtering and monitoring within school) and guidance on the use of social media. Staff also receive training on how to deal with incidents of child on child abuse. This training is updated annually. This training may be provided by the DSL, or alternatively is provided by the local social services department or external agencies acceptable to the Staffordshire Children's Advice and Support Service. All staff must read and confirm that they have read *Part 1 of KCSIE* (including Annex A and B) at the start of each academic year. Safeguarding and child protection updates (via email and/or staff meetings) are sent out as required, and staff receive safeguarding updates in staff meetings and training days in order to ensure that staff have the relevant skills and knowledge to safeguard children effectively.

(c) All newly-appointed members of staff and Governors undergo child protection training as part of a clear induction process.

They are provided with (and are expected to have a good understanding of):

- a link to a copy of *KCSIE* (2023) (including Annex A and B), which they are required to read and be familiar with
- the School's *Safeguarding Policy* (including the CME procedures, child on child abuse and sexual violence and harassment)
- *Staff Code of Conduct*
- *Whistleblowing Policy*
- *Behaviour Rewards and Sanctions Policy and Anti Bullying and Anti Cyber Bullying Policy*
- *Missing Pupil Policy*
- *Social Media Policy for Staff*

Staff are also expected to be familiar with online safety and acceptable use guidance and to annually sign agreement with this. This training is provided by the School's DSL who makes them aware of their role; they receive appropriate induction training on their responsibilities in being alert to the signs of abuse and bullying, as well as the procedures for recording and referring concerns to the DSL. Training is an important part of the induction process. Training includes an overview of this policy and the policies mentioned above, and makes them aware of the identity of the DSL and Deputy DSLs. Training also makes staff aware of the forms and signs of child abuse, and promotes greater awareness of particular safeguarding concerns,

including political/ religious extremism, female genital mutilation, child sexual exploitation, cyber-bullying, online safety, prejudice based and discriminatory behaviour, mental health and how to deal with low level concerns. They are also made aware of the content of KCSE Annex B. Training also covers online safety which amongst other things, includes an understanding of the expectations, applicable roles and responsibilities in relation to filtering and monitoring. This training takes place annually, at induction and is regularly updated. Staff also receive basic cyber security training annually. It is the responsibility of the DSL and DDSL to ensure that training is in accordance with latest advice provided by SCAS and other relevant agencies.

(d) Voluntary staff are made aware of the Safeguarding Policy by the DSL.

Safeguarding and child protection training is also given to governors.

(e) All records of staff training are kept in the Child Protection Log. This is kept and maintained by the DSL.

23. Staff Obligations

All staff in the School are required to notify the School immediately if there are any reasons why they should not be working with children. The School takes its responsibility to safeguard children very seriously and any staff member who is aware of anything that may affect his/her suitability to work with children must notify the School immediately. This will include notification of any convictions, cautions, court orders, reprimands or warnings he/she may receive.

24. Safeguarding children and whistleblowing

A member of staff or volunteer who has concerns about the behaviour of another member of staff towards a child, or more general concerns about failings in the School's safeguarding and child protection procedures, should report them, following the guidance in the School's *Whistleblowing Policy* (available on the School's website). They can be confident that such concerns will be thoroughly investigated. Adverse consequences will not be suffered by anyone who reports a genuine concern in good faith. Where there are allegations of criminal activity, the relevant authorities will always be informed

25. Safer Employment Practices

(Please also refer to the School's *Safer Recruitment Policy* for further details)

The School follows the Government's recommendations for the safer recruitment and employment of staff who work with children and acts at all times in compliance with the *Independent School Standards Regulations* and the requirements of *KCSIE*.

In line with Part 3 of the DfE's guidance '*Keeping Children Safe in Education*' (*KCSIE*), the Governing Body prevents people who pose a risk of harm from working with pupils by adhering to statutory responsibilities to check all staff who work with children, taking proportionate decisions on whether to ask for any checks beyond the minimum required, and ensuring volunteers are appropriately supervised.

As part of carrying out safer recruitment procedures under *KCSIE*, members of the teaching and non-teaching staff at the school including part-time staff, temporary and

supply staff, and visiting staff, such as musicians and sports coaches are subject to the necessary statutory child protection checks before starting work.

In line with *KCSIE*, a curriculum vitae (CV) will only be accepted alongside a full application form and is not sufficient on its own when applying for a post at the School.

To further ensure safer recruitment and in line with *KCSIE*, the Schools will consider online searches as part of their due diligence checks on candidates who are shortlisted for posts at the School. Candidates will be informed that online searches will be done as part of due diligence checks.

For most appointments, an enhanced DBS check with 'barred list' information will be appropriate. Further to the DBS check, anyone appointed to carry out teaching work will require an additional check to ensure they are not prohibited from teaching by order of the Secretary of State. For those engaged in management roles an additional check is required to ensure they are not prohibited under section 128 provisions.

All governors, volunteers and contractors working regularly during term-time (such as contract catering staff) are also subject to the statutory DBS checks. Should the School develop concerns about an existing staff member's suitability to work with children, it will carry out all relevant checks as if the individual were a new member of staff.

Safeguarding within the Early Years Foundation Stage: The School will inform OFSTED of any allegations of serious harm or abuse by any person working or looking after children at the premises (whether that allegation relates to harm or abuse committed on the premises or elsewhere), or any other abuse which is alleged to have taken place on the premises, and of the action taken in respect of these allegations.

The School will inform OFSTED of the above as soon as is reasonably practicable, but at the latest within 14 days

Please also refer to the School's *Safer Recruitment Policy* for further details.

26. Promoting Awareness amongst pupils about safeguarding and online safety

The School seeks to give its pupils an age-appropriate understanding of how to promote both their own safety, emotional health and well-being and that of other children (this includes online safety).

The School is aware that the use of technology has become a significant component of many safeguarding issues. The use of technology has become a significant component of many safeguarding issues. Child Criminal Exploitation, CSE, radicalisation, sexual predation, and technology often provides the platform that facilitates harm.

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

Specific advice is given to pupils on how to keep themselves safe, especially when using electronic equipment and accessing the internet (both at school and at home). This is done through a variety of means, including the PSHE programme, ICT lessons, tutor / form periods and assemblies.

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

- Content: being exposed to illegal, inappropriate or harmful content; eg. Pornography, fake news, racism, misogyny, self harm, suicide, anti-Semitism, radicalisation and extremism
- Contact: being subjected to harmful online interaction with other users; eg. child to child pressure, commercial advertising and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial and other purposes.
- Conduct: personal online behaviour that increases the likelihood of, or causes, harm; eg. Making, sending and receiving explicit images (eg consensual and non-consensual sharing of nudes and semi-nudes and/or pornography, sharing other explicit images and online bullying.
- Commerce: risks such as online gambling, inappropriate advertising, phishing and or financial scams.

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

We have an online safety policy (*E Safety, Mobile Device and ICT Acceptable Use Policy*) which identifies the usage and expected behaviour of pupils. As a school we appreciate the value of technology and that appropriate filters are in place, yet this does not lead to unreasonable restrictions which would limit online teaching and safeguarding.

Use of 3G, 4G and 5G in school: in order to limit the access to 3G and 4G the School does not allow pupils in Years 7-11 to use their mobile phones during the school day unless given permission and monitored by a member of staff. The School protects its pupils when accessing the internet via the School's network through the use of Smoothwall and content filtering software. This is regularly reviewed by SMT and the DSL / DDSL are aware of how the filtering system works and check reports from Smoothwall. Concerns flagged on the filtering system are sent through immediately to the DSL/DDSL; they will follow up what has been flagged with the pupil (or member of staff) and will log it and the outcome. The log is held in a shared area which DDSLs and pastoral leaders have access to. If it is found that there is a concern then this will be followed up depending on the incident in line with the *School's Behaviour, Rewards and Sanction Policy* or *Safeguarding Policy* and will be logged on CPOMS. In addition the DSL/DDSL receive a Smoothwall report on a daily basis in order to ensure that they have an overview of the filtering system. The filtering system is regularly monitored and a full audit takes place annually (or whenever any substantive changes occur), is carried out by the School's

Head of Network and Infrastructure Services and the DSL (the audit includes a test of the fundamental capabilities of the filtering system by SWGfl and their tool to check that our filtering provider is signed up to relevant lists (CSA content, Sexual Content, Terrorist Content etc) is also used). A full report is made to SMT and to Governors. This is done inline with and in accordance with the DfE's *Meeting Digital and Technology Standards in Schools and Colleges* (2023).

Education at home / remote learning: where children are being asked to learn online at home, the School will refer to and use the links and resources provided by the DfE; safeguarding in schools, college and other providers and safeguarding in remote education. Parents and carers will be made aware of what their children are being asked to do and the sites they will be asked to access. Parents will be informed by the school when remote learning is taking place for their child.

The School's curriculum and pastoral systems are designed to foster the spiritual, moral, social and cultural development of all our pupils. All teaching staff play a vital role in this process, helping to ensure that all pupils relate well to one another and feel safe and comfortable within the School. We expect all the teaching staff to lead by example and to play a full part in promoting an awareness that is appropriate to their age amongst all our pupils on issues relating to health, safety and well-being. All staff, including all non-teaching staff, have an important role in insisting that pupils always adhere to the standards of behaviour set out in our behaviour policy and in enforcing our anti-bullying policy.

Time is allocated in PSHE to discussions of what constitutes appropriate behaviour and on why bullying and lack of respect for others is never right. PSHE sessions also include guidance on relationships, sex education, emotional well being and health education (RSE). Assemblies, drama and RE lessons are used to promote tolerance and mutual respect and understanding, including a sympathetic appreciation of other faiths and cultures, and embed fundamental British values of democracy, the rule of law and individual liberty. All pupils know that there are adults whom they can turn to if they are worried. If the School has concerns about a child there is always a recognised requirement for sensitive communication and designated staff members are aware of the need to avoid asking leading questions.

They also include specific advice to children as to how to keep themselves safe, especially when using electronic equipment and accessing the internet both at school and at home. Further guidance to pupils on e-safety and appropriate use of electronic equipment can be found in the School's *E Safety, Mobile Device and ICT Acceptable Use Policy*. The School recognises its obligations, under the Counter-Terrorism and Security Act 2015, to prevent its pupils from being drawn into terrorism and develop their resilience to extremist ideologies. The School works in partnership with the local safeguarding partnership and other agencies to make staff aware of how to protect

children who may be vulnerable to radicalisation or exposed to extremist views. All pupils know that there are adults to whom they can turn to if they are worried.

Our support to pupils includes the following:

- Advice and help numbers are available for external specialists such as ChildLine, CEOP.
- Our First Aid Rooms display advice on where pupils can seek help and the School Counsellors are available for help and advice.
- We provide leadership training to our head boys/girls and their team of prefects which specifically covers child protection issues and the importance of offering support and assistance to younger and to vulnerable pupils.
- We provide regular lessons to pupils on e-safety and ensure that all pupils understand and adhere to the School's guidelines in this area. For more details on cyber-bullying please refer to the School's *Anti-Bullying and Anti Cyber Bullying Policy*.

27. Review

This policy is reviewed annually by the Governing Body to check that it remains compliant with current legislation. The Nominated Governor with responsibility for Child Protection (Safeguarding) (see Section 6) meets termly with the DSL to discuss how the policy has been implemented during the previous year. He will then make an annual report to the Governing Body in order to assist it with an annual review of the efficiency with which the duties of the school in relation to its Child Protection (Safeguarding) policies have been discharged. The Governing Body will ensure that any deficiencies or weaknesses identified by the annual review are remedied without delay.

Appendix 1: Specific safeguarding issues

All staff should have an awareness of safeguarding issues; some of which are listed below. Staff should be aware that behaviours linked to the likes of drug taking, alcohol abuse, truanting and sexting put children in danger.

All staff should be aware safeguarding issues can manifest themselves through children abusing children. This is most likely to include, but not limited to: bullying (including cyber bullying), gender based violence/sexual assaults and sexting. Staff should be clear as to the School's policies and procedures with regards to child on child abuse.

Expert and professional organisations are best placed to 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 and the NSPCC websites. School and college staff can access government guidance as required on the issues listed below via GOV.UK and other government websites. KCSIE (2023) includes additional information about specific forms of abuse and safeguarding issues:

- Child Abduction and community safety incidents
- Children and the Court System
- Child missing from education - see below
- Children who are absent from education – see below
- Children with family members on prison
- Child criminal exploitation and Child sexual exploitation (CSE) – see below
- County lines
- Modern Slavery and the National Referral Mechanism
- Cybercrime
- Domestic abuse – see below
- Mental health
- Female genital mutilation (FGM) – see below
- Forced marriage
- Homelessness – see below
- Serious violence
- So-called honour based abuse
- Missing children and adults strategy
- Online safety
- Private fostering
- Preventing Radicalisation – see below
- The Prevent Duty and Channel
- Child on child abuse – see below
- Sexual violence and sexual harassment between children – see below
- The response to a report of sexual violence or harassment
- Upskirting (which is a criminal offence)

1. Child sexual exploitation (CSE) and Child Criminal Exploitation (CCE)

CSE and CCE are forms of abuse and both occur where an individual or groups takes advantage of an imbalance in power to coerce, manipulate or deceive a child into sexual or criminal activity. Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including gender, sexual identity, cognitive ability, physical strength, status and access to economic or other resources. In some cases, the abuse will be in exchange for something the victim needs or wants and / or will be of financial benefit or other advantages of the perpetrator or facilitator. The abuse can be perpetrated by individuals or groups, males or females, children or adults. The abuse can be one off or a series of incidents over time, and range from opportunistic to complex organised abuse. It can involve force and / or enticement based methods of compliance and may, or may not, be accompanied by violence or threats of violence. Victims can be exploited even when activity appears consensual and as well as being physical it can take place on line.

Child Sexual Exploitation

CSE is a form of sexual abuse where children are sexually exploited for money, power or status. Like all forms of child sex abuse, child sexual exploitation:

- can affect any child or young person (male or female) under the age of 18 years, including 16 and 17 year olds who can legally consent to have sex;
- can still be abuse even if the sexual activity appears consensual;
- can include both contact (penetrative and non-penetrative acts) and non-contact sexual activity;
- can take place in person or via technology, or a combination of both;
- can involve force and/or enticement-based methods of compliance and may, or may not, be accompanied by violence or threats of violence;
- may occur without the child or young person's immediate knowledge (e.g. through others copying videos or images they have created and posted on social media);
- can be perpetrated by individuals or groups, males or females, and children or adults. The abuse can be a one-off occurrence or a series of incidents over time, and range from opportunistic to complex organised abuse; and
- is typified by some form of power imbalance in favour of those perpetrating the abuse.

Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including gender, sexual identity, cognitive ability, physical strength, status, and access to economic or other resource

A significant number of children who are victims of sexual exploitation go missing from home, care and education at some point.

Some of the following signs may be indicators of sexual exploitation:

1. Children who appear with unexplained gifts or new possessions;
2. Children who associate with other young people involved in exploitation;
3. Children who have older boyfriends or girlfriends;
4. Children who suffer from sexually transmitted infections or become pregnant;

5. Children who suffer from changes in emotional well-being;
6. Children who misuse drugs and alcohol;
7. Children who go missing for periods of time or regularly come home late;
8. Children who regularly miss school or education or do not take part in education

Child Criminal Exploitation:

CCE is where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child into criminal activity in exchange for something the victim needs or wants, and / or for financial or other advantage of the perpetrator and / or through violence or threat of violence. The victim may have been criminally exploited even if the activity appears consensual. CCE does not always involve physical contact; it can also occur through the use of technology.

CCE can include children being forced to work in cannabis factories, being coerced into moving drugs or money across the country (county lines), forced to shoplift or pickpocket or to threaten other young people.

Children can become trapped by this type of exploitation as perpetrators can threaten victims (and their families) with violence or entrap and coerce them into debt. They may be coerced into carrying weapons such as knives or begin to carry a knife for a sense of protection from harm from others. As children involved in criminal exploitation often commit crimes themselves, their vulnerability as victims is not always recognised by adults and professionals (particularly older children) and still have been criminally exploited even if the activity appears to be something that have consented to. It is important to note that the experience of girls who are criminally exploited can be very different to that of boys. The indicators may not be the same, however, we need to be aware that girls are at risk of criminal exploitation too. It is also important to note that both boys and girls being criminally exploited may also be at higher risk of sexual exploitation.

Some of the following can be indicators of CCE:

- children who appear with unexplained gifts or new possession
- children who associate with other young people involved in exploitation
- children who suffer from changes in emotional well being
- children who misuse drugs
- children who go missing for periods of time or regularly come home late
- children who regularly miss school or education or do not take part in education

Some additional specific indicators that may be present in CSE children are:

- Have older boyfriends / girlfriends
- Suffer from sexually transmitted infections, display sexual behaviours beyond expected sexual development or become pregnant.

County Lines

County lines is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs into one or more importing areas in the UK, using dedicated mobile phone lines or other form of 'deal line'.

Exploitation is an integral part of the county lines offending model with children and vulnerable adults exploited to move and store drugs and money. Offenders will often use coercion, intimidation, violence (including sexual violence) and weapons to ensure compliance of victims. Children can be targeted and recruited into county lines in a number of locations including schools. Children are often recruited to move drugs and money between locations and are known to be exposed to techniques such as 'plugging' where drugs are concealed internally to avoid detection. Children can easily become trapped by this exploitation as county lines gangs create drug debts and can threaten serious violence and kidnap towards victims and their families if they attempt to leave the county lines network.

Key to identifying potential involvement in county lines are missing episodes both from home and school, when the victim may have been trafficked for the purpose of transporting drugs and a referral to the National Referral Mechanism (the National Crime Agency: human trafficking) should be considered. If a child is suspected to be at risk of or involved in county lines, a safeguarding referral should be considered alongside consideration of availability of local services/third sector providers who offer support to victims of county lines.

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

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

In addition to the indicators for CSE and CCE some additional indicators that may be present where a child is criminally exploited through involvement in county lines are children who:

- Go missing and are subsequently found in areas away from their home
- Have been the victim or perpetrator of serious crime eg knife crime
- Are involved in receiving requests for drugs via a phone line, moving drugs, handing over and collecting money for drugs
- Are exposed to techniques such as 'plugging'; where drugs are concealed internally to avoid detection
- Are found in accommodation that they have no connection with, often called a 'trap house' or 'cuckooing' or hotel rooms where there is drug activity
- Owe a debt bond to their exploiters
- Have their bank accounts used to facilitate drug dealing

2. Mental Health

All staff have an incredibly important role to play in supporting the mental health and wellbeing of our pupils and should be aware that mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation.

Only appropriately trained professionals should attempt to make a diagnosis of a mental health problem. Staff, however, are well placed to observe children day to day and identify those whose behaviour suggests that they may be experiencing a mental health problem or be at risk of developing one. If staff have concerns then they should follow the procedures as laid out in the School's *Positive Mental Health Policy*.

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

If a member of staff has a mental health concern about a child that is also a safeguarding concern, immediate action should be taken and the member of staff should report their concerns to the DSL or DDSL as soon as possible.

3. So-called 'honour based' abuse

So-called 'honour-based' abuse (HBA) encompasses 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 so called HBA are abuse (regardless of the motivation) and should be handled and escalated as such. If in any doubts staff should speak to the DSL or a DDSL. Professionals in all agencies, and individuals and groups in relevant communities, need to be alert to the possibility of a child being at risk of HBA, or already having suffered HBA.

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

Female Genital Mutilation

FGM comprises all procedures involving partial or total removal of the external female genitalia or other injury to the female genital organs. It is illegal in the UK and a form of child abuse with long lasting harmful consequences.

Staff need to be alert to the possibility of a girl being at risk of FGM, or already having suffered FGM. There is a range of potential indicators that a child or young person may be at risk of FGM, which individually may not indicate risk but if there are two or more indicators present this could signal a risk to the child or young person. Victims of FGM are likely to come from a community that is known to practise FGM. Professionals

should note that girls at risk of FGM may not yet be aware of the practice or that it may be conducted on them, so sensitivity should always be shown when approaching the subject.

Section 5B of the Female Genital Mutilation Act 2003 (as inserted by section 74 of the Serious Crime Act 2015) places a statutory duty upon teachers along with regulated health and social care professionals in England and Wales, to report to the police where they discover (either 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 pupils, 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 personally report to the police cases where they discover that an act of FGM appears to have been carried out. The teacher should also discuss any such case with the DSL and involve children’s social care as appropriate. The duty does not apply in relation to at risk or suspected cases (i.e. where the teacher does not discover that an act of FGM appears to have been carried out, either through disclosure by the victim or visual evidence) or in cases where the woman is 18 or over. In these cases, teachers should follow local safeguarding procedures.

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 a marriage. The threats can be physical or emotional and psychological. A lack of full and free consent can be where a person does not consent or where they cannot consent (if they have learning disabilities, for example). Some perpetrators use perceived cultural practices, to coerce a person into marriage. Schools and colleges play an important role in safeguarding children from forced marriage.

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

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

From February 2023 it has also been a crime to carry out any conduct whose purpose is to cause a child to marry before their eighteenth birthday, even if violence, threats or

another form of coercion are not used. As with the existing forced marriage law, this applies to non-binding, unofficial 'marriages' as well as legal marriages. School and college staff can contact the Forced Marriage Unit for advice or information: Contact: 020 7008 0151 or email fm@fcdo.gov.uk.

4. Preventing Radicalisation

See *Preventing Extremism and Radicalisation Policy*

Protecting children from the risk of radicalisation is part of the School's wider safeguarding duties, and is similar in nature to protecting children from other forms of harm and abuse. During the process of radicalisation it is possible to intervene to prevent vulnerable people being radicalised. Radicalisation refers to the process by which a person comes to support terrorism and forms of extremism (extremism is vocal or active opposition to our fundamental values, including the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs. This also includes calling for the death of members of the armed forces.).

There is no single way of identifying an individual who is likely to be susceptible to an extremist ideology. It can happen in many different ways and settings. Specific background factors may contribute to vulnerability which are often combined with specific influences such as family, friends or online, and with specific needs for which an extremist or terrorist group may appear to provide an answer. The Internet and the use of social media in particular has become a major factor in the radicalisation of young people.

As with managing other safeguarding risks, staff should be alert to changes in children's behaviour which could indicate that they may be in need of help or protection. School staff should use their professional judgement in identifying children who might be at risk of radicalisation and act proportionately which may include making a referral to the Channel programme.

The Prevent Duty

From 1 July 2015 specified authorities and all schools 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. It applies to a wide range of public-facing bodies. Bodies to which the duty applies must have regard to statutory guidance issued under section 29 of the CTSA 2015 ("the Prevent guidance").

Paragraphs 57-76 of the 'Revised Prevent duty guidance for England and Wales' are specifically concerned with schools.

The statutory '*Revised Prevent duty guidance: for England and Wales*' (for schools) summarises the requirements on schools, which we follow, in terms of four general themes: risk assessment, working in partnership, staff training and IT policies.

- Schools are expected to assess the risk of children 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 children

and young people in the area and a specific understanding of how to identify individual children who may be at risk of radicalisation and what to do to support them.

- The Prevent duty builds on existing local partnership arrangements. For example, governing bodies and proprietors of all schools should ensure that their safeguarding arrangements, as is the case for the School, take into account the policies and procedures of Local Safeguarding Children Boards (LSCBs). Effective engagement with parents / the family should also be considered as they are in a key position to spot signs of radicalisation. It is important for us to assist and advise families who raise concerns and be able to point them to the right support mechanisms. School will also discuss any concerns in relation to possible radicalisation with a child's parents in line with our school's safeguarding policies and procedures unless they have specific reason to believe that to do so would put the child at risk.

- All staff receive Prevent awareness training (WRAP) to enable them to protect children from the risk of radicalisation.

- Schools must ensure that children are safe from terrorist and extremist material when accessing the internet in schools. Our school ensures that suitable filtering is in place and teaches pupils about online safety more generally.

The government website 'educate against hate' (<http://educateagainsthate.com/>) provides information and resources that help to recognise and address extremism and radicalisation in young people.

Channel

School staff should understand when it is appropriate to make a referral to the Channel programme. Channel is a voluntary, confidential support programme which focuses on providing support at an early stage to people who are identified as being vulnerable to being drawn into terrorism. Prevent referrals may be passed to a multi agency Channel panel, which will discuss the individual referred to determine whether they are vulnerable to being drawn into terrorism and consider the appropriate support requires. A representative of the School may be asked to attend the Channel panel to help with this assessment. An individual's engagement with the programme is entirely voluntary at all stages.

5. Domestic abuse

Domestic abuse can encompass a wide range of behaviours and may be a single incident or a pattern of incidents. 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

Children can be victims of domestic abuse. They may see, hear or experience the effects at home and/or suffer domestic abuse in their own intimate relationships (teenage relationship abuse). Exposure to domestic abuse and/or violence can have a serious, long lasting emotional and psychological impact on children. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result. Domestic abuse affecting young people can also occur within their personal relationships, as well as in the context of their home life. We are an Operation Encompass school and act appropriately when we receive an alert to support the children in our school.

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

Operation Encompass helpline 0204 513 9990

Safelives: young people and domestic abuse

6. Homelessness

Being homeless or being at risk of becoming homeless presents a real risk to a child's welfare. The DSL/DDSL should be aware of contact details and referral routes in to the Local Housing Authority so they can raise/progress concerns at the earliest opportunity. Indicators that a family may be at risk of homelessness include household debt, rent arrears, domestic abuse and anti-social behaviour, as well as the family being asked to leave a property. Whilst referrals and or discussion with the Local Housing Authority should be progressed as appropriate, this does not, and should not, replace a referral into children's social care where a child has been harmed or is at risk of harm.

The Homelessness Reduction Act 2017 places a new legal duty on English councils so that everyone who is homeless or at risk of homelessness will have access to meaningful help including an assessment of their needs and circumstances, the development of a personalised housing plan, and work to help them retain their accommodation or find a new place to live.

In most cases school staff will be considering homelessness in the context of children who live with their families, and intervention will be on that basis. However, it should also be recognised in some cases 16 and 17 year olds could be living independently from their parents or guardians, for example through their exclusion from the family home, and will require a different level of intervention and support. Children's services will be the lead agency for these young people and the DSL/DDSL should ensure appropriate referrals are made based on the child's circumstances.

7. Serious Violence

All staff should be aware of the indicators which may signal children are at risk from or involved with serious violent crime. These may include:

- Increased absence from school

- A change in friendships
- Relationships with older individuals or groups
- A significant decline in performance
- Significant change in well being
- Signs of assault or unexplained injuries

All staff should be aware of the range of risk factors which increase the likelihood of involvement in serious violence such as

- Being male
- Having been frequently absent or permanently excluded from school
- Having experience child maltreatment
- Having been involved in offending

8. Children who are Absent From Education

Children being absent from education for prolonged periods and/or on repeated occasions can act as a vital warning sign to a range of safeguarding issues, including neglect, child sexual and child criminal exploitation - particularly county lines. It is important the school's response to persistently absent pupils and children missing education supports identifying such abuse, and in the case of absent pupils, helps prevent the risk of them becoming a child missing education in the future.

This includes when problems are first emerging but also where children are already known to local authority children's social care and need a social worker (such as a child who is a child in need or who has a child protection plan, or is a looked after child), where being absent from education may increase known safeguarding risks within the family or in the community.

Further information and support, includes:

- Working together to improve school attendance including information on how schools should work with local authority children's services where school absence indicates safeguarding concerns.
- Information regarding schools' duties regarding children missing education, including information schools must provide to the local authority when removing a child from the school roll at standard and non-standard transition points, can be found in the department's statutory guidance: Children missing education.
- Further information for colleges providing education for a child of compulsory school age can be found in: Full-time enrolment of 14 to 16-year-olds in further education and sixth-form colleges
- General information and advice for schools and colleges can be found in the Government's Missing Children and Adults strategy.

Appendix 2: Policy and Procedures for Child on Child Abuse (including Child on Child Sexual Violence and Sexual Harassment)

ALL staff at the School must ensure that they:

- recognise the increasing national concern regarding this issue as highlighted in the KCSIE (2023)
- are aware of the level and nature of risk that our pupils are or may be exposed to
- understand the important role that they play in the culture of vigilance
- recognise child-on-child abuse of all types
- are confident and competent in responding promptly and appropriately with timely challenge of the attitudes and behaviours of child-on-child abuse (both inside and outside the classroom)
- listen to children, capture their voice, and help to create a culture in which our children feel able to share their concerns openly, in a non-judgemental environment
- will not downplay behaviours and dismiss them as ‘just banter’, ‘having a laugh’ or ‘part of growing up’
- understand that by dismissing unacceptable behaviours it can lead to an unsafe environment for children and, in worst case scenarios, a **culture** that **normalises** abuse leading to children accepting it as normal and not having the confidence to come forward, speak out and report what has happened to them.
- report and record their concerns following our safeguarding referral processes
- understand that even if there are no reports of this type of abuse that it ‘does happen here’
- are committed to a whole setting, whole staff approach, to ensure the prevention, early identification, and appropriate management of child-on-child abuse within our setting and beyond
- recognise and understand that children who harm others, may have additional or complex needs of their own, e.g., significant disruption in their own lives, exposure to domestic abuse, witnessing/suffering abuse as well as educational under-achievement and possibly an involvement in criminal activity and therefore they too, will need support.
- encourage parents to communicate with us so that we can work together to ensure and enable a prompt and appropriate response to any type of child-on-child abuse.
- know that putting a stop to child-on-child abuse of any type and ensuring the safety of our children is a priority in our education setting.
- regard the introduction of this policy as a positive, proactive, and preventative measure

At School we work hard to create a culture where child-on-child abuse does not happen. We strive to create an ethos of mutually respectful behaviour. However,

if this type of abuse is seen, heard or reported **ALL** staff are confident in their actions and subsequent support. Training in child on child abuse is regular and staff are able to challenge immediately and understand the importance of language to use, recording what they see as soon as possible afterwards so that a full and current picture is known. Staff are also aware of the local area and issues and contextual safeguarding.

Our Pupils

ALL children are at risk of child-on-child abuse, but some groups are more vulnerable than others to abuse and include the following:

- A child with additional needs and disabilities
- A child living with domestic abuse
- A child who is at risk of/suffering significant harm
- A child who is at risk of/or has been exploited or at risk of being exploited, criminally/sexually
- A looked after child
- A child who goes missing from school/home or is missing education
- Children who identify as or are perceived as LGBTQI+
(The fact that a child or a young person may be LGBT is not in itself an inherent risk factor for harm. However, children who are LGBT can be targeted by other children. In some cases, a child who is perceived by other children to be LGBT (whether they are or not) can be just as vulnerable as children who identify as LGBT. These risks can be compounded where children who are LGBT lack a trusted adult with whom they can be open. It is therefore vital that staff endeavour to reduce the additional barriers faced and provide a safe space for these children to speak out or share their concerns with members of staff).

Research tells us that girls are more frequently identified as being abused by their peers and more likely to experience unwanted sexual touching, sexual violence and/or sexual harassment. They often are exploited into gangs and are victims of sexual violence when in those gangs. However, we are aware that these are behaviours not just confined to girls. Boys are less likely to report intimate relationship abuse and may display other behaviour such as anti-social/criminal behaviours. Boys are more likely to be exploited /entrapped into gangs and subject to violence because of gang culture.

At school we encourage our children to talk to us and tell us when they are worried and what they are worried about, be it about themselves or another child.

We are confident that our children know:

- who to speak to and/or where to go for support
- that they will be listened to, taken seriously and not dismissed
- that they will receive the right help at the right time
- that they will receive ongoing support
- that they will be supported to feel safe in school

- that they will be supported to continue to access their education

We reassure all victims that they are being taken seriously, regardless of how long it has taken them to come forward, and that they will be supported and kept safe. Abuse that occurs online or outside of the school will not be downplayed and will be treated equally seriously. Victims will never be given the impression that they are creating a problem by reporting sexual violence or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report. We will ensure that we explain that the law is in place to protect children and young people rather than criminalise them, and this will be explained in such a way that avoids causing alarm or distress.

We also inform our children that there are other ways to report abuse if they are worried about themselves or other children and for whatever reason don't feel that they can speak to staff in school. For example:

[NSPCC Helpline](https://www.nspcc.org.uk) on [0808 800 5000](tel:08088005000) or by emailing help@nspcc.org.uk.

[Get Support | Childline](#)

Through PSHE, assemblies and tutor support we educate children about Child on Child abuse in all its forms. We work to empower children to be informed and understand that they have a voice through the Student Council, peer mentoring, questionnaires, drop ins, assemblies and form time. We look to educate children against harmful sexual behaviours, e.g. in PSHE and assemblies which open up topics such as:

- Healthy and respectful relationships, including consent
- What respectful behaviour looks like
- Gender roles, stereotyping, equality
- Body confidence and self-esteem
- Prejudiced behaviour
- That sexual violence and sexual harassment is always wrong and addressing cultures of sexual harassment

Child-on-Child Abuse - What is it?

Child on child abuse is any form of physical, sexual, emotional, and financial abuse using coercion/power and/or control by an individual child or group of children and is exercised between children and within their relationships (both intimate and non-intimate).

All staff recognise that children can abuse their peers and are aware of the different forms that these safeguarding issues take:

- Bullying-emotional/physical so **repeated** behaviour which is intended to hurt someone either emotionally or physically (hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm)
- Online/Cyber bullying
- Prejudiced relating bullying
- Sexual Violence, Sexual Harassment and Sexually Harmful behaviour.
- Sexting sharing of nude or indecent (youth produced sexual imagery).

- Abuse in intimate relationships, including teenage relationship abuse
- Initiation/hazing type violence and rituals.
- Hate crime
- Child Criminal Exploitation
- Child Sexual Exploitation
- Gang association and serious violence - County Lines
- Radicalisation

This abuse can be motivated by perceived differences. e.g. on grounds of race, religion, gender, sexualorientation, disability or other differences and result in significant, long lasting, and traumatic isolation, intimidation, and/or violence to the victim.

We will record all instances of child on child abuse and inform parents /carers of such incidents.

Bullying is unwanted, aggressive behaviour among school aged children that involves a real or perceived power imbalance. The behaviour is **repeated** or has the potential to be repeated over time. Children and young people who are bullied and/or who bully others may have serious and lasting problems.

To be considered bullying, the behaviour must be aggressive and include the following:

- an imbalance of power such as physical strength, access to embarrassing information, or popularity to control or harm others. These imbalances can change over time and in different situations, even if they involve the same people.
- repetition as these behaviours happen more than once or have the potential to happen more than once.
- actions such as making threats, spreading rumours, attacking someone physically or verbally or for a particular reason, e.g. size, hair colour, gender, sexual orientation, and excluding someone from a group on purpose.

Any behaviours that may need to be handled with sanctions will be in line with our *Behaviour, Rewards and Sanctions Policy* and *Anti Bullying and Anti Cyber Bullying Policy*.

Online bullying is the use of technology (social networking, messaging, text messages, e-mail, chat rooms, etc.) to harass threaten or intimidate someone for the same reasons as stated above. It can take many forms and this list is not exhaustive:

- Abusive or threatening texts, emails, or messages
- Posting abusive comments on social media sites
- Sharing humiliating videos or photos of someone else
- Stealing someone's online identity
- Spreading rumours online
- Trolling-sending menacing or upsetting messages through social networks, chat rooms or games
- Developing hate sites about another person
- Prank calls or messages

- Group bullying or exclusion online
- Anonymous messaging
- Encouraging a young person to self-harm
- Pressuring children to send sexual messages or engaging in sexual conversations.

Prejudiced related bullying refers to a range of hurtful behaviour, physical or emotional or both, which causes someone to feel powerless, worthless, excluded or marginalised, and which is connected with prejudices around belonging, identity and equality in wider society, e.g. disabilities and special educational needs, ethnic, cultural and religious backgrounds, gender, home life (for example in relation to issues of care, parental occupation, poverty and social class) and sexual identity.

Sexual Violence, Sexual Harassment and Sexually Harmful Behaviour (SHB)

Sexual Violence, Sexual Harassment and Sexually Harmful Behaviour (SHB) can occur between two children of any age and sex or with groups of children by sexually assaulting or sexually harassing a single child or group of children.

We recognise that this behaviour can take place in a school or any setting where pupils are together and that the impact of this behaviour on children can be extremely distressing, impacting on their emotional health and wellbeing as well as affecting their academic achievement.

Sexual Violence and Sexual Harassment **must** be referred **immediately** to the Designated Safeguarding Lead (DSL).

Sexual Violence - For this policy we are referring to sexual offences under the Sexual Offences Act 2003 as described below:

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

Sexual Harassment - For this policy we mean 'unwanted conduct of a sexual nature' that can occur online and offline. We refer to this in the context of child on child sexual harassment. Sexual harassment is likely to violate a child's dignity, and/or make them feel intimidated, degraded, or humiliated and/or create a hostile, offensive or sexualised environment. Whilst not intended to be an exhaustive list, sexual harassment can include:

- Sexual comments, such as: telling sexual stories, making lewd comments, making sexual remarks about clothes and appearance, and calling someone sexualised names
- Sexual “jokes” or taunting
- Physical behaviour, such as deliberating brushing against someone, interfering with someone’s clothes and displaying pictures, photos, or drawings of a sexual nature; and
- Online sexual harassment, which might include non-consensual sharing of sexual images and videos and sharing sexual images and videos (both often referred to as sexting); sexualised online bullying and inappropriate sexual comments on social media; exploitation; coercion and threats. Online sexual harassment may be standalone, or part of a wider pattern of sexual harassment and/or sexual violence

Sexually Harmful Behaviour (SHB) In this policy we recognise the importance of distinguishing between healthy, problematic, and sexually harmful behaviour. Sexually harmful behaviour from young people is not always contrived or with the intent to harm others. There may be many reasons why a young person engages in sexually harmful behaviour, and it may be just as distressing to the young person who instigates it as to the young person it is intended towards. It may include:

- inappropriate sexual language
- inappropriate role play
- sexual touching
- sexual assault/abuse

Consent is when someone **agrees by choice** and has the **freedom** and **capacity** to make that choice. It is important to note that:

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

Sexting - the sharing of nude or indecent imagery (youth produced sexual imagery)

The term ‘sexting’ relates to the sending of indecent images, videos and/or written messages with sexually explicit content; these are created and sent electronically. They are often ‘shared’ via social networking sites and instant messaging services. These images may have been because of upskirting.

Initiation/Hazing

Hazing is a form of initiation ceremony which is used to induct newcomers into an organisation such as sports team, etc. There are several different forms, from relatively mild rituals to severe and sometimes violent ceremonies. The ceremony welcomes newcomers by subjecting them to a series of trials which promote a bond between them. After the hazing is over, the newcomers also have something in common with older members of the organisation, because they all experienced it as part of a rite passage. Many rituals involve humiliation, embarrassment, abuse,

and harassment.

Teenage relationship abuse

Teenage relationship abuse is a pattern of actual or threatened acts of physical, sexual, and/or emotional abuse, perpetrated by an adolescent (between the ages of 13 and 18) against a current or former partner. Abuse may include insults, coercion, social sabotage, sexual harassment, threats and/or acts of physical or sexual abuse. The abusive teen uses this pattern of violent and coercive behaviour, in a heterosexual or same gender relationship, to gain power and maintain control over the partner. This abuse may be child sexual exploitation.

Hate Crime

Hate crimes happen because of race, gender identity, religion, sexual orientation, and disability. They can happen anywhere, home, school and in the community and can be frightening for both victim and witnesses and is an offence. Hate crimes can include:

- physical attacks - physical assault, damage to property, offensive graffiti, neighbour disputes and arson
- threat of attack - offensive letters or emails, abusive or obscene telephone calls, groups hanging around to intimidate you and unfounded, malicious complaints
- verbal abuse or insults - harassment over the phone, by text or face to face, abusive gestures, and remarks, bullying and threats

Indicators that a child may be suffering from Child on Child abuse

Indicators and signs that a child may be suffering from child on child abuse can also overlap with those indicating other types of abuse and can include:

- failing to attend school, disengaging from classes, or struggling to carry out school related tasks to the standard ordinarily expected
- physical injuries
- experiencing difficulties with mental health and/or emotional wellbeing
- becoming withdrawn and/or shy; experiencing headaches, stomach aches, anxiety and/or panic attacks; suffering from nightmares or lack of sleep or sleeping too much
- broader changes in behaviour including alcohol or substance misuse.
- changes in appearance and/or starting to act in a way that is not appropriate for the child's age
- abusive behaviour towards others

Abuse affects our children and their presenting behaviours in different ways and the list above is not exhaustive. Children who present with one or more of these signs are not necessarily victims of abuse and their behaviour will depend on their individual circumstances.

ALL staff are alert to behaviour that may cause concern and think about what the behaviour might signify. We actively encourage children to share with us any underlying reasons for their behaviour, and, where appropriate, to engage with their parents/carers so that the cause(s) of their behaviour can be investigated and understood with the appropriate support in place.

All staff should be aware that children may not feel ready or know how to tell someone that they are being abused and/or they may not recognise their experiences as harmful. For example, children may feel embarrassed, humiliated, or being threatened. This could be due to their vulnerability, disability and/or sexual orientation or language barriers. This should not prevent staff from having a professional curiosity and speaking to the DSL if they have concerns about a child. It is also important that staff determine how best to build trusted relationships with children and young people which facilitate communication.

Responding to a concern/incident/disclosure of child-on-child abuse

Child-on-child abuse may occur in our school, on the way to or from school or out in the community. Consideration will be given to many aspects of the abuse and here are a few examples:

- Does it involve a single incident or has occurred over time?
- Is the behaviour problematic and concerning?
- Does it involve any overt elements of victimisation or discrimination, e.g. related to race, gender, sexual orientation, physical, emotional, or intellectual vulnerability?
- Is there any element of coercion or pre-planning?
- Does it involve a power imbalance between the child/children allegedly responsible for the behaviour and the child/children allegedly the subject of that power?
- Has there been a misuse of power?

It is also important that we:

- ascertain if there were there any witnesses to the abuse
- make notes and record **all** conversations with children spoken to as well as parents/carers/other professionals, including any actions taken
- treat all children involved as being at potential risk - while the child allegedly responsible for the abuse may pose a significant risk of harm to other children, s/he may also have considerable unmet needs and be at risk of harm themselves
- ensure that a safeguarding response is in place for both victim and alleged perpetrator

Consideration should also be given to supporting children who have witnessed child on child abuse of any kind. This is likely to be traumatic and support may be required. We will signpost to agencies and support services available where needed.

We will do all that we can to ensure both the victim and alleged perpetrator, and any witnesses, are not being bullied or harassed following this. Social media is likely to play a part in the fall out from any incident and friends from either side could well harass the victim or alleged perpetrator online as well as face to face. Any evidence we have of pupils using social media or inappropriately will be sanctioned according to our existing policies.

Responding to all reports and concern of sexual violence and/or sexual harassment between children.

We have mentioned above what we do when responding to child on child abuse concerns/disclosures and these **all** apply to sexual violence and sexual harassment between children's disclosures; however, we recognise the complexity and challenges that we face following the report of this particular type of abuse.

Guidance is clear in that it does not attempt to provide (nor would it be possible to provide) detailed advice on what we should do in any or every particular case; it provides effective safeguarding practice and principles for us to consider in our decision-making process and on a case-by-case basis.

Our DSL/DDSL will take the lead role when dealing with this type of abuse using their professional judgement and working together practices. 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 and it is important to maintain a calm, considered and appropriate response to any reports.

We understand that it is not easy for children to tell us about this type of abuse, and they may struggle to make a direct verbal report. Therefore, observations of changes in presenting behaviours are key.

We understand the importance of our initial response to a report and how this can encourage or undermine the confidence of future victims of sexual violence and sexual harassment. The culture in our setting is key to this.

On occasions the victim may not wish for their identity to be known and there are no easy or definitive answers when this is requested. If the victim does not give consent to share information, we may still lawfully share it, if it can be justified to be in the public interest. For example, to protect children from harm and to promote the welfare of children.

The Designated Safeguarding Lead will consider the following:

- The wishes of the victim in terms of how they want to proceed
- The victim(s) 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 - we will balance this aspect and the need to balance our duty and responsibility to protect other children

- The nature of the alleged incident(s) including might a crime have been committed and consideration of any display of harmful sexual behaviour
- The ages of the students involved
- The developmental stages of the students involved
- Any power imbalance between the students (e.g. Is the alleged perpetrator significantly older? Does the victim have a disability or learning difficulty?)
- If the alleged incident is a one off or a sustained pattern of abuse (the sustained pattern of abuse may not just be of a sexual nature)
- That sexual violence and sexual harassment can take place within intimate personal relationships between peers
- Whether there are ongoing risks to the victim, other children, adult students, or staff
- Other related issues and wider context, including links to any forms of child exploitation

When we talk about Sexual Violence and Sexual Harassment between children, we will refer to 'victim' and 'alleged perpetrator'. This does not mean that we are taking sides nor making any judgement, but for the purpose of this policy we will refer to children involved in this way.

Victim - When we speak to the 'victim' we will:

- listen and take any disclosure seriously
- never make them feel that they are creating a problem or be ashamed
- reassure them that they will be kept safe
- handle the situation with sensitivity
- use proper names for body parts but record exactly any language or vocabulary used by the child
- ask open questions and not lead the victim
- ascertain where the abuse occurred as this may highlight 'hot spots' or vulnerable locations in our setting or within the community which may need to be revisited by either ourselves (in school) or by alerting police/partners if it is in the community
- ascertain if other children witnessed this abuse
- consider ongoing support within our setting
- consider any referrals for external support

Parents or carers of the victim will be informed (unless this would put the victim at greater risk). Rape, assault by penetration and sexual assaults are crimes and the DSL will have to balance the victim's wishes against their duty to protect the victim and other children within the school setting. If we do decide to make a referral to children's social care and/or a report to the police against the victim's wishes, this will be handled extremely carefully, the reasons will in most cases be explained to the victim and appropriate specialist support offered. We will also consider the following:

- The wishes of the victim in terms of how they want to proceed

- That the victim(s) 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. (We will balance this aspect and the need to balance our duty and responsibility to protect other children)
- The nature of the alleged incident(s) including might a crime have been committed and consideration of any display of harmful sexual behaviour.
- The ages of the students involved
- The developmental stages of the students involved
- Any power imbalance between the students (e.g. is the alleged perpetrator significantly older? Does the victim have a disability or learning difficulty?)
- If the alleged incident is a one off or a sustained pattern of abuse (the sustained pattern of abuse may not just be of a sexual nature)
- That sexual violence and sexual harassment can take place within intimate personal relationships between peers
- Are there ongoing risks to the victim, other children, adult students, or staff
- Other related issues and wider context, including links to any forms of child exploitation

We will give all the necessary support for the victim to remain in school; however, if the trauma results in the victim being unable to do this, alternative provision or a move to another school or college will be considered to enable them to continue to receive suitable education. This will only be at the request of the victim (and following discussion with their parents or carers).

Alleged perpetrator - When we speak to the 'alleged perpetrator' we will:

- listen to what they say and not dismiss their account
- handle the situation with sensitivity and a non-judgemental approach
- offer ongoing support
- record all conversations and all action taken
- consider any referrals for external support, e.g. Youth Offending Service/Catch 22

When to inform the alleged perpetrator will be a decision that will be carefully considered. Where a report is going to be made to children's social care and/or the police, then, as a general rule, we will speak to the relevant agency and discuss next steps and how the alleged perpetrator will be informed of the allegations.

There are four likely scenarios we will need to consider when managing any reports of sexual violence and/or sexual harassment:

- a) Manage internally - In some cases of sexual harassment (for example, one-off incidents), we may take the view that the students concerned are not in need of early help or statutory intervention and that it would be appropriate to handle the incident internally using our own sanctions in line with our *Behaviour Rewards and Sanctions Policy* and by providing pastoral intervention and support.
- b) Early Help - We may decide that the children involved do not require statutory interventions but may benefit from early help where we are the lead professional.

Early help means providing support as soon as a problem emerges, at any point in a child's life. Providing early help is more effective in promoting the welfare of children than reacting later. Early help can be particularly useful to address non-violent harmful sexual behaviour and may prevent escalation of sexual violence. This will help to evidence the support that we have given, the work undertaken and if desired outcomes have been achieved

Reporting to the Police

At school we understand our responsibilities to call the Police and reporting forms of child on child abuse. This does not mean that we are looking to criminalise children, and this may not always be necessary.

The guidance that we follow is:

When to call the police (guidance for schools and colleges)

Outcome 21 Sexting Guidance

In any form of child on child abuse where it is believed that an offence has been committed, a report may be made to the Police. Where a report has been made to the police, we will consult with the police and agree what information is appropriate to disclose to staff and others, in particular the alleged perpetrator and their parents or carers. We will also discuss the best way to protect the victim and their anonymity.

This may also include the development of a clear and robust safety and support plan as part of this early help process. However, as you will see further on in this policy, risk assessing, and safety planning is a key aspect of all child on child abuse.

Regarding sexual violence and sexual harassment between children, where there is a report of a rape, assault by penetration or sexual assault, the starting point is that this should be passed to the police who will advise and log according to their own guidelines.

Referring to Children's Social Care

In all cases of child on child abuse, but in particular with sexual violence and sexual harassment, consideration will be given to the reporting of the matter to Children's Social Care. In making this decision, we must consider whether a child is at risk of harm or is in immediate danger.

In some cases, children's social care will review the evidence and decide that a statutory intervention is not appropriate, and, in these circumstances, we will consider other support mechanisms, such as early help, specialist support/referrals and pastoral support within a formalised plan. We will consider starting an Early Help process where we are the lead professional.

However, if the DSL/DDSL feels that the child remains in immediate danger or at risk of harm, they may refer again.

At this referral stage, we will inform parents or carers, unless there are compelling reasons not to (if informing a parent or carer is going to put the child at additional risk). Any such decision will be made with the support of children's social care. If a referral is made, children's social care will then make enquiries to determine whether any of the children involved need protection or other services.

Where statutory assessments are appropriate, we will work alongside, and cooperate with, the relevant lead social worker. This collaborative working will help ensure the best possible package of coordinated support is implemented for the victim and, where appropriate, the alleged perpetrator and any other children requiring support.

We will not wait for the outcome, or even the start of a children's social care investigation before protecting the victim and other children in the School. It will be important for us to work closely with children's social care (and other agencies as required) to ensure any actions we take do not jeopardise a statutory investigation.

Working with our parents and carers

At School we will, in most instances, engage with both the victim's and the alleged perpetrator's parents or carers when there has been a report of child on child abuse including sexual or sexual harassment. The exception to this rule is if there is a reason to believe that informing a parent or carer will put a child at additional risk.

We will carefully consider what information provided to the respective parents or carers about other children involved and when to do so.

In some cases, children's social care and/or the police will have a very clear view on this aspect, and it will be important for us to work with relevant agencies to ensure a consistent approach is taken to information sharing.

It should be the case that we will meet the victim's parents or carers with the victim present to discuss what arrangements are being put in place to safeguard the victim and understand their wishes in terms of support they may need and how the report will be progressed.

It is also likely that we will meet with the alleged perpetrator's parents or carers to discuss any arrangements that are being put into place that impact the alleged perpetrator, such as, for example, moving them out of classes with the victim and what this means for their education.

We will be clear and transparent and explain the reason behind any decisions. Support for the alleged perpetrator will be discussed including any referrals, if appropriate.

We realise that parents and carers may well struggle to cope with a report that their child has been the victim of an assault or is alleged to have assaulted another child. Details of organisations that support parents are provided at the end of the policy.

Sanctions

We will decide appropriate sanctions on a case-by-case basis in line with our *Behaviour, Rewards and Sanctions Policy* and any graduated response required. As previously mentioned, it may be that other children in our setting start to 'take sides' and become involved and may behave in ways that can cause upset and distress to other children. We will take their behaviour seriously and again use a graduated response to this, whilst also educating them the importance of resolving any conflict in a respectful and restorative way.

If there is police involvement, we will work closely with them to ensure that any disciplinary action taken by us, as a result of the incident, does not jeopardise the police investigation.

Post Incident Management

It is vital that all children involved in child on child abuse are given appropriate and ongoing support for as long as it is required/needed. This may include referrals to other agencies/professionals outside our setting and this decision will be made in conjunction with the children, their parents/carers, and other professionals. If there are other professionals involved, then we will liaise with those colleagues to ensure that we are working together and understand one another's role in this support.

There may be delays in any case that is being progressed through the criminal justice system. However, we will not wait for the outcome (or even the start) of a police investigation before protecting the victim, alleged perpetrator, and other children in the school and moving forward with our post incident management.

Support planning is vital, and it is imperative that following any incident the children involved continue to feel supported and receive help even if they tell us that they are coping and managing. Sometimes feelings of embarrassment, remorse, regret, or unhappiness may occur at a much later stage. We will do our best to ensure that they do not engage in any further harmful behaviour either towards someone else or to themselves as a way of coping (e.g. self-harm). For this reason, regular reviews with the young people following the incident(s) will happen as part of this plan.

Referrals may have already happened as mentioned previously in this policy, but it is important to establish which professionals continue to work with **all** children involved in this process and this is helped with robust planning

Safety planning/Risk assessment

Integral to post incident management is robust safety planning/risk assessment and this is an invaluable and necessary process. It is one of our key priorities as part of the post incident management. When looking at this process, consideration should be given to the following:

- if this is an ongoing police investigation, we will ask the police if we have any questions about the progress of the matter for example, are there any bail conditions in place or has there been a charging decision. It is key to have a central point of contact with the police for updates and progress. Where required, advice from the police will be sought to help us to manage our

safeguarding responsibilities. Where bail is deemed proportionate and necessary, as above, we will work with children's social care and the police to manage any implications and safeguard our children

- the importance in ensuring that the victim can continue in their normal routine, including continuing to receive a suitable education
- the importance of the alleged perpetrator in continuing to access education and support
- do the victim and alleged perpetrator share classes
- what measures need to be put in place when children move between lessons/classes
- what measures need to be put in place for unstructured time (break and lunchtimes)
- what measures need to be put in place for the arrival at the start of the school day and leaving at the end of the school day
- do the victim and alleged perpetrator travel to and from school using the same form of transport
- appropriate information sharing with staff in our setting in order that the plan is manageable and as successful as possible
- if it is the case that the alleged perpetrator is moved to another educational institution (for any reason), then we will ensure that the new educational institution is made aware of any ongoing support needs.

In all cases, we will record our decision making together with the rationale behind those decisions. All the above will be considered with the needs and wishes of the victim at the heart of all that we do as part of this process (supported by parents and carers as required). Our safety plan/risk assessment will be kept under review.

Additional support and guidance

- [Keeping children safe in education 2023](#)
- [Working Together to Safeguard Children 2023](#)
- [Review of sexual abuse in schools and colleges](#)
- [Staffsccb-Responding to Sexting Guidance](#)
- [Relationships and sex education \(RSE\) and health education](#)
- [Mental health and behaviour in schools 2018](#)
- [Exclusion from maintained schools, academies, and pupil referral units](#)
- [Children missing education](#)
- [CEOP-Safety centre](#)
- [Disrespect NoBody – Safe4Me](#)
- [Behaviour and discipline in schools](#)
- [UKCIS Guidance: Sharing Nudes and Semi-Nudes](#)
- [Searching, screening and confiscation](#)
- [Sharing nudes and semi-nudes: advice for education settings working with children and young people](#)
- [Preventing sexual bullying](#)
- [Preventing bullying](#)
- [Harmful online challenges and online hoaxes](#)
- [London Grid for Learning 'Undressed' guidance](#)
- [Cyberbullying advice](#)
- [Equality & Human Rights Commission](#)
- The NSPCC email help@nspcc.org.uk
- Specialist Sexual Violence [Rape Crisis](#)
- The UK safer internet centre email at helpline@saferinternet.org.uk
- [Internet Watch Foundation](#)
- [UK Council for Child Internet Safety \(UKCCIS\)](#)
- [Think u know](#)

Appendix 3: Policy and Procedures for Child Missing from Education

(this does not include truancy or pupils leaving the site without permission; for this see *Missing Pupil Policy*.)

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 establish, as far as it is possible to do so, the identity of children of compulsory age who are missing education in their area. A child going missing from education is a potential indicator of abuse or neglect, which may include sexual abuse or exploitation and can also be a sign of child criminal exploitation including involvement in county lines.

See '*Missing Children and Adults Strategy*' and '*Children Missing Education*' DfE.

School staff should follow the School's procedures for dealing with children that go missing from education, particularly on repeat occasions, to help identify the risk of abuse and neglect, including sexual exploitation, and to help prevent the risks of their going missing in future. 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, FGM and forced marriage.

All pupils at the School are on the Admissions Register and also recorded on the Attendance Register, both of which are maintained by the Registrar, Mrs C Quigley. The School holds at least two emergency contact numbers for each pupil, so that a responsible adult can be contacted for when a child is missing education or if there is a welfare / safeguarding concern.

The Registrar informs the 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; (where a parent intends to home educate their child, the local authority, school, other key agencies and parents will look to meet if possible)
- have ceased to attend school and no longer live within reasonable distance of this school;
- have been certified by the School's appointed 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;
- have been permanently excluded.

The local authority is notified when the School deletes a pupil from its Register under any of the above circumstances. This is done as soon as the grounds for deletion are met, but no later than deleting the pupil's name from the Register. This enables the local

authority to follow up with any child in danger of not receiving an education who might be at risk of abuse or neglect.

Where it is suspected that a pupil might be missing education because they are suffering from maltreatment, including abuse, the School will follow procedures set down in the Safeguarding Policy.

Registration of pupils

Each pupil's attendance is monitored through daily registration. Pupils are registered by their Form Tutor / Teacher twice a day (morning and afternoon) and this is recorded on SIMS.

Where a pupil has not registered at the start of the school day and the School has not received notification of absence from the child's parent / carer, then the School Office will contact the parent / carer.

Unexplained absences or absences which are not explained to the School's satisfaction will be investigated.

Any pupil whose attendance falls below ninety per cent from the start of the academic year is brought to the attention of the Deputy Head Pastoral (Senior School) / Head (Prep School). The Deputy Head Pastoral and the relevant Head of Year / Head and Deputy Head (Prep School) will investigate and decide on appropriate course of action which may be in the form of a letter or a discussion with parents.

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, at such intervals as are agreed between the School and the local authority (or in default of such agreement, at intervals determined by the Secretary of State).

Appendix 4: Role of the DSL

The School has one DSL, Designated Safeguarding Lead, and four trained Deputy Designated Safeguarding Leads (DDSL). They work closely together.

The DSL and DDSLs will carry out their roles in accordance with *Keeping Children Safe in Education* 2023.

The DSL, currently Mrs J A Simms, is a member of the School Senior Management Team and takes the lead responsibility for safeguarding and child protection. The DSL provides advice and support to staff on child welfare and child protection matters, takes part in strategy discussions and interagency meetings or supports others in doing so and contribute to the assessment of children.

The DSL:

- Refers cases of suspected abuse to the local safeguarding partnership as required;
- Supports staff who make referrals to local authority children's social care;
- Refers cases to the Channel programme where there is a radicalisation concern as required;
- Supports staff who make referrals;
- Refers cases where a person is dismissed or left due to risk/harm to a child to the Disclosure and Barring Service as required;
- Refers cases where a crime may have been committed to the Police as required. When to call the police (NPCC 2020) should help the DSL understand when they should consider calling the police and what to expect when they do
- Has overall responsibility for online safety. This includes an understanding of the expectations, applicable roles and responsibilities on relation to the filtering and monitoring systems and processes in place.
- As part of online safety, the School is aware of their responsibility for information security and access management, and will ensure that there are appropriate levels of security protection procedures in place in order to safeguard our systems, staff and pupils. To ensure this the DSL and Head of Network and Infrastructure review the effectiveness of these procedures (as outlined above) to keep up with evolving cyber crime technologies.

Work with others

- Liaises with the Headmaster to inform him of issues especially ongoing enquiries under section 47 of the Children Act 1989 and police investigations;
- As required, liaises with the "case manager" and the designated officer(s) at the local authority for child protection concerns (all cases which concern a staff member);
- liaises with the three safeguarding partners and works with other agencies in line with *Working Together to Safeguard Children. The NPCC – When to call the Police*, will help the DSL understand when they should consider calling the Police and what to expect when they do.
- Liaise with staff (especially pastoral support staff, school nurses, IT technicians and SENCo) on matters of safety and safeguarding (including online and digital safety) and when deciding whether to make a referral by liaising with relevant agencies.

- Acts as a source of support, advice and expertise for staff.

Undertake training

The DSL and DDSLs undergo training to provide the knowledge and skills required to carry out their roles. This training is updated at least every two years. The DSL and DDSLs undertake Prevent awareness training. Training should provide DSL / DDSLs with a good understanding of their own role and the processes, procedures and responsibilities of other agencies, particularly children's social care, so they:

- Understand the assessment process for providing early help and statutory intervention, including local criteria for action and local authority children's social care referral arrangements;
- 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 School's child protection policy and procedures, especially new and part time staff;
- Are alert to the specific needs of children in need, those with special educational needs and young carers;
- understand relevant data protection legislation and regulations, especially the Data Protection Act 2018 and the General Data Protection Regulation
- understand the importance of information sharing, both within the School and with the three safeguarding partners, other agencies, organisations and practitioners
- Are able to keep detailed, accurate, secure written records of concerns and referrals;
- Understand and support the School with regards to the requirements of the Prevent duty and are able to provide advice and support to staff on protecting children from the risk of radicalisation;
- Are able to understand the unique risks associated with online safety and be confident that they have the relevant knowledge and up to date capability required to keep children safe whilst they are online at School
- Can recognise the additional risks that children with SEND face online, eg, from online bullying, grooming and radicalisation and can support SEND children in helping them to stay safe online
- 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.

Raise Awareness

The DSL should:

- Ensure the School's safeguarding policies are known, understood and used appropriately;
- Ensure the School's Safeguarding Policy is reviewed annually (as a minimum) and the procedures and implementation are updated and reviewed regularly, and work with governing bodies regarding this;

- Ensure the Safeguarding 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 in this; and
- Link with the local safeguarding partner to make sure staff are aware of training opportunities and the latest local policies on safeguarding.
- help promote educational outcomes by sharing the information about welfare, safeguarding and child protection issues that children, including children with a social worker, are experiencing, or have experienced, with teachers and school leadership staff. Ensuring that the School and their staff know who these children are, understand their academic progress and attainment and maintain a culture of high aspirations for this cohort; supporting teaching staff to identify the challenges that children in this groups might face and the additional academic support and adjustments that they could make to best support these children.

Information sharing and managing the Child Protection File

The DSL is responsible for ensuring that child protection files are kept up to date and stored securely. All information is recorded on CPOMS.

The records include:

- A clear and comprehensive summary of the concern
- Details of how the concern was followed up
- Note of action taken, decisions reached and outcome

The safeguarding files can only be accessed by the DSL, DDSLs and the Headmaster. Where children leave the School ensure their child protection file is transferred to the new school or college as soon as possible. This should be transferred separately from the main pupil file, ensuring secure transit and confirmation of receipt should be obtained.

Availability

- During term time the DSL or DDSLs will always be available (during School hours) for staff in the School to discuss any safeguarding concerns.

Appendix 5: Children staying with host families (homestay)

Private fostering and educational institutions

School quite often makes arrangements for our children to have learning experiences where, for short periods, the children may be provided with care and accommodation by a host family to which they are not related. This might happen, for example, but not only, as part of a foreign exchange visit or sports tour. Such arrangements could amount to “private fostering” under the Children Act 1989 or the Safeguarding Vulnerable Groups Act 2006, or both. The following paragraphs are not intended to be a comprehensive guide to all the circumstances in which private fostering may arise, but only to those situations which might arise for school through the normal course of our activities in promoting learning activities for children.

DBS check request by a regulated activity provider

Where a private fostering arrangement is made by a school or a third party such as a language school and the school or third party has the power to terminate the arrangement, then it **could be the regulated activity provider** for the purposes of the Safeguarding Vulnerable Groups Act 2006. A regulated activity provider will be committing an offence if they allow a person to carry out a regulated activity whilst barred and they know or have reason to believe that the person was barred.

Where the School is the regulated activity provider, it will request a DBS enhanced check (which will include barred list information) to help determine their suitability for the arrangement. However, where the parents make the arrangements themselves, this will be a private matter between the child’s parents and the host parents and in these circumstances the School will not be the regulated activity provider.

LA notification when private fostering is discovered

Where the School has not been involved in making the arrangement but a member of staff or volunteer at School becomes aware that a pupil may be in a private fostering arrangement, where a child under the age of 16 (or 18 if disabled) is provided with care and accommodation by someone to whom they are not related in that person’s home, they should raise this in the first instance with the DSL at School. The School will notify the local authority of the circumstances, and the local authority will check that the arrangement is suitable and safe for the child. A person who is barred from regulated activity will themselves be committing an offence under the Children Act 1989 and under the Safeguarding Vulnerable Groups Act 2006 if they privately foster a child. If the School has any reason to believe that the third party is failing to undertake a statutory duty we will notify the police.

Although the School may arrange for our children to stay with families overseas, the DBS cannot access criminal records held overseas. Host families in other countries, therefore, cannot be checked in the same way by local authorities as schools in this

country when children stay abroad. The School will work with partner schools abroad to ensure that similar assurances are undertaken prior to a visit.

If they wish, local authorities and schools can contact the relevant foreign embassy or High Commission of the country in question and find out if similar checks can be done in that country.

Appendix 6: COVID-19 Safeguarding Policy Addendum

1) Context

During the COVID-19 pandemic parents were asked to support public health efforts by keeping their children at home, wherever possible, and for schools to remain open only for those children of workers critical to the COVID-19 response. **If the School finds itself in a similar situation then this addendum will operate alongside the School's Safeguarding Policy.**

2) Vulnerable Children

Vulnerable children include those who have a social worker and those children and young people up to the age of 25 with education, health and care (EHC) plans. Those who have a social worker include children who have a Child Protection Plan and those who are looked after by the Local Authority. Others at the provider and local authority's discretion including pupils and students who need to attend to receive support or manage risks to their mental health. Newcastle under Lyme School recognises that previously looked after children are a potentially vulnerable group who may not have a social worker and will consider the support and offer to this cohort of children. Those with an EHC plan will be risk-assessed in consultation with the Local Authority and parents, to decide whether they need to continue to be offered a school place in order to meet their needs, or whether they can safely have their needs met at home. Member of SMT, especially the Designated Safeguarding Lead (and Deputies) know who our most vulnerable children are and we have the flexibility to offer a place to those on the edge of receiving children's social care support. Newcastle under Lyme School will continue to work with and support children's social workers to help protect vulnerable children. The School will work collaboratively with other schools and education providers and other local partners (including the local authority, social workers, police, youth services, key workers etc.) to maximise opportunities for face-to-face provision for vulnerable children. The School will encourage our vulnerable children and young people to attend a school, including remotely if needed. The DSL will continue to provide support to teachers and pastoral staff to ensure that contact is maintained with children (and families) who are not attending school.

3) Attendance

During the period of national lockdown, the School will remain open to vulnerable children and young people and the children of critical workers only. All other pupils will receive remote education. Pupils who are self-isolating should not attend school. Clinically extremely vulnerable pupils are also advised not to attend school. The School will continue to record attendance in the register. We will follow up on absences of the pupils who are expected to be in school but where a parent wishes for their child to be absent, we may authorise the absence during this national lockdown period. Newcastle under Lyme School and social workers will agree with parents/carers whether children in need should be attending school and we will then follow up on any pupil that they were expecting to attend, who does not. We will also follow up with any

parent or carer who has arranged care for their child(ren) and the child(ren) subsequently do not attend. In all circumstances where a vulnerable child does not take up their place at school, or discontinues, the School will notify their social worker.

4) Critical workers

Parents whose work is critical to the coronavirus (COVID-19) and EU transition response include those who work in health and social care and in other key sectors. Children with at least one parent or carer who is a critical worker can go to school if required, but parents and carers should keep their children at home if they can.

5) Safeguarding and reporting of concerns

Where staff have a concern about a child, they should continue to follow the process outlined in our Safeguarding Policy. Staff are reminded of the need to report and record any concern immediately and without delay (via email or through CPOMS). Where staff are concerned about an adult working with children in the school, they should report the concern to the Headmaster. If there is a requirement to make a notification to the Headmaster whilst away from school, this should be done verbally over the phone and followed up with an email to the Headmaster to confirm the discussion. Concerns around the Headmaster should be directed to the Chair of Governors (Mr David Wallbank). The School will continue to have regard to the statutory safeguarding guidance, *Keeping Children Safe in Education*.

6) Designated Safeguarding Lead

The School will have a trained DSL (or deputy) available on site every day (Monday – Friday). If the DSL (or one of the deputies) is unable to be on sight then they will be available to be contacted by telephone. Where a trained DSL (or deputy) is not on site, in addition to the above option, a member of SMT will take responsibility for co-ordinating safeguarding on site. The DSL will ensure all relevant safeguarding and welfare information held on children remains accurate, and complete. If a child from our school attends another setting, we will do what we can reasonably to provide the receiving institution with relevant welfare and child protection information. All staff and volunteers have access to a trained DSL (or deputy) and staff will be made aware of who is available each day in school. The DSL will continue to engage with social workers, and attend all multi-agency meetings, which can be done remotely.

7) Safeguarding Training and Induction

All existing school staff at Newcastle under Lyme School have had safeguarding training and have read part 1 (including Annex A and B) of *Keeping Children Safe in Education (2023)*. The DSL will communicate with staff any new local arrangements, so they know what to do if they are worried about a child. Where new staff are recruited, or new volunteers enter the School, they will continue to be provided with a safeguarding induction.

8) Safer recruitment/volunteers and movement of staff

It remains essential that people who are unsuitable are not allowed to enter the children's workforce or gain access to children. When recruiting new staff, the School will continue to follow the relevant safer recruitment processes, including, as appropriate, relevant sections in part 3 of *Keeping Children Safe in Education (2023)* (KCSIE). The School will comply with our legal duties regarding pre-appointment including having regard to part three of the statutory safeguarding guidance keeping children safe in education. Where the School is utilising volunteers, we will continue to follow the checking and risk assessment process as set out in KCSIE. Under no circumstances will a volunteer who has not been checked be left unsupervised or allowed to work in regulated activity. The School will continue to follow the legal duty to refer to the DBS anyone who has harmed or poses a risk of harm to a child or vulnerable adult. Full details can be found in KCSIE. The School will also continue to consider and make referrals to the Teaching Regulation Agency (TRA) as outlined in KCSIE and the TRA's 'Teacher misconduct advice for making a referral. During the COVID-19 period all referrals should be made by emailing: misconduct.teacher@education.gov.uk Whilst acknowledging the challenge of the current national emergency, it is essential from a safeguarding perspective that any the School is aware, on any given day, which staff/volunteers will be in school, and that appropriate checks have been carried out, especially for anyone engaging in regulated activity. As such, the School will continue to keep the single central record (SCR) up to date as outlined in KCSIE.

Volunteers

Volunteers may be used to support the work of the School, as would usually be the case. They will be properly supported and given appropriate roles. The School will continue to follow the checking and risk assessment process as set out in the volunteer section in part 3 of keeping children safe in education. Under no circumstances will a volunteer who has not been checked be left unsupervised or allowed to work in regulated activity. Mixing of volunteers across groups will be kept to a minimum, and they should remain 2 metres from pupils and staff where possible. Existing volunteers in regulated activity do not need to be re-checked if they have already had a DBS check (which includes barred list information).

Supervision must be:

- by a person who is in regulated activity.
- regular and day to day; and
- reasonable in all the circumstances to ensure the protection of children.

8) Online safety in Newcastle under Lyme School

We will continue to provide a safe environment, including online. This includes the use of an online filtering system. Where pupils are using computers in school, appropriate supervision will be in place.

9) Children and online safety away Newcastle under Lyme School

It is important that all staff who interact with children, including online, continue to look out for signs a child may be at risk. Any such concerns should be dealt with as per

the Safeguarding Policy and where appropriate referrals should still be made to children's social care and as required, the police.

Online teaching should follow the same principles as set out in the online teaching and learning policy and all live lessons must be recorded. Lessons are quality assured (through appropriate training and monitoring) by SMT. The School will ensure any use of online learning tools and systems is in line with privacy and data protection/GDPR requirements.

Where webcams are involved:

- Staff and children must wear suitable clothing, as should anyone else in the household.
- Any computers used should be in appropriate areas, for example, not in staff bedrooms; and the background should be neutral.
- Language must be professional and appropriate, including any family members in the background.
- Staff must only use platforms specified by SMT and approved by our IT network manager / provider to communicate with pupils eg Google Classroom / Google Meet
- Staff should report any safeguarding concerns.

10) Delivering remote education safely

Keeping children safe online is essential. The statutory guidance *Keeping Children Safe in Education* provides schools and colleges with information on what they should be doing to protect their pupils online.

11) Supporting children not in School

Newcastle under Lyme School is committed to ensuring the safety and wellbeing of all their children and young people. Where the DSL has identified a child to be on the edge of social care support, or who would normally receive pastoral-type support in school, they will ensure that a robust communication plan is in place for that child or young person. Details of this plan will be recorded as will a record of contact that has been made. The DSL will work closely with all stakeholders to maximise the effectiveness of any communication plan. This plan will be reviewed regularly (at least once a fortnight) and where concerns arise, the DSL will consider any referrals as appropriate.

The School recognises that the School is a protective factor for children and young people, and that the current circumstances, can affect the mental health of pupils and their parents/carers. All school staff are aware of this in setting expectations of pupils' work where they are at home. The School will ensure that where they care for children of critical workers and vulnerable children on site, they ensure appropriate support is in place for them.

12) Supporting children in School

Newcastle under Lyme School is committed to ensuring the safety and wellbeing of all its pupils. Our pupils will continue to have a safe space for all children to attend and flourish. Our Governors and Headmaster ensure that appropriate staff are on site and

staff to pupil ratio numbers are appropriate, to maximise safety. The School refers to the Government guidance for education and childcare settings on how to implement social distancing and continue to follow the advice from Public Health England on measures to limit the risk of spread of COVID19. We ensure that where we care for children of critical workers, vulnerable children and returning pupils on site, we ensure appropriate support is in place for them.

13) Mental Health

The School is aware of the impact of the negative experiences and distressing life events on the mental health of children, parents and staff. We will, as we always have, ensure there is appropriate support and signposting to relevant support agencies in place, and also supporting those children who continue to work from home. Pupils may be experiencing a variety of emotions in response to the coronavirus (COVID19) outbreak, such as anxiety, stress or low mood. This may particularly be the case for vulnerable children, including those with a social worker and young carers. It is important to contextualise these feelings as normal responses to an abnormal situation. Some may need support to re-adjust, either to a return to learning at home or being in school without their peers, and some may be showing signs of more severe anxiety or depression. Others will not be experiencing any challenges and will be content with the change in circumstances. The return to remote learning for most will limit pupils' social interaction with their peers, carers and teachers, which may have an impact on wellbeing. The School will also provide more focused pastoral support where issues are identified that individual pupils may need help with, drawing on external support where necessary and possible. The School will also consider support needs of particular groups they are already aware need additional help (for example, children in need.) The School will also make sure that parents and pupils are aware of who in the school to contact if they have a new concern about mental health and wellbeing.

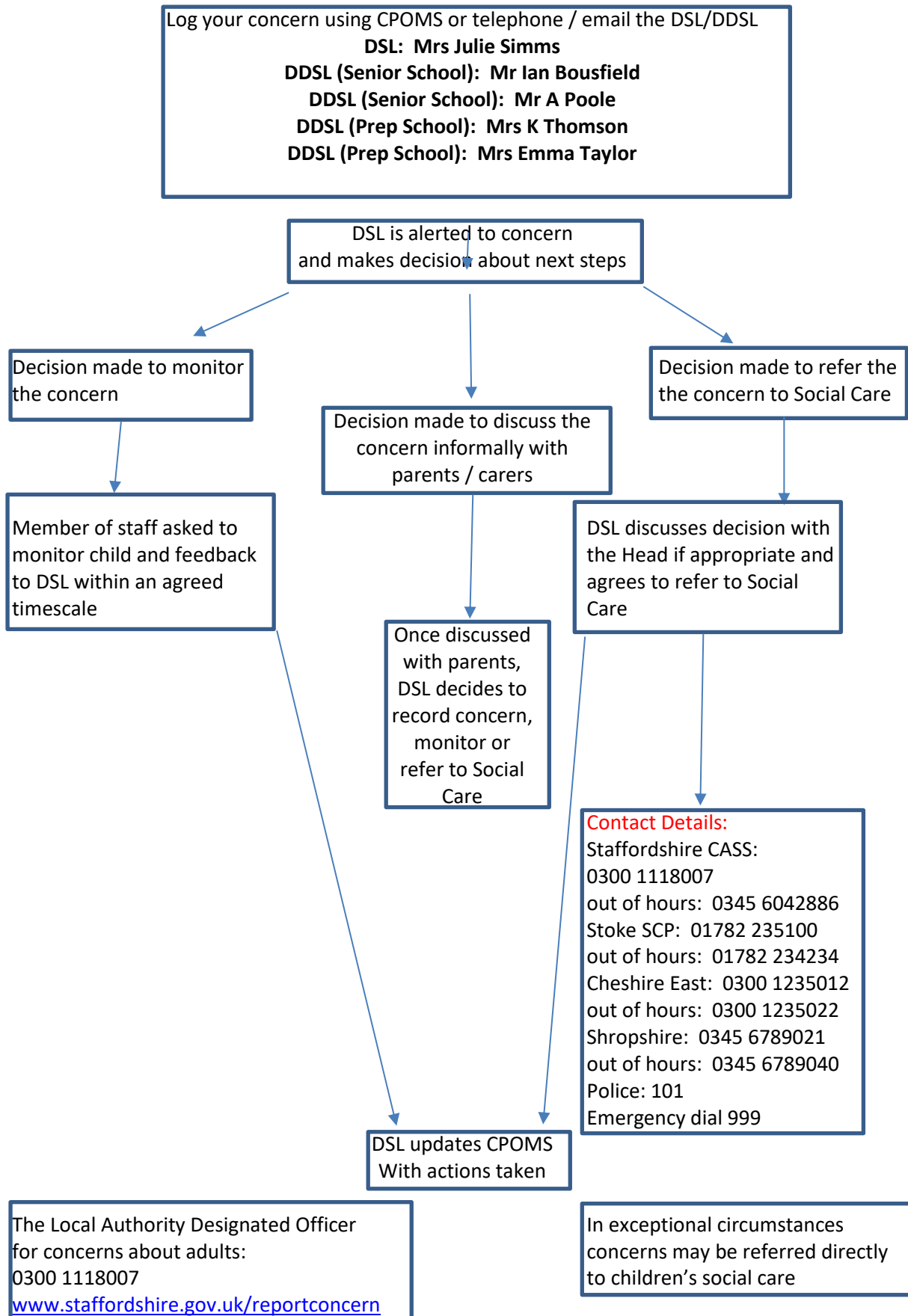
We have considered and offer the provision of pastoral and extra-curricular activities to all pupils, including those learning at home (for example through online activities and assemblies). We have our School counsellor, as well as pastoral staff, available to support the health and wellbeing of our pupils; our pastoral support offers a range of support including:

- support for resilience, mental health and wellbeing
- support for pupils with additional needs
- supporting vulnerable children and keeping children safe

14) Child on Child Abuse

Newcastle under Lyme School recognises that during the closure a revised process may be required for managing any report of such abuse and supporting victims. Where the School receives a report of child on child abuse, they will follow the principles as set out in part 5 of KCSIE and of those outlined within the School's *Safeguarding Policy*. Our school will listen and work with the young person, parents/carers and any multiagency partner required to ensure the safety and security of that young person. Concerns and actions will be recorded and appropriate referrals made.

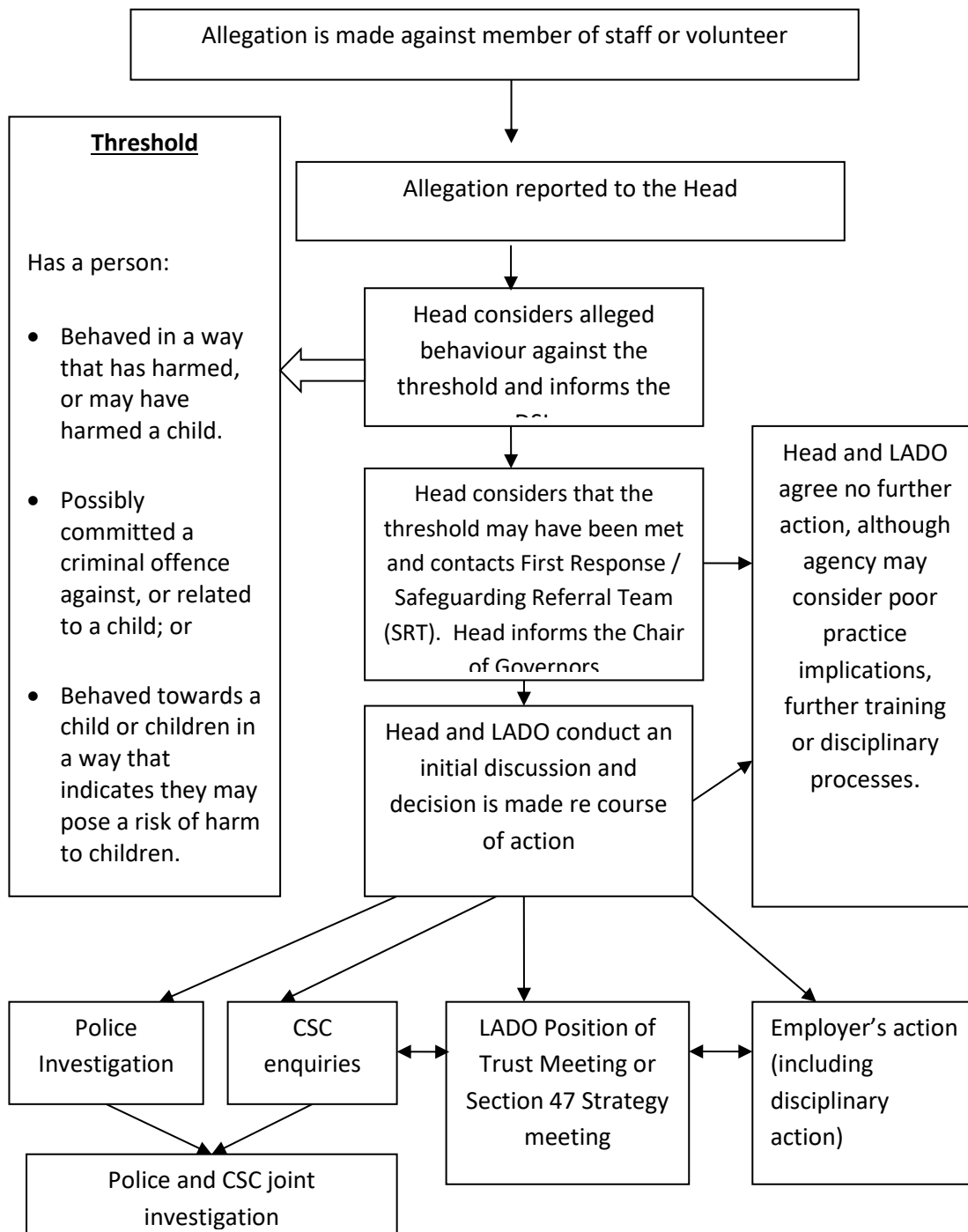
Raising Safeguarding Concerns about a Child



Managing Allegations / Concerns against Staff and Volunteers

Distinguish allegations from complaint. An allegation may relate to a person who works with children who has:

- Behaved in a way that has harmed a child, or may have harmed a child; or
- Possibly committed a criminal offence against or related to a child; or
- Behaved towards a child or children in a way that indicates they may pose a risk of harm to a child or children



LADO tracks progress, monitors and records outcomes
 Advises employer about duty to report to Disclosure and Barring Service (DBS) when appropriate

SMT Policy Lead:	J A Simms
Policy reviewed at SMT:	January 2024
Policy reviewed by Governors:	January 2024
Next Review Due:	September 2024