



Policy on Safeguarding and Child Protection

Aims

The aims of this policy are as follows:

- to actively safeguard and promote the welfare of children, staff and others who come into contact with the school and protect them from harm;
- to actively promote the well-being of pupils;
- to have clear procedures in place in dealing with and referring concerns about the welfare of any individual and allegations of abuse; neglect and /or exploitation;
- to raise awareness about how to report concerns and how they will be investigated whether they are current or historic in nature;
- to raise staff awareness about the School's safeguarding expectations;
- to raise awareness about how to report concerns and ensure they are appropriately investigated;
- to ensure staff are competent to carry out their safeguarding responsibilities and feel supported in this role;
- to ensure consistent good safeguarding practice throughout the School to include the promotion of a zero-tolerance approach to child-on-child sexual violence and harassment in which pupils are confident to report it and staff are confident to identify and to respond to it; and
- to promote a whole school culture of safety, equality and protection.

Every pupil should feel safe and protected from any form of abuse, neglect and exploitation.

All staff should understand the indicators of abuse and neglect and specific safeguarding risks so that they can identify them and report any concerns about children. The indicators and key safeguarding risks for the School community are set out in Appendix 1.

Members of the School community including alumni should also feel able to raise any safeguarding concerns, whether current or non-recent, safe in the knowledge that they will be supported, and that the matter will be handled sensitively with appropriate action taken.

Anyone about whom a concern is raised should feel confident that they will be supported and that the matter will be handled sensitively and that appropriate action will be taken.

The policy forms part of the whole school approach to promoting child safeguarding and wellbeing, which seeks to involve everyone at the School to ensure that the best interests of pupils underpins and is at the heart of all decision, systems, processes and policies.

Although this policy is necessarily detailed, it is important to the School that its safeguarding policies and procedures are transparent, clear and easy to understand for staff, pupils, parents and carers. The School welcomes feedback on how it can improve its policies.



Scope and application

This policy applies to the whole School.

This policy applies at all times including where pupils or staff are away from School, whether they are on school-arranged activities or otherwise and whether or not the School is open. It will therefore apply out of School hours and in the holidays.

This policy is designed to address the School's safeguarding duty in relation to specific statutory obligations to safeguard and promote the welfare of children as defined below.

- provide a safe and trusted environment which safeguards anyone who comes into contact with it, including beneficiaries, staff and volunteers;
- set an organisational culture that prioritises safeguarding, so that it is safe for those affected to report incidents and concerns with the assurance they will be handled sensitively and properly;
- have adequate safeguarding policies, procedures and measures to protect people;
- provide clarity as to how incidents and allegations will be handled should they arise, including reporting to the relevant authorities, such as the police, local authority and the specific statutory obligations on the School to safeguard and promote the welfare of children, as defined below.

Regulatory Framework

This policy has been prepared to meet the School's responsibilities under:

1. Education (Independent School Standards) Regulations 2014;
2. Education and Skills Act 2008;
3. Childcare Act 2006;
4. Children and Social Work Act 2017;
5. Data Protection Act 2018 and General Data Protection Regulation (GDPR);
6. Equality Act 2010;
7. Human Rights Act 1998.

The policy has regard to the following guidance and advice:

[Keeping children safe in education \(DfE, September 2024\) \(KCSIE\);](#)

[After school clubs, community activities and tuition: safeguarding guidance \(DfE, September 2023\);](#)

[Working together to safeguard children 2023 \(DfE, updated February 2024\)](#)

[Behaviour in schools: advice for headteachers and school staff \(DfE, February 2024\);](#)

[Working together to improve school attendance \(DfE, August 2024\);](#)

[Meeting digital and technology standards in education \(DfE maintained\);](#)

[Disqualification under the Childcare Act 2006 \(DfE, updated August 2018\);](#)



[Prevent Duty guidance for England and Wales \(HM Government, December 2023\);](#)

[Managing the risk of radicalisation in your education setting \(DfE, September 2023\);](#)

[Channel duty guidance: protecting vulnerable people from being drawn into terrorism \(HM Government, February 2021\)](#)

[Multi-agency statutory guidance on female genital mutilation \(HM Government, updated July 2020\);](#)

[Virginity testing and hymenoplasty: multi-agency guidance \(DHCS, updated April 2024\);](#)

[Forced marriage resource pack \(Home Office, May 2023\);](#)

[What to do if you're worried a child is being abused: advice for practitioners \(HM Government, March 2015\);](#)

[Information sharing: advice for practitioners providing safeguarding services to children, young people, parents and carers \(DfE, May 2024\);](#)

[Sharing nudes and semi-nudes: advice for education settings working with children and young people \(DSIT and UKCIS, March 2024\)\);](#)

[Children missing education \(DfE, August 2024\);](#)

[Child sexual exploitation: definition and a guide for practitioners local leaders and decision makers working to protect children from child sexual exploitation \(DfE, February 2017\);](#)

[Searching, screening and confiscation: advice for schools \(DfE, July 2022\);](#)

[Listening to and involving children and young people \(DfE, January 2014\);](#)

[Meeting digital and technology standards in schools and colleges \(DfE, maintained\);](#)

[Safeguarding children \(links to government guidance and resources\);](#)

[Teaching online safety in schools \(DfE, January 2023\);](#)

[Harmful online challenges and online hoaxes \(DfE, February 2021\)](#)

[Multi-agency practice principles for responding to child exploitation and extra-familial harm \(TCE support programme\);](#)

[Educate Against hate \(HM Government\);](#)

[Relationships education, relationships and sex education and health education guidance \(DfE, updated September 2021\);](#)

[Multi-agency statutory guidance on FGM \(HM Government, July 2020\);](#)

[Lincolnshire, Cambridgeshire and Peterborough Safeguarding Partnership Board Threshold Document;](#)

[Equality Act 2010: advice for Schools](#)



The following policies and procedures are relevant to this policy:

- Staff Code of Conduct.
- Whistle Blowing Policy.
- Social Media Policy.
- Recruitment Selection and Disclosure Policy and Procedure.
- On Line Safety and Acceptable Use of ICT Policy for pupils.
- Acceptable use of ICT for staff.
- Preventing Radicalisation and Extremism Policy.
- Behaviour Management Policy.
- Anti-bullying Policy.
- Restraints Policy.
- Visitors and Visiting Speakers' Policy.
- Risk Assessment Policy for pupil Welfare.
- Missing Pupil Procedure.
- Attendance Policy.
- SEN Policy.
- Health and Safety Policy.
- Relationships Education and Relationships Sex Education Policy.
- Administration of Medicines Policy.
- PSHE Policy.
- Inclusion, Equality and Diversity Policy.

Publication and Availability

This policy is published on the School website. It is also available in hard copy on request. A copy of the policy is available for inspection from the School Office during the School day. The policy can be made available in large print or other accessible format if required.

This policy and all policies referred to in it are available to all staff.

Definitions

Where the following words or phrases are used in this policy:

References to **working days** mean Monday to Friday, when the School is open during term time. The dates of terms are published on the School's website. If referrals to an external agency are required outside term time, references to working days are to the days on which the relevant external agency is working.

Safeguarding is the protection of people from harm.



Safeguarding and promoting the welfare of children is defined in KCSIE 2024 as:

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

References to Local Safeguarding Partners means the three safeguarding partners (local authority, Integrated Care Systems ICSs) and the chief officer of police for an area any part of which falls within the local authority area) who make arrangements to work together with appropriate relevant agencies to safeguard and promote the welfare of local children, including identifying and responding to their needs. The local arrangements relevant to the School can be found in Appendix 8.

References to Children's Social Care includes, depending on the context, the team based in the local authority where the School is located and, where appropriate, the team based in the local authority where the child is resident.

Reference to Harmful Sexual Behaviour (HSB) in this policy refer to the DfE's definition: problematic, abusive and violent sexual behaviours expressed by children and young people under the age of 18 years old that are developmentally inappropriate and may cause developmental damage, may be harmful towards self or others, or abusive towards another child, young person or adult.

DSL means the Relevant School's Designated Safeguarding Lead. References to the DSL include the Deputy DSL (DDSL) where the DSL is unavailable.

Reference to staff includes reference to all those who work for or on behalf of the School, regardless of their employment status, including supply staff, contractors, volunteers and proprietors unless otherwise indicated.

LADO means designated officer at the local authority. The LADO has overall responsibility for oversight of the procedures for dealing with allegations, for resolving any inter-agency issues, and for liaison with the three safeguarding partners.



Responsibility statement and allocation of tasks: the School's approach to safeguarding leadership

Ultimate and overall responsibility for all matters of Safeguarding relating to this policy lies with the proprietor, Mr George Wyman. These include:

- legal responsibility to ensure that arrangements are made to safeguard and promote the welfare of pupils at the school, having regard to the relevant guidance issued by the Secretary of State;
- strategic leadership responsibility for the School's Safeguarding arrangements; and
- specific responsibilities to facilitate a whole school approach to safeguarding, set out in more detail in part 2 of KCSIE.

The School also has an independent Safeguarding Advisor who is responsible for advising the Proprietor in taking responsibility for the School's Safeguarding arrangements. This is Dr Bruce Ramsay.

The Proprietor, Mr George Wyman together with the Independent Advisor and Headteacher maintains a proper oversight of Safeguarding by:

- liaising with the DSL through regular meetings at which all issues relating to Safeguarding in School is discussed;
- scrutinising the holistic Annual Report to the Proprietors on Safeguarding produced by the DSL and discussing matters arising;
- ensuring appropriate delegation arrangements at school level, led by the Headteacher and DSL to enable the School to discharge its safeguarding duties effectively;
- ensuring that all staff training is appropriately booked and funded and that training is consistent with KCSIE and Local Safeguarding partner Guidance;
- ensuring that the school discharges its legal responsibilities under the Human Rights Act 1998 and the Equality Act 2010, having regard for the implications of safeguarding that such responsibilities have.

Headteacher

The Headteacher is responsible for the overall management of the School and for the management of concerns and allegations about staff. The Headteacher ensures that the School's policies and procedures relating to safeguarding (particularly those concerning referrals of cases of suspected abuse and neglect) and child protection are understood and followed by all staff

Designated Safeguarding Lead

The DSL is a senior member of staff of the School's leadership team with the necessary status and authority to take lead responsibility for all aspects of safeguarding and child protection (including on-line safety and understanding the filtering and monitoring systems and processes in place) throughout the School.



The DSL is a senior member of staff who has the appropriate status, training and authority within the School to carry out the duties of the post and the time, funding, training, resources and support to enable them to provide advice and support to other staff on child welfare and child protection matters; to take part in strategy discussions and inter-agency meetings and or to support other staff to do so and to contribute to the assessment of children.

The name and contact details of the DSL and Deputy DSLs are listed at the end of this policy. The main responsibilities of the DSL are set out in Annex C of KCSIE.

The DSL takes lead responsibility for all aspects of safeguarding throughout the School.

The DSL communicates at least three times a year with the Safeguarding member of the Advisory Board to discuss recent trends and updates.

The DSL liaises with the Headteacher to inform them of issues relating to any police investigations and statutory requirements for children to have an appropriate adult. The role of the appropriate adult is to safeguard the rights, entitlements and welfare of juveniles and to know the provisions of PACE Code C and other applicable codes of practice.

The DSL will take lead responsibility for looked after children. Direct support will be delegated to the Form Tutor or Head of Pastoral Care as appropriate.

If the DSL is unavailable, the activities of the DSL will be carried out by the Deputy DSL. Details of the DSLs in School are listed at the end of this policy.

The DSL and Deputy DSL have written job descriptions describing responsibility and activities related to their role.

Specific Safeguarding Duties in Relation to Children

Safeguarding and promoting the welfare of children is **everyone's** responsibility.

Every pupil should feel safe and protected from any form of abuse or neglect. The indicators of abuse and examples of specific safeguarding issues are set out in Appendix 1.

The School is committed to acting in the best interests of the child so as to safeguard and promote the welfare of children and young people. The School requires everyone who comes into contact with children and their families to share this commitment.

The School will:

- understand its role in the safeguarding partner arrangements and operate safeguarding procedures put in place by Lincolnshire, Cambridgeshire and Peterborough Safeguarding Children Partnership boards;
- be alert to signs of abuse whether in School, within the child's family or outside, both in the School and from outside and take steps to protect individuals from any form of abuse, neglect or exploitation, whether from an adult or another child;
- include opportunities within the curriculum for children to develop key skills they need to recognise and stay safe from abuse;



- promote the systems in place for children to confidentially report abuse, ensuring they know their concerns will be treated seriously, they can safely express their views and give feedback;
- take active steps to promote school attendance;
- deal appropriately with every suspicion or complaint of abuse and support children who have been abused in accordance with appropriate education, child protection/welfare plans;
- design and operate procedures which, so far as possible, ensure that staff and others who are innocent are not prejudiced by malicious, false, unsubstantiated or unfounded allegations;
- prepare staff to identify children who may benefit from Early Help and encourage them to be particularly alert to the potential need for early Help for children with the indicators listed in KCSIE or WTSC;
- be alert to children at potentially greater risk of harm (both online and offline) including children who need a social worker and mental health support;
- be alert to the needs of children with physical or mental health conditions, special educational needs or disabilities, which could be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation and where additional barriers can exist when detecting abuse or neglect;
- encourage a culture of listening to pupils and victims of abuse taking account of their wishes and feelings in any measure put in place by the School to protect them;
- operate robust and sensible health and safety procedures and operate clear and supportive policies on drugs, alcohol and substance misuse;
- assess the risk of pupils being drawn into terrorism, including support for extremist ideas that are part of terrorist ideology, based on an understanding of the potential risk in the local area;
- identify pupils who may be vulnerable to extremist ideology and radicalisation and know what to do when they are identified;
- identify pupils who might be vulnerable to being drawn into county lines or other gang activities; and consider and develop procedures to deal with any other safeguarding issues which may be specific to individual pupils in the local area;
- consider and develop procedures to deal with any safeguarding issues which may be specific to individual pupils in the School or in the local area and allow staff to determine how best to build trusted relationships with pupils which facilitate communication.



Extra-familial harm

Safeguarding incidents and/or behaviours can be associated with factors outside the School and /or can occur between children outside School, inside and outside of home and on-line.

All staff including the DSL should consider the context within which such incidents and /or behaviours occur for example where wider environmental factors are present in a child's life that may be a threat to their safety and /or welfare.

Children's social care should be informed of all such information to allow any assessment process to consider all available evidence and the full context of any abuse.

All staff, but especially the DSL and Deputy DSLs should consider whether children are at risk of abuse or exploitation in situations outside their families. Extra-familial harms take a variety of forms and children can be vulnerable to multiple harms including (but not limited to) sexual abuse, including harassment and exploitation, domestic abuse within their own intimate relationships (teenage relationship abuse), criminal exploitation, serious youth violence, county lines and radicalisation.

Staff may follow the School's Whistle Blowing Policy to raise concerns about poor or unsafe safeguarding practices at the School or potential failures by the School or its staff to properly fulfil its safeguarding responsibilities. Such concerns will be taken seriously. The NSPCC whistle blowing helpline is available for staff who do not feel able to raise concerns about child protection failures internally. Staff may also report concerns direct to the local authority See Whistle Blowing Policy.

Reporting obligations of staff

Staff members should maintain an attitude of 'it could happen here' where safeguarding is concerned. When concerned about the welfare of a pupil, staff members should always act in the best interests of the pupil.

Staff should be aware that pupils may not feel ready or know how to tell someone that they are being abused, exploited or neglected and/or they may not recognise that their experiences as harmful e.g. a child may feel embarrassed, humiliated or being threatened due to their vulnerability, disability and / or sexual orientation or language barrier. Exercising professional curiosity and knowing what to look for is vital for the early identification of abuse and neglect so that staff are able to identify cases of children who may be in need of help or protection.

All staff have a duty to:

- report any concerns they may have about the safety and/ or well- being of pupils (this includes where there are concerns about children who may be at risk of being drawn into terrorism);
- report any concerns they may have about the safety and/or well- being of other persons associated with the School;
- report any safeguarding concerns about staff or anyone else associated with the School; and follow up on any such reports about staff to ensure that appropriate action is or has been taken.



The procedures for doing so are set out below. If staff are unsure about the appropriate process to use, they should not hesitate to exercise professional curiosity and speak to the DSL, any member of the senior leadership team or directly to children's social care (whether the School's local authority or that local to the child's home address) or police in their absence for guidance.

What to do if staff have a concern about a pupil's welfare

If staff have any concern about a pupil's welfare, they should report their concern to the DSL or the DDSL in the DSL's absence immediately. In the absence of either, an immediate referral should be made to Children's Social Care.

See Appendix 2 for guidance about what to do when receiving a disclosure and recording a concern.

A concern about a child is not defined and should be interpreted broadly. It may relate to a recognition that a child would benefit from extra support to an emerging problem or to a potentially unmet need or may reflect a concern about a child's welfare and that a child may be deemed to be 'in need' or at 'immediate risk of harm' as defined by the Children Act 1989.

If the concern involves an allegation against a member of staff, supply staff, contractors or a volunteer this must be reported in accordance with the School's Whistle Blowing Policy and in accordance with the procedures set out in Appendix 4 and parts 1 and 4 of KCSIE.

What if the DSL is unavailable?

The DSL or DDSL should always be available during school hours or when a school activity is taking place out of hours to discuss safeguarding concerns. As staff availability cannot be guaranteed out of school hours, or when a school activity is not taking place, at such times urgent safeguarding matters should be referred direct to Children's Social care (and copied to the DSL). During these times, non-urgent matters may be emailed to the DSL or reported on CPOMS.

If in exceptional circumstances the DSL or DDSL are unavailable, staff must not delay in taking action. Staff should speak to their senior line manager or a member of the senior leadership team and/or advice should be taken from children's social care. Any action taken by a member of staff pursuant to this requirement should then be shared with the DSL or DDSL as soon as practically possible.

Where a child is suffering or is likely to suffer from harm, a referral to children's social care and/or the police should be made immediately.

Staff should be aware of the process of making referrals direct to Children's Social Care and /or the Police in these circumstances.

Any action taken by a member of staff pursuant to this requirement should then be shared with the DSL or DDSL or a member of the senior management team as soon as possible.



Action by the DSL

On receipt of a report of a concern, the DSL (together with the wider DSL/DSL team where necessary) will consider the appropriate course of action in accordance with the Lincolnshire or Cambridge and Peterborough Safeguarding Children Partnership Board procedures and threshold document. Such action may include:

- managing any support for the pupil internally via the School's own pastoral support processes, seeking advice from Children's Social care where required;
- undertaking an Early Help Assessment (which generally requires parental consent);
- making a referral to statutory services.

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

Where the concern relates to the welfare of a pupil who is aged 18 or over, the DSL will consider whether it is necessary to refer such concerns to the safeguarding Adults Board rather than, or in addition to, children's social care.

If it is decided that a referral is not required, the DSL will keep the matter under review and give ongoing consideration to a referral if the pupil's situation does not appear to be improving.

Managing support for pupils internally

The School has a framework for the identification, assessment, management and review of risk to pupil welfare so that appropriate action can be taken to reduce the risks identified.

The School will ensure that appropriate advice and consultation is sought about the management of safeguarding issues, including advice from children's social care when necessary.

Tutors provide support through one to one conversation with pupils and implement plans with other school staff to support pupils. A more specialist support is provided by other pastoral staff including the Head of Pastoral Care and mentors as well as Form Tutors. All pupils are known very well and pupils choose mentors in KS4 who offer support both academically and pastorally. Pupils and specific needs are discussed at briefings and staff meetings so that everyone is aware and knows best how to support a pupil wherever they are in school: classroom, playground, specialist lessons, lunch etc.

Advice and support are provided for tutors by the Head for Pastoral Care.

More specialist support/advice is available from the SENCO who also liaises with other agencies such as health care professionals.

Counselling services may be accessed for pupils via the Bobby Copping Foundation.



Early Help Assessment

Early Help, also known as early intervention is support given to a family when a problem first emerges. It can be provided at any stage of a child or young person's life to parents, children or whole families and this is generally supported by children's social care in consultation with the family.

The School understands that providing early help is more effective in promoting the welfare of children than reacting later.

The School's Safeguarding training includes guidance about the Early Help process and prepares all staff to identify children who may benefit from Early Help. Staff are mindful of specific safeguarding issues and those pupils who may face additional safeguarding issues and those pupils who may face additional safeguarding challenges. Staff should be particularly alert to the potential need for Early Help for a child who:

- is disabled or who has certain health conditions and has specific additional needs;
- has special educational needs (irrespective as to whether they have an EHCP or not);
- has a mental health need;
- is a young carer;
- is showing signs of being drawn into anti-social or criminal behaviour including gang involvement and association with organised crime groups or county lines;
- if frequently missing/goes missing from care or home;
- is at risk of modern slavery, trafficking or exploitation;
- is at risk of being radicalised or exploited;
- has a parent or carer in custody or is affected by parental offending;
- is in a family circumstance presenting challenges for the child, such as substance abuse, adult mental health issues or domestic abuse;
- is misusing drugs or alcohol themselves;
- is looked after or has returned home to their family after care;
- is at risk from 'honour' based abuse such as Female Genital Mutilation or Forced Marriage;
- is a privately fostered child;
- has experienced multiple suspensions and is at risk of, or has been permanently excluded.

A member of staff who considers that a pupil may benefit from Early Help should keep a written record of their concerns and in the first instance discuss this with the DSL. The DSL will consider the appropriate action to take in accordance with the relevant Safeguarding Children Partnership Board menu of Early Help services and their referral threshold document. The DSL will support staff in liaising with other agencies and setting up an inter-agency assessment as appropriate.

If Early Help is appropriate, staff may be required to support other agencies and professionals in an Early Help assessment and will be supported by the DSL in carrying out this role. In some cases, staff may be required to take a lead role.



The matter will be kept under review and consideration given to a referral to Children's Social Care for assessment for statutory services if the pupil's situation seems to be getting worse or does not appear to be improving.

Making a Referral

Where a child is suffering or is likely to suffer from harm, a referral to Children's Social care (and if appropriate the Police) should be made immediately.

'Harm is the 'ill treatment or impairment of the health or development of a child'. Seeing or hearing the ill-treatment of another person is also a form of harm. It can be determined 'significant' by 'comparing a child's health and development with what might be reasonably expected of a similar child'.

The contact details for children's social care is set out at the back of this policy.

Anyone can make contact with Children's Social Care to discuss concerns before a referral is made. This includes professionals as well as a child themselves, family members and members of the public. Parental consent is not required for referral to statutory agencies.

The child's local safeguarding partnership will have a threshold of need framework and guidance which will provide more information which can support decision making in relation to contacting children's social care.

Normal referral processes are used where there are concerns about children who may be at risk of being drawn into terrorism.

Statutory Assessments

Children's Social care may undertake a statutory assessment under the Children Act 1989 into the needs of the child. It is likely that the person making the referral will be asked to contribute to this process. Statutory assessments include:

- **Children in Need:** A child in need is a child who is unlikely to achieve or maintain a reasonable level of health or development or whose health and development is likely to be significantly or further impaired, without the provision of services; or a child who is disabled. Children in need may be assessed under section 17 of the Children Act 1989.
- **Children suffering or likely to suffer significant harm:** Local authorities have a duty to make enquiries under section 47 of the Children Act 1989 if they have reasonable cause to suspect that a child is suffering or is likely to suffer from significant harm.
- Anyone can make a referral. Where staff may be required to make a direct referral, there are a number of additional resources that staff may find helpful:

Online tool to find the relevant children's social care contact numbers:

<https://www.gov.uk/report-child-abuse-to-local-council>

The flowchart set out on page 22 of KCSIE and the flowcharts set out in Chapter 1 of WTSC for information about the likely actions and decisions required.



Parental consent is not required for referrals to statutory agencies but Staff will need to have access to certain information about the child and the safeguarding concern in order to make the referral. In general terms, the information will comprise:

- personal details of the child including the child's developmental needs;
- detailed information about the concern;
- information about the child's family and siblings including the capacity of the child's parents or carers to meet the child's developmental needs and any external factors that may be undermining their capacity to parent.

If the referral is made by telephone, it should be followed up in writing.

If the referral is made by someone other than the DSL, the DSL should be informed of the referral as soon as possible.

Confirmation of the referral and details of the decision as to what course of action will be taken should be received by the Local Authority within one working day. If this is not received, the DSL (or the person who made the referral) should contact Children's Social Care again.

Following a referral, if the child's situation does not appear to be improving, the local escalation procedures should be followed to ensure that concerns have been addressed and that the child's situation improves. (Resolving professional differences: escalation policy)

Allegations against pupils - child on child abuse

Allegations against pupils should be reported in accordance with the procedures set out in this policy. (See Appendix 3) If harmful sexual behaviour is alleged to have occurred, the DSL will have regard to Part 5 of KCSIE and take into account the response of the Police and Children's Social Care to these issues. The views of the alleged victim will be taken into account but will not be determinative.

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

What to do if staff have a concern about someone else's welfare

Staff who have concerns about the welfare of others or any other safeguarding issue not expressly covered by this policy should report them. This should be to the DSL in the first instance.

Allegations made and/or concerns raised against Staff and others in School

The School has procedures for dealing with allegations made and/ or concerns raised about staff or anyone working for, or on behalf of, the School whether paid or unpaid, or any Other Adult which may affect the safety and welfare of children:



All staff should read and understand the Whistle Blowing Policy and be aware of procedures relating to allegations made and/or concerns raised about staff or anyone working in School including volunteers and contractors.

The procedures in this policy apply to staff who pose a risk of harm to children or may behave in a way that indicates that they may be unsuitable to work with children. They also apply to low level concerns that do not meet the harms threshold. The procedures aim to strike a balance between the need to protect children from harm and abuse and the need to protect staff from malicious, false, unsubstantiated or unfounded allegations. These procedures are set out in Appendix 4 and follow the guidance in Parts 1 and 4 of KCSIE.

The School will follow employment procedures for dealing with any other concern raised about staff, involving external agencies as appropriate.

Detailed guidance is provided to staff to ensure that all staff are clear on rules of conduct and any expectations of the School in relation to contact with pupils, parents, colleagues and any other person who comes into contact with the School. The guidance is contained in the Staff's Code of Conduct and includes details of additional safeguarding arrangements where staff engage in one to one teaching and meetings with pupils.

Informing parents

Parents will normally be kept informed as appropriate of any action to be taken under these procedures. However, there may be circumstances when the DSL may have to consult the Head, the LADO, children's social care; the police and/or the pupil before discussing details with parents. The DSL will always operate in the best interests of the child. In all cases, the DSL will be guided by the Lincolnshire or Cambridgeshire and Peterborough Safeguarding Children Partnership Board threshold document.

Where a pupil has made a disclosure, which relates to a family member, the parents should not be informed unless advised by the safeguarding team at children's social care.

See also Appendix 4 for details about the disclosure of information where an allegation has been made against a member of staff.

Additional reporting

In addition to the reporting requirements above, the School will consider whether it is required to report safeguarding incidents to any other regulatory body or organisation, including but not limited to:

Health and Safety Executive

The School is legally required under RIDDOR to report certain incidents to the Health and Safety Executive. See School's Health and Safety Policy.

Disclosure and Barring Service

A referral to the DBS will be made promptly if the criteria are met.



Teaching Regulation Agency (TRA)

Separate consideration will be given as to whether a referral to the TRA should be made where a teacher has been dismissed or would have been dismissed had not he/she resigned.

Insurers

The School will consider whether it is necessary to report a safeguarding incident to relevant insurers and if so the time scale required by the relevant policies. This will be done before renewal to ensure that the School complies with its duties under the Insurance Act of 2015.

Safer recruitment and supervision of staff

The School is committed to practising safer recruitment in checking the suitability of staff (including staff employed by another organisation.) See the School's separate Recruitment, Selection and Disclosure Policy and Procedure..

The School maintains a single central register of appointments for all staff.

The School's protocol for ensuring that visiting speakers are suitable and appropriately supervised is set out in the School's separate Visiting Speakers Policy.

Use of mobile electronic devices and smart technology

The School's policy on the use of mobile technology in School, including phones and cameras in the EYFS setting is as follows:

- The School's Acceptable Use of ICT Policy sets out the expectations on pupils. Pupils in Years 7-10 are prohibited using mobile electronic devices during the school day. Pupils in Year 11 may use mobile phones during lunchtime in a designated Year 11 area.
- Staff (including staff in the EYFS setting) should use mobile phones and cameras in accordance with the guidance set out in the code of conduct.
- Parents (including those of pupils in the EYFS) may bring mobile phones onto the premises but may only take photographs during events such as plays, concerts or sporting events for personal use. Parents should be reminded that publication of such images (including on personal social networking sites even where access to the image may be unlawful).
- Visitors may bring mobile phones onto the premises but may not take photographs or videos under any circumstances. The only exception is where a commercial third party is permitted to take photos or videos of pupils with the Headmistress' consent and with appropriate supervision.
- The School allows access to the internet on site. Appropriate internet safety measures are taken to manage associated risks, including use of filters and monitoring usage.
- The School's approach to on-line safety is set out in the School's On-Line Safety Policy, Acceptable Use of ICT Policy for Pupils and Acceptable Use of ICT for Staff.



Training

The School ensures that regular and guidance and training is arranged on induction and at regular intervals thereafter so that staff understand what is expected of them by this policy and have the necessary skills and knowledge to carry out their roles. The level and frequency of training depends on the role of the individual member of staff. The School maintains written records of all staff training.

All training is carried out in accordance with Lincolnshire or Cambridgeshire and Peterborough Safeguarding Children Partnership Board procedures where possible

Induction

All staff, including temporary staff and volunteers will be provided with induction training and includes copies of:

- The Safeguarding Policy.
- The Behaviour and Rewards and Sanctions Policy.
- The Anti-Bullying Policy which includes details of the School's policy on cyber-bullying and prejudice-based and discriminatory bullying.
- The Staff Code of Conduct including staff/pupil relationships and communications.
- The Whistle Blowing Policy.
- The Social Media Policy.
- Staff guidance for Acceptable use of ICT.
- The role and identity of DSL and DDSL with contact details.
- How to report a concern about a child.
- The safeguarding response to children who are absent from education, particularly on repeat occasions and /or prolonged periods.
- The School's approach to on-line safety which includes an understanding of expectations, applicable roles and responsibilities in relation to filtering and monitoring. Staff delivering induction training will ensure that staff understand the material and have the opportunity to discuss topics in more detail where required.
- Part 1 and Annex B of KCSIE (whether the member of staff works directly with children or not).
- A copy of Annex A of KCSIE will be provided for those staff not working directly with children where appropriate.
- Safeguarding training in accordance with Cambridgeshire and Peterborough Safeguarding Children Partnership Board procedures including guidance on managing a report of child on child harmful sexual behaviour.

Appropriate Prevent Duty training.

Staff delivering induction training ensure that staff understand the material and have the opportunity to discuss topics in more detail where required.



Safeguarding Training

All staff including the Headteacher receive a copy of this policy and Part 1 Annex B of KCSIE (whether they work with children or not) and will be required to confirm that they have read and understood these by signing on the Google Drive.

Members of the senior leadership team and Safeguarding member of the Advisory Board will receive a copy of this policy and be expected to read all of KCSIE.

The Headteacher and all staff members will undertake appropriate safeguarding training at least every 3 years. In addition, all staff members will receive safeguarding and child protection updates including on-line safety via e-mail or through staff meetings on a regular basis and at least annually.

Staff development training will also include training on online safety which should, amongst other things include an understanding of the filtering and monitoring systems and processes in place in the School; searching pupils for prohibited and banned items and Prevent Duty training assessed as appropriate for them by the School.

Additionally, the School will make an assessment of the appropriate level and focus for staff training and responsiveness to specific safeguarding concerns such as radicalisation, child-on- child abuse, harmful sexual behaviour, child criminal and child sexual exploitation, female genital mutilation, cyberbullying, prejudice-based and discriminatory bullying, gangs and mental health to ensure that staff have the skills, knowledge and understanding to keep children safe.

The Proprietors of the School and the Safeguarding member of the Advisory Board receive Safeguarding training (including on-line safety) and updates and receive an annual report on Safeguarding from the DSL. This training will equip them with the knowledge to provide strategic challenge to test and assure themselves that the School's safeguarding policies in place are effective and support a robust whole school approach to safeguarding. This training will be regularly updated.

The School has mechanisms in place to assist staff to understand and discharge their role and responsibilities and to ensure that they have the relevant skills, and knowledge to safeguard children effectively including staff meetings, twilight training and professional development reviews. This includes information on how staff can report concerns out of hours/ out of term time.

Designated Safeguarding Lead (DSL)

The DSLs and Deputy DSLs will undertake training to provide them with the knowledge and skills required to carry out the role. The training includes inter-agency working and Prevent awareness training and will be updated at least every 2 years.

In addition, their knowledge and skills will be refreshed at regular intervals, at least annually to allow them to understand and keep up with any developments relevant to their role. For further details about the training of the DSL, see Annex C of KCSIE.

Prevent duty training will be consistent with the Government's prevent training for schools. See Educate Against Hate (HM Government 2018) for further details



Teaching pupils about Safeguarding

The School teaches pupils about safeguarding through PSHE, tutorials, assemblies, social skills groups, ICT and the curricular and extra-curricular programme. This includes guidance on adjusting behaviour to reduce risks, particularly online, building resilience to protect themselves and their peers, fostering healthy and respectful relationships with others and providing information about who they should turn to for help.

The School recognises that a one size fits all approach may not be appropriate for children and a more personalised or contextualised approach for more vulnerable children, victims of abuse and some SEND children may be needed.

Pupils are introduced to well-being, emotional, physical and mental health in order to develop resilience and self-esteem in an age appropriate manner. Resilience is particularly important in safeguarding to mitigate against the risk of being drawn into extremism. Parental advice is also provided through letters / e-mails and talks given by relevant experts and specialists.

Pupils are taught about harmful sexual behaviours, including sexual violence and sexual harassment through personal, Social, Health and Economic Education (PSHE), Emotional Well Being (EW) Education and Spiritual, Moral, Social and Cultural Education (SMSC) appropriate to their age and stage of development. It will tackle issues such as: healthy and respectful relationships; boundaries and consent; stereotyping, prejudice and equality, body confidence and self-esteem; how to recognise abusive relationships, including coercive and controlling behaviour; concepts and laws relating to sexual consent; sexual exploitation; sexual abuse; grooming; harassment; rape; domestic abuse; so called 'honour' based violence and how to access support; what constitutes sexual harassment and sexual violence and why these are always unacceptable.

Pupils are given the opportunity to talk about safeguarding issues in a classroom environment and specialist safeguarding days are arranged throughout the year using relevant professionals.

Pupils have ample opportunities during the school day to talk to staff about any concerns.

The Head of Pastoral Care is also available during the school day including breaks and lunchtime. A designated Pastoral Room is available for pupils to speak confidentially or to seek advice.

The safe use of technology is a focus in all areas of the curriculum and key ICT messages are re-enforced in assemblies; talks by the local constabulary and through designated pupil training days. The purpose of which is to help pupils keep themselves safe on line and in remote learning. The School has appropriate filters and monitoring systems in place which meet the DfE's filtering and monitoring standards.

The School keeps in regular contact with parents and carers to reinforce the importance of keeping pupils safe online and make them aware of the systems in place to filter and monitor online use and the sites pupils will be expected to access during learning.



Risk Assessment

Where a concern about a pupil's welfare is identified, the risks to that pupil's welfare will be assessed and appropriate action will be taken to reduce the risks identified.

The format of the risk assessment may vary and may be included as part of the School's overall response to a welfare issue. This will be in line with recommendations in EHCPs, health care, behaviour and education plans. The risk assessment will be discussed by relevant members of staff and this may include liaising with external agencies. Regardless of the form used, the School's approach to promoting pupil welfare will be systematic and pupil focused.

The Headteacher has overall responsibility for ensuring that matters affecting pupil welfare are adequately risk assessed and that the relevant findings are implemented, monitored and evaluated. She works collaboratively with the DSL, SENCO and the Head of Pastoral Care who have day to day responsibility for ensuring that all staff are aware of risks and understand how best to support pupils in line with their risk assessment.

Monitoring and Review

The DSL and Deputy DSLs will ensure that the procedures in this policy and the implementation of these procedures are updated and reviewed regularly, working with the Safeguarding member of the Advisory Board as necessary and seeking contributions from staff. The DSL will update the Headteacher and Proprietors regularly on the operation of the School's safeguarding arrangements.

Any serious safeguarding incidents at School will be followed by a review of these procedures by the DSL and a report made to the Proprietors. Where an incident involving a member of staff occurs, the LADO will be asked to assist in reviewing the School's procedures to determine whether any improvements can be made. Any shortfalls in regard to safeguarding arrangements at any time will be remedied without delay.

This policy will be updated whenever needed to ensure that it remains up to date with safeguarding issues as they emerge and evolve, including in relation to lessons learnt.

The safeguarding member of the advisory board will also undertake an annual review of this policy and the School's safeguarding procedures, including an update and review of the effectiveness of procedures and their implementation and the effectiveness of inter-agency working. The DSL will also produce an annual review of the School's approach to on-line safety and filtering and monitoring provision supported by an annual risk assessment that considers the risks that pupils face.

The DSL will produce an Annual Report to the Proprietors to summarise the School's safeguarding practices over the year. This written report will address how the School ensures that the policy is kept up to date; staff training on safeguarding; referral information; issues and themes which have emerged in the School and how these have been handled, including lessons learnt and the contribution the School is making to multi-agency working in individual cases or local discussions on safeguarding matters.

The safeguarding member of the advisory board will review the report by the DSL and will also consider independent corroboration such as: inspection of records or feedback from external agencies such as the LADO; reports of ISI inspections; the outcome of any relevant complaints and press reports.



The DSL and DDSLs meet regularly to discuss safeguarding practices in School and an annual meeting will consider updates to the policy. Note: Updates are also implemented following any safeguarding incident which requires practice adjustment.

Record keeping

All records created in accordance with this policy are managed in accordance with the School's records management policy and records retention schedule.

The DSL keeps all records related to Safeguarding in a locked cabinet in her room. This has strictly limited access.

Staff must record all concerns about a pupil's welfare on C-POMS.

The DSL will open a child protection file following a report made to her of a child protection concern about a pupil. The DSL will record all discussions with both colleagues and external agencies, decisions made and the reasons for them and the action taken.

Each concern and referral which is kept in a separate child protection file should include:

- a clear and comprehensive summary of the concern;
- details of how the concern was followed up and resolved;
- a note of any action taken, decisions reached and outcome;
- open concerns are regularly reviewed by the DSL /DDSL team and closed once
- actions are complete;
- pupils with significant historic concerns will be regularly monitored by C-POMS.

The records created in accordance with this policy may contain personal data. The School's use of personal data will be in accordance with data protection law. The School's approach to data protection is set out in the School's data protection policies and procedures.

Staff must record all concerns about a pupil's welfare on C-POMS.

The DSL will open a child protection file following a report being made to them of a child protection concern about a pupil. The DSL will record all discussions with both colleagues and external agencies, decisions made; the reasons for them and detail of the action taken.

The information created in connection with this policy may contain personal data. The School's use of this personal data will be in accordance with data protection law. The School has information on its website about how it will use personal data. The School's approach to data protection compliance is set out in the School's data protection policies and procedures. In addition, staff must ensure that they follow the School's data protection policies and procedures when handling personal data created in connection with this policy.

Information sharing and multi-agency working

The School will treat all safeguarding information with an appropriate level of confidentiality, only involving others where appropriate. The School will always act in order to safeguard and promote the welfare of others. When a child leaves the School their child protection file (should one exist) is transferred securely to their next place of education.



The School understands that information sharing is essential for effective safeguarding and promoting the welfare of children and young people including their educational outcomes. Fears about sharing information will not stand in the way of the need to promote the welfare, and protect the safety of pupils which is always the School's paramount concern. Schools have clear powers to share, hold and use information for these purposes and the UK GDPR and data Protection Act 2018 provide a framework to ensure that personal data is shared appropriately.

When the School receives a request for safeguarding information (e.g. a subject access request from a parent or a request from the police), the School will carefully consider its response to make sure that any disclosure is in accordance with its obligations under the UK GDPR and Data Protection Act 2018. The School will also have regard to its data protection policies.

The School will co-operate with children's social care and where appropriate the police, to ensure that all relevant information is shared for the purposes of Early Help assessments and assessments and child protection investigations under the Children Act 1989.

Where allegations have been made against staff, the School will consult with the LADO and where appropriate the police and children's social care to agree the information that should be disclosed and to whom.

While the School will share information with those involved where and when it is appropriate to do so, they may be unable to for reasons of data protection and confidentiality, for example because to do so may pose a risk of harm to others or because it has been prohibited by external agencies.

Version Control

Date of adoption of this policy	4 th September 2024
Date of the last review of this policy	22 nd October 2024
Date for next review of this policy	August 2025 or earlier as necessary

Authorised by:

Corinne L. Jones

Circulation:

The Proprietors and their representative, advisory member for Safeguarding, all staff, volunteers, parents and pupils on request.

Published on the School's Website and available from the School Office on request.



Appendix 1. Forms of abuse and neglect and exploitation and specific safeguarding risks

Abuse and neglect

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

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

Indicators of abuse and neglect

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

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

Sexual Abuse: This 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 (e.g. 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, or encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse. Sexual abuse can take place online and technology can be used to facilitate offline abuse.

Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children (child-on-child abuse). The sexual abuse of children by other children is a specific safeguarding issue in education and all staff should be aware of this.

Emotional Abuse: This is 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 in so far 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 the child's developmental capability, as well as overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction. It may involve seeing or hearing the ill treatment of another. It may involve serious bullying (including cyber bullying and prejudice-based or discriminatory bullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, though it may occur alone.

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

Signs of abuse

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

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



The Lincolnshire and Cambridgeshire and Peterborough Safeguarding Children Partnership Boards can provide advice on the signs of abuse and the DfE advice: What to do if you're worried a child is being abused (March 2015) provides advice in identifying child abuse. The NSPCC website is also a good source of information and advice.

Specific Safeguarding Issues

Statutory guidance acknowledges the following as specific safeguarding issues:

- child abduction and community safety incidents;
- children and the court system;
- children missing from education;
- children with family members in prison;
- child criminal exploitation and sexual exploitation;
- county lines or other gang activities;
- modern slavery and the national referral mechanism;
- cybercrime;
- domestic abuse;
- homelessness;
- so-called 'honour-based' abuse (Including Female Genital mutilation and Forced Marriage);
- preventing radicalisation;
- child on child abuse;
- sexual violence and sexual harassment between children in schools and colleges;
- upskirting;
- sexual violence and sexual harassment between children in schools and colleges;
- Mental health;
- Serious violence.

Further advice and links to guidance on these specific safeguarding issues can be found in Annex A of KCSIE. Staff should be particularly aware of the safeguarding issues set out below.

Children who are absent from education

Children who are absent from education particularly repeatedly and / or for prolonged periods of time can act as a vital warning sign of a range of safeguarding issues including neglect, sexual abuse, and child sexual and criminal exploitation including involvement in County Lines. It may indicate mental health problems, risk of substance abuse, risk of travelling to conflict zones, risk of FMG, 'honour based' abuse or risk of forced marriage.

School attendance registers are carefully monitored to identify any trends. Action should be taken in accordance with this policy if any absence of a pupil from the School gives rise to a concern about welfare.



Where reasonably possible the School will hold more than one emergency contact for each pupil in order to ascertain whether a child is missing.

The School will inform the local authority of any pupil who is going to be added or deleted from the School's Admissions Register outside of standard transition points in accordance with the requirements of the School Attendance (Pupil Registration) (England) 2024.

This will assist the authority to: fulfil its duty to identify children of compulsory school age who are missing from education and to follow up with any child who might be in danger of not receiving an education and might be at risk of abuse, neglect or radicalization or involved with serious violent crime.

The School shall inform the local authority with the names and addresses of all pupils of compulsory age who:

- fail to attend school regularly or
- who have been absent for a continuous period of ten school days where their absence has been recorded with one or more of the codes statistically classified as unauthorized (G, N,O and /or U). The frequency will be determined by the local authority but no less frequently than once per calendar month;
- have been recorded with code I (illness) and who has reasonable grounds to believe will miss 15 days consecutively or cumulatively because of sickness in a school year.

Elective Home Education (EHE)

Where a parent expresses their intention to remove a pupil from school with a view to educating at home, the School will work with the local education authority and other key

professionals to co-ordinate a meeting with parents where possible, ideally before a final decision is made. This is to ensure that parents have considered what is in the best interests of their child. This will be particularly important if their child has SEND, is vulnerable or has a social worker.

Child sexual exploitation (CSE) and child criminal exploitation (CCE)

Both CSE and CCE are forms of abuse. It occurs when an individual or group (adult or another child) takes advantage of an imbalance of power to coerce, manipulate or deceive a child into taking part in criminal or sexual activity:

- in exchange for something the victim wants or needs e.g. money, gifts or affection and/or
- for the financial advantage or increased status of the perpetrator or facilitator; and /or
- through violence or threat of violence to victims (and their families).

Children can be exploited by adult males or females, as individuals or in groups. They may also be exploited by other children, who themselves may be experiencing exploitation-where this is the case, it is important that the child perpetrator is also recognised as a victim.



CSE and CCE can affect children of any sex and can include children who have been moved (commonly referred to as trafficking) for the purpose of exploitation.

The victim may have been sexually exploited even if the sexual activity appears consensual.

CCE can include children being coerced into moving drugs or money across the country (county lines), forced to shop lift or pickpocket, or to threaten other young people.

Some of the following can be indicators of both CSE and CCE, including children who:

- appear with unexplained gifts, money or new possessions;
- associate with other young people involved in exploitation;
- suffer from changes in emotional well-being;
- misuse drugs or alcohol;
- go missing for periods of time or regularly come home late; and
- regularly miss school or education or do not take part in education.

Children who have been exploited will need education additional support to help maintain them in education.

CSE can be a one-off occurrence or a series of incidents over time and range from opportunistic to complex organised abuse. It may involve force and / or enticement-based methods of compliance and may, or may not, be accompanied by violence or threats of violence.

The victim may have been sexually exploited even if the sexual activity appears consensual. CSE does not always involve physical contact; it can occur through the use of technology. CSE can include both contact (penetrative and non-penetrative acts) and non -contact sexual activity and 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). The above CCE indicators may also be indicators of CSE, as can children who :

- have older boyfriends and girlfriends; or
- suffer from sexually transmitted infections or become pregnant.

County Lines

County lines is a term used to describe gangs and organised criminal networks involved in the exporting of illegal drugs (primarily crack cocaine and heroin) into one or more importing areas within the UK, using dedicated mobile phone lines or other form of 'deal line'. They are likely to exploit children and vulnerable adults to move, store and sell drugs and money and will often use coercion, intimidation, violence (including sexual violence) and weapons.

Children are increasingly being targeted and recruited online using social media. Children can easily become trapped by this type of 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.



A number of indicators for CSE and CCE as detailed above and in annex B of KCSIE may also be applicable to children involved in county lines.

Additional Reporting duties include:

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 exploitation.

Where a pupil may have been trafficked for the purpose of transporting drugs, a referral to the National Referral Mechanism should be considered.

Serious Violence

Indicators which may signal children are at risk from, or are involved in serious violent crime may include:

- increased absence 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;
- signs of assault or unexplained injuries; and
- unexplained gifts or new possessions c by, or are involved with, individuals associated with criminal networks or gangs and may be at risk of criminal exploitation.

Staff should be aware of the range of risk factors which increase the likelihood of involvement in serious violence, e.g. being male, having been frequently absent or permanently excluded from school, having experienced child maltreatment and having been involved in offending, such as theft or robbery. Further advice for schools is provided in the Home Office's Preventing youth violence and gang involvement and its Criminal exploitation of children and vulnerable adults: county lines guidance.

Cybercrime

Cybercrime is a criminal activity committed using computers and / or the internet. It's broadly categorised as either 'cyber-enabled' (crimes that can happen off-line but enabled at scale and speed online e.g. fraud, purchasing illegal drugs, child sex abuse and exploitation) or 'cyber- dependent' (crimes that can only be committed using a computer).

Cyber-dependent crimes include:

- unauthorised access to computers (illegal hacking) e.g. accessing a school's computer, network to look for test papers or change grades awarded;
- Denial of Service (Dos and DDos) attacks or 'booting' which are attempts to make a computer, network or website unavailable by overwhelming it with internet traffic;
- making, supplying or obtaining malware e.g. viruses, spyware, ransomware, botnets and remote Access Trojans with intent to cause further offence.



Children with particular skills and interest in computing and technology may inadvertently or deliberately stray into cyber-crime.

The DSL or Deputy should consider referring into the Cyber Choices programme if they have concerns. This is a nationwide programme which intervenes when young people are at risk of committing or being drawn into, low-level cyber-dependent offences and divert them to a more positive use of their skills and interests.

Domestic Abuse

Domestic abuse can encompass a wide range of behaviours and may be a single incident or a pattern of incidents. That abuse can be, but is not limited to psychological, physical, sexual, financial or emotional.

Children can be victims of domestic abuse. They may see, hear or experience the effects of abuse at home and / or suffer domestic abuse in their own intimate relationships (teenage relationship abuse). All of this can have a long-term and detrimental impact on their health, well-being, development and ability to learn.

All children can witness and be adversely affected by domestic abuse in the context of their home life where domestic abuse occurs between family members. 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.

Further advice on identifying children who are affected by domestic abuse and how they can be helped can be found in Annex B of KCSIE. This includes details about Operation Encompass which operates in all police forces across England helping schools and police to work together to provide emotional and practical help to children.

So called Honour-based abuse

All forms of so-called honour-based violence are abuse (regardless of motivation) and should be handled and escalated as such. Abuse committed in the context or preserving 'honour' often involves other risk factors such as wider network of family or community pressure and the possibility of multiple perpetrators which should be taken into account when deciding what safeguarding action to take. Staff should speak to the DSL if they have any doubts.

If appropriate, the DSL will activate the local safeguarding procedures using existing national and local protocols for multiagency liaison with the police and children's social care.

Female Genital Mutilation (FGM)

FGM is a form of honour based violence. It 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.

There are a range of potential indicators that a child or young person may be at risk of FGM. Guidance on the warning signs that FGM may be about to take place, or may have already taken place can be found on pages 38-43 of the Multi-agency guidance on FGM (HM Government, July 2020) Pages 61-63 focus on the role of schools.



All staff must be aware of the requirement for teachers to report to the police where they discover (either by disclosure by the victim or visual evidence) that FGM appears to have been carried out on a girl under the age of 18. The report should be made orally by calling 101, the single- non- emergency phone number. 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. Unless the teacher has a good reason not to, they should still consider and discuss any such case with the DSL and involve children's social care as appropriate.

If the teacher is unsure whether this reporting duty applies, they must report the matter to the DSL in accordance with this policy. See Home Office guidance Mandatory reporting of female Genital M-procedural information January 2020 for further details about the duty.

Guidance published by the Department for Health also provides useful information and support health professionals which will be taken into account by the School's medical staff. The National FGM centre has also produced guidance to help schools understand their role in safeguarding girls, engaging parents and teaching about FGM.

Forced Marriage

Since February 2023, it has 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 other form of coercion are not used. As with existing forced marriage law, this applied to non-binding, unofficial 'marriages' as well as legal marriages.

Forced marriage is also a form of honour-based violence. Forcing a person into 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 or coercion is used to cause a person to enter into a marriage. Threats can be physical or emotional and psychological. A lack of full and free consent can be where a person does not consent or where they cannot (if they have learning difficulties for example). Nevertheless, some communities use religion and culture as a way to coerce a person into marriage.

Guidance on the warning signs that forced marriage may be about to take place, or may have already taken place can be found on pages 39-44 of the Multi-agency guidelines: handling case of forced marriage (HM Government, April 2023).

Staff should speak to the DSL if they have any concerns. Pages 79-84 of the Multi-agency guidelines: handling case of forced marriage (HM Government April 2023) focus on the role of schools in detecting and reporting forced marriage and the Forced Marriage Unit can be contacted on: 020 7008 0151 or fm@fco.gov.uk for advice and information.



Radicalisation and Prevent Duty

The School has a legal duty to have due regard to the need to prevent people from being drawn into terrorism.

The School aims to build pupils' resilience to radicalisation by promoting fundamental British values and enabling them to challenge extremist views. Being drawn into terrorism includes not just violent extremism but also nonviolent extremism, which can create an atmosphere conducive to terrorism and popularise views which terrorists exploit. The School is committed to providing a safe space in which children, young people and staff can understand and discuss sensitive topics including terrorism and the extremist views which are part of terrorist ideology, understand the risks associated with terrorism and develop the skills to be able to challenge extremist arguments.

The School has adopted the government's definitions for the purposes of being compliant with Prevent duty:

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

Radicalisation: 'the process by which a person comes to support terrorism and forms of extremist ideologies associated with terrorist groups.

Terrorism: 'an action that endangers or causes serious violence to a person/people; causes serious damage to property, or seriously interferes or disrupts an electronic system. The use of threat must be designed to influence the government or to intimidate the public and made for the purpose of advancing a political, religious or ideological cause.'

There is no single way of identifying an individual who is likely to be susceptible to an extremist ideology. There are, however, possible indicators which should be taken into consideration alongside other factors and contexts. Background factors combined with specific influences such as family and friends may contribute to a child's vulnerability. Radicalisation can occur through many different methods such as social media and settings such as the internet.

It is possible to protect vulnerable people from extremist ideology and intervene to prevent those at risk of radicalisation being radicalised. As with managing other safeguarding risks, staff should be alert to changes to children's behaviour which could indicate that they are 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 the DSL making a referral

Prevent referral.

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 required. An individual's engagement with this programme is entirely voluntary at all stages. Channel duty Guidance: protecting vulnerable people from being drawn into terrorism HM Government February 2021.



The DfE and Home Office's briefing note: The use of social media for online radicalisation (July 2015) includes information on how social media is used to radicalise young people and guidance on protecting pupils at risk.

Also see Prevent Duty Policy.

Child on Child abuse

All staff should be aware that children can abuse other children (often referred to as child-on-child abuse) and that it can happen both inside and outside the home and online.

The School's policy on child on child abuse can be found in Appendix 3.

Online safety

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

It is essential that children are safeguarded from potentially harmful and inappropriate online material. An effective whole school approach to online safety empowers a school to protect and educate pupils and staff in their use of technology and establishes mechanisms to identify, intervene in and escalate any concerns where appropriate.

The breadth of issues classified within online safety is considerable but can be categorised into 4 areas of risk:

- 1.Content: being exposed to illegal; inappropriate or harmful content, for example: pornography, fake news, racism, misogyny, self-harm, suicide, anti-Semitism, radicalisation and extremism.
- 2.Contact: being subjected to harmful online interaction with other users; for example: peer to peer pressure, commercial advertising and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes.
- 3.Conduct: personal online behaviour that increases the likelihood of or causes, harm, for example, making, sending and receiving explicit images (e.g. consensual or non-consensual sharing of nudes and semi-nudes and / or pornography, sharing other explicit images and online bullying.
- 4.Commerce: risks such as online gambling, inappropriate advertising, phishing and or financial scams. If pupils, students or staff are at risk, it should be reported to the Anti-Phishing Working Group (<https://apwg.org/>).

Sharing nude and semi-nude images and videos

Consensual and non-consensual sharing of nudes and semi-nude images and /or videos can be signs that children are at risk.

'Sharing nudes and semi-nudes' means the taking and sending or posting of nude or semi-nude images, videos or live streams by young people under the age of 18 online. This could be via social media, gaming platforms, chat apps or forums. It can also involve sharing between devices offline e.g. via Apple's AirDrop. This is also known as sexting or youth



produced sexual imagery. This includes the sharing of digitally manipulated or AI-generated nude and semi-nude images. The School treats all incidences of sharing nudes and semi-nude images as safeguarding matters to be actioned in accordance with this policy.

Members of staff must not intentionally view any nude or semi-nude images which is reported to them, or copy, print or share the images under any circumstances. In referring any incident of sharing images, members of staff should describe the content of the images as reported to them.

The DSL may in exceptional circumstances view images with the prior approval of the Head and only where:

- it is the only way to make a decision whether to involve other agencies, as there is insufficient information available as to its contents;
- it is necessary to report the image to a website, app or suitable reporting agency to have it taken down or to support the pupils or parents in making a report; or
- a pupil has reported the image directly to a member of staff in circumstances where viewing the image is unavoidable or images have been found on the School's devices or network.

Where viewing an image is unavoidable:

- viewing should take place on School premises wherever possible;
- the image should be viewed by a person of the same sex as the person alleged to be shown in the image (where this is known);
- a senior member of staff should be present to monitor and support the person viewing the image. This member of staff should not view the image;
- full details of the viewing must be recorded in the School's safeguarding records, including who was present, the date and time, the nature of the image and the reasons for viewing it;
- any member of staff who views an indecent image should be given appropriate support.

If any devices need to be confiscated (whether to view the image(s) or to pass evidence to the appropriate authority), they should be turned off and locked away securely until they are required.

If an electronic device that is prohibited by the school rules has been seized and the member of staff has reasonable grounds to suspect that it contains evidence in relation to an offence, or that it contains a pornographic image of a child or an extreme pornographic image, the device will be given to the police.

If external agencies do not need to be involved, the school must consider the deletion of any images. Pupils should be asked to delete images themselves and to confirm that this is done. Members of staff should not search devices to delete images. If images have been shared online and cannot now be deleted by the person who shared them, the school should consider reporting the images to the relevant web or host provider (if an option is provided)



or contacting the Internet Watch Foundation or ChildLine (if the website does not provide this option).

Where a pupil receives unwanted images, the School should advise the pupil and their parents of options that may be available to block the sender or to change the pupil's mobile phone number and e-mail address.

The UK Council for Child Internet Safety's advice note Sharing nudes and semi-nudes: advice for educational settings working with children and young people March 2024 contains details of support agencies and provides further information for schools on how to respond to incidents of sharing nudes and semi-nudes..

Advice for pupils at:

<http://www.thinkuknow.co.uk>

<https://www.childline.org.uk/explore/online-safety/pages/sexting.aspx>

Advice for parents:

<http://www.nspcc.org.uk/preventing-abuse/keeping-children-safe/sexting/>



Upskirting

Upskirting typically involves taking a picture under a person's clothing (not necessarily a skirt) without their permission or knowledge with the intention of viewing parts of their genitals or buttocks (with or without underwear) to obtain sexual gratification, or cause the victim humiliation, distress or alarm. Anyone of any gender can be a victim.

Upskirting is a criminal offence. Attempting to commit an act of upskirting may also be a criminal offence e.g. if actions are taken to do something that is more than merely preparatory to committing the offence such as attempting to take a photograph on a telephone or camera but failing to do so because of lack of storage space or battery.

The School will treat incidents of upskirting as a breach of discipline and also as a safeguarding matter under the School's child protection procedures.

All matters relating to upskirting images and devices which may have been used in connection with an allegation of upskirting will be dealt with in a similar manner to sharing sexual images/sexting.

Special educational needs and disabilities or physical health issues

The School welcomes pupils with special educational needs and disabilities and will do all that is reasonable to ensure that the School's curriculum, ethos, culture, policies, procedures and premises are made accessible to everyone. See the School's policies on Special educational Needs and Disability.

Additional barriers can exist when detecting the abuse or neglect of pupils with a special educational need or certain medical or physical health conditions that can create additional safeguarding challenges for those involved in safeguarding and promoting the welfare of this group of children. The School is mindful that:

- assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the pupil's special educational need or disability without further exploration;
- pupils with a special educational need or disability or certain health conditions may be more prone to peer group pressure and isolation and can be disproportionately impacted by bullying (including prejudice-based and discriminatory bullying) without showing any outward signs;
- some pupils may be unable to understand the difference between fact and fiction in online context and can repeat the content /behaviour in school without understanding the consequences and
- there may be communication barriers which are difficult to overcome to identify whether action under this policy is required.

The School will consider providing extra pastoral support and attention for these pupils along with ensuring any appropriate support for communication is in place.



Looked after children and previously looked after children

The Proprietor ensures that staff have skills, knowledge and understanding to keep looked after children safe and that appropriate staff have the information they need in relation to a looked after child's legal status, for example:

- whether they are looked after under voluntary arrangements with consent of parents or on an interim full care order;
- contact arrangements with birth parents or those with parental responsibility;
- information about a child's care arrangements and levels of authority delegated to the carer by the authority looking after him / her.

The DSL (who is also the LAC Lead) maintains these details, including contact details of the child's social worker. The SENCO works with local authorities to promote the educational achievement of looked after children.

Care Leavers

The DSL maintains details of the local authority personal advisor appointed to guide and support care leavers and liaises with them as necessary regarding any issues of concern.

Mental Health

The contact details of the Mental Health Lead is set out at the end of this policy. She meets regularly with Tutors and also checks C-POMS for mental health related concerns.

The School has a designated trained Mental Health Lead who is also the Head of Pastoral Care. A number of staff have obtained a level 2 qualification in Mental Health. Training in relation to Mental Health and Emotional Well-being for all staff is also given high priority. The School is committed to promoting wellbeing and resilience alongside raising awareness of and eliminating the stigma attached to mental illness. Incidences of depression, self-harm and eating disorders have all risen in recent years in the UK and are all linked to poor mental health.

The principles used by the School are:

Prevention: creating a safe and calm environment in order to promote good mental health and to reduce anxiety. All staff are known to pupils and supply agencies are not used. Teaching and support staff have a high presence around the campus at all break and lunchtimes.

Pupils are supported in developing resilience in order that they are best able to manage the stresses of every-day life. This includes teaching pupils about mental health and emotional well-being and providing them with safe and calm places throughout the school day. The School's entirely inclusive ethos enables all pupils to gain self-esteem both within the classroom and through a wide range of extra-curricular activities.

Identification: staff are able to recognise emerging issues and understand the processes of referral and escalation. Pupils with existing mental health and emotional issues are known to staff and concerns are recorded on C-POMS and Edu-key. Pupils with mental health and emotional needs are carefully monitored and support is reviewed regularly.



Access to specialist support: The School liaises with a variety of specialists to ensure that pupils have swift access to appropriate specialist support. The Bobby Copping Foundation provides swift interventions for pupils who are identified as benefitting from additional counselling support. The School also works closely with CAMHS, Autism Outreach, Occupational Therapists and Speech and language therapists to support pupils' wider well-being.

Working together: The School maintains very close relationships with parents and emphasis is placed very firmly on working together to support pupils' mental health and emotional well-being. Referrals to support agencies are done in collaboration with parents / carers.

Form tutors have the support of the Head of Pastoral Care who is also the School's Mental Health Lead and Attendance Champion. Small teaching and tutor groups enable staff to quickly note changes in behaviour, attendance or mood/ approach to work which may be indicative of underlying mental health needs.

Support for Staff: The School recognizes that staff can also benefit from support for good mental health and to that end provision is made for personal support and access to wider mental health services.

Pupils may be identified as being in need of further support through data tracking so that changes in pupils' patterns of attainment, attendance, or behavior are noted and can be acted upon. Staff consider mental health and other factors in all cases of poor or changed behaviour. Staff have training opportunities and updates on a regular basis and are expected to escalate concerns through C-POMS. This allows the DSL and Mental Health Lead to decide on next steps.

When staff suspect that a pupil is having mental health difficulties, they should not delay putting support in place. In collaboration with Form Tutors and the Head of Pastoral Care / Mental Health Lead, an assessment will be made to establish a clear analysis of the pupil's needs. If the Pupil has SEN, advice will also be obtained from the SENCO who will also advise on EHCP provisions. A clear plan will be implemented as to how best the pupil can be supported. This may involve external agencies and support such as CAMHS and The Bobby Copping Foundation.

Parents will work in close partnership with School and there will be regular reviews to assess the effectiveness of the provision and lead to changes where necessary.

Advice for parents and pupils is available at:

<http://www.youngminds.org.uk/>

<https://www.mentalhealth.org.uk/explore-mental-health/a-z-topics/eating-disorders>

<https://www.mentalhealth.org.uk/explore-mental-health/a-z-topics/depression>

<https://www.mentalhealth.org.uk/ayoz/s/self-harm>



Children who are lesbian, gay, bi, trans, queer or questioning (LGBTQ+)

The School recognises that pupils who are or perceived to be LGBTQ+ are vulnerable to being targeted by other children.

LGBTQ+ inclusion is taught as part of the statutory relations education / RSE / PSHE curriculum.

All staff are aware of these vulnerabilities and the School endeavours to provide a safe space to speak out or to share concerns with a member of staff.

N.B. The relevant section of KCSIE is subject to review, pending government consultation on this subject. Staff must refer to any updated guidance, where available, in dealing with any such affected children.



Appendix 2

Concerns about a Child (guidance for staff)

Receiving a disclosure

- Listen carefully and keep an open mind. Do not take a decision as to whether or not the abuse has taken place.
- Do not ask leading questions, ie a question which suggests its own answer. Use 'tell me, explain to me, describe to me (TED) questioning. It is particularly important not to continue questioning a pupil if they disclose something which suggests that a criminal offence may have been committed. The Police will need to take the lead on investigating and continued questioning might compromise possible criminal proceedings.
- Reassure the pupil they are being taken seriously and they will be supported and kept safe so that no victim will be given the impression that they are creating a problem by reporting abuse, sexual violence or sexual harassment and no victim can ever be made to feel ashamed for making a report.
- Do not give a guarantee of absolute confidentiality. Explain the need to pass on the information in accordance with this policy so that the correct action is taken. This will involve professional judgement, but where doubt exists, the information must be passed in accordance with the policy.
- Keep a sufficient record of the conversation completed at the earliest possible time. All other evidence, for example scribbled notes, mobile phones containing text messages, clothing, and computers must be kept securely the written record.
- Pass on the record when reporting a concern in accordance with this policy.
- Where a pupil makes a disclosure relating to a family member, parents should not be informed unless advised to do so by the safeguarding team at children's social care.

Recording a concern

Staff must record all concerns in writing.

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

Records should include:

- the pupil's details: name and date of birth;
- date and time of the event /concern/ conversation;
- a clear and comprehensive summary of the event/ concern/ conversation;
- details of how the concern was followed up and resolved;
- the action taken and by whom with reasons for the decision made and the outcome;
- the name and position of the person making the record.



The School has a Child Protection Logging System on C-POMS which should be used when reporting the matter in accordance with this policy. Staff without internet access must report in person immediately to one of the DSLs. The formal written record can be completed after an initial discussion with the DSL and completed with the DSL where appropriate.

Where the allegation or complaint is made by an adult, the DSL will ask for a written and signed statement from that person and will inform them that their evidence may be passed on to a third party. If, after due consideration, the School decides to pass this information on to an outside agency in accordance with this policy, the DSL will contact the disclosing party (unless the School is advised otherwise by that agency) to inform them of this and that they should expect further contact from the agency.

Use of reasonable force

There are exceptional circumstances when it would be appropriate for staff to use reasonable force to safeguard pupils. 'Reasonable' in these circumstances means using no more force than needed. Staff should refer to the School's policy on the use of reasonable force for more detailed guidance in addition to the Behaviour Policy and the Staff Code of Conduct.



Appendix 3

Dealing with allegations of Child on Child Abuse

Children of any age can abuse other children (often referred to as child on child abuse) and this can happen inside and / or outside the home and online. This includes, but is not limited to:

- bullying (including cyberbullying and prejudice-based and discriminatory bullying);
- abuse within intimate personal relationships between children (teenage relationship abuse);
- physical abuse such as hitting, kicking, biting, hair pulling, or otherwise causing physical harm (this may include an online element which facilitates and / or encourages physical abuse);
- sexual violence. Such as rape, assault by penetration and sexual assault (including: grabbing bottoms, breasts, genitalia, under or over clothes, flicking bra, unwanted kisses, or embraces) possibly with an online element which encourages sexual violence;
- sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment, which may be stand alone or a part of a broader pattern of abuse;
- causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party;
- consensual and non-consensual sharing of nude and semi-nude images (also known as 'sexting' or 'youth produced sexual imagery') means the taking and sending or posting of nude or semi-nude images, videos or live streams by young people under the age of 18 online. This can be via social media, gaming platforms, chat apps or forums. It can also involve sharing between devices offline, for example via Apple's AirDrop. This includes the sharing of digitally manipulated or AI-generated nude and semi-nude images;
- upskirting, typically involving taking a picture under a person's clothing without their permission, with the intention of viewing their genitals or buttocks (with or without underwear) to obtain sexual gratification or cause the victim humiliation, distress or alarm;
- initiation / hazing type violence and rituals (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may include an online element).



The School's approach to child-on-child abuse

Staff understand that even if there are no reports of child-on-child abuse at the School it does not mean that it is not happening. It may be the case that it is just not being reported. Staff understand the importance of reporting any concerns regarding child-on-child abuse to the DSL or the DDSL in the DSL's absence.

Such behaviour is never accepted and should be considered as both a safeguarding issue and potentially a disciplinary one. The School will adopt a zero-tolerance approach to abuse. Downplaying certain behaviours (by, for example, dismissing sexual harassment as 'banter, having a laugh or just 'part of growing up') can lead to a culture of unacceptable behaviours. An unsafe environment for children and at worst, a culture that normalises abuse.

All staff should challenge inappropriate behaviour between pupils and anyone who suffers, witnesses or hears of any form of abuse between pupils is asked to report it in accordance with this policy and the School's Behaviour and Anti-Bullying policies so that appropriate action can be taken.

Appropriate action will involve supporting all members of the School community who may be involved as a priority. This may require investigation by the School or other agencies. Until investigations have been undertaken and findings made, the School will work on the basis that the allegations may or may not be true and undertake careful risk assessment of the welfare of those involved to determine how best to manage the situation. This should be undertaken whether or not the incident is alleged to have taken place at School, or when the pupil involved was under the School's care and whether or not the pupil is under 18, as an issue which may impact pupil welfare. Disciplinary action will follow separately if appropriate.

Sexual violence and harassment (SVSH)

Where the misconduct may constitute sexual violence (rape, assault by penetration, sexual assault or causing someone to engage in sexual behaviour without consent) or sexual harassment (unwanted conduct of a sexual nature), it should be reported to the DSL and will be managed in accordance with this policy. SVSH is never acceptable.

Whilst any report of sexual violence or sexual harassment should be taken seriously, staff are aware that it is more likely that girls will be victims of SVSH and more likely perpetrated by boys.

The School recognises that LGBTQ+ and SEND pupils may be at greater risk of sexual violence or sexual harassment.

SVSH can occur between two or more children of any age or sex from primary to secondary stage. It can also occur online. It can also occur through a group of children sexually assaulting or sexually harassing a single child or group of children. SVSH exists on a continuum and may overlap. Addressing inappropriate behaviour even when it seems to be relatively innocuous can be an important intervention which helps to prevent problematic or abusive behaviour in the future by setting and enforcing clear expectations of behaviour, supporting victims and encouraging them and others to speak out and facilitating targeted support for those demonstrating harmful sexual behaviour.



The 2021 OFSTED report concluded that whether or not schools are aware of reported instances of SVSH in their community, it is likely to be occurring. The School acknowledges this and that children are likely to report such matters, if at all, to people they trust. All staff are therefore trained to identify signs of abuse and on how to respond to a report.

Management of Child on Child Abuse

The initial report

The School recognises that it is not easy for children to tell staff about abuse. Staff are trained in signs of abuse and required to look out for them and act upon them, and to respond to all reports of abuse however they are reported and whether they are made by victims directly or by third parties.

The School acknowledges that the initial response is incredibly important and may impact not just the management of the issue but others of SVSH, Staff are also trained in how to receive a report. Where possible they accompanied by the DSL or other staff.

They should:

- listen carefully and respectfully reassuring the person making the report that they are being taken seriously and offer support without promising confidentiality or making a judgement about its veracity;
- where possible they should ask open questions about whether pupil(s) have been harmed; or if they may be at a risk of harm;
- where there is an online element, considering searching, screening and / or confiscation of devices and the UKCIS Sharing nudes and semi-nudes; advice for education settings with children and young people. The key consideration is for staff not to view or forward illegal images of a child;
- explain the next steps and how the report will be progressed;
- make a written record of the report (recording facts as the child has presented them);
- inform the DSL (or Deputy) as soon as is practically possible, if they are not involved in the initial report and then only share the report with those necessary to progress it.

DSL's considerations

Reports of SVSH are often complex and require difficult professional decisions to be made. Further disclosures may follow and facts may be difficult to establish. These decisions are made on a case by case basis taking all of the circumstances into account, in the best interests of the pupils involved. The School's response is led by the DSL who will always have regard to Part 5 of KCSIE in the management of the issue.



School's considerations

The School will consider:

- the victim's wishes in terms of how they want to proceed. Victims should be given as much control as is reasonably possible over decisions made about investigation and support, but their wishes will not always be determinative as the School may have to take action to protect other children;
- the nature of the alleged incident (including whether it was a one-off or sustained pattern), whether a crime may have been committed and whether harmful sexual behaviour has been displayed the ages and developmental stages of the children involved and any imbalance between them;
- if there is an intimate personal relationship between them;
- whether there are on-going risks to those involved;
- the time and location of any incident and any action to make this location safer;
- the wider context.

Before deciding how best to support and protect those involved, this will involve:

- carrying out immediate risk and needs assessments-these will be undertaken in cases of sexual violence and considered otherwise. Where appropriate, they will be discussed with those involved and their parents. This may involve exclusion pending investigation. Risk and needs assessment will be recorded and kept under review in the knowledge that police investigation and criminal proceedings can take several months to conclude.
- Considering what, if any, further action is appropriate such as involvement of Police and / or other agencies. The School will make a proportionate response to these matters in the light of the circumstances and the factors identified above.

The School will do all it reasonably can to protect the anonymity of children involved in sexual violence or sexual harassment. Amongst other things, this will mean carefully considering, based on the nature of the report, which staff should know about the report and any support that will be put in place for the children involved.

Investigations and findings

The School will record the findings of investigations undertaken by the police and / or the CPS and if the police decide to take no further action, will consider whether investigation should be undertaken or commissioned by the School to enable it to determine, whether or not it is likely that the allegations are substantiated, unsubstantiated, unfounded, false or malicious. There may be circumstances where this is not appropriate as it may prejudice a possible future investigation, for example if a victim does not currently wish to make a victim statement. In those circumstances the School should consider whether a limited investigation is appropriate. The concerns, discussions, decisions and reasons for these should be recorded.

The School should continue to support those involved, with reference to the range of support options set out in Part 5 of KCSIE and should also consider whether future referral and / or disciplinary action may be appropriate against either the perpetrator where concerns are substantiated and / or harmful sexual behaviours identified, or the victim where concerns were found to be deliberately invented or malicious.



Appendix 4.

Raising allegations and low level concerns:

Key Information

Below is the key contact information you may need to raise an allegation or low level concern under this policy.

DSL Designated Safeguarding Lead Prevent Lead LAC Lead	Miss Emma Wilson Tel: 01778 560 350 e-mail: ewilson@kirkstonehouseschool.co.uk
Headteacher	Mrs Corinne Jones Tel: 01778 560 350 e-mail: cjones@kirkstonehouseschool.co.uk
DDSL	Mr Gareth Wingrove Tel: 01778 560 350 e-mail: gwingrove@kirkstonehouseschool.co.uk
Head of Pastoral Care Mental Health Lead Attendance Lead	Mrs Trine Whittemore Tel: 01778560350 e-mail: twhittemore@kirkstonehouseschool.co.uk
Proprietor	Mr George Wyman Tel: 01778 560 386 or 01778 440 262
LADO Cambridgeshire	LADO@cambridgeshire.gov.uk Tel: 01223 727 967
LADO Lincolnshire	LADO@lincolnshire.gov.uk Tel: 01522 554 674
Member of Advisory Board for Safeguarding	Dr Bruce Ramsay Tel: 01778 560 350 e-mail: bruce.ramsay@me.com

Purpose and application

Purpose: The School takes safeguarding extremely seriously. It is of paramount importance that we maintain an open and transparent culture in which all concerns about adults are shared promptly, responsibly and with the right person. We recognise the importance of ensuring that adults who work with, or otherwise come into contact with children, do so in a way that is consistent with our values, culture and expected standards of behaviour. We also recognise that concerns may arise in several ways and from a number of sources. The purpose of this policy is to provide a framework for all concerns to be raised, recorded and dealt with effectively by the School.

Application: The policy applies to all adults working in or on behalf of the School (whether on a paid or unpaid basis), including Advisory Board members, supply staff, volunteers and contractors (Staff).



Other adults: Although this policy directly relates to those who work for the School, the School recognises that its safeguarding role extends to the protection of everyone associated with it. Should concerns be raised about people who are not staff or pupils, then they should be reported to the Head or the DSL who will take appropriate action and co-operate with the relevant agencies as appropriate.

Statutory guidance

This policy has regard to the following statutory guidance:

Keeping children safe in education (September 24) (KCSIE). Part 4 of KCSIE deals with allegations made and concerns raised about staff, supply staff, volunteers and contractors (Staff) who are all adults working for or on behalf of, the School. It distinguishes between two categories of concerns / allegations that can be raised about Staff.

These are:

- concerns that do not meet the harm threshold, otherwise known as 'low level concerns' and;
- allegations that meet the harm threshold.
- working together to safeguard children (2023) (WT) which requires policies to be put in place setting out the process, including timescales for investigation and what support and advice will be available to individuals against allegations have been made. WT requires schools to have regard to KCSIE in order to fulfil their duties in respect of safeguarding and promoting the welfare of children.

Key Staff duties

Staff behaviour: all Staff must comply with the School's Code of Conduct in the staff Handbook which sets out appropriate and expected standards of behaviour.

Duty to report: members of staff must follow this policy immediately if they have any concerns about a member of staff or any other adult (which could include adults not employed by the School).

This includes any concern however it arises, for example, behaviour witnessed or a concern raised by a colleague, pupil, parent or another adult or as a result of checks or information brought to your attention.

Duty to self-refer: staff must refer themselves to the Head where, for example, they have found themselves in a situation which could be misinterpreted, which might appear compromising to others or if on reflection, a member of staff feels they have behaved in such a way that may fall below the standards expected by the School.

A culture of sharing: All staff have a positive obligation to support the School's culture of openness and sharing without fear of reprisal.



What needs to be reported?

Reporting all concerns: all concerns must be raised whether they are considered to be 'low level' concerns or conduct which may meet the harm threshold.

Low level concerns: a low level concern is any concern, no matter how small, and even if no more than a sense of unease or a 'nagging doubt' that a member of staff may have acted in a way that is inconsistent with expected professional standards and / or the Staff Code of Conduct whether inside or outside work. No concern is too small or minor to raise under this policy.

Concerns that meet the harm threshold: allegations that may meet the harm threshold are those that might indicate a person would pose a risk of harm if they continue to work in their present position, or in any capacity with children, for example where the individual has:

- behaved in a way which has harmed a child, or may have harmed a child; and / or
- possibly committed a criminal offence against or related to a child; and / or
- behaved towards a child or children in a way that indicates he or she would pose a risk of harm to children; and /or
- behaved or may have behaved in a way that indicates they may not be suitable to work with children. This includes behaviour that may have happened outside the School which creates a transferable risk.

Definition of Harm: It is important to understand the types of conduct that may be harmful to children, and to recognise that harm may not be limited to the most obvious types of physical abuse. There is no single legal definition of harm but to assist understanding of what may amount to 'harm' the following should be considered:

- the Safeguarding Vulnerable Groups Act 2006 which does not give a definition of harm, encouraging people to apply, 'normal, everyday meaning';
- the Children Act 1989 defines: 'harm' as 'ill-treatment or the impairment of health or development (including for example, impairment suffered by seeing or hearing the ill-treatment of another);
- 'ill-treatment' as including 'sexual abuse and forms of ill-treatment which are not physical';
- 'health' as 'physical or mental health'.

How to raise concerns and allegations:

Raising low level concerns: staff should report any low level concern about any member of staff immediately. This can be raised with the Head or the DSL.

Duty of the DSL to refer concerns to the Head: The Headteacher remains the ultimate decision maker in respect of all low level concerns. Save for cases involving the Headteacher, the DSL must therefore promptly report any concern raised with them to the Headteacher. Wherever possible the DSL must speak to the Headteacher in person about the concern as soon as possible after the concern is raised and always on the same day the concern is raised. If it is not possible to speak to the head in person, the DSL must e-mail the head with a summary of the concern on the same day it is raised.



Concerns about staff: staff should raise immediately any concern about the conduct of a member of staff (other than the Head) that may meet the harm threshold.

Concerns involving the Proprietor: Staff should report concerns to the Local Authority Designated Officer (LADO) without first notifying the Proprietor.

Concerns involving the Headteacher: If Staff have a concern about the Headteacher, they should notify the Proprietor and Advisory Board member for Safeguarding immediately without notifying the Head.

Conflicts of interest: where there is a conflict of interest in raising a concern with the Headteacher, (e.g. concerns raised in connection with an individual who is related to or personally connected with the Headteacher) staff must report their concern directly to the Local Authority Designated Office (LADO) without first notifying the Headteacher.

Reports to the DSL: If it is not possible to make a report to the Headteacher, Proprietor or Advisory Board member, staff should make a report immediately to the DSL. The DSL will take action in accordance with these procedures and will, as soon as possible inform the Head.

The School's response to concerns and allegations:

Appropriate action: The School will ensure that appropriate action is taken to address concerns that are raised under this policy.

Assessing concerns: the Headteacher (or if the concern relates to the Headteacher, the Advisory Board member for safeguarding) will determine whether the concerns raised are low level or potentially meet the harm threshold. The DSL, Headteacher and Advisory Board member for safeguarding have all been trained to assess concerns, and to record and address them appropriately.

Low level concerns: if the School determines the concern is a low level concern, then the School will address the concern as appropriate. This will usually involve making the individual aware of the concern against them, undertaking any investigation that may be required and include giving management guidance and advice or invoking the School's capability or disciplinary procedures.

Borderline cases: the Headteacher (or if the concern relates to the Headteacher, the Advisory Board member for Safeguarding) may take advice from the LADO in borderline cases in order to establish whether the concern is a low level concern or an allegation that potentially meets the harm threshold. This may include conducting an initial 'no names' conversation with the LADO about whether the harm threshold is met.

Referral: where the Headteacher (or, if the concern relates to the Head, the Advisory board member for safeguarding) considers the concerns raised potentially meet the harm threshold, the Headteacher (or if the concern relates to the Head, the Advisory board member for Safeguarding) will make a report to the LADO before further action is taken. Advice may also be sought from the LADO as appropriate. Where a LADO referral is appropriate, this will be made within one working day of the allegation being reported in accordance with this policy.



Responding to an allegation that may meet the harm threshold: where an allegation is made that may meet the harm threshold, the School will take advice from and co-operate with the LADO, the police and any other external body that may be involved in the response to the allegation.

The School will follow its internal procedures in order to investigate and respond to the allegation when it is appropriate to do so and will keep the LADO informed of the action it is taking.

Case Manager: where an investigation is deemed necessary into an allegation of conduct that may meet the harm threshold, a 'Case Manager' will be appointed by the School to lead the investigation. The Case Manager will be either the Headteacher or a person with appropriate authority appointed by the Headteacher. Where the Headteacher is the subject of an allegation, the Case Manager will usually be the Advisory Board member for Safeguarding.

Disclosure of information about concerns and allegations

Informing the individual of a concern: the School will in most cases inform the individual about any low level concern that is raised against them.

Informing the individual of an allegation where appropriate: the Case Manager will consult with the LADO in order to agree if and when it is appropriate to inform the individual of the allegation.

Communication and support for the individual subject to an allegation: if and when it is appropriate to inform the individual of the allegation against them, the Case Manager will also offer appropriate pastoral support and will keep the individual informed of the timescales for the investigation under this procedure and the factors which may affect it. In all cases, the investigation will be concluded as soon as reasonably practicable.

Informing the child's parents / carers where appropriate: The Case Manager will agree with the LADO when and how the parents / carers of the child / children involved will be informed of the allegation if they do not know already of it. The Case Manager will also agree with the LADO what information will be shared with the parents / carers / child / children as the case progresses. The timing and extent of disclosures and the terms on which they are made will be dependent upon and subject to the laws on confidence and data protection and the advice of external agencies.

Reporting restrictions: the school is mindful of and will comply with the reporting restrictions under section 141 Education Act 2002 which prevent the identification of a teacher who is the subject of such an allegation in certain circumstances.

Involvement of external agencies: where the LADO advises that a strategy discussion is needed or the police or children's social care need to be involved, the case manager will not inform the individual subject to the allegation or the parents or carers until these agencies have been consulted and it has been agreed what information can be disclosed.



Concerns about supply staff and contractors: where a concern / allegation has been made in respect of a member of supply staff or a contractor, the concern / allegation may be notified to their employer. Where a case manager has been appointed to investigate an allegation, the case manager will consult with the LADO before sharing any information with the individual's employer.

Referrals to the Disclosure & Barring Service (DBS) & Teaching Regulation Agency

Report to DBS: The School is under a legal duty to make a referral to the DBS where a member of Staff is removed by the School from working in regulated (whether paid or unpaid), or has resigned prior to being removed, because they have harmed or pose a risk of harm to a child. The DBS will then consider whether to impose sanctions which may restrict or prevent that person from working with children in the future.

Report to the Teaching Regulation Agency: If a teacher is dismissed because they are found to have committed serious misconduct or because their conduct has breached the Teachers' Standards, or they resign prior to dismissal on such grounds, the School will also make a referral to the Teaching Regulation Agency. The TRA will consider whether to impose a prohibition order on that person which prevents them from undertaking teaching work in the future.

Record Keeping

Records of low level concerns: low level concerns will be recorded in writing. The record of the concern will be retained so that potential patterns of concerning, problematic or inappropriate behaviour can be identified and addressed. Records of low level concerns that have been addressed with an individual will usually be kept on the individual's personnel file. In addition, all low-level concerns, including those that have not been addressed formally under the School's procedures, will also be stored securely in a central file (Concerns and Allegations Record).

Recording low level concerns: The Concerns and Allegations Record will set out the name of the individual involved (if an individual is named), a brief description of the concern and the context in which it arose, any investigation that has been carried out and the outcome / result of the investigation into the concern. The name of the individual who has raised the concern should also be noted.

Where that individual wishes to remain anonymous, the School will try to accommodate this as far as reasonably possible but cannot guarantee anonymity in all circumstances

Records of allegations that may meet the harm threshold: details of allegations that may meet the harm threshold will be recorded both on the individual's personnel file and the Concerns and Allegations Record. The individual's personnel file and the Concerns and Allegations Record will include a summary of the allegation, details of how the allegation was followed up and resolved, a note of any action taken in response to the allegation.

Storage and security of Concerns and Allegations Record: The Concerns and Allegations Record will be stored in the Head's Office and will be accessed by the Head, the Advisory Board member with responsibility for safeguarding and the DSL only.



Malicious or false low level concerns and allegations: details of low level concerns and allegations found to be malicious or false will be removed from personnel records and from the Concerns and Allegations Record.

Retention of records: information stored on staff personnel files about low level concerns and allegations that may meet the harm threshold, and the Concerns and Allegations Record, will be retained by the School indefinitely. The School may in future be required to produce this information if it is notified of an allegation of historic abuse relating to a current or former member of staff, if a former member of staff is accused of committing safeguarding allegations arising elsewhere.

References

Low level concerns: low level concerns will not be disclosed in a reference unless they were addressed formally and resulted in a sanction under the School's disciplinary or capability policies and procedures and it is otherwise appropriate to disclose them.

Allegations that meet the harm threshold: allegations that meet the harm threshold will be disclosed in a reference if the allegation was found to be substantiated (including any cases in which any disciplinary sanction had expired). The School will not disclose information about allegations that were found to be false, unsubstantiated or malicious.



Appendix 5

Key External contacts

Cambridgeshire & Peterborough

Cambridgeshire and Peterborough Safeguarding Children Partnership Board
<http://www.safeguardingcambspeterborough.org.uk/children-board/>

Education Safeguarding Team ECPS.General@cambridgeshire.gov.uk

Police Child Abuse Investigation Unit Tel: 101

Cambridgeshire

Education Safeguarding Manager sara.rogers@cambridgeshire.gov.uk

Early Help Hub (EHH) 01480 376666

Customer Service Centre – social care referrals 03450 455203

Emergency Duty Team (out of hours) 01733 234724

Local Authority Designated Officer (LADO) 01223 727967

LADO@cambridgeshire.gov.uk

Senior Education Adviser – Phil Nash 01223 699448

Peterborough

Education Safeguarding Lead – Sue Proffitt susan.proffitt@peterborough.gov.uk

Early Help 01733 863649

Customer Service Centre – social care referrals 01733 864180

Emergency Duty Team (out of hours) 01733 234724

Local Authority Designated Officer (LADO)

Gisela Jarman 01733 864038

Jane Bellamy 01733 864790

Lincolnshire

Local Authority Designated Officers (LADOs) 01522 554674

Children's Safeguarding 01522 782111

Lincolnshire Police Central Referral Unit 01522 947352



Rutland

Reporting a concern

01527 758407

The Rutland MARF Form:

<https://www.rutland.gov.uk/my-services/health-and-family/childrens-social-care/report-a-concern-children-and-young-people/>

e-mail: childrensreferrals@rutland.gov.

Implementation of the policy is the responsibility of the DSL who:

- keeps the policy up to date and compliant with the law and best practice;
- monitors the policy, relevant risk assessments and any action taken in response and evaluates effectiveness;
- maintains up to date records of all information created in relation to the policy and its implementation as required by GDPR;
- Seeks input from interested groups such as pupils' staff and parents to consider processes under the policy;
- conducts a formal annual review of the School's safeguarding policies; procedure and implementation;
- produces an annual report on Safeguarding for the proprietors;
- oversees and delivers induction training on Safeguarding for all staff and arranges whole staff training on an annual basis or before if necessary;
- Liaises with the Proprietor about all matters relating to Safeguarding in School.



To ensure the efficient discharge of its responsibilities under this policy the proprietor has allocated the following tasks:

Task	Allocated to	When /frequency of review
Keeping the policy up to date and compliant with the law and best practice	DSL and Headteacher	As required and at least annually
Monitoring the Implementation of the Policy, relevant risk assessments and any action taken in response and evaluating effectiveness.	DSL, Independent Advisor, Headteacher	As required and at least termly
Maintaining up to date records of all information created in relation to the policy and its implementation as required by the UK GDPR	DSL and DDSL	As required and at least annually.
Seeking input from interested groups such as pupils, staff, parents to consider improvements to the School's processes under this policy.	DSL and DDSL	As required and at least annually.
Formal annual review of the School's Safeguarding policies and procedure and their implementation	Proprietor and Advisory Safeguarding Member.	At least annually
Assessing the adequacy of those using the premises	Safer Recruitment Officer, Proprietor and Headteacher	Before commencement of employment or volunteering.