



FARNBOROUGH HILL

WHOLEHEARTEDLY

## SAFEGUARDING and CHILD PROTECTION POLICY, PROCEDURE AND GUIDANCE

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This policy should be read in conjunction with the:

- Keeping Children Safe in Education guidance
- Anti-Bullying Policy
- Technology Acceptable Use Policy
- Mental Health Policy
- Attendance Policy including Children Missing Education
- Pupil Unaccounted for during the School Day Policy
- Supervision of Pupils Policy
- Supporting Pupils with Medical Conditions Policy
- SENDA Policy
- Online Communications Policy
- Recruitment, Selection and Disclosures Policy and Procedure
- Safeguarding Action Plan following an allegation against a member of staff, volunteer or Governor
- Low Level Concerns Policy
- Visiting Speakers Policy
- Whistleblowing Policy

## **POLICY STATEMENT**

The safety and well-being of every pupil at Farnborough Hill is of vital importance. The School fully recognises its moral and statutory responsibility to safeguard and promote the welfare of all children in its care. The best interests of each and every pupil are paramount in order to enable them to have the best outcomes.

**Safeguarding and promoting the welfare of children is the responsibility of every adult at the School.** We make every effort to provide a safe and welcoming environment underpinned by a culture of openness where both children and adults feel secure, able to talk and believe that they are being listened to.

We always maintain an attitude of 'it could happen here' where safeguarding is concerned and our procedures help us to identify young people who are suffering, or who are at risk of suffering, harm or abuse. We offer early help assessment and support, and make appropriate referrals with the aim of keeping children safe at school, at home and in their communities.

The purpose of this policy is to provide staff, volunteers and governors with the framework they need in order to keep children safe and secure in our school, and to inform parents and guardians how we will safeguard their children whilst they are in our care. Specific guidance is available to staff within the procedure documents.

This policy is available to parents on the School's website and on request from the Headmistress's PA, Mrs Melanie Clark. A hard copy is also kept in the School Office.

A review of the School's Safeguarding and Child Protection Policy takes place at least annually, including an update and review of the effectiveness of procedures and their implementation. This is overseen by the Chair of Governors, drawing on the expertise of staff, including the DSL, in shaping the safeguarding arrangements and policies.

### **There are seven main elements to our safeguarding practice at Farnborough Hill:**

- Ensuring we practise safe recruitment in checking the suitability of all staff and volunteers who work with children with the Disclosure and Barring Service and other relevant authorities, and in advertising this fact to all potential employees/volunteers (see *Recruitment and Selection of Staff Policy* which outlines safer recruitment procedures).
- Establishing a safe environment in which children can learn and develop.

- Raising awareness of safeguarding and equipping children with the skills needed to keep themselves safe.
- Developing and then implementing procedures for early identification and reporting of cases, or suspected cases, of harm or abuse.
- Supporting pupils who have been abused or harmed in accordance with their agreed child protection plan where relevant.
- Contributing to inter-agency working in line with Working Together to Safeguard Children through effective communication and good co-operation with local agencies.
- Ensuring that all staff receive regular training and updates to ensure that they fully understand and fulfil their safeguarding and child protection responsibilities effectively, and that they read changes in statutory guidance when circulated by the DfE. This also involves ensuring that new staff induction includes safeguarding and child protection training, as well as training on anti-bullying and the School's *Behaviour Policy*. (See section on Training below for further information.)

**Our policy applies to all staff, governors, volunteers and pupils at the School.**

### Legal context

- Section 175 of the Education Act 2002;
- The Education (Independent School Standards) Regulations 2014
- The Children Act 2004 & 1989
- Relationships Education, Relationships and Sex Education (RSE) and Health Education (2019, updated 2021)
- The Human Rights Act 1998 and Equality Act 2010

This policy also has regard to the following guidance and advice:

- Hampshire Safeguarding Children Partnership (HSCP) protocols, guidance and procedures
- Keeping Children Safe In Education ('KCSIE') (September 2023)
- What to do if you're worried a child is being abused: advice for practitioners (March 2015)
- Working Together to Safeguard Children (July 2022)
- Information sharing: advice for practitioners providing safeguarding services (July 2023)
- Sexual violence and sexual harassment between children in schools and colleges (September 2021)
- Sharing nudes and semi-nudes: advice for education settings working with children and young people (UK Council for Internet Safety December 2020)
- Promoting children and young people's emotional health and wellbeing: a whole school and college approach (September 2021)
- Behaviour in Schools (October 2022)
- Searching, Screening and Confiscation: advice for schools (July 2023) guidance.
- FGM Act 2003 Mandatory Reporting Guidance (January 2020)
- Revised Prevent Duty Guidance for England and Wales (April 2021)
  - The Prevent Duty: Departmental advice for schools and childcare providers (June 2015)
  - The use of social media for on-line radicalisation (July 2015)

### Definitions

Within this document:

**Safeguarding** is related to action taken to promote the welfare of children and protect them from harm. Safeguarding is defined (in Working Together to Safeguard Children) as:

- protecting children from maltreatment
- preventing impairment of children's mental and physical health or development
- ensuring that children grow up in circumstances consistent with the provision of safe and effective care
- taking action to enable all children to have the best outcomes

**Child protection** is an aspect of safeguarding, but is focused on how we respond to children who have been significantly harmed or are at risk of significant harm.

The term **staff** applies to all those working for or on behalf of the School, full time or part time, in either a paid or voluntary capacity. This also includes parents and governors.

**Child** refers to all young people who have not yet reached their 18<sup>th</sup> birthday. However, we recognise that we also have a duty of care to safeguard pupils over the age of 18 who are still at the School. On the whole, this policy will apply to pupils of our school; however, it will also extend to visiting children and pupils.

**Parent** refers to birth parents and other adults in a parenting role, for example adoptive parents, step parents, guardians and foster carers.

**Abuse** could mean neglect, physical, emotional or sexual abuse or any combination of these. Parents, carers and other people can harm children either by direct acts and/or failure to provide proper care. Explanations of these are given within the procedure document in Annex 2.

**Contextual Safeguarding** is an approach to understanding and responding to young people's experiences of significant harm beyond their families. It recognises that the different relationships that young people form in their neighbourhoods, schools and online can feature abuse and violence. Contextual safeguarding assesses risk and intervenes to protect young people in these cases beyond the boundaries of their home. All staff will be aware that safeguarding incidents and/or behaviours can be associated with factors outside the School and/or can occur between children outside of these environments. All staff, but especially the Designated Safeguarding Lead and Deputy Designated Safeguarding Lead, will consider whether children are at risk of abuse or exploitation in situations outside their families, including extra-familial harms such as sexual exploitation, criminal exploitation, and serious youth violence.

## **Aims**

- To provide staff with the framework to promote and safeguard the well-being of children and in so doing ensure they meet their statutory responsibilities.
- To ensure consistent good practice across the School.
- To demonstrate our commitment to protecting children.

## **Principles and Values**

- Children have a right to feel secure and cannot learn effectively unless they do so.
- All children have a right to be protected from harm.
- **All staff have a key role in prevention of harm and an equal responsibility to act on any suspicion or disclosure that may indicate a child is at risk of harm, either in the School or in the community**, whilst taking into account contextual safeguarding, in accordance with the guidance.
- We acknowledge that working in partnership with other agencies protects children and reduces risk, so we will engage in partnership-working throughout the child protection process to safeguard children.
- Whilst the School will work openly with parents as far as possible, it reserves the right to contact Children's Social Care or the police without notifying parents, if this is believed to be in the child's best interests.

## **Leadership and Management**

We recognise that staff anxiety around child protection can compromise good practice and so have established clear lines of accountability, training and advice to support the process and individual staff within that process.

At Farnborough Hill any individual can contact the Designated Safeguarding Lead (DSL) or her Deputy if they have concerns about a young person. The Headmistress's PA, Mrs Melanie Clark, should be contacted in the event that they are otherwise engaged and not immediately available.

**The DSL is Miss Pippa Sexton (Deputy Head - Pastoral). The School has two Deputy DSLs – Mrs Laura Evans-Jones (Assistant Head – Operations/Pastoral) and Dr Ian Taylor-Warwick (Assistant Head - Academic).** There is a nominated Safeguarding Governor, **Mrs Julie Micklethwaite**, who takes leadership responsibility for safeguarding. The Chair of Governors, **Mr Gerry McCormack**, will receive reports of allegations against the Headmistress and act on behalf of the Governing Body.

**As an employer Farnborough Hill follows safer recruitment guidance as set out in KCSIE 2023.**

## **Training**

All staff at Farnborough Hill are expected to be aware of the signs and symptoms of abuse and must be able to respond appropriately. Training is provided as required, every three years by an external trainer. Training covers all areas of safeguarding, including Prevent awareness, how to identify children and young people at risk and online safety. The DSL also provides training updates every year and more often as appropriate. Separate training is provided to all new staff on appointment by the DSL, as well as all volunteers. All staff who work directly with children have read and acknowledged Part I and Annex B of the government's Keeping Children Safe in Education (KCSIE) guidance and other staff have read and acknowledged Part I of KCSIE. The DSL and Deputy DSLs attend training at least every other year to enable them to fulfil their role. This will include local inter-agency working protocols and training in the safeguarding partners' approach to Prevent duties. In addition, the DSL attends training and other CPD courses/conferences on safeguarding issues such as the Prevent duty. Informal supplementary training will be kept up to date at least annually. Any update in national or local guidance will be shared with all staff and then captured in the next whole school training. The Headmistress is included in all training and updates. This policy will be updated during the year, where appropriate, to reflect any changes brought about by new guidance.

All new staff are provided with induction training that includes:

- \* the School's Safeguarding and Child Protection Policy, including the policy and procedures to deal with peer-on-peer abuse and information about the identity and role of the DSL and DDSLs
- \* the Staff Code of Conduct, Low Level Concerns Policy, Whistleblowing Policy and Technology Acceptable Use Policy
- \* the Behaviour and Anti-Bullying Policies
- \* the school's safeguarding response to children who go missing from education (Attendance Policy)
- on-line safety (which, amongst other things, includes an understanding of the expectations, applicable roles and responsibilities in relation to filtering and monitoring)
- \* a copy of Part I of KCSIE or Annex A if appropriate (and Annex B also, for those who work directly with children, see above).

Copies of the above documents marked with an asterisk \* are provided to all 'staff' during induction. The School takes a risk-based approach to the level of information that is provided to temporary staff and volunteers. Where possible, all temporary staff and volunteers have full face-to-face training on the Staff Code of Conduct and the School's safeguarding procedures. Temporary staff who are only at the School for a very short time (for example providing cover for a few days) will be provided with the Briefing Sheet for Temporary and Supply Staff (Annex 12)

Governors and trustees receive appropriate safeguarding and child protection (including online) training at induction. This training equips them with the knowledge to provide strategic challenge to test and assure themselves that the safeguarding policies and procedures in place at the School are effective and support the delivery of a robust whole school approach to safeguarding. They also receive, read and acknowledge updated policies each year so that they are equipped with the knowledge to fulfil their functions.

## Referral

Following any concerns raised, the DSL will assess the information and consider if significant harm has happened or there is a risk that it may happen. If the evidence suggests the threshold of significant harm, risk of significant harm or risk of *immediate* serious harm, has been reached the DSL will contact Children's Social Care immediately and if appropriate the police. If it is not clear if the threshold is met, then the DSL will also contact Children's Social Care and if appropriate the police. If the DSL and Deputy DSLs are not available and there are immediate concerns, the staff member may refer directly to Children's Social Care and the police if appropriate. The School will use the guidance from the National Police Chiefs' Council (NPCC) to determine when to contact the police.

Generally, the DSL will inform the parents prior to making a referral. However, there are situations where this may not be possible or appropriate, particularly when informing parents/carers may place the child at further risk.

**N.B.** *The exception to this process will be in those cases of known FGM where there is a mandatory requirement for the teacher to report directly to the police. The DSL should also be made aware and be included in the process of communicating with the police if possible.*

## Confidentiality

- We maintain that all matters relating to child protection are to be treated as confidential and only shared as per the 'Information Sharing: Advice for Practitioners Providing Safeguarding Services' (DfE 2023) guidance.
- Information will be shared with individuals within the School on a 'need to know' basis.
- All staff are aware that they cannot promise a child to keep a disclosure confidential.
- There is a lawful basis for child protection concerns to be shared with agencies who have a statutory duty for child protection.
- Relevant staff have due regard to the relevant data protection principles, which allow them to share (and withhold) personal information, as provided for in the Data Protection Act 2018 and the UK GDPR. This includes:
  - being confident of the processing conditions which allow them to store and share information for safeguarding purposes, including information which is sensitive and personal, and should be treated as 'special category personal data'.
  - understanding that 'safeguarding of children and individuals at risk' is a processing condition that allows practitioners to share special category personal data. This includes allowing relevant staff to share information without consent where there is good reason to do so, and that the sharing of information will enhance the safeguarding of a child in a timely manner. Examples would include where it is not possible to gain consent (as it cannot be reasonably expected that a practitioner gains consent) or if to gain consent would place a child at risk.
  - not providing pupils' personal data where the serious harm test under legislation is met. For example, in a situation where a child is in a refuge or another form of emergency accommodation, and the serious harm test is met, the School will withhold providing the data in compliance with schools' obligations under the Data Protection Act 2018 and the UK GDPR. Where in doubt the School will seek independent legal advice.
  - The Data Protection Act 2018 and UK GDPR do not prevent the sharing of information for the purposes of keeping children safe. Fears about sharing information will not be allowed to stand in the way of the need to safeguard and promote the welfare and protect the safety of children.

## Mental Health

The School fully recognises and is alert to issues affecting both the mental and physical health of pupils; staff treat them as having equal importance. All staff are aware that mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation. Where children have suffered abuse and neglect, or other potentially traumatic adverse childhood experiences, this can have a lasting impact on their mental health, behaviour and education throughout childhood, adolescence and into

adulthood. Whilst only appropriately trained professionals should attempt to make a diagnosis of a mental health problem, staff are well placed to observe children on a day-to-day basis and identify those whose behaviour suggests that they may be experiencing a mental health problem or be at risk of developing one. Where staff have a mental health concern about a child that is not identified as also being a safeguarding concern, they will report this without delay to a pupil's Head of Year. Where staff have a mental health concern about a child that is also a safeguarding concern, they will take immediate action to report this to the DSL or DDSL, following normal safeguarding procedures. If there is any doubt as to whether the mental health concern is safeguarding-related, staff will report this to the DSL or DDSL.

### **As a school we will educate and encourage pupils to keep safe through:**

- The content of the curriculum.
- The School's ethos which helps children to feel safe and able to talk freely about their concerns, believing that they will be listened to and valued.
- Every pupil having access to a trusted adult in the School, for example their Tutor.

### **Dealing with allegations against staff**

If a concern is raised about the practice or behaviour of a member of staff (including volunteers and any supply staff and contractors), both at or outside of school, this should be reported to the Headmistress, Maria Young. The Headmistress will usually discuss this concern with the DSL where appropriate. The Headmistress will make an assessment to determine if the matter is a 'low level concern' or an 'allegation'. The Local Authority Designated Officer (LADO) will then be contacted and the relevant guidance followed. If the Headmistress needs advice or guidance she will contact the LADO.

If the allegation is against the Headmistress, this information will be recorded and passed to the DSL, who will contact the Chair of Governors or LADO directly. Any member of staff is also able to contact the Chair of Governors or the LADO directly themselves.

See *Annex 10* and the *Safeguarding Action Plan Following an Allegation Against a Member of Staff* for further information on the School's procedures.

### **Dealing with allegations against pupils**

If a concern is raised or there is an allegation of a pupil abusing another pupil within the School, the *Child on Child Abuse Policy* guidance will be followed (Annex 2).

## **ROLES AND RESPONSIBILITIES WITHIN FARNBOROUGH HILL**

### **Staff responsibilities**

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

- Have an awareness of safeguarding issues that can put children at risk of harm. This includes a range of signs and indicators of the different types of abuse, including child on child abuse and sexual harassment.
- Establish and maintain an environment where children feel secure, are encouraged to talk and are listened to, and work to build trusted relationships with the pupils which facilitate communication.
- Ensure children know that there are adults in the School who they can approach if they are worried or have concerns.
- Recognise that that children may not feel ready or know how to tell someone that they are being abused, exploited, or neglected, and/or they may not recognise their experiences as harmful. This could be due to their vulnerability, disability and/or sexual orientation or language barriers.
- Plan opportunities within the curriculum for children to develop the skills they need to assess and manage risk appropriately and keep themselves safe.

- Attend training in order to be aware of and alert to the signs of abuse.
- Maintain an attitude of ‘it could happen here’ and a ‘professional curiosity’ approach with regards to safeguarding.
- Be aware that mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation.
- Recognise that abuse, neglect or other adverse childhood experiences, can have an impact on the mental health, behaviour and education of children.
- Always reassure pupils that any concerns or allegations will be taken seriously and that all steps will be taken to ensure they will be supported and kept safe. A pupil should never be given the impression that they are creating a problem by reporting abuse, sexual harassment or sexual violence, or feel ashamed for making a report.
- Record their concerns if they are worried that a child is being abused and report these to the DSL as soon as practical that day. If the DSL is not contactable immediately the Deputy DSL should be informed.
- Be prepared to refer directly to Children’s Social Care, and the police if appropriate, if there is a risk of significant harm and the DSL or their Deputy is not available. **Any** member of staff can make a referral.
- Follow the *Allegations Against Staff* procedures (Annex 10) if the disclosure is an allegation against a member of staff.
- Follow the procedures set out by the Hampshire Safeguarding Children Partnership (HSCP) and take account of guidance issued by the DfE.
- Support relevant pupils in line with their child protection plan.
- Help promote educational outcomes for pupils who have experienced, or are experiencing, safeguarding and child protection issues, including those with a social worker, as well as those who have had other adverse childhood experiences and those who require mental health support and. This includes helping to maintain a culture of high aspirations, responding to any challenges that these pupils may face and providing additional adjustments to best support them.
- Treat information with confidentiality but never promise to ‘keep a secret’.
- Notify the DSL or their Deputy of any child on a child protection plan or child in need plan who has unexplained absence.
- Have an understanding of Early Help, and be prepared to identify and support children who may benefit from this intervention.
- Liaise with other agencies that support pupils and provide early help assessment.
- Ensure they know who the DSL and Deputy DSL are and know how to contact them.
- Have an awareness of the *Safeguarding and Child Protection Policy*, the *Behaviour Policy*, the *Staff Code of Conduct*, child on child abuse procedures, the safeguarding response for children who go missing from education and the role of the DSL.
- Challenge any inaction and follow this up with the DSL and children’s social care as appropriate.
- Have an understanding of online safety which, amongst other things, includes an understanding of the expectations, applicable roles and responsibilities in relation to filtering and monitoring.

### Senior Leadership Team responsibilities

- Contribute to inter-agency working in line with the Working Together to Safeguard Children guidance.
- Provide a co-ordinated offer of early help assessment when any additional needs of children are identified.
- Ensure staff are alert to the various factors that can increase the need for early help assessment.
- Working with Children’s Social Care, support their assessment and planning processes including the School’s attendance at conference and core group meetings.
- Carry out tasks delegated by the Governing Body such as training of staff, safer recruitment and maintaining a Single Central Register.
- Provide support and advice on all matters pertaining to safeguarding and child protection to all staff, regardless of their position within the School.



- Treat any information shared by staff or pupils with respect and follow agreed policies and procedures.
- Ensure that allegations or concerns against staff are dealt with in accordance with guidance from the Department for Education (DfE), Hampshire Safeguarding Children Partnership (HSCP) and Hampshire County Council (HCC).
- Determine if a concern about a member of staff is a 'low level concern' or an allegation.

### **Governing Body responsibilities**

- Ensure the School has effective safeguarding policies and procedures including a *Safeguarding and Child Protection Policy*, a *Staff Code of Conduct*, a *Behaviour Policy* and a response to children who go missing from education.
- Ensure HSCP is informed in line with local requirements about the discharge of duties via the annual safeguarding audit.
- Ensure that the School contributes to inter-agency working in line with Working Together to Safeguard Children through effective communication and good co-operation with local agencies.
- Ensure recruitment, selection and induction follows safer recruitment practice, including all appropriate checks.
- Ensure allegations against staff are dealt with by the Headmistress. Allegations against the Headmistress should be dealt with by the Chair of Governors.
- Ensure a member of the Senior Leadership Team is appointed as Designated Safeguarding Lead (DSL) and has this recorded in their job description.
- Ensure staff undergo safeguarding and child protection training (including online safety which, amongst other things, includes an understanding of the expectations, applicable roles and responsibilities in relation to filtering and monitoring) and that this is regularly updated in line with guidance from safeguarding partners.
- Ensure any safeguarding deficiencies or weaknesses are remedied without delay.
- Ensure a nominated governor for safeguarding is identified.
- Ensure that a review of the School's Safeguarding and Child Protection Policy takes place at least annually, including an update and review of the effectiveness of procedures and their implementation. This is overseen by the Safeguarding Governor and Chair of Governors.
- Review the Department for Education's filtering and monitoring standards and support the School to meet these standards.

### **DSL responsibilities** (to be read in conjunction with DSL role description in KCSIE)

**At Farnborough Hill the DSL is Pippa Sexton (Deputy Head – Pastoral). The School has two Deputy DSLs – Mrs Laura Evans-Jones (Assistant Head) and Dr Ian Taylor-Warwick (Assistant Head - Academic).**

In addition to the role of all staff and the Senior Leadership Team, the DSL will:

- Refer cases to Children's Social Care, and the police where appropriate (following NPCC 'When to call the police' guidance), in a timely manner, avoiding any delay that could place the child at more risk.
- Assist the Governing Body in fulfilling their safeguarding responsibilities set out in legislation and statutory guidance.
- Attend appropriate training and demonstrate evidence of continuing professional development to carry out the role.
- Ensure every member of staff knows who the DSL and the Deputy are, have an awareness of the DSL role and know how to contact them.
- Ensure all staff and volunteers understand their responsibilities in being alert to the signs of abuse and referring any concerns about a child to the DSL, and concerns about an adult to the Headmistress.
- Help promote educational outcomes for children who are at greater risk of harm, by sharing information with appropriate staff about the welfare, safeguarding and child protection issues that

these pupils may have. This includes pupils who have experienced or are experiencing abuse, those with a social worker, those who are known to have had other adverse childhood experiences and those who require mental health support.

- In addition to the above, ensure that those staff that need to know, are aware of those children who have experienced, or are experiencing abuse, in order to promote their educational outcomes and provide the appropriate support.
- Ensure whole school training occurs regularly with at least annual updates so that staff and volunteers can fulfil their responsibilities knowledgeably.
- Ensure any members of staff joining the School outside of the agreed training schedule receive induction prior to commencement of their duties.
- Keep clear and comprehensive written records of child protection concerns, discussions and decisions made, and the reasons for those decisions, securely and separately from the main pupil file, and use these records to assess the likelihood of risk. Also keep records related to allegations of bullying in accordance with Independent School Standards Regulations (ISSRs).
- Ensure that safeguarding records are transferred accordingly (separate from pupil files) and in a timely fashion when a pupil transfers school.
- Where new pupils join the School, the DSL will ensure that the Head of Learning Support and other staff are aware of relevant information as required.
- Ensure that where a pupil transfers school and is on a child protection plan or is a child looked after, their information is passed to the new school immediately and that the child's social worker is informed. Consideration should also be given to a transition meeting prior to moving, if the case is complex or on-going.
- Be involved in the embedding of online safety procedures and policies, and to lead on safeguarding issues related to online safety. In addition, to understand the filtering and monitoring systems and processes in place.
- Be aware of local procedures for making Prevent referrals and do so in timely manner if there are concerns about a pupil at the School.
- Be aware of the training opportunities and briefings provided by HSCP to ensure staff are aware of the latest local guidance on safeguarding.
- Develop, implement and review procedures in the School that enable the identification and reporting of all cases, or suspected cases, of abuse.
- Work collaboratively with external agencies so that relevant pupils' needs are considered holistically.
- Meet any other expectations set out for DSLs in *KCSIE 2023*, as laid out in Annex 9 of this policy.

## **FARNBOROUGH HILL CHILD PROTECTION PROCEDURES**

### **Overview**

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

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

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

All staff are aware that some children, such as those with disabilities, special needs, certain medical conditions or language deficit/English as a second language may have more difficulty in communicating concerns or feelings. They may be more likely to communicate concerns with behaviours rather than words. Additionally, staff will question the cause of knocks and bumps in children who have limited mobility which will include children (for example younger siblings) visiting the School site in addition to pupils.

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

1. Make an initial record of the information. This can be a handwritten record (which must be signed and dated) or an initial record on the Recording Form for Staff (Annex 7). All initial records should be given to the DSL.
2. Report it to the DSL immediately.
3. Ask the DSL to consider if there is a requirement for immediate medical intervention. However, urgent medical attention should not be delayed if the DSL is not immediately available (see point 8 below).
4. Make an accurate record (which may be used in any subsequent court proceedings) on CPOMS (or, in the case of staff who may not have access to CPOMS, on the Recording Form for Staff (Annex 7)) as soon as possible and within 24 hours of the occurrence, of all that has happened, including details of:
  - Dates and times of their observations
  - Dates and times of any discussions in which they were involved
  - Any injuries
  - Explanations given by the child/adult
  - What action was taken
  - Any actual words or phrases used by the childAny written records must be signed and dated by the author or the equivalent on electronic based records.
5. In the absence of the DSL or their Deputy, be prepared to refer directly to Children's Social Care (and the police if appropriate) if there is the potential for immediate significant harm.

**Following a report of concerns the DSL must take the following actions:**

**NB: Although Farnborough Hill is located in Hampshire and it therefore follows guidance and procedures laid down by the Hampshire Safeguarding Children Board (HSCP), it in fact has pupils from three counties – Hampshire, Surrey and Berkshire. The actions below are tailored to Hampshire SCP guidelines but the DSL will follow Surrey and Berkshire guidelines in respect of pupils who live outside of Hampshire.** Although their guidelines are similar to Hampshire's, there are slight differences and these will of course be followed. Contact details for Surrey and Berkshire safeguarding partners can be found in Annex 13.

1. Decide whether or not there are sufficient grounds for suspecting significant harm, in which case a referral must be made to Children's Social Care and the police if it is appropriate (using the NPCC's *When to call the police* guidance). The rationale for this decision should be recorded by the DSL.
2. Normally the School should try to discuss any concerns about a child's welfare with the family and where possible to seek their agreement before making a referral to Children's Social Care. However, in accordance with DfE guidance, this should only be done when it will not place the child at increased risk or could impact a police investigation. Where there are doubts or reservations about involving the child's family, the DSL should clarify with Children's Social Care or the police whether the parents should be told about the referral and, if so, when and by whom. This is important in cases where the police may need to conduct a criminal investigation. The child's views should also be taken into account as far as possible.
3. If there are grounds to suspect a child is suffering, or is likely to suffer, significant harm the DSL (or Deputy) must contact Children's Social Care via the Inter-Agency Referral Form (IARF), making a clear statement of:
  - the known facts
  - any suspicions or allegations
  - whether or not there has been any contact with the child's familyIf there is an indication that the child is suffering significant harm, a call will also be made to the Children's Reception Team (CRT) on 01329 225379.
4. If a child is in immediate danger and urgent protective action is required, the police must be called. The DSL must also notify Children's Social Care of the occurrence and what action has been taken.
5. When a pupil needs *urgent* medical attention and there is suspicion of parental abuse causing the medical need, the DSL or their Deputy should take the pupil to the Accident and Emergency unit at the nearest

hospital (Frimley Park), having first notified Children's Social Care. Advice should be sought from Children's Social Care about informing the parents, remembering that parents should normally be informed that a child requires urgent hospital attention.

6. If there is not a risk of significant harm, the DSL will either actively monitor the situation or consider the early help assessment process, using the HSCP referral threshold document. The DSL will then liaise with external agencies and professionals in an inter-agency assessment, as appropriate. If early help assessment is appropriate, the matter will be kept under review. Consideration will be given to a referral to Children's Social Care if the pupil's situation does not appear to be improving.
7. In cases of allegations against staff or low-level concerns, the procedures detailed in the School's *Allegations against adults who work with children* guidance (Annex 10), HSCP procedure or the School's Low Level Concerns procedures will be followed.

## **The School's arrangements to fulfil other safeguarding responsibilities**

### **Teaching children how to keep safe**

The School ensures that all pupils are taught about safeguarding, including online, through the curriculum and PSHEE to help them to adjust their behaviours in order to reduce risks and build resilience, including to radicalisation. This includes teaching pupils about the safe use of the internet and electronic equipment, such as mobile phones and iPads, as well as the risks posed by adults or young people who use the internet and social media for sexting purposes or to bully, groom, abuse or radicalise other people, especially children and young people.

For further information on keeping children safe online, see Annex 6 (Online Safety).

Pupils receive Relationships and Sex Education (RSE) and are also taught about child on child abuse as part of the PSHEE programme. The School seeks to provide preventative education in the context of a whole-school approach that prepares pupils for life in modern Britain and creates a culture of zero tolerance for sexism, misogyny/misandry, homophobia, biphobic and sexual violence/harassment. The School has a clear set of values and standards as set out in its Mission Statement and codes of conduct, upheld and demonstrated throughout all aspects of school life. These will be underpinned by the School's *Behaviour Policy* and pastoral support system, as well as by a planned programme of evidence-based RSHE delivered in regularly timetabled lessons and reinforced throughout the whole curriculum. RSE helps to form and inform pupils for the opportunities, responsibilities and experiences of adult personal relationships. The RSE curriculum provides a well-balanced, comprehensive programme which promotes the spiritual, moral, social, cultural and physical development of pupils at the School and of society, and prepares such pupils for opportunities, responsibilities and experiences of adult life. It is designed to introduce topics at appropriate developmental points, in an age-appropriate way, in order to be sensitive to the needs of the individual pupil, recognising the mix of pupils with different sexual orientations, genders and faith and family backgrounds.

Any issues of a safeguarding and child protection nature raised during RSE are referred in the first instance to the DSL. If the DSL is unavailable then referrals are made to the DDSLs or to the Headmistress. Additionally, the School Nurse is always available for pupils to discuss issues pertaining to safeguarding matters and, depending on the nature of the issue, it may sometimes be appropriate to advise pupils to seek advice and support from them.

### **Children with a social worker**

When informed by the Local Authority or when otherwise made aware that a pupil has a social worker, the DSL and other relevant staff will ensure that she is provided with enhanced support as appropriate. This support will seek to put in place protective factors against vulnerability to further harm, such as difficulties with attendance, learning, behaviour and mental health, and promote well-being. The DSL will ensure that staff are aware of any pupils with a social worker, understand their academic progress and maintain a culture of high aspirations for them. This is also relevant to any pupils who have had a social worker in the past. In addition, teaching staff will be supported to identify the challenges that these pupils may face and the additional academic support and adjustments that they could make to best support them. The School recognises that even when statutory social care intervention has ended, there can still be a lasting impact on children's

educational outcomes, and will make every effort to provide appropriate enhanced support for them throughout their time at the School.

### **Looked after children**

The School ensures that staff have the skills, knowledge and understanding necessary to keep safe any children on roll who are looked after by a local authority.

The DSL, Pippa Sexton, is the designated member of staff who has responsibility for the welfare and progress of any looked after children who may join the School. The School ensures that she receives appropriate training in order to carry out her role.

As the designated member of staff, the DSL will assess with the Headmistress how any funding such as pupil premium plus can be best used to support the progress of looked after children in the School and meet the needs identified in the child's personal education plan. The DSL will also seek every opportunity to promote the educational achievement of previously looked after children.

### **Children who are absent from education**

Children being absent from education for prolonged periods and/or on repeat occasions can act as a vital warning sign to a range of safeguarding issues including neglect, child sexual and child criminal exploitation - particularly county lines. The School's response to persistently absent pupils and children missing education supports identifying such abuse, and in the case of absent pupils, helps prevent the risk of them becoming a child missing education in the future. This includes when problems are first emerging. It also includes situations where children are already known to local authority children's social care and need a social worker (such as a pupil who is a child in need, has a child protection plan or is a looked after child). In this instance being absent from education may increase known safeguarding risks within the family or in the community. Where necessary, the School refers to further information and support from government guidance contained within *Working Together to Improve School Attendance*, *Children Missing Education* and their *Missing Children and Adults Strategy*.

### **Elective Home Education (EHE)**

The School recognises that many home educated children have an overwhelmingly positive learning experience and expects that any parental decision to home educate will be made with their child's best education at the heart of the decision. However, the School is fully aware that this is not the case for all children, and home education can mean some children are less visible to the services that are there to keep them safe and supported in line with their needs. Therefore, where a parent has expressed their intention to remove a child from the School with a view to educating at home, the School will work with the Local Authority and other key professionals to co-ordinate a meeting the parent(s) where possible. Ideally, this will take place before a final decision has been made, to ensure the parent(s) has considered what is in the best interests of each child. This is particularly important where a child has special educational needs or a disability, and/or has a social worker, and/or is otherwise vulnerable. Where a child has an Education, Health and Care plan the School will check that the Local Authority reviews the plan, working closely with parents and carers.

Department for Education guidance for local authorities on EHE sets out the role and responsibilities of local authorities and their powers to engage with parents in relation to EHE. Although this is primarily aimed at local authorities, the School is also familiar with this guidance.

The School informs the Local Authority of any deletions from its admissions register when a pupil is taken off roll.

### **Arrangements for Visiting Speakers**

The School has clear protocols for ensuring that any visiting speakers are suitable and appropriately supervised. The School's responsibility to pupils is to ensure that they can critically assess the information

they receive as to its value to themselves, and that the information is aligned to the ethos and values of the School and British values. See *Visiting Speakers Policy* for more detail.

### **Use of the School premises for non-school activities**

The School will ensure that appropriate arrangements are in place to keep children safe when it rents out its facilities to organisations or individuals. The School will seek assurance that the body concerned has appropriate safeguarding and child protection policies and procedures in place (including inspecting these as needed). It will also ensure that there are arrangements in place to liaise with the School on these matters where appropriate. This applies regardless of whether or not the children who attend any of these services or activities attend the School or are on-roll. In addition, the School will also ensure safeguarding requirements are included in any transfer of control agreement (ie lease or hire agreement), as a condition of use and occupation of the premises, and that failure to comply with this would lead to termination of the agreement.

### **Annual review**

As a school, we review this policy annually in line with DfE KCSIE guidance, HSCP and HCC requirements and other relevant statutory guidance.

**This policy is reviewed annually by the Deputy Head - Pastoral and Headmistress. This review is overseen by the Safeguarding Governor and Chair of Governors.**

**The next review is due in September 2024.**

## **ANNEX I: Indicators of early help assessment need and definitions and indicators of child abuse**

All staff should have an awareness of safeguarding issues that can put children at risk of harm. This includes signs such as, but not limited to, drug taking, alcohol misuse, deliberately missing education and consensual and non-consensual sharing of nudes and semi-nude images and/or videos. The information contained within this annex gives a comprehensive but not exhaustive overview of the indicators staff should be aware of. All staff should be aware that children may not feel ready or know how to tell someone that they are being abused, exploited, or neglected, and/or they may not recognise their experiences as harmful. For example, children may feel embarrassed, humiliated, or being threatened. This could be due to their vulnerability, disability and/or sexual orientation or language barriers. This should not prevent staff from having a professional curiosity and speaking to the DSL if they have concerns about a child.

### **Early help**

Any child may benefit from early help assessment, but all staff should be particularly alert to the potential need for early help for a child who:

- is disabled and has specific additional needs
- has special educational needs (whether or not they have a statutory education, health and care plan)
- is showing early signs of abuse and/or neglect
- is in a family circumstance presenting challenges for the child, such as adult mental health problems, domestic abuse or substance abuse
- is showing signs of being drawn in to anti-social or criminal behaviour, including gang involvement and association with organised crime groups
- is misusing drugs or alcohol
- is frequently missing/goes missing from home or care
- is at risk of exploitation, modern slavery or trafficking
- is a young carer
- is a privately fostered child.
- has returned home to their family from care
- is at risk of being radicalised or exploited

### **Definitions and indicators of child abuse**

The following definitions are taken from 'Working Together to Safeguard Children' (2022) and 'Keeping Children Safe in Education' (2023). To support the local context, all staff have access to the Hampshire Safeguarding Children Partnership (HSCP) threshold chart.

### **What is abuse and neglect?**

Abuse and neglect are forms of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm, or by failing to act to prevent harm. Children may be abused in a family or in an institutional or community setting, by those known to them or, more rarely, by others. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Children may be abused by an adult or adults, or another child or children.

### **Neglect**

Neglect is the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to:

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

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

The **HSCP Neglect Strategy** is used to provide a more detailed summary of neglect and the local thresholds for referrals.

### **Emotional abuse**

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

### **Physical abuse**

Physical abuse may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating, or otherwise causing physical harm to a child. This includes honour-based abuse (HBA) such as female genital mutilation (FGM) (see additional paragraph below). Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child.

### **Domestic abuse**

Domestic violence and abuse is defined as any incident or pattern of incidents of controlling, coercive, threatening behaviour, violence or abuse between those aged 16 or over who are, or have been, intimate partners or family members regardless of gender or sexuality. This can encompass, but is not limited to, psychological, physical, sexual, financial and emotional abuse. Children can be victims of domestic abuse. 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 detrimental and long-term impact on their health, well-being, development and ability to learn. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result.

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. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others.

Young people can also experience domestic abuse within their own intimate relationships. This form of child on child abuse is sometimes referred to as 'teenage relationship abuse'. Depending on the age of the young people, this may not be recognised in law under the statutory definition of 'domestic abuse' (if one or both parties are under 16). However, as with any child under 18, where there are concerns about safety or welfare, the School's child safeguarding procedures will be followed and both young victims and young perpetrators will be offered support.

### **Sexual abuse**

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

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

Both CSE and CCE are forms of abuse that occur where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or young person under the age of 18 into sexual activity



(a) in exchange for something the victim needs or wants, and/or (b) for the financial advantage or increased status of the perpetrator or facilitator and/or (c) through violence or the threat of violence. This power imbalance is most obviously age-based, but can also be due to a range of other factors including gender, sexual identity, cognitive ability, physical strength, status and access to economic or other resources. The abuse can be perpetrated by individuals or groups, males or females, and children or adults. Victims may be exploited by other children who themselves may be experiencing exploitation. Where this is the case, the child perpetrator should also be recognised as a victim. The abuse can be a one-off occurrence or a series of incidents over time, and range from opportunistic to complex organised abuse. It can include children who have been moved (trafficked) for the purpose of exploitation. The victim may have been exploited even if the sexual/criminal activity appears consensual.

### **Child sexual exploitation (CSE)**

CSE is a form of child sexual abuse. Sexual abuse may involve physical contact, including assault by penetration (for example, rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing, and touching outside clothing. It may include non-contact activities, such as involving children in the production of sexual images, forcing children to look at sexual images or watch sexual activities, encouraging children to behave in sexually inappropriate ways or grooming a child in preparation for abuse including via the internet. CSE can occur over time or be a one-off occurrence, and may happen without the child's immediate knowledge, for example through others sharing videos or images of them on social media. CSE can affect any child who has been coerced into engaging in sexual activities. This includes 16 and 17 year olds who can legally consent to have sex. Some children may not realise they are being exploited e.g. they believe they are in a genuine romantic relationship.

### **Child criminal exploitation (CCE) and serious violence**

Examples of child criminal exploitation include involvement with serious violent crime, often through criminal networks or gangs, as well as county lines activities. County lines is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs (primarily crack cocaine and heroin) into one or more importing areas within the UK, using dedicated mobile phone lines or other form of 'deal line'. They are likely to exploit children and vulnerable adults to move and store the drugs and money, and they will often use coercion, intimidation, violence (including sexual violence) and weapons. Children can be targeted and recruited into county lines in a number of locations including schools, further and higher educational institutions, pupil referral units, special educational needs schools, children's homes and care homes. Children are often recruited to move drugs and money between locations and are known to be exposed to techniques such as 'plugging', where drugs are concealed internally to avoid detection. Children can easily become trapped by this 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.

Other specific forms of CCE can include children being forced or manipulated into working in cannabis factories, shoplifting or pickpocketing. They can also be forced or manipulated into committing vehicle crime or threatening/committing serious violence to others. Children can become trapped by this type of exploitation as perpetrators can threaten victims (and their families) with violence, or entrap and coerce them into debt. They may be coerced into carrying weapons such as knives or begin to carry a knife for a sense of protection from harm from others. As children involved in criminal exploitation often commit crimes themselves, their vulnerability as victims is not always recognised by adults and professionals, (particularly older children), and they are not treated as victims despite the harm they have experienced. They may still have been criminally exploited even if the activity appears to be something they have agreed or consented to. The experience of girls who are criminally exploited can be very different to that of boys and the indicators may not be the same. Girls (and boys) who are being criminally exploited may be at higher risk of sexual exploitation.

There are a range of risk factors which increase the likelihood of involvement in serious violence, such as being male, having been frequently absent or permanently excluded from school, having experienced child maltreatment and having been involved in offending, such as theft or robbery. Whilst some of these risk factors are not applicable at the school, staff should continue to maintain an attitude of 'it could happen here' and remain vigilant to any signs that would indicate a pupil was at risk.

## **Honour based abuse**

So-called 'honour based' abuse (HBA) encompasses crimes which have been committed to protect or defend the honour of the family and/or the community, including female genital mutilation, forced marriage and practices such as breast ironing. Abuse committed in the context of preserving 'honour' often involves a wider network of family or community pressure and can include multiple perpetrators. All forms of HBA are abuse (regardless of the motivation) and the School will handle and escalate them as such. If in any doubt staff should speak to the DSL. If a concern is raised regarding a child that might be at risk of HBA the School will activate local safeguarding procedures, using existing national and local protocols for multi-agency liaison with the police and Children's Services. Any suspected, evidenced or disclosed cases of FGM will be reported to the police and/or Children's Services. There is a mandatory reporting duty placed on individual teachers to personally report to the police where they discover that FGM appears to have been carried out on a girl under 18. If a teacher does have a concern regarding a child that might be at risk of HBA, or who has suffered from HBA, they should speak to the Designated Safeguarding Lead, her Deputy or the Headmistress. They will then contact the police together. In the unlikely event that this is not possible, the teacher should contact the police themselves without delay.

## **Radicalisation and extremism**

Radicalisation refers to the process by which a person comes to support forms of extremism and terrorism. Extremism goes beyond terrorism and includes people who target the vulnerable – including the young – by seeking to sow division between communities on the basis of race, faith or denomination; justify discrimination towards women and girls; persuade others that minorities are inferior; or argue against the primacy of democracy and the rule of law in our society. Extremism is defined in the Counter Extremism Strategy 2015 as the vocal or active opposition to our fundamental values, including the rule of law, individual liberty and the mutual respect and tolerance of different faiths and beliefs. Calls for the death of members of our armed forces are also regarded as extremist. Terrorism is 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 or threat is designed to influence the government or to intimidate the public and is made for the purpose of advancing a political, religious or ideological cause.

The School has due regard to the need to assess the risk of and prevent pupils from being drawn into terrorism (the Prevent duty 2015). Although only small numbers of people radicalise it should be recognised that pupils from a diverse range of ethnic, national, political and religious groups may be targeted or influenced to participate in radicalism or extremism, both by adults and other young people. Background factors combined with specific influences such as family and friends may contribute to a child's vulnerability. The School recognises that radicalisation can occur both in person and via the internet. Such incidents will be referred to local children's social care as a child protection concern. If staff have concerns that there is an immediate/significant risk of a child being drawn into terrorism they must call 999.

## **Modern Slavery**

Modern slavery encompasses human trafficking and slavery, servitude and forced or compulsory labour. Exploitation can take many forms, including sexual exploitation, forced labour, slavery, servitude, forced criminality and the removal of organs. If the School has any concerns the DSL will follow advice contained in the government's Modern Slavery Statutory Guidance, and will use the National Referral Mechanism to report their concerns.

## **Cybercrime**

Cybercrime is criminal activity committed using computers and/or the internet. It is broadly categorised as either 'cyber-enabled' (crimes that can happen off-line but are enabled at scale and at speed on-line) or 'cyber dependent' (crimes that can be committed only by using a computer). Cyber-dependent crimes include:

- unauthorised access to computers (illegal 'hacking'), for example accessing a school's computer network to look for test paper answers or change grades awarded
- denial of Service (Dos or DDoS) attacks or 'booting'. These are attempts to make a computer, network or website unavailable by overwhelming it with internet traffic from multiple sources
- making, supplying or obtaining malware (malicious software) such as viruses, spyware, ransomware, botnets and Remote Access Trojans with the intent to commit further offence, including those above.

Children with particular skill and interest in computing and technology may inadvertently or deliberately stray into cyber-dependent crime. If there are concerns about a child in this area, the DSL will consider referring into the Cyber Choices programme (a nationwide police programme supported by the Home Office and led by the National Crime Agency, which aims to intervene where 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). As Cyber Choices does not currently cover 'cyber-enabled' crime such as fraud, purchasing of illegal drugs on-line and child sexual abuse and exploitation, or other areas of concern such as on-line bullying or general on-line safety, then existing safeguarding procedures will be, including referrals to Children's Social Care and/or the police.

## **Indicators of abuse**

### **Neglect**

#### **The nature of neglect**

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

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

#### **Neglect can include parents or carers failing to:**

- provide adequate food, clothing and shelter
- protect a child from physical and emotional harm or danger
- ensure adequate supervision or stimulation
- ensure access to appropriate medical care or treatment.

#### **NSPCC research has highlighted the following examples of the neglect of children under 12:**

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

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

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

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

#### **Indicators of neglect**

The following is a summary of some of the indicators that may suggest a child is being abused or is at risk of harm. It is important to recognise that indicators alone cannot confirm whether a child is being abused. Each child should be seen in the context of their family and wider community and a proper assessment carried out by appropriate persons. What is important to keep in mind is that if you feel unsure or concerned, do

something about it. Don't keep it to yourself. The **HSCP Neglect Strategy** provides a more detailed list of indicators of neglect and is available to all staff.

### **Physical indicators of neglect**

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

### **Behavioural indicators of neglect**

- Constant tiredness
- Frequent absence from school or lateness
- Missing medical appointments
- Isolated among peers
- Frequently unsupervised
- Stealing or scavenging, especially food
- Destructive tendencies

## **Emotional abuse**

### **The nature of emotional abuse**

Most harm is produced in low warmth, high criticism homes, not from single incidents. Emotional abuse is difficult to define, identify/recognise and/or prove. It is chronic and cumulative and has a long-term impact. All kinds of abuse and neglect have emotional effects although emotional abuse can occur by itself. Children can be harmed by witnessing someone harming another person, for example in domestic violence.

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

### **Indicators of emotional abuse**

#### **Developmental issues**

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

#### **Behaviour**

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

## **Social issues**

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

## **Emotional responses**

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

## **Domestic violence and abuse**

### **Indicators that a child has witnessed domestic abuse**

- Aggression or bullying
- Anti-social behaviour, eg vandalism
- Anxiety, depression or suicidal thoughts
- Attention seeking
- Bed wetting, nightmares or insomnia
- Constant or regular sickness, such as colds, headaches and mouth ulcers
- Drug or alcohol use
- Eating disorders
- Difficulties at school or challenges with learning
- Difficulty managing emotions, particularly anger
- Withdrawal

Hampshire, Surrey and Berkshire police forces are part of Operation Encompass, which helps police and schools work together to provide emotional and practical help to children. The system ensures that when police are called to an incident of domestic abuse, where there are children in the household who have experienced the domestic incident, the police will inform the DSL before the pupil arrives at school the following day. This ensures that the School has up to date relevant information about the child’s circumstances and can enable support to be given to the child as appropriate.

Advice can be sought from the charity Refuge, which runs the National Domestic Abuse Helpline which can be called free of charge and in confidence, 24 hours a day on 0808 2000 247. Its website provides guidance and support for potential victims, as well as those who are worried about friends and loved ones. The NSPCC provides additional advice on identifying children who are affected by domestic abuse and how they can be helped.

## **Physical abuse**

### **The nature of physical abuse**

Most children collect cuts and bruises quite routinely as part of the rough and tumble of daily life. Clearly, it is not necessary to be concerned about most of these minor injuries. However accidental injuries normally occur on the bony prominences, eg shins. Injuries on the soft areas of the body are more likely to be inflicted intentionally and should therefore make us more alert to other concerning factors that may be present.

A body (skin) map (Annex 8) can assist in the clear recording and reporting of physical abuse. The body map should only be used to record observed injuries and no child should be asked to remove clothing by a member of staff of the School.

### **Indicators of physical abuse / factors that should increase concern**

- Multiple bruising or bruises and scratches (especially on the Head and face)
- Clusters of bruises, eg fingertip bruising (caused by being grasped)
- Bruises around the neck and behind the ears – the most common abusive injuries are to the head
- Bruises on the back, chest, buttocks, or on the inside of the thighs
- Marks indicating injury by an instrument, eg linear bruising (stick), parallel bruising (belt), marks of a buckle
- Bite marks
- Deliberate burning may also be indicated by the pattern of an instrument or object, eg electric fire, cooker, cigarette
- Scalds with upward splash marks or tide marks
- Untreated injuries
- Recurrent injuries or burns
- Bald patches

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

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

### **You should be concerned if the child or young person:**

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

## **Sexual abuse**

### **The nature of sexual abuse**

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

Sexual exploitation is seen as a separate category of sexual abuse. Indicators of CSE can be found in the next section.

### **Characteristics of child sexual abuse:**

- it is often planned and systematic – people do not sexually abuse children by accident, although sexual abuse can be opportunistic
- grooming the child – people who abuse children take care to choose a vulnerable child and often spend time making them dependent

- grooming the child's environment – abusers try to ensure that potential adult protectors (parents and other carers especially) are not suspicious of their motives

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

## Indicators of sexual abuse

### Physical observations

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

### Behavioural observations

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

## Child sexual exploitation (CSE)

### Indicators of child sexual exploitation / factors that should increase concern:

- Acquisition of money, clothes, mobile phones etc without plausible explanation
- Gang-association and/or isolation from peers/social networks
- Exclusion or unexplained absences from school
- Leaving home/care without explanation and persistently going missing or returning late
- Excessive receipt of texts/phone calls
- Returning home under the influence of drugs/alcohol
- Inappropriate sexualised behaviour for age/sexually transmitted infections/pregnancy
- Evidence of/suspicions of physical or sexual assault
- Relationships (both friendships and romantic/sexual relationships) with controlling or significantly older individuals or groups
- Associate with other children involved in exploitation
- Multiple callers (unknown adults or peers)
- Frequenting areas known for sex work

- Concerning use of internet or other social media
- Increasing secretiveness around behaviours
- Self-harm or significant changes in emotional well-being.

Additional lists of signs and symptoms are available in literature provided during staff training, in other publications such as *'What to Do if You're Worried a Child is Being Abused – Advice for Practitioners'* (2015) and on the NSPCC website (NSPCC.org.uk). Any concerns, however minor, will in all instances be raised with the DSL, who will always take them seriously.

### **Child criminal exploitation (CCE) and serious violence**

#### **Indicators of child criminal exploitation or involvement in serious violence / factors that should increase concern:**

- Increased absence from school and/or going missing from home
- Change in friendships or relationships with older individuals or groups
- Associate with other children involved in exploitation
- Significant decline in performance
- Signs of self-harm or a significant change in well-being
- Signs of assault or unexplained injuries
- Unexplained gifts or new possessions

### **Forced marriage**

#### **Indicators of forced marriage / factors that should increase concern:**

- Pupil showing stress before forthcoming school holidays
- Requests for extended absence from school, particularly if pupil reports a planned long holiday to her family's home country
- Failure to return from visits to family's home country
- Absence and persistent absence
- Decline in behaviour, engagement, performance or punctuality
- Pupil becoming isolated from friends
- Pupil not allowed to attend extra-curricular activities
- Poor test or examination results
- Serious well-being concerns such as self-harm, suicidal thoughts or attempted suicide, eating disorders, depression or substance misuse
- Pupil going missing or running away from home
- Surveillance by siblings
- Being withdrawn from school by those with parental responsibility and not being provided with suitable alternative education elsewhere or at home
- Pupil prevented from going on to further/higher education
- Sudden announcement of engagement to a stranger
- Early/unwanted pregnancy
- Female genital mutilation
- Family history such as early marriage of, or serious well-being concerns about siblings, unreasonable restrictions placed on pupil by parents and family disputes

Forcing a person into a marriage is a crime in England and Wales. In addition, since February 2023 it has also been a crime to carry out any conduct whose purpose is to cause a child to marry before their eighteenth birthday, even if violence, threats or another form of coercion are not used. As with the existing forced marriage law, this applies to non-binding, unofficial 'marriages' as well as legal marriages. Staff will support pupils in expressing any concerns they may have about this issue. They will be particularly vigilant to any signs that may indicate that a pupil is at risk of forced marriage. Any concerns will be brought to the attention of the DSL at the earliest opportunity.



## **Radicalisation and extremism – the Prevent duty**

Prevent is the name given to a national strategy which aims to stop people from becoming violent extremists or supporting terrorism. Channel is a voluntary, confidential support programme that supports people at risk of being drawn towards terrorism or violent extremism. Prevent aims to deal with all forms of extremism, including Far Right racist extremism, animal rights extremism and religious extremism. 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.

### **Indicators of radicalisation / factors that should increase concern:**

- Notable changes in appearance, behaviour or mood
- Expression of more extreme political or radical views
- Pupil supporting, or appearing to be increasingly sympathetic to, radical and terrorist acts
- Changes in friendships and/or increasing isolation from existing friends and peers
- Pupil spending increasing amounts of time on their own or online

As with all safeguarding and child protection concerns, staff will be particularly vigilant to any signs that may indicate that a pupil is at risk. Any concerns will be brought to the attention of the DSL at the earliest opportunity. Staff will support all pupils in expressing any concerns they may have about their own circumstances or regarding another pupil.

### **Special educational needs and/or disabilities (SEND)**

Pupils with SEND may not outwardly shown signs of abuse and/or may have difficulties in communication about abuse or neglect. They may not feel ready or know how to tell someone that they are being abused, exploited, or neglected, and/or they may not recognise their experiences as harmful. They may also be more prone to peer group isolation than other children.

These signs can include:

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

Staff will support such pupils in expressing any concerns they may have. They will be particularly vigilant to any signs or indicators of abuse, discussing this with the DSL as appropriate. In addition, staff will consider extra pastoral support for those children, where appropriate.

### **Lesbian, gay, bi or trans (LGBT)**

The fact that a child or a young person may be LGBT is not in itself an inherent risk factor for harm. Children who are LGBT can be targeted by their peers. In some cases, a pupil who is perceived by their peers to be LGBT (whether they are or not) can be just as vulnerable as children who identify as LGBT. Risks can be compounded where children who are LGBT lack a trusted adult with whom they can be open. The School takes its responsibility for safeguarding the well-being of LGBT young people very seriously and works hard to reduce the additional barriers faced and provide a safe space for them to speak out or share their concerns with members of staff. LGBT inclusion is part of the School's Relationship and Sex Education curriculum within PSHEE and it has a robust response to any homophobic, biphobic and transphobic mistreatment, bullying or abuse.

### **Children who are missing or absent from education**

If a child goes missing from education, or is absent on repeat occasions (persistent absence) this is a potential indicator of abuse or neglect, or other safeguarding concerns such as radicalisation, child sexual and/or criminal exploitation (particularly county lines) or modern slavery (see *Missing Pupil Policy*).

## **ANNEX 2: Child on child abuse, including sexual harassment and sexual violence between children in the School**

### **Child on Child Abuse Policy**

This policy should be read in conjunction with the:

- Keeping Children Safe in Education guidance
- Anti-Bullying Policy
- Technology Acceptable Use Policy
- Behaviour Policy

#### **Context**

Child on child abuse (also referred to as peer on peer abuse) is any form of physical, sexual, emotional and financial abuse, and coercive control, exercised between children and within children's relationships (both intimate and non-intimate). It can take different forms, such as:

- Bullying (including cyberbullying, prejudice-based and discriminatory bullying).
- Abuse in intimate personal relationships between peers.
- Sexual harassment and sexual violence, including sexual comments, remarks, jokes and online sexual harassment, which may be standalone or part of a broader pattern of abuse.
- Physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (this may include an online element which facilitates, threatens and/or encourages sexual violence).
- Causing someone to engage in sexual activity without their 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 nudes and semi nudes images or videos (also known as sexting or youth produced sexual imagery).
- Upskirting (which is now a criminal offence under the Voyeurism Act 2019) which typically involves taking a picture under a person's clothing (not necessarily a skirt) without their permission and/or knowledge, 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. It is a criminal offence. Anyone of any gender can be a victim.
- Initiation/hazing type violence and rituals (including activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element).

Child on child abuse can take place in person or online, both inside and outside of school. It may be standalone or part of wider abuse. The School also recognises that even if there are no reported cases of child on child abuse, such abuse may still be taking place but not being reported. Although it is more likely that girls will be victims and boys the perpetrators, all child on child abuse is unacceptable and will be taken very seriously.

**Any concerns regarding child on child abuse, however small, must be reported to the DSL.**

#### **Policy**

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

We recognise that children are capable of abusing their peers; this will be dealt with under our *Safeguarding and Child Protection Policy* and in line with *KCSIE (2023)*.

The School has a zero tolerance approach to child on child abuse. We are clear that all forms of child on child abuse, including sexual violence and sexual harassment, are not acceptable, will never be tolerated and are not an inevitable part of growing up. Abusive comments and interactions will never be passed off, downplayed or dismissed as 'banter'. Nor will harmful sexual behaviours be dismissed as the same or 'just having a laugh', 'part of growing up' or 'boys being boys'/'girls being girls', as this could lead to a culture of

unacceptable behaviours and unsafe environments. All staff have an equal responsibility to challenge any abusive or concerning behaviours, however minor.

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

### **Prevention:**

- Taking a whole school approach to safeguarding and child protection.
- Providing training to staff.
- Providing a clear set of values and standards, underpinned by the School's Mission Statement, *Behaviour Policy* and pastoral support system, and by a planned programme of evidence-based content delivered through the curriculum, including through the teaching of RSE.
- Engaging with specialist support and interventions.

### **Sexual harassment and sexual violence**

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

Children who are victims of sexual harassment and sexual violence will likely find the experience stressful and distressing. This will, in all likelihood, adversely affect their educational attainment as well as their emotional well-being. Sexual violence and sexual harassment exist on a continuum and may overlap; they can occur online and offline (both physically and verbally) and are never acceptable. It is important that all victims are taken seriously and offered appropriate support.

Systems are in place at the School to enable pupils to report sexual harassment, sexual violence and other forms of child on child abuse. All pupils are made aware and regularly reminded that they can talk to any member of staff about concerns, or directly with the DSL. In addition, they are able to express their views and give feedback to the DSL, Heads of Year or, where appropriate, the School Council.

Whilst systems are in place to enable pupils to report any form of abuse to the School, we recognise that some children will not feel able to do this. If staff have any concerns about a child's welfare (such as changes in behaviour, other signs, a report from a friend or an overheard conversation that suggests a child has been harmed) they will act on them without delay, rather than waiting to be told or to receive a formal allegation.

Reports of sexual harassment and sexual violence can be extremely complex to manage. Pre-planning, training and effective systems and policies are in place to ensure a calm, considered and appropriate response to any reports, that also encourages the confidence of future victims of sexual harassment or violence to come forward too. The School will make every effort to protect victims, offer appropriate support and ensure their education is not disrupted. The School will also support and protect other children, older pupils and School staff as appropriate.

Addressing any inappropriate behaviour (even if it appears to be relatively innocuous) can be an important intervention that helps prevent problematic, abusive and/or violent behaviour in the future.

### **Responding to reports of child on child abuse, including sexual harassment and sexual violence:**

- Children making a report of child on child abuse, including sexual harassment or sexual violence, will be taken seriously, regardless of how long it has taken them to come forward, kept safe and be well supported by a range of pastoral staff at the School. Abuse that occurs online or outside of the school or college will be treated equally seriously and never downplayed.
- A pupil will never be given the impression that they are creating a problem by reporting abuse, sexual harassment or sexual violence, or made to feel ashamed for making a report.
- Staff understand that their initial response to a report from a child is incredibly important and can encourage or undermine the confidence of victims of child on child abuse, in particular sexual harassment or sexual violence, to report or to come forward in the future.

- Where reference is made to the law, staff will sensitively explain to a child that the law is in place to protect children and young people rather than criminalise them. As far as is possible, this will be explained in such a way that avoids alarming or distressing them.
- If the report includes an online element staff will be mindful of the *Searching, Screening and Confiscation: advice for schools* (DfE 2023) guidance.
- Staff receiving the report will inform the DSL or their Deputies as soon as practicably possible but at least within 24 hours.
- Although pupils' privacy will be fully respected, staff receiving a report will never promise confidentiality.
- Parents or carers will normally be informed (unless this would put the child at greater risk).
- If a child is at risk of harm, is in immediate danger, or has been harmed, a referral will be made to Children's Social Care.

### **Risk Assessment:**

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

The risk assessment will consider;

- The victim, especially their protection and support.
- The alleged perpetrator, their support needs and any disciplinary action.
- All other children at the School.
- The victim and the alleged perpetrator sharing classes and space at school.

The risk assessment will be recorded and kept under review.

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

### **Action: The DSL will consider:**

- The wishes of the victim.
- The nature of the incident including whether a crime has been committed and the harm caused.
- The ages of the children/young people involved.
- The developmental stages of the children/young people.
- Any power imbalance between the children/young people.
- Any previous incidents.
- Any ongoing risks.
- Any familial harms and any necessary support for siblings following incidents.
- Other related issues or the wider context.

### **Options: The DSL will manage the report with the following options:**

- Manage internally.
- Engage with Early Help .
- Refer to Children's Social Care.
- Report to the police (generally in parallel with a referral to Children's Social Care) .

### **Ongoing Response:**

- All concerns, discussions and decisions made, and the reasons for those decisions, will be recorded in writing and stored in the pupil's confidential safeguarding file. This will include a clear and comprehensive summary of the concern, details of how the concern was followed up and resolved, and a note of any action taken, the decisions reached and the outcome. Records will be reviewed so that potential patterns of concerning, problematic or inappropriate behaviour can be identified and addressed.
- The DSL will manage each report on a case-by-case basis and will keep the risk assessment under review.

- Where there is a criminal investigation into rape, assault by penetration or sexual assault, the alleged perpetrator should be removed from any classes/coaches they share with the victim during the investigation.
- The DSL will consider how best to keep the victim and perpetrator a reasonable distance apart on school premises and on transport where appropriate.
- Where a criminal investigation into a rape or assault by penetration leads to a conviction or caution, the School will take suitable action. In all but the most exceptional of circumstances, the rape or assault is likely to constitute a serious breach of discipline and lead to the view that allowing the perpetrator to remain in the same school would seriously harm the education or welfare of the victim (and potentially other pupils and students).
- Where a criminal investigation into sexual assault leads to a conviction or caution, the School will, if it has not already, consider any suitable sanctions in light of the *Behaviour Policy*, including consideration of permanent exclusion. In nearly all cases it is highly likely that permanent exclusion would be the expected outcome. Where the perpetrator is going to remain at the School, the principle of keeping the victim and perpetrator in separate classes where possible would be maintained and continued. Consideration would be given to the most appropriate way to manage potential contact on the School site and transport. The nature of the conviction or caution and the wishes of the victim will be especially important in determining how to proceed in such cases.
- The victim, alleged perpetrator and other witnesses (children and adults) will receive appropriate support and safeguards on a case by case basis.
- When ongoing support is required by the victim, the victim will be asked whether they would find it helpful to have a designated trusted adult with which to talk about their needs. The choice of any such adult will be made by the victim (as far as possible) and this choice will be supported.
- The School will take any disciplinary action against the alleged perpetrator in line with the *Behaviour Policy*.
- The School recognises that taking disciplinary action and providing appropriate support are not mutually exclusive actions and will occur at the same time if necessary.

#### **Review:**

- Decisions and actions will be regularly reviewed and relevant policies will be updated to reflect lessons learnt.
- Potential patterns of concerning, problematic or inappropriate behaviour will be looked for. Where a pattern is identified, the School will decide on a course of action to respond to this concern. Consideration will be given to whether there are wider cultural issues within the School that enabled the inappropriate behaviour to occur and where appropriate extra teaching time and/or staff training could be delivered to minimise the risk of it happening again.

#### **Unsubstantiated, unfounded, false or malicious reports**

- If a report is determined to be unsubstantiated, unfounded, false or malicious, the DSL will consider whether the child and/or the person who has made the allegation is in need of help, or may have been abused by someone else and this is a cry for help. In such circumstances, a referral to Children's Social Care may be appropriate.
- If a report is shown to be deliberately invented or malicious, the School will consider whether any disciplinary action is appropriate against the individual who made it in line with the *Behaviour Policy*.

#### **Consensual and non-consensual sharing of nude and semi-nude images and videos**

Consensual and non-consensual sharing of nude and semi-nude images and videos is also referred to as youth produced sexual imagery or 'sexting'. This means the sending or posting of nude or semi-nude images, videos or live streams of themselves or others by young people under the age of 18 online. This could be via social media, gaming platforms, chat apps or forums. It could also involve sharing between devices via services like Apple's AirDrop which works offline. The term 'sexting' also includes sending sexually explicit message. This can be done via mobiles or over the Internet.

Whilst non-consensual sharing of nude and semi-nude images is illegal and abusive, consensual image sharing, especially between older children of the same age, may require a different response. It might not be abusive, although pupils still need to know it is illegal.

If an incident involving the sharing of nude or semi-nude images/videos comes to the attention of staff:

- The incident should be referred to the DSL as soon as possible.
- The DSL will hold an initial review meeting with appropriate school staff.
- The DSL will interview the pupil(s) involved, with another member of the pastoral support staff in attendance if appropriate.
- Parents will be informed at an early stage and involved in the process, unless there is good reason to believe that involving them will put the pupil at risk of harm.
- Appropriate actions will be taken to respond to the incident, in accordance with the School's safeguarding procedures and also the Behaviour Policy, where relevant. Support will be provided for the victim. In addition, support will be provided for the perpetrator too, where relevant.
- At any point in the process if there is a concern that a pupil has been harmed or is at risk of harm, a referral will be made to Children's Social Care and/or the police immediately.

The DSL will make an immediate referral to police and/or Children's Social Care will be made if:

- The incident involves an adult.
- There is reason to believe that the pupil has been coerced, blackmailed or groomed, or if there are concerns about her capacity to consent (for example owing to special educational needs).
- What is discovered about the imagery suggests the content depicts sexual acts which are unusual for the young person's developmental stage, or are violent.
- The imagery involves sexual acts and any pupil in the imagery is under 13.
- There is reason to believe a pupil is at immediate risk of harm owing to the sharing of the imagery, for example, if the young person is presenting as suicidal or self-harming.

### **Physical Abuse**

While a clear focus of child on child abuse is often around the sharing of nude and semi-nude images and sexual abuse and harassment, physical assaults and initiation violence and rituals from pupils to pupils can also be abusive. These are equally not tolerated and if it is believed that a crime has been committed, will be reported to the police. The principles from the *Anti-Bullying* and *Behaviour Policies* will be applied in these cases, with recognition that any police investigation will need to take priority.

References:

*KCSIE (DfE 2023)*

*Sexual Violence and Sexual Harassment between Children in Schools and Colleges (DfE 2021)*

*Sharing nudes and semi-nudes: advice for education settings working with children and young people (UK Council for Internet Safety 2020)*



**EXAMPLE Assessment**

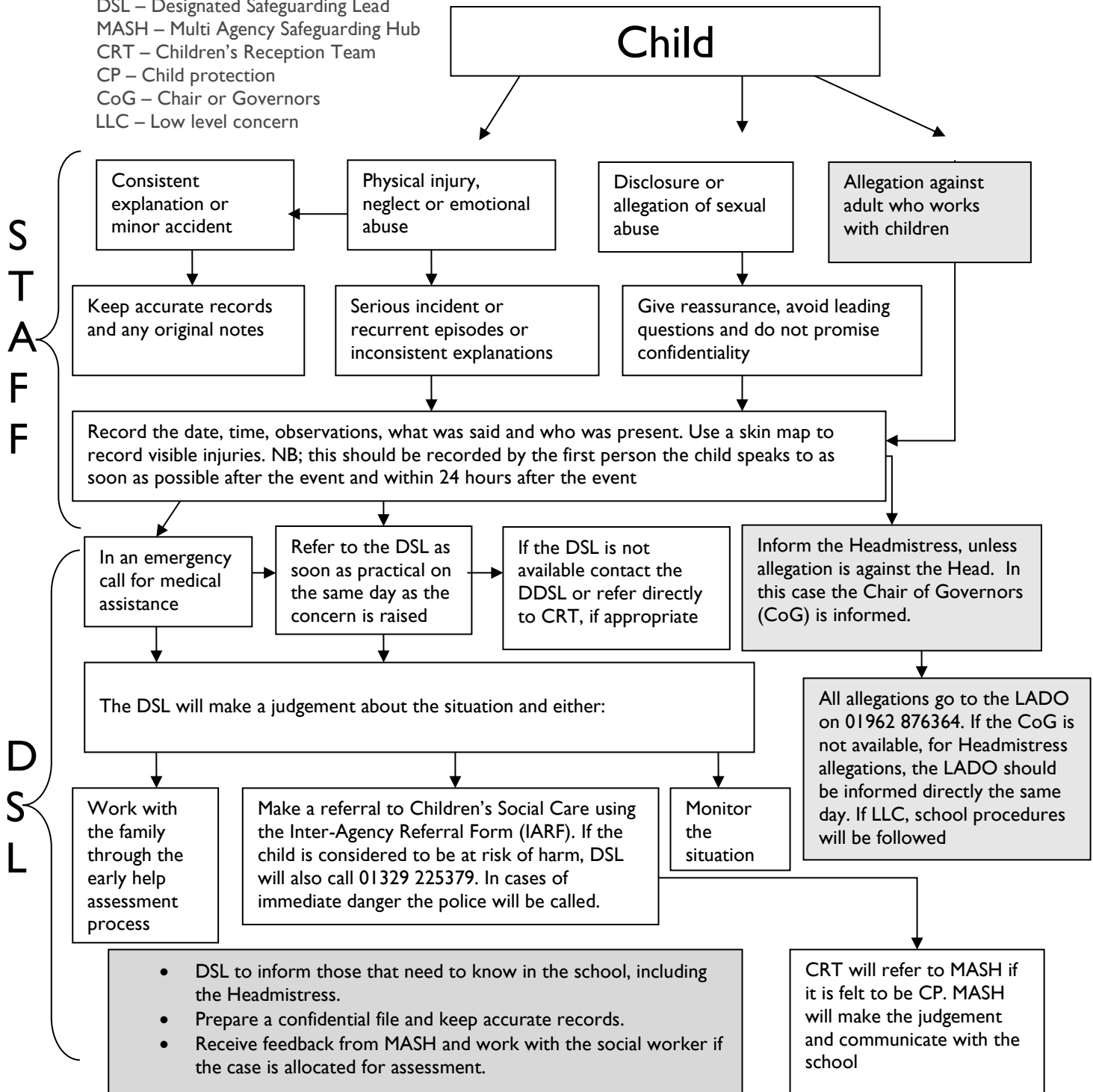
Presenting behaviours	What are the risks? Who might be harmed and how?	Action	Action by who?	Action by when?	Action status or Date completed and outcome including further actions
<p><b>Behaviour:</b> One female child (Child A, the Subject) has asked another female child (Child B) to go into the toilets with her. Child A has exposed herself and coerced Child B into touching the subject's genitals.</p> <p>Subject is under the age of criminal responsibility. Subject has no known CP history. There have been no previous concerns about Subject (Child A).</p>	<p>Child B may be abused again. Other pupils may be forced or coerced into sexual activity.</p>	<p>Key members of staff with supervisory and other pastoral responsibility for the pupils in question have been briefed by the DSL and will increase monitoring at break times. Subject will be escorted to the toilet.</p>	<p>DSL HoY, Asst HoY, Tutors and other relevant staff (named)</p>	<p>From Immediate effect</p>	<p>01/02/2020. Increased monitoring and supervision in place.</p>
	<p>Other children within the community</p>	<p>Subject's parents informed re incident and behaviour, and the risk plan put in place. Made aware of referral to Children's Services. Agreement for:</p> <ul style="list-style-type: none"> <li>• Referral to CAMHS</li> <li>• Increased monitoring and supervision</li> <li>• Keep safe work</li> </ul>	<p>DSL and Headmistress</p>	<p>01/02/20</p>	<p>01/02/20 Contract of agreement has been signed by the parents to include increased monitoring, supervision and keep safe work.</p>
		<p>Referral to Children's Services</p>	<p>DSL</p>	<p>01/02/20</p>	<p>01/02/20 Children and Family Assessment to be completed by CAST</p>
		<p>Victim's parents informed, and child's views gained. Child offered keep safe work.</p>	<p>DSL with support from HoY</p>	<p>01/02/20</p>	<p>Parents are satisfied with the school's actions and safeguarding measures so far. Child and family want child to remain in the same class for the time being. ACTION – Review this in one week's time. Keep safe work accepted.</p>
		<p>Referral to CAMHS</p>	<p>DSL</p>	<p>02/02/20</p>	<p>Referral made. ACTION – follow up with CAMHS as to the status of referral after 10 working days if not heard before.</p>



Presenting behaviours	What are the risks? Who might be harmed and how?	Action	Action by who?	Action by when?	Action status or Date completed and outcome including further actions
		Safeguarding measures to be reviewed.	DSL and key staff members	09/02/20	No additional concerns raised. ACTION - Review plan again in one week's time.
		Keep safe work to be completed. Targeted work to be carried out	DSL and HoY	23/02/2020	OUTSTANDING Work planned and due to be delivered w/c 16/02.
	Community Impact Assessment LOW. The parents of the subject and the victim are satisfied that the school is taking all necessary safeguarding measures to manage the risk. There are no indications at this stage for community unrest. This will be kept under review.	DSL and SLT to be aware of any community discussion/concerns about the incidents.	DSL and SLT	05/04/2020	
	Media: Director of Marketing and Communications to be informed if Community Impact Assessment risk increases	Monitor during term	SLT	05/04/2020	
	Information Sharing: All information sharing has been completed in line with the school's CP and UK GDPR policies.	Relevant information to be recorded on each child's CP file as required.			
	Social Media: There are no current risks from community use of social media. This will be kept under review.	Monitoring of social media during the term	Key staff	05/04/2020	

# ANNEX 4: Flowchart for Child Protection Procedures

DSL – Designated Safeguarding Lead  
 MASH – Multi Agency Safeguarding Hub  
 CRT – Children’s Reception Team  
 CP – Child protection  
 CoG – Chair or Governors  
 LLC – Low level concern



\* In the cases of known FGM, the teacher who was made aware will also make contact with the police

## **ANNEX 5: Dealing with Disclosures**

### **Staff responsibilities:**

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

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

All staff should know who the DSL is and who to approach if the DSL is unavailable. Ultimately, all staff have the right to make a referral to the police or Children's Social Care directly and should do this if, for whatever reason, there are difficulties following the agreed protocol, eg they are the only adult on the School premises at the time and have concerns about sending a child home.

### **Guiding principles - the seven Rs**

#### **Receive**

- Listen to what is being said, without displaying shock or disbelief.
- Allow the pupil to talk freely, accept what is said and take it seriously.
- Make a note of what has been said as soon as practicable.

#### **Reassure**

- Reassure the pupil, but only so far as is honest and reliable.
- Do not make promises you may not be able to keep eg 'I'll stay with you' or 'everything will be all right now' or 'I'll keep this confidential'. However, the pupil can be told that only those who need to know will be told and that their privacy will be respected.
- Do reassure, eg you could say: 'I believe you', 'I am glad you came to me', 'I am sorry this has happened', 'We are going to do something together to get help'.

#### **Respond**

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

#### **Report**

- Share concerns with the DSL as soon as possible, in person or by phone.
- If you are not able to contact your DSL or the Deputies, and the child is at risk of immediate harm, contact Children's Social Care directly.
- If you are dissatisfied with the level of response you receive following your concerns, you should press for re-consideration.

#### **Record**

- If possible, make some very brief notes at the time, and write them up as soon as possible.
- Give your original notes, as well as your official write-up, to the DSL so they can be kept in the child's safeguarding file.

- Record the date, time, place, persons present and noticeable non-verbal behaviour, and the words used by the child. If the child uses specific terminology, such as sexual 'pet' words, record the actual words used, rather than translating them into 'proper' words.
- Complete a body map to indicate the position of any noticeable bruising or marks.
- Record facts and observable things, rather than your 'interpretations' or 'assumptions'.

### **Remember**

- Support the child: listen, reassure and be available.
- Whilst you cannot promise a pupil to keep a disclosure or concern confidential, complete confidentiality within the staff body is essential. Share your knowledge only with the DSL, and other appropriate professionals if advised to do so by the DSL or Headmistress.
- Ask the DSL, your Head of Department or Head of Year for some support for yourself if you need it.

### **Review (led by DSL)**

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

### **What happens next?**

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

If a staff member believes that their concerns have not been dealt with effectively or that the child remains at risk, they should initially ask the DSL to reconsider ensuring that the risks are understood. If this does not result in a satisfactory outcome, or the DSL rationale appears to miss the risk to the child, then the Safeguarding Governor should be informed and the School's whistleblowing procedures should be followed. If the DSL is unhappy with the response from Children's Social Care, they should consider following the HSCP escalation protocol.

Receiving a disclosure can be upsetting for the member of staff and the School will provide support for them after the disclosure as appropriate. This might include reassurance that they have followed procedure correctly and that their swift actions will enable the allegations to be handled appropriately. In some cases, additional support such as counselling might be needed, and staff should be encouraged to recognise that disclosures can have an impact on their own emotions.

## ANNEX 6: Online Safety

The School has an essential role in being responsible for ensuring it has the appropriate level of security protection procedures in place in order to safeguard its systems, pupils and staff.

The School plays a key role in safeguarding children from potentially harmful and inappropriate online material. Online safety is an integral part of the School's Computing curriculum and also embedded in PSHEE education. It is also an important consideration when devising and implementing policies and procedures. It is embedded not only across different areas of the curriculum but also in teacher training and within the role and responsibilities of the DSL, as well as discussions with parents. Internet safety has a number of different facets – behaviour, education, monitoring and infrastructure – and all of these are key to safeguarding pupils both when at school but also outside of the school day. We work hard to minimise risks whilst at the same time educating pupils about safe and responsible conduct online.

The School consults guidance on online safety, e-security and other online matters from organisations such as the UK Safer Internet Centre and the National Cyber Security Centre. It also follows the Government's *Meeting digital and technology standards in schools and colleges – filtering and monitoring standards for schools and colleges* guidance.

There is a whole school approach to online safety which empowers staff to protect pupils. It also educates 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 four areas of risk:

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

The School does all that it reasonably can to limit pupils' exposure to risks from the School's IT systems. It has appropriate filters and monitoring systems in place to safeguard children and staff from potentially harmful and inappropriate material online. The School's systems aim to reduce the risk of children and staff being exposed to illegal, inappropriate and harmful materials online or being subjected to harmful online interaction with others. The systems also help manage online pupil behaviour that causes, or can increase a child's likelihood of, harm. Relevant staff have an awareness and understanding of the provisions in place, manage them effectively and know how to escalate concerns when identified. The DSL works closely with the IT team as appropriate on safeguarding matters. Regular reviews of the filters and monitoring systems are carried out to check effectiveness and to keep up with evolving cyber-crime technologies. Further detail on the School's approach to online safety can be found in the School's *Technology Acceptable Use Policy*.

The School follows the Department for Education's filtering and monitoring standards. It therefore:

- identifies and assigns roles and responsibilities to manage filtering and monitoring systems.
- reviews filtering and monitoring provision at least annually.
- blocks harmful and inappropriate content without unreasonably impacting teaching and learning.
- has effective monitoring strategies in place that meet the School's safeguarding needs

The Governors review the Department for Education's filtering and monitoring standards and support the School to meet these standards.

Whilst the School takes all reasonable steps to protect pupils from online risk, it is not possible to prevent exposure to all internet-related hazards. In addition, when devices are beyond the School's control (for example on a personal network such as 4 or 5G) the risks can be significantly greater. Therefore, the School takes a proactive approach to educating pupils about safe and responsible online behaviour, healthy use of devices and how to respond appropriately if faced with an unsafe situation, both in and out of school. It also engages with parents to raise awareness of internet safety issues and help them to support their children appropriately.

In order to do this the School:

- Educates pupils via PSHEE/RSHE sessions, Computing lessons and pupil induction activities about safe and responsible behaviour online and healthy use of devices, in order to enable them to embed safe online habits into their daily lives and make good choices when using their own connections.
- Promotes internet safety across the pupil body at every opportunity outside of lessons through activities and media, for example assemblies, displays and notices in Form Time.
- Gives regular reminders to pupils about the importance of not posting any content, comments, images or videos on social media or elsewhere online which may cause embarrassment, harm, distress or offence to others.
- Goes through the *Technology Acceptable Use Policy For Pupils* with all pupils when they join the School and provides reminders about their responsibilities as they move up the School.
- Makes every effort to maintain effective channels of communication for pupils with Tutors, Heads/Assistant Heads of Year and the School's safeguarding team, so that pupils will feel able to talk to a trusted adult if they come across any problems or feel unsafe online.
- Raises parental awareness of the importance of children being safe online at information evenings and by engaging external speakers to talk with them about online safety and other IT-related issues.
- Responds appropriately to any concerns raised regarding the behaviour of pupils or others online by following the Safeguarding and Child Protection, Anti-Bullying and Behaviour Policies, engaging with outside agencies as necessary.

The School follows Department for Education's *Harmful online challenges and online hoaxes* (February 2021) guidance, including preparing for any online challenges and hoaxes, sharing information with parents and where to get help and support.

**ANNEX 7: Recording Form**

<b>Child's name:</b>			
<b>Date and time:</b>		<b>DoB:</b>	
<b>Name and role of person raising concern:</b>			

<b>Details of concern (where? when? what? who? behaviours? Use child's words)</b>

<b>Actions taken</b>			
<b>Date</b>	<b>Person taking action</b>	<b>Action taken</b>	<b>Outcome of action</b>

**Signed:** ..... **Staff Name:** .....

**Passed to DSL on** ..... **(date)** at ..... **(time)**

## ANNEX 8: Skin/body map

Name of child: \_\_\_\_\_

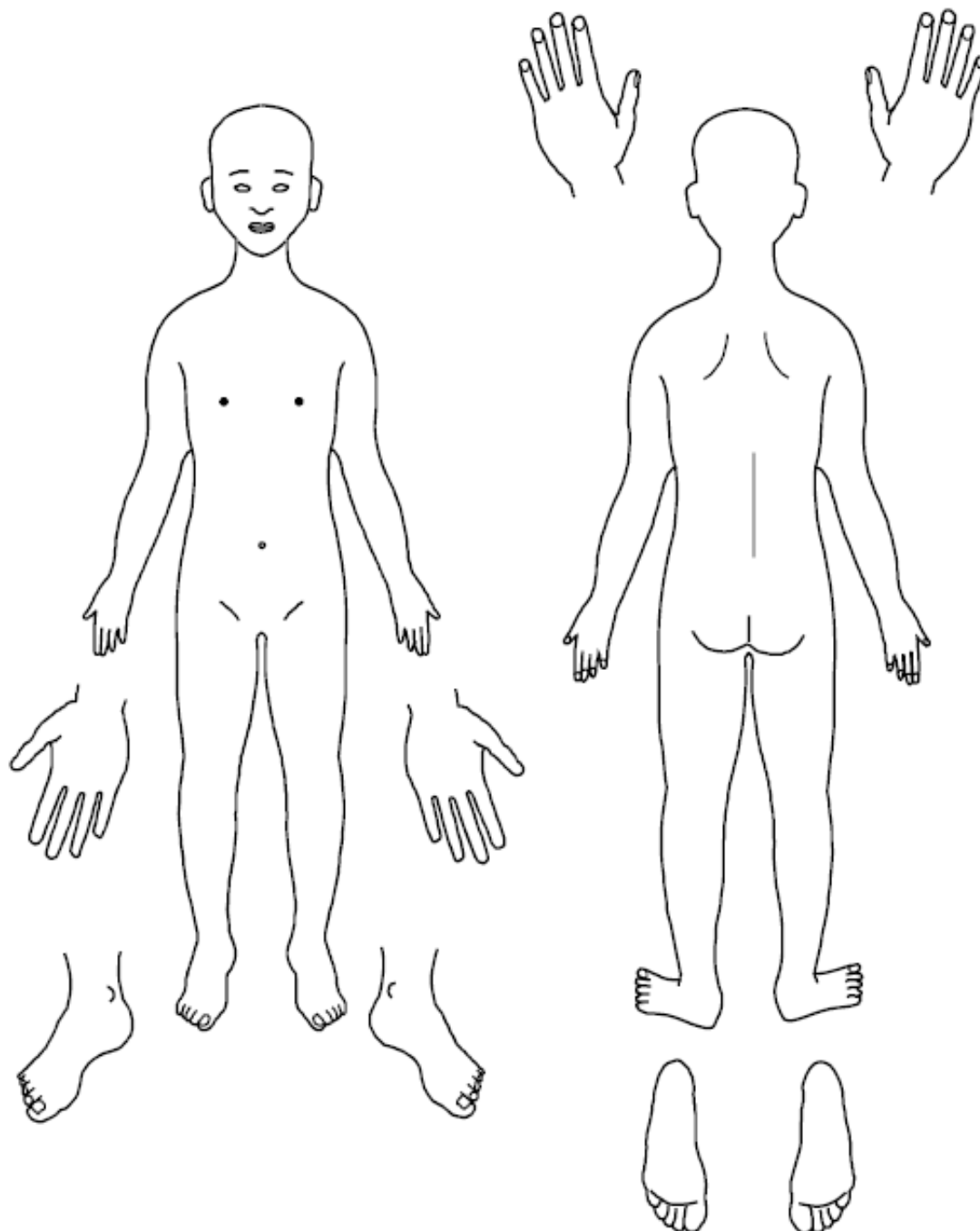
Date of birth: \_\_\_\_\_

Name of completer: \_\_\_\_\_

Date of recording: \_\_\_\_\_

### Things to remember:

- Use a black pen to indicate and locate any evidence of physical abuse
- Label the skin map in as much detail as possible, eg size and colour of marks/bruises
- Do not take photos of the marks/bruises
- Never ask pupils to remove clothing in order to mark bruises, etc, on the diagram. Only mark what is clearly obvious.







Any additional information:

## **ANNEX 9: KCSIE government guidance (Annex C) on the role of the Designated Safeguarding Lead**

Governing bodies and proprietors should ensure an appropriate senior member of staff, from the school or college leadership team, is appointed to the role of designated safeguarding lead. The designated safeguarding lead should take lead responsibility for safeguarding and child protection (including online safety). This should be explicit in the role holder's job description.

This person should have the appropriate status and authority within the school or college to carry out the duties of the post. The role of the designated safeguarding lead carries a significant level of responsibility, and they should be given the additional time, funding, training, resources and support they need to carry out the role effectively. Their additional responsibilities include providing advice and support to other staff on child welfare, safeguarding and child protection matters, taking part in strategy discussions and interagency meetings, and/or supporting other staff to do so, and to contributing to the assessment of children.

### **Deputy designated safeguarding leads**

It is a matter for individual schools and colleges as to whether they choose to have one or more deputy designated safeguarding leads. Any deputies should be trained to the same standard as the designated safeguarding lead and the role should be explicit in their job description. Whilst the activities of the designated safeguarding lead can be delegated to appropriately trained deputies, the ultimate lead responsibility for child protection, as set out above, remains with the designated safeguarding lead, this lead responsibility should not be delegated.

### **Availability**

During term time the designated safeguarding lead (or a deputy) should always be available (during school or college hours) for staff in the school or college to discuss any safeguarding concerns. Whilst generally speaking the designated safeguarding lead (or deputy) would be expected to be available in person, it is a matter for individual schools and colleges, working with the designated safeguarding lead, to define what "available" means and whether in exceptional circumstances availability via phone and or Skype or other such media is acceptable. It is a matter for individual schools and colleges and the designated safeguarding lead to arrange adequate and appropriate cover arrangements for any out of hours/out of term activities.

### **Manage referrals**

The designated safeguarding lead is expected to refer cases:

- of suspected abuse and neglect to the local authority children's social care as required and support staff who make referrals to local authority children's social care;
- to the Channel programme where there is a radicalisation concern as required and support staff who make referrals to the Channel programme;
- where a person is dismissed or left due to risk/harm to a child to the Disclosure and Barring Service as required; and
- where a crime may have been committed to the Police as required. NPCC - When to call the police should help understand when to consider calling the police and what to expect when working with the police.

### **Working with others**

The designated safeguarding lead is expected to:

- act as a source of support, advice and expertise for all staff;
- act as a point of contact with the safeguarding partners;
- liaise with the Headteacher or principal to inform him or her of issues- especially ongoing enquiries under section 47 of the Children Act 1989 and police investigations. This should include being aware

of the requirement for children to have an Appropriate Adult. Further information can be found in the Statutory guidance – PACE Code C 2019;

- as required, liaise with the “case manager” (as per Part four) and the local authority designated officer(s) (LADO) for child protection concerns in cases which concern a staff member;
- liaise with staff (especially teachers, pastoral support staff, school nurses, IT Technicians, senior mental health leads and special educational needs coordinators (SENCOs), or the named person with oversight for SEN in a college and Senior Mental Health Leads) on matters of safety and safeguarding and welfare (including online and digital safety) and when deciding whether to make a 145 referral by liaising with relevant agencies so that children’s needs are considered holistically;
- liaise with the senior mental health lead and, where available, the Mental Health Support Team, where safeguarding concerns are linked to mental health;
- promote supportive engagement with parents and/or carers in safeguarding and promoting the welfare of children, including where families may be facing challenging circumstances;
- work with the Headteacher and relevant strategic leads, taking lead responsibility for promoting educational outcomes by knowing the welfare, safeguarding and child protection issues that children in need are experiencing, or have experienced, and identifying the impact that these issues might be having on children’s attendance, engagement and achievement at school or college. This includes:
  - ensure that the school or college knows who its cohort of children who have or have had a social worker are, understanding their academic progress and attainment, and maintaining a culture of high aspirations for this cohort; and,
  - support teaching staff to provide additional academic support or reasonable adjustments to help children who have or have had a social worker reach their potential, recognising that even when statutory social care intervention has ended, there is still a lasting impact on children’s educational outcomes.

### **Information sharing and managing the child protection file**

The designated safeguarding lead is responsible for ensuring that child protection files are kept up to date.

Information should be kept confidential and stored securely. It is good practice to keep concerns and referrals in a separate child protection file for each child.

Records 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 the outcome.

They should ensure the file is only accessed by those who need to see it and where the file or content within it is shared, this happens in line with information sharing advice as set out in Part one and Part two of this guidance.

Where children leave the School (including in year transfers) the DSL will ensure their child protection file is transferred to the new school or college as soon as possible, and within 5 days for an in-year transfer or within the first 5 days of the start of a new term to allow the new school or college to have support in place for when the child arrives. This will be transferred separately from the main pupil file, ensuring secure transit, and confirmation of receipt will be obtained. Where new pupils join the School, the DSL will ensure that the Head of Learning Support and other staff are aware of relevant information as required.

Lack of information about their circumstances can impact on the child’s safety, welfare and educational outcomes. In addition to the child protection file, the designated safeguarding lead should also consider if it would be appropriate to share any additional information with the new school or college in advance of a child leaving to help them put in place the right support to safeguard this child and to help the child thrive in the school or college. For example, information that would allow the new school or college to continue supporting children who have had a social worker and been victims of abuse and have that support in place for when the child arrives.

## Raising awareness

The designated safeguarding lead should:

- ensure each member of staff has access to, and understands, the school's or college's child protection policy and procedures, especially new and part-time staff;
- ensure the school's or college's child protection policy is reviewed annually (as a minimum) and the procedures and implementation are updated and reviewed regularly, and work with governing bodies or proprietors regarding this;
- ensure the child protection policy is available publicly and parents are aware of the fact that referrals about suspected abuse or neglect may be made and the role of the school or college in this;
- link with the safeguarding partner arrangements to make sure staff are aware of any training opportunities and the latest local policies on local safeguarding arrangements; and,
- help promote educational outcomes by sharing the information about the welfare, safeguarding and child protection issues that children who have or have had a social worker are experiencing with teachers and school and college leadership staff.

## Training, knowledge and skills

The designated safeguarding lead (and any deputies) should undergo training to provide them with the knowledge and skills required to carry out the role. This training should be updated at least every two years. The designated safeguarding lead should undertake Prevent awareness training. Training should provide designated safeguarding leads with a good understanding of their own role, how to identify, understand and respond to specific needs that can increase the vulnerability of children, as well as specific harms that can put children at risk, and the processes, procedures and responsibilities of other agencies, particularly children's social care, so they:

- understand the assessment process for providing early help assessment and statutory intervention, including local criteria for action and local authority children's social care referral arrangements;
- have a working knowledge of how local authorities conduct a child protection case conference and a child protection review conference and be able to attend and contribute to these effectively when required to do so;
- understand the importance of the role the designated safeguarding lead has in providing information and support to children social care in order to safeguard and promote the welfare of children;
- understand the lasting impact that adversity and trauma can have, including on children's behaviour, mental health and wellbeing, and what is needed in responding to this in promoting educational outcomes;
- are alert to the specific needs of children in need, those with special educational needs and disabilities (SEND), those with relevant health conditions and young carers;
- understand the importance of information sharing, both within the school and college, and with the safeguarding partners, other agencies, organisations and practitioners;
- understand and support the school or college with regards to the requirements of the Prevent duty and are able to provide advice and support to staff on protecting children from the risk of radicalisation;
- are able to understand the unique risks associated with online safety and be confident that they have the relevant knowledge and up to date capability required to keep children safe whilst they are online at school or college;
- can recognise the additional risks that children with special educational needs and disabilities (SEND) face online, for example, from online bullying, grooming and radicalisation and are confident they have the capability to support children with SEND to stay safe online;
- obtain access to resources and attend any relevant or refresher training courses; and,
- encourage a culture of listening to children and taking account of their wishes and feelings, among all staff, in any measures the school or college may put in place to protect them.

In addition to the formal training set out above, their knowledge and skills should be refreshed (this might be via e-bulletins, meeting other designated safeguarding leads, or simply taking time to read and digest

safeguarding developments) at regular intervals, as required, and at least annually, to allow them to understand and keep up with any developments relevant to their role.

### **Providing support to staff**

Training should support the designated safeguarding lead in developing expertise, so they can support and advise staff and help them feel confident on welfare, safeguarding and child protection matters. This includes specifically to:

- ensure that staff are supported during the referrals processes; and
- support staff to consider how safeguarding, welfare and educational outcomes are linked, including to inform the provision of academic and pastoral support.

### **Understanding the views of children**

It is important that children feel heard and understood. Therefore, designated safeguarding leads should be supported in developing knowledge and skills to:

- encourage a culture of listening to children and taking account of their wishes and feelings, among all staff, and in any measures the school or college may put in place to protect them; and,
- understand the difficulties that children may have in approaching staff about their circumstances and consider how to build trusted relationships which facilitate communication.

### **Holding and sharing information**

The critical importance of recording, holding, using and sharing information effectively is set out in Parts one, two and five of this document, and therefore the designated safeguarding lead should be equipped to:

- understand the importance of information sharing, both within the school and college, and with other schools and colleges on transfer including in-year and between primary and secondary education, and with the safeguarding partners, other agencies, organisations and practitioners;
- understand relevant data protection legislation and regulations, especially the Data Protection Act 2018 and the UK General Data Protection Regulation (UK GDPR); and,
- be able to keep detailed, accurate, secure written records of concerns and referrals and understand the purpose of this record-keeping.

## ANNEX 10: Allegations against adults who work with children

The School has a clear policy for dealing with allegations against people who work with children. The School makes a clear distinction between an allegation, a complaint or a concern about the quality of care or practice.

Allegations as defined by the government's *Keeping Children Safe in Education (KCSIE)* guidance (2023) will be reported to the LADO (see detail in Part I below). Complaints or concerns will be managed independently by the School under internal procedures or in accordance with the *Low Level Concerns Policy*.

Complaints could include:

- Breaches of the School's Staff Code of Conduct
- Any breach of data protection or confidentiality
- Poor behaviour management
- Inappropriate use of social media
- Misadministration of medication

Concerns could include:

- Inappropriate use of language, shouting or swearing
- Discussing personal or sexual relationships with, or in the presence, of pupils
- Making (or encouraging others to make) unprofessional comments which scapegoat, demean or humiliate children, or might be interpreted as such

Low Level Concerns (LLCs) which do not reach the allegations harms threshold (or complaints criteria) will be dealt with under the School's LLC procedure, which is laid out in the *Low Level Concerns Policy*.

### Part I: Allegations that may meet the harms threshold

#### Procedure

This procedure should be used in all cases in which it is alleged that a member of staff (including any supply staff not directly employed by the School), contractor or volunteer, or another adult who works with children would pose a risk of harm if they continue to work in their present position, or in any capacity with children at Farnborough Hill. It applies when they have, either at work or outside of school:

- **behaved in a way that 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 may 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 (transferrable risk).**

This behaviour, practice or experience may have not involved children, but could have an impact on the member of staff's suitability to work with children because of transferrable risk. For example, if a member of staff was involved in an adverse incident where no children were involved, the School would still need to consider what triggered these actions and whether a pupil could be put at risk if they triggered the same reaction. Where appropriate an assessment of transferable risk to children with whom the person works should be undertaken. If in doubt the School will seek advice from the Local Authority Designated Officer (LADO).

In dealing with allegations or concerns against an adult, staff must take the following course of action:

- Report any concerns about the conduct of any member of staff (including the DSL), supply staff, contractor or volunteer to the Headmistress (or, in her absence, the Chair of Governors) without delay. If the concern is about the Headmistress it should be reported to the Chair of Governors directly.

- If an allegation is made against the Headmistress, the concerns will be raised with the Chair of Governors by the DSL as soon as possible, without the Headmistress being informed at this point. If the Chair of Governors is not available, then the LADO will be contacted directly.
- Where the School identifies that a child has been harmed, that there may be an immediate risk of harm to a child or if the situation is an emergency, the Headmistress, DSL or Chair of Governors will contact Children's Services, following normal procedures laid out in the Safeguarding and Child Protection Policy.
- In certain situations, the Headmistress or Chair of Governors will want to involve the police immediately if the person is deemed to be an immediate risk to children or there is evidence of a possible criminal offence.
- Once an allegation has been received by the Headmistress or Chair of Governors they will contact the LADO on 01962 876364 or [child.protection@hants.gov.uk](mailto:child.protection@hants.gov.uk) immediately and within one working day, and before carrying out any investigation into the allegation other than preliminary enquiries.
- The child's parents will be informed of the allegation unless there is a good reason not to.
- The Case Manager (the Headmistress or Chair of Governors) will follow procedures set out in the School's *Safeguarding Action Plan Following an Allegation Against a Member of Staff* document.
- Information will be recorded on the file of the accused person
- A report will be sent promptly to the Disclosure and Barring Service and the Teaching and Regulation Agency (TRA) where a teacher has been dismissed (or would have been dismissed had he/she not resigned) and a prohibition order may be appropriate. The reasons such an order would be considered are: 'unacceptable professional conduct', 'conduct that may bring the profession into disrepute' or a 'conviction, at any time, for a relevant offence'.

In liaison with the LADO, the School will determine how to proceed and if necessary the LADO will refer the matter to Children's Social Care and/or the police (if this has not already been done).

If the matter is investigated internally, the LADO will advise the School to follow procedures set out in Part 4 of *Keeping Children Safe in Education (2023)* and **HSCB procedures**.

In certain circumstances the School may have to consider an allegation against an individual not directly employed by Farnborough Hill, where its disciplinary procedures do not fully apply, for example, if using supply staff provided by an employment agency. Whilst the School is not the employer of the supply staff, it will ensure allegations are dealt with properly. The School will discover the facts and liaise with the Local Authority Designated Officer (LADO) to determine a suitable outcome. Under no circumstances would the School decide to cease to use supply staff due to safeguarding concerns without following this course of action first.

When receiving information from outside agencies about school staff, the LADO will assess the potential for transferable risk, and make a disclosure to the School where there is the likelihood of transferable risk to children and there is a pressing need.

### **Supply staff and contractors**

While supply staff and contractors are not employees of the school, the School is still required to report any allegations to the LADO.

In the instance of supply staff, if the matter requires an internal investigation, this will be carried out by the School in liaison with an HR representative (acting as the employer) from the supply agency or contractors' company. The supply agency will be kept fully informed and involved.

### **Organisations or individuals using school premises**

The School may receive an allegation relating to an incident that happened when an individual or organisation was using the premises for the purposes of running activities for children (for example community groups, sports associations, or service providers that run co-curricular activities). As with any safeguarding allegation, the School will follow its safeguarding policies and procedures, including informing the LADO.

## **Part 2: Concerns that do not meet the harms threshold (low level concerns)**

The term 'low level' concern does not mean that it is insignificant, it means that the behaviour towards a child does not meet the threshold set out in Part 1 above. A low-level concern is any concern, no matter how small (and even if no more than causing a sense of unease or a 'nagging doubt') that an adult working in or on behalf of the School may have acted in a way that:

- is inconsistent with the Staff Code of Conduct, including inappropriate conduct outside of work
- does not meet the allegations threshold or is otherwise not considered serious enough to consider a referral to the LADO

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

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

Such behaviour can exist on a wide spectrum, from the inadvertent or thoughtless, or behaviour that may look to be inappropriate but might not be in specific circumstances, through to that which is ultimately intended to enable abuse.

Concerns may arise in several ways and from a number of sources. Examples include suspicion, complaint, disclosure made by a child, parent or other adult within or outside of the organisation or as a result of vetting checks undertaken. It is essential that concerns of any type are shared.

As part of Farnborough Hill's whole school approach to safeguarding, a culture of openness, trust and transparency is promoted. This is to ensure that the School's values and expected behaviour which are set out in the Staff Code of Conduct are constantly lived, monitored and reinforced by all staff, and all concerns about all adults working in or on behalf of the School (including supply teachers, volunteers and contractors) are recorded and dealt with promptly and appropriately. All concerns about adults should be shared responsibly and with the appropriate person which is the Headmistress (or Bursar in the case of contractors).

The School is committed to identifying concerning, problematic or inappropriate behaviour earlier to minimise the risk of abuse and ensure that adults working in or on behalf of Farnborough Hill are clear about professional boundaries and act within these boundaries, and in accordance with the School's ethos and values. Ensuring that they are dealt with effectively should also protect those working in or on behalf of the School from potential false allegations or misunderstandings.

**The School will deal with all low level concerns promptly and comprehensively, following guidance in the *Low Level Concerns Policy*.**



## **ANNEX 11: Whistleblowing**

### **Whistleblowing in a safeguarding context**

While the School has a separate *Whistleblowing Policy*, this is a summary that outlines the process when there is a concern that safeguarding issues have not been reported or procedures have not been followed correctly.

This guidance does not replace the *Whistleblowing Policy* and should be read in conjunction with this policy.

Whistleblowing is a term that is used if staff wish to report a concern within the School that involves a colleague, their line manager or a person senior to them which may prevent them from following the normal reporting systems. There are a limited number of areas that can be called whistleblowing, and the policy protects staff from being punished for raising concerns.

### **Raising a Concern**

In any cases where staff members have concerns about poor or unsafe practices and potential failures in the School's safeguarding regimes, or have concerns about the behaviour of another member of staff towards a pupil, they should report it at once to the Headmistress or to the DSL.

If the concern relates to the Headmistress a staff member should inform the DSL, who will then inform the Chair of Governors.

If staff would prefer to raise concerns outside of the school environment they should contact the NSPCC whistleblowing line on 0800 028 0285 (email [help@nspcc.org.uk](mailto:help@nspcc.org.uk)) or make contact with Hampshire County Council.

If there is reason to believe that a member of staff is harming a child (an allegation) and this has been reported to the Headmistress but no action has been taken, or the member of staff that there are concerns about is the Headmistress, then staff can also contact the Local Authority Designated Officers (LADOs) on 01962 876364 or [child.protection@hants.gov.uk](mailto:child.protection@hants.gov.uk)

If a member of staff believes that a child is being abused by an individual(s) outside of the School, and it is not possible to contact the DSL, a referral to Children's Social Care should be made by calling 0300 555 1384 (office hours) or 0300 555 1373 (outside of office hours).

## **ANNEX 12: Briefing sheet for temporary and supply staff**

**NB: Where possible all supply staff and those on short contracts will receive face-to-face safeguarding training from the DSL.**

### **For supply staff and those on short contracts at Farnborough Hill**

While working at Farnborough Hill, all supply staff and those on short contracts have a duty of care towards all pupils at the School. This means that at all times staff should act in a way that is consistent with the pupils' safety and welfare. In addition, if at any time colleagues have a concern about a child, particularly if they may be at risk of abuse or neglect, it is their responsibility to share that concern with the School's Designated Safeguarding Lead (DSL), Pippa Sexton, who can be found in her office on the Red Corridor. Alternatively, she can be contacted by phone on Extension 212.

This is not an exhaustive list but concerns may arise as a result of:

- Observing a physical injury, which may have been non-accidental.
- Observing something in the appearance of a pupil which suggests they are not being sufficiently well cared for.
- Observing child behaviour that leads an adult to be concerned about a pupil.
- A pupil telling a member of staff that they have been subjected to some form of abuse.
- Observing adult behaviour that leads an adult to be concerned about their suitability to work with young people.

In any of the circumstances listed here, a member of staff must write down what they saw or heard, date and sign the account, and give it to the DSL as soon as possible and no longer than 24 hours later. This may be the beginning of a legal process – it is important to understand that legal action against a perpetrator can be seriously damaged by any suggestion that the child has been led in any way.

If a child talks to a member of staff about abuse, you should follow these guidelines:

- Rather than directly questioning the child, just listen and be supportive.
- Never stop a child who is freely recalling significant events, but do not push the child to tell more than they wish.
- Make it clear that information may need to be passed on to staff in other agencies who may be able to help – do not promise confidentiality. Staff are obliged to share any information relating to abuse or neglect.
- Write an account of the conversation immediately, as close to verbatim as possible. Put the date and timings on it, and mention anyone else who was present. Then sign it and give the record to the DSL who should follow due process, including contacting Children's Social Care if appropriate.

The School has a *Safeguarding and Child Protection Policy* which provides further details of School and local procedures to be followed by all staff. This can be found in the Staff Shared drive, or on the School's website. A printed copy can also be obtained from the School Office.

If the concern involves the conduct of a member of staff, volunteer, Governor or contractor, contact the Headmistress in the first instance. If you do not feel comfortable doing this, contact the LADO on 01962 847364 or the NPSCC whistleblowing line on 0800 028 0285. If the concern involves the conduct of the Headmistress herself, contact the Chair of Governors via Melanie Clark, the Headmistress's PA. Again, if you do not feel comfortable doing this, contact the LADO on 01962 847364 or the NPSCC whistleblowing line on 0800 028 0285.

**Remember, if you have a concern, report it.**

## ANNEX 13: Useful contacts

### Internal – key school contacts

Key Personnel	Name/contact
DSL	Pippa Sexton - Ext 212
Deputy DSL	Laura Evans-Jones - Ext 246
Deputy DSL	Ian Taylor-Warwick - Ext 260
School Nurse	Nikki Condren/Jennifer Lavelle - Ext 219
Mental Health Lead	Pippa Sexton - Ext 212
'Prevent' Lead	Pippa Sexton - Ext 212
Designated Teacher for Looked After Children	Ian Taylor-Warwick – Ext 260
FGM Lead	Laura Evans-Jones – Ext 246
Nominated Safeguarding Governor	Julie Micklethwaite - Contact details available from Headmistress's PA (Ext 208)
Chair of Governors	Gerry McCormack - Contact details available from the Bursar (Ext 203)
Headmistress	Maria Young - Ext 207

## External – key contacts

Hampshire Children's Reception Team (CRT)	01329 225379 (Professionals' Line) csprofessional@hants.gov.uk
Hampshire Out of Hours Social Care	0300 555 1373 (Professionals' Line)
Police	101 or in emergencies 999
Hampshire Safeguarding advisors/Local Authority Designated Officers (LADOs)	Barbara Piddington, Fiona Armfield or Shona McMinn HCC Safeguarding Unit – 01962 876364 child.protection@hants.gov.uk
Hampshire Children's Services Department, District Service Manager	Sarah Marsden – via Professionals' Line (01329 225379)
Hampshire Safeguarding Children Partnership	hscp@hants.gov.uk/01962 876355 www.hampshirescp.org.uk
Surrey Multi-Agency Safeguarding Hub (MASH)	Surrey Contact Centre - 0300 470 9100 csmash@surreycc.gov.uk Out of hours emergency duty team - 01483 517898
Bracknell Forest (Berkshire) Multi-Agency Safeguarding Hub (MASH)	01344 352005 MASH@bracknell-forest.gov.uk Out of hours emergency duty team – 01344 786543
NSPCC Child Protection Line	0808 800 5000
Childline	0800 1111
Support and advice about extremism	DfE's dedicated helpline - 020 7340 7264 counter.extremism@education.gov.uk
Support and advice about forced marriage	Forced Marriage Unit - 020 7008 0151 fmu@fco.gov.uk
NSPCC whistleblowing advice line	0800 028 0285 (8.00 am – 8.00 pm Mon – Fri) help@nspcc.org.uk Weston House, 42 Curtain Road, London, EC2A 3NH