



# Child Protection & Safeguarding Policy

## 2025-26

Author: Duncan Flint (DSL)

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\*Policy is updated and reviewed in line with DfE safeguarding update

## Child Protection & Safeguarding Policy

### EXTERNAL CONTACTS:

<b>Local Authority Designated Officer</b>	Jim Foy (F/T) Donna Cole (P/T) TEL: 01572 758454 EMAIL: <a href="mailto:LADO@rutland.gov.uk">LADO@rutland.gov.uk</a>
<b>Local Authority Children's Social Services Duty Team</b>	TEL: 01572 758407 EMAIL: <a href="mailto:Childrensreferrals@rutland.gov.uk">Childrensreferrals@rutland.gov.uk</a> OUT OF HOURS EMERGENCY DUTY TEAM TEL: 0116 3050005
<b>Multi-Agency Safeguarding Hub</b>	TEL: 01572 758407 EMAIL: <a href="mailto:Childrensreferrals@rutland.gov.uk">Childrensreferrals@rutland.gov.uk</a>
<b>Support and Advice about Extremism</b>	<p><b>Police</b> Leicestershire Police TEL: 01162 486726 EMERGENCY: 999 NON EMERGENCY NUMBER: 101</p> <p><b>Local Authority</b> Leicestershire CHANNEL Prevent Engagement Team TEL: 01162 486726</p> <p><b>Department for Education</b> NON EMERGENCY NUMBER: 020 7340 7264 EMAIL: <a href="mailto:counter.extremism@education.qsi.gov.uk">counter.extremism@education.qsi.gov.uk</a></p>
<b>NSPCC Whistleblowing Advice Line</b>	ADDRESS: Weston House 42 Curtain Road London EC2A 3NH TEL: 0800 028 0285 EMAIL: <a href="mailto:help@nspcc.org.uk">help@nspcc.org.uk</a>
<b>Disclosure and Barring Service</b>	ADDRESS: DBS customer services PO Box 3963 Royal Wootton Bassett SN4 4HH TEL: 03000 200 190 EMAIL: <a href="mailto:dbsdspatch@db.gov.uk">dbsdspatch@db.gov.uk</a>
<b>Teaching Regulation Agency</b>	ADDRESS: Teacher Misconduct Ground Floor South Cheylesmore House 5 Quinton Road Coventry CV1 2WT TEL: 0207 593 5393 EMAIL: <a href="mailto:misconduct.teacher@education.gov.uk">misconduct.teacher@education.gov.uk</a>
<b>OFSTED Safeguarding Children</b>	TEL: 0300 123 4666 (Monday to Friday from 8am to 6pm) EMAIL: <a href="mailto:Whistleblowing@ofsted.gov.uk">Whistleblowing@ofsted.gov.uk</a>
<b>Independent Schools Inspectorate</b>	TEL: 0207 6000100 EMAIL: <a href="mailto:concerns@isi.net">concerns@isi.net</a>

## KEY SCHOOL CONTACTS

<b>Nominated Senior Board Level Lead</b>	Mark Thomas TEL: 01536 512066 EMAIL: <a href="mailto:stpshead@st-peters.org.uk">stpshead@st-peters.org.uk</a>
<b>Designated Safeguarding Lead ("DSL")</b>	Duncan Flint TEL: 01572 724776 EMAIL: <a href="mailto:headmaster@brooke.rutland.sch.uk">headmaster@brooke.rutland.sch.uk</a>
<b>Deputy Designated Safeguarding Lead ("DDSL") EYFS Responsibility</b>	Suzie McMurray TEL: 01572 724776 EMAIL: <a href="mailto:smc@brooke.rutland.sch.uk">smc@brooke.rutland.sch.uk</a>
<b>Designated Teacher for Looked After Children</b>	Duncan Flint TEL: 01572 724776 EMAIL: <a href="mailto:headmaster@brooke.rutland.sch.uk">headmaster@brooke.rutland.sch.uk</a>
<b>Head</b>	Duncan Flint TEL: 01572 724776 EMAIL: <a href="mailto:headmaster@brooke.rutland.sch.uk">headmaster@brooke.rutland.sch.uk</a>

## POLICY STATEMENT

All DSLs and DDSLs are fully DSL trained.

This policy applies to all staff, supply staff and volunteers working in the School, including those in the Early Years Foundation Stage (EYFS) provision. It also applies to all pupils at the School. This policy will be made available to parents on request and is available on the School website.

Safeguarding and promoting the welfare of children is defined as:

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

**Child Protection** is a part of safeguarding and promoting welfare. This refers to the activity that is undertaken to protect specific children who are suffering, or are likely to suffer, significant harm.

Safeguarding is everyone's responsibility and anyone can make a referral to external agencies.

This policy has regard to the following guidance and advice:

- *Keeping Children Safe in Education* (September 2025) ("KCSIE")

- *KCSIE incorporates the additional statutory guidance, Disqualification under the Childcare Act 2006 (August 2018)*
- *KCSIE also provides links to various toolkits and additional advice and support*
- *Working Together to Safeguard Children (December 2023) ("WT"). WT is complemented by non-statutory advice:*
  - *Information sharing (July 2018)*
  - *What to do if you're worried a child is being abused (March 2015)*
- *Prevent duty guidance: Guidance for specified authorities in England and Wales December 2023 . Prevent duty guidance is supplemented by non-statutory advice and a briefing note:*
  - *The Prevent duty: Departmental advice for schools and childminders (June 2015)*
  - *The use of social media for on-line radicalisation (July 2015)*
- *Relationships education, relationships, and sex education (RSE) and health education (September 2021).*
- *Children Missing Education (September 2016)*
- *Multi Agency Guidance on FGM (July 2020)*
- *Behaviour in schools (September 2022)*
- *Children's Social Care National Framework (December 2023)*
- *Working together to improve school attendance: statutory guidance for maintained schools, academies, independent schools and local authorities (February 2024)*
- *Keeping children safe in out of school settings (April 2022)*
- *Digital and technology standards in schools and colleges (March 2023)*
- *After school clubs, community activities, and tuition (safeguarding guidance for providers) (September 2023)*

This policy also takes into account the procedures and practice of Leicestershire & Rutland Safeguarding Children Partnership (LRSCP).

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## 1. SUMMARY OF KEY POLICY CHANGES

These are the key changes in this version of the policy, compared to the previous version dated 2024-25.

- Changes to reflect the updated version of Keeping Children Safe in Education 2025 including:
  - Disinformation and misinformation added to online content risks
  - Generative AI: product safety expectations added to filtering and monitoring
  - Changes made to Alternative Provision
  - 'Working Together to Improve School Attendance' is now statutory
  - Changes to role of Virtual School Head

## **2. STATEMENT OF INTENT**

Brooke Priory School (The School) fully recognises its moral and statutory responsibilities for safeguarding and promoting the welfare of children.

At Brooke Priory School we are committed to safeguarding children and young people and we expect everyone who works in our school to share this commitment. Adults in our school take all welfare concerns seriously and encourage children and young people to talk to us about anything that worries them. We will always act in the best interest of the child.

The School's duty is to ensure that safeguarding permeates all activity and functions. This policy therefore adheres to the statutory guidance Keeping Children Safe in Education (Department for Education, current version September 2024), and complements and supports other school policies.

The School fully recognises the contribution it can make to protect children and support pupils in school. The aim of the policy is to safeguard and promote our pupils' welfare, safety and health by fostering an honest, open, caring and supportive environment. We encourage children to talk about their worries and to report their concerns to us in a number of alternative ways. The pupils' welfare is of paramount importance.

## **3. CONCERNS ABOUT A CHILD**

The School has a duty to consider at all times the best interests of the pupil and take action to enable all pupils to achieve the best outcomes. Safeguarding and promoting the welfare of children is everyone's responsibility. The School adopts a 'whole school' approach to safeguarding. This means involving everyone in the school or college, and ensuring that, safeguarding and child protection are at the forefront and underpin all relevant aspects of process and policy development.

Parents are encouraged to raise any concerns directly with the School, if necessary, using this safeguarding policy for concerns about the safety and/or welfare of children. Parents may contact the ISI directly if they wish.

The School has arrangements for listening to children and providing early help. Early Help is offered in consultation with [Rutland County Council Early Help](#) external support agency. Safeguarding arrangements consider the procedures and practice of the local authority.

All school staff are prepared to identify children who may benefit from early help, be aware of the early help process and understand their role in it. If early help is appropriate, the designated safeguarding lead will support staff in liaising with other agencies and setting up an inter-agency assessment as appropriate. Staff will be included as appropriate. If early help or other support is appropriate, the case will be kept under constant review in weekly safeguarding meetings and consideration given to a referral to children's social care if the child's situation does not appear to be improving.

### **Definitions of safeguarding and types and signs of abuse**

Safeguarding and promoting the welfare of children is defined as providing help and support to meet the needs of children as soon as problems emerge; protecting children from maltreatment, whether that is within or outside the home, including online; 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; and taking action to enable all children to have the best outcomes. Child protection is part of safeguarding and promoting the welfare of children and is defined as activity that is undertaken to protect

children who are suspected to be suffering, or likely to suffer, significant harm. This includes harm that occurs inside or outside the home, including online.

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

- physical abuse;
- emotional abuse;
- sexual abuse; and/or
- neglect.

Staff are referred to Appendix 1 of this policy for further detail of the types of abuse and possible signs of abuse, as well as further information regarding specific safeguarding issues such as child criminal and/or sexual exploitation.

## 4. PROCEDURES FOR DEALING WITH CONCERNS ABOUT A CHILD

Every member of staff, including volunteers working with children at our School, is advised to maintain an attitude of 'it could happen here' where safeguarding is concerned. If staff suspect or hear an allegation/concern or complaint of abuse, neglect or exploitation from a child or any third party, they must act immediately and follow the relevant procedure below. Staff should not assume that somebody else will act and share information that might be critical in keeping children safe.

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. It is also important that staff determine how best to build trusted relationships with children and young people which facilitate communication.

The guidance, *Information Sharing: Advice for Practitioners Providing Safeguarding Services to Children, Young People, Parents and Carers* supports staff who have to make decisions about sharing information. The proprietor recognises the importance of information sharing between practitioners and local agencies, including ensuring arrangements for sharing information within the School and with local authority children's social care, the safeguarding partners and other organisations, agencies, and practitioners as required.<sup>16</sup> Fears regarding sharing information under the Data Protection Act 2018 and the UK General Data Protection Regulation ("UK GDPR") must not be allowed to stand in the way of safeguarding and promoting the welfare of children, and neither the DPA 2018 or the UK GDPR prevent the sharing of information for the purposes of keeping children safe. If in doubt about what information can and should be shared, staff should speak to the Designated Safeguarding Lead ("DSL").

[The governing body or The proprietor] will ensure that staff understand the relevant data protection principles which allow them to share (and withhold) personal information, including:<sup>18</sup>

- 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 the sharing of special category personal data, including without consent where there is good reason to do so. For example, information may be shared without consent where: it is not possible to gain consent; it cannot be reasonably expected to gain consent; and, gaining consent would place a child at risk
- not providing pupils' personal data where the serious harm test is met.

All staff should:

- listen carefully
- avoid asking leading questions

- observe their behaviour
- reassure the individual that the allegation/complaint will be taken seriously and that they will be supported and kept safe
- ensure that the individual is not made to feel ashamed for making the report or given the impression that they are creating a problem by making the report
- not guarantee absolute confidentiality (as this may ultimately not be in the best interests of the child) and explain that the information needs to be passed to the appropriate person who will ensure that the correct action is taken
- be aware that the individual may not feel ready or know how to tell someone that they are being abused, exploited or neglected, and/or may not recognise their experiences as harmful. Staff should exercise professional curiosity and speak to the DSL if they have concerns
- determine how best to build trusted relationships with children and young people which facilitate communication}

All concerns, discussions, and decisions (together with reasons) made under these procedures should be recorded in writing, using the School's Disclosure Form where possible. The record should include the date and time of the conversation and detail of what was said and done by whom and in whose presence and signed by the person making it. Where the allegation relates to harmful sexual behaviours, if possible, the disclosure should be managed with two members of staff present (preferably one of them being the DSL or their deputy). The information should be kept confidential and stored securely, ensuring that the file is only accessible to those who need to see it, and is shared in accordance with the guidance set out in Parts one and two of *KCSIE*.

Where there is a safeguarding concern, the School will ensure the pupil's wishes and feelings are considered when determining what action to take and what services to provide. This is particularly important in the context of harmful behaviours, such as sexual harassment and sexual violence. The School manages this by ensuring that there are systems in place, that are well promoted, easily understood and easily accessible for children to confidently report abuse, knowing their concerns will be treated seriously, and knowing they can safely express their views and give feedback.

The School implements a child-centred approach to safeguarding. Whilst the School are committed to working collaboratively, and in partnership, with parents and carers as far as possible the wishes and feelings of the child and what is in their best interest is always central to the School's decision-making process.

## **Contextual Safeguarding**

Safeguarding incidents and/or behaviours can be associated with factors outside the School and can occur between children outside School. All staff, but especially the DSL and any deputies, should consider the context within which such incidents and/or behaviours occur. The School will as part of the wider assessment of children, consider whether environmental factors are present in a child's life that are a threat to their safety and/or welfare. The School will share as much information with Children's Social Care as possible as part of the referral process to enable consideration of all the available evidence and the full context of any abuse.

## **Early Help**

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

- Is disabled or has certain health conditions and has specific additional needs
- Has special educational needs (whether or not they have a statutory education, health, and care plan)
- Has a mental health need
- Is a young carer
- Is showing signs of being drawn in to anti-social or criminal behaviour, including gang involvement as association with organised crime groups or county lines
- Is frequently missing/goes missing from education, home or care
- Has experienced multiple suspensions, is at risk of being permanently excluded from schools, or in Alternative Provision or a Pupil Referral Unit
- Is misusing drugs and other alcohol themselves
- Is at risk of modern slavery, trafficking, and/or sexual or criminal exploitation
- Is in a family circumstance presenting challenges for the child, such as substance abuse, adult mental health problems or domestic abuse
- Is at risk of being radicalised or exploited
- Has a parent or carer in custody, or is affected by parental offending
- Is a privately fostered child
- is at risk of so-called 'honour'-based abuse such as Female Genital Mutilation or Forced Marriage

Early help is support for children of all ages that improves resilience and outcomes or reduces the chance of a problem getting worse. Early help may be appropriate for children who have several needs, or whose circumstances might make them more vulnerable.

The School has effective measures in place to identify emerging problems and potential unmet needs of individual pupils. All staff undertake appropriate training to ensure that they know when to share information with other agencies and what action to take to support early identification and assessments.

In the first instance, staff who consider that a pupil may benefit from early help should discuss this with the School's DSL. The DSL will consider the appropriate action to take in accordance with [Leicestershire and Rutland Safeguarding Children Partnership](#) and [Rutland County Council Early Help](#). The DSL will support staff in liaising with external agencies and professionals in an inter-agency assessment, as appropriate. If early help is appropriate, the matter will be kept under review and consideration given to a referral to children's social care if the pupil's situation does not appear to be improving.

### **What staff should do if they have concerns about a child**

If staff (including supply staff and volunteers) have any concerns about a child (as opposed to a child being in immediate danger), they should, where possible, speak with the School's DSL to agree a course of action, although staff can make a direct referral to children's social care. If the DSL is unavailable, they should, where possible, speak to a DDSL to agree a course of action. As set out above, staff should not assume that somebody else will take action and share information that might be critical in keeping children safe. If anyone other than the DSL makes a referral, they should inform the DSL as soon as possible that a referral has been made. If a child's situation does not appear to be improving, the DSL should press children's social care for reconsideration. Staff should challenge any inaction and follow this up with the DSL and children's social care as appropriate. All concerns, discussions and decisions made and the reasons for those decisions should be recorded in writing.

### **What staff should do if a child is in danger or at risk of harm**

If staff (including supply staff and volunteers) believe that a child is in immediate danger or at risk of harm, they should make an immediate referral to children's social care and/or the Police. Anyone can make a referral. Any such referral must be made immediately and in any event within 24 hours (one working day) of staff being aware of the risk. Parental consent is not needed for referrals to statutory agencies such as the police and children's social care. If anyone other than the DSL makes a referral, they should inform the DSL as soon as possible that a referral has been made. The local authority social worker should acknowledge receipt to the referrer within 24 hours and decide about the next steps and type of response required. Staff should challenge any inaction and follow this up with the DSL and children's social care as appropriate. All concerns, discussions and decisions made and the reasons for those decisions should be recorded in writing.

[Leicestershire and Rutland Safeguarding Children Partnership \(LRSCP\)](#). A full copy of local procedures can be found [here](#).

### **What staff should do if a child is seen as at risk of radicalisation**

Staff should follow the School's normal referral processes when there are concerns about children who may be at risk of being drawn into terrorism, as set out above. This may include a Prevent referral or referral to children's social care depending on the level of risk. However, if staff have concerns that there is an immediate/significant risk of a child being drawn into terrorism they must call 999 or Children's Social Care directly. Advice and support can also be sought from children's social care.

The School, in recognition that pupils may be at risk of being drawn into terrorism or other forms of extremism, carries out appropriate risk assessments (following consultation with local partners, such as the Police) of the potential risk in the local area. Such risk assessments are discussed with the Head, DSL and DDSL to ensure the School's safeguarding arrangements are sufficiently robust to help prevent and protect children from being drawn into terrorism and are regularly revised.

The School's particular training requirements are to complete the Channel General Awareness course. The technical details of the filters used by the School are as follows: we monitor the filtering of online traffic through on and off-site means. Off-site, all traffic is monitored through a proxy server managed by Exa Networks, which scans both encrypted and non-encrypted traffic. On-site, we use a Cisco router as our server fire wall, monitoring both incoming and outgoing traffic, individual devices all use the installed Windows fire wall. Our school email provider is currently RM, which uses a strict educational filtering system. This service is currently being migrated to Office 365. Every machine runs E Set antivirus, which is kept up to date and managed by Mark1 IT Solutions. This has a three-tiered process, scanning first off-site then on the server and finally on the individual machine.

### **What staff should do if they discover an act of Female Genital Mutilation ("FGM")**

Staff must report to the Police cases where they discover that an act of FGM appears to have been carried out. Unless the member of staff has a good reason not to, they should still consider and discuss any such case with DSL and involve children's social care as appropriate. Staff are referred to Appendix 1 of this policy for the procedure to be followed where they suspect that a pupil may be at risk of FGM.

### **What staff should do if they have concerns that children are at risk from or involved with serious violent crime**

All staff should be aware of indicators which may signal that children are at risk from, or are involved with serious violent crime. These may include increased absence from School, a change in friendships or relationships with older individuals or groups, a significant decline in performance, signs of self-harm or a significant change in wellbeing, signs of assault or unexplained injuries.

If staff have any concerns about a child (as opposed to a child being in immediate danger), they should, where possible, speak with the School's DSL to agree a course of action, although staff can make a direct referral to children's social care.

### **How should staff respond to an incident of nudes and semi-nudes being shared by pupils**

All members of staff in an education setting have a duty to recognise and refer any incidents involving nudes and semi-nudes and will be equipped with the necessary safeguarding training and support to enable them to recognise concerns.

For this purpose, 'sharing nudes/semi-nudes' means the sending or posting of nude or semi-nude images, videos or live streams by children under the age of 18 online. This could be via social media (including Snapchat), gaming platforms, chat apps (including WhatsApp and iMessage) or forums. It could also involve sharing between devices via services like Apple's AirDrop which works offline. The sharing of nudes and semi-nudes may happen publicly online, in 1:1 messaging or via group chats and/or via closed social media accounts. The images, videos or live streams may include more than one child.

Many professionals may refer to 'nudes and semi-nudes' as:

- youth produced sexual imagery or 'youth involved' sexual imagery
- indecent imagery. This is the legal term used to define nude or semi-nude images and videos of children and young people under the age of 18.
- 'sexting'. Many adults may use this term, however some young people interpret sexting as 'writing and sharing explicit messages with people they know' rather than sharing images
- image-based sexual abuse. This term may be used when referring to the nonconsensual sharing of nudes and semi-nudes

Terms such as 'revenge porn' and 'upskirting' are also used to refer to specific incidents of nudes and semi-nudes being shared. However, these terms are more often used in the context of adult-to-adult non-consensual image sharing offences outlined in s.33-35 of the Criminal Justice and Courts Act 2015, Voyeurism (Offences) Act 2019 and s.67A of the Sexual Offences Act 2003.

Terms such as 'deep fakes' and 'deep nudes' may also be used by adults and young people to refer to digitally manipulated and AI-generated nudes and semi-nudes. Any direct disclosure by a child will be taken seriously and staff will ensure the child is feeling comfortable and will only ask appropriate and sensitive questions, in order to minimise further distress or trauma to them.

Any direct disclosure by a child will be taken seriously and staff will ensure the child is feeling comfortable and will only ask appropriate and sensitive questions, in order to minimise further distress or trauma to them.

If staff are notified or become aware of an incident of nudes or semi-nudes being shared by a pupil or of a pupil, they should refer the incident to the DSL as soon as possible.

The DSL will follow the DDMSC / UKIS guidance "*Sharing nudes and semi-nudes: advice for education settings working with children and young people*" (February 2024) when responding to a report of sharing nudes and/or semi-nudes. This will include:

- Holding an initial review meeting with appropriate staff. This may include the staff member(s) who heard the disclosure and the safeguarding or leadership team who deal with safeguarding concerns.
- Carrying out interviews with the children involved (if appropriate).
- Informing parents and carers at an early stage and keep them involved in the process in order to best support the pupil unless there is good reason to believe that involving them would put the child at risk of harm. Any decision not to inform them should be made in conjunction with other services such as children's social care and/or the police, who would take the lead in deciding when they should be informed.
- Carrying out a risk assessment to determine whether there is a concern that a child has been harmed or is at risk of immediate harm at any point in the process

An immediate referral to police and/or children's social care through the MASH or equivalent will be made if any of the following points apply:

- The incident involves an adult. Where an adult poses as a child to groom or exploit a child or young person, the incident may first present as a child-on-child incident.
- There is reason to believe that a child or young person has been coerced, blackmailed or groomed, or there are concerns about their capacity to consent (for example, owing to special educational needs).
- The images or videos suggests the content depicts sexual acts which are unusual for the young person's developmental stage, or are violent.
- The images involves sexual acts and any child or young person in the images or videos is under 13.
- There is reason to believe a child or young person is at immediate risk of harm owing to the sharing of nudes and semi-nudes, for example, they are presenting as suicidal or self-harming.

If none of the above apply, the School may decide to respond to the incident without involving the police or children's social care. All incidents relating to nudes and semi-nudes being shared need to be recorded, whether they have been referred externally or not. The decision to respond to an incident without involving the police or children's social care will only be made in cases where the DSL (or equivalent) is confident that they have enough information to assess the risks to any child or young person involved and the risks can be managed within the School's pastoral support and disciplinary framework. Any decision in this regard will be made by the DSL (or equivalent) with input from the Head. The decision will be made and recorded in line with this Policy and will be based on consideration of the best interests of any child or young person involved. Any decision will take into account proportionality as well as the welfare and protection of any child or young person. The decision will be reviewed throughout the process of responding to the incident. If doubts remain local safeguarding arrangements will be followed.

This guidance does not apply to the sharing of images of persons under 18 by an adult over 18 as this constitutes child sexual abuse. In the event that staff become aware of such an incident, they should notify the DSL immediately, who should always inform the police as a matter of urgency.

## **What staff should do if a child is absent from education**

Children who are absent from education particularly on repeat occasions and/or for prolonged periods, and children missing education can act as a vital warning sign to a range of safeguarding issues, including neglect and child sexual and/or criminal exploitation, particularly county lines. It is important that 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. Unauthorised absences from school will be managed in accordance with the School's Attendance Policy and/or Missing Child Policy. The School will monitor all pupil absences from school and promptly address concerns about irregular attendance with the parent/carer.

Where reasonably possible, the School will hold more than one emergency contact number for each pupil to provide the School with additional options to contact a responsible adult particularly when a child missing from education is also identified as a welfare and/or safeguarding concern.

A pupil who fails to attend school regularly or has been absent from school without the School's permission for a continuous period of 10 school days or more will be reported to the local authority (Children Missing from Education Officer: 01572 722577 inclusion@rutland.gov.uk). For further details on when the School has a duty to report to the local authority, please see the Missing Child Policy and Procedures when a Child is not Collected on Time.

When working with local authority children's services where school absence indicates safeguarding concerns the School will have regard to the DfE guidance *'Working together to improve school attendance: statutory guidance for maintained schools, academies, independent schools and local authorities (February 2024)*

## **What staff should do if a child needs a social worker (Children in Need and Child Protection Plans)**

Children may need a social worker due to safeguarding or welfare needs. Children may need this help due to abuse, neglect, exploitation and complex family circumstances. A child's experiences of adversity and trauma can leave them susceptible to further harm, as well as educationally disadvantaged in facing barriers to attendance, learning, behaviour, and mental health.

Local authorities should share the fact a child has a social worker, and the DSL should hold and use this information so that decisions can be made in the best interests of the child's safety, welfare, and educational outcomes. This should be considered as a matter of routine.

Where children need a social worker, this should inform decisions about safeguarding (for example, responding to unauthorised absence or missing education where there are known safeguarding risks) and about promoting welfare (for example, considering the provision of pastoral and/or academic support, alongside action by statutory services).

## **What staff should do if a child requires mental health support**

All staff should be aware that mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation.

Only appropriately trained professionals should attempt to make a diagnosis of a mental health problem. Staff however, are well placed to observe children day to day and identify those

whose behaviour suggest that they may be experiencing a mental health problem or be at risk of developing one.

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

Staff know that if they have a mental health concern about a child that is also a safeguarding concern, immediate action should be taken by speaking to the DSL or DDSL.

The department has published the following advice and guidance on [Preventing and Tackling Bullying and Mental Health and Behaviour in Schools](#). In addition, Public Health England has a range of resources to support schools in the aim of promoting positive health, wellbeing and resilience among young people in [Promoting Children and Young People's Emotional Health and Wellbeing](#). [Every Mind Matters](#) from Public Health England also includes materials and lesson plans.

For further information, refer to the School's Well-Being Policy

### **What staff should do if they have safeguarding concerns about another staff member**

If staff have safeguarding concerns about another staff member (including supply staff and volunteers), then this should be referred to the Headteacher. Where there are concerns about the Head, this should be referred to the LADO (informing the Proprietor). In the event of allegations/concerns of abuse being made against the staff, staff are referred to the procedures below regarding managing allegations of abuse against staff (including volunteers) or may refer the matter directly to LADO.

### **What staff should do if they have concerns about safeguarding practices in the School**

The School aims to ensure there is a culture of safety and raising concerns and an attitude of 'it could happen here'. Where staff have concerns about poor or unsafe practices and potential failures in the School's safeguarding systems, these should be raised in accordance with the School's Whistleblowing Policy. There will be no disciplinary action taken against a member of staff for making such a report provided that it is done in good faith.

If staff and volunteers feel unable to raise an issue with the School or feel that their genuine concerns are not being addressed, they may use other whistleblowing channels, such as the NSPCC whistleblowing advice line. Contact details for the NSPCC helpline can be found on the Key Contacts page at the start of this policy.

## **5. ARRANGEMENTS FOR DEALING WITH CHILD-ON-CHILD ALLEGATIONS (INCLUDING SEXUAL VIOLENCE AND SEXUAL HARASSMENT)**

Child-on-child abuse is abuse by one or more pupils against another pupil. It can manifest itself in many ways and can include bullying (including cyber bullying), physical abuse, initiation/hazing violence and rituals, upskirting, sexting (also known as youth produced sexual imagery), consensual and non-consensual sharing of nudes and/or semi-nudes, sexual

assault, gender-based issues and harmful sexual behaviours including sexual violence and sexual harassment. It also includes causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party. Abusive comments and interactions should never be passed off or dismissed as “banter” or “part of growing up”. Nor will harmful sexual behaviours be dismissed as the same or “just having a laugh” or “boys being boys”. All staff must challenge abusive behaviours between peers. The School recognises that a child is likely to disclose an allegation to someone they trust: this could be any member of staff. By making such a disclosure the pupil is likely to feel that the member of staff is in a position of trust. Any concerns of child-on-child abuse must be reported to the DSL. The school equally recognises that child-on-child abuse may still be occurring even if no disclosures are forthcoming and will remain vigilant at all times.

The School has an Anti-Bullying and Behaviour Policies which outline how child-on-child abuse incidents are recorded, investigated and handled.

The School takes the following steps to minimise the risk of child-on-child abuse:

The school has a zero-tolerance approach to abuse. We will ensure, through training, that staff (including supply staff) and volunteers will have an understanding of the range of child-on-child abuse, including sexual violence and sexual harassment, and will be made aware of how to recognise and manage such issues. Staff will be given the skills to identify and manage harmful sexual behaviour using resources such as the [Brook Traffic Light Tool](#). The school recognises that girls are more likely to be victims of child-on-child abuse, with boys more likely perpetrators. However, all child-on-child abuse is wholly unacceptable. The School recognises that children with special educational needs and disabilities can be more prone to peer on peer group isolation than other children and will consider extra pastoral support for those children. The school also recognises that certain children may face additional barriers in telling someone because of their disability, sex, ethnicity and/or sexual orientation.

Staff are deployed to supervise children during breaks and any periods of free time to minimise the risk of child-on-child abuse.

Where an issue of pupil behaviour or bullying gives ‘reasonable cause to suspect that a child is suffering, or is likely to suffer, significant harm’, staff should follow the procedures below rather than the School’s Anti-Bullying and Behaviour policies:

A pupil against whom an allegation of abuse has been made may be suspended from the School during the investigation. The School will take advice from the [LRSCP](#) [three safeguarding partners] on the investigation of such allegations and will take all appropriate action to ensure the safety and welfare of all pupils involved including the alleged victim and perpetrator. If it is necessary for a pupil to be interviewed by the Police in relation to allegations of abuse, the School will ensure that, subject to the advice of the LRSCP [three safeguarding partners], parents are informed as soon as possible and that the pupils involved are supported during the interview by an appropriate adult and until the investigation is completed. Confidentiality will be an important consideration for the School and advice will be sought as necessary from the LRSCP [three safeguarding partners] and / or the Police as appropriate.

Police may be informed of any harmful sexual behaviours which are potentially criminal in nature, such as grabbing bottoms, breasts and genitalia. Rape, assault by penetration and sexual assaults will also be passed to the Police. If the DSL decides to make a referral to children’s social care and/or a report to the Police against a victim’s wishes, the reasons should be explained to the pupil and appropriate specialist support offered.

The DSL is to be informed of any incidents involving sexting. While pupils are not permitted to bring mobile phones into school, all incidents of sexting or youth produced sexual imagery must be referred to the DSL who will follow the guidance produced by the UK Council for Child Internet Safety (UKCCIS). The DSL will meet with any pupils involved. The DSL will not view images unless it is unavoidable and may discuss any incident with the parents of the children involved. Once the DSL has sufficient information, a decision will be made to either deal with the matter in school, refer it to the Police or to social care.

In the event of disclosures about peer on peer (child on child) abuse, all children involved (both victim(s) and perpetrator(s)) will be treated as being at risk and safeguarding procedures in accordance with this policy will be followed. Victims will be supported by the Head, the DSL, DDSLs or other appropriately trained members of staff and support from external agencies will be sought, as appropriate.

When there has been a report of sexual violence, the DSL will make an immediate risk and needs assessment. Where there has been a report of sexual harassment, the need for a risk assessment should be considered on a case-by-case basis. Reports of incidents of sexual violence or sexual harassment will be responded to in line with Part 5 of Keeping Children Safe in Education 2023 and the DfE guidance [‘Sexual violence and sexual harassment between children in schools and colleges’](#). The risk and needs assessment should consider:

- the victim(s);
- the alleged perpetrator(s); and
- the other children (and, if appropriate, staff) at the School.

Risk assessments will be recorded (written or electronic) and kept under review. In relation to a report of sexual violence or sexual harassment, the DSL (and indeed all staff) will reassure any victim that they are being taken seriously and that they will be supported and kept safe. The victim will never be made to feel ashamed for making a report nor will they be given the impression that they are creating a problem by reporting sexual violence or sexual harassment; nor would a victim ever be made to feel ashamed for making a report or have their experience minimised. The School will explain to the child in a way that avoids alarming or distressing them that the law is in place to protect children rather than to criminalise them. The School will consider the age and the developmental stage of the victim, the nature of the allegations and the potential risk of further abuse. The School acknowledges that, by the very nature of sexual violence and sexual harassment, a power imbalance is likely to have been created between the victim and alleged perpetrator(s). The DSL will consider the risks posed to pupils and put adequate measures in place to protect them and keep them safe and to ensure their educational attainment is not adversely affected as far as is possible. This may include careful consideration of the proximity of the victim and alleged perpetrator and considerations regarding shared classes, sharing School premises (including during any before or after school-based activities), and School transport. The School will also consider the risks posed to the victim from other health needs, including physical, mental and sexual health problems, as well as unwanted pregnancy which may arise as a result of the incident, and will consider recommending additional support.}

The School will consider intra familial harms and whether any support for siblings is necessary following an incident.

The School will keep a written record of all concerns, discussions and decisions made.

The School will reflect on reported concerns, including the decisions made and actions taken, in order to identify any patterns of concerning, problematic or inappropriate behaviour which may indicate an unacceptable culture, or any weaknesses in the School's safeguarding

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system which may require additional training or amendments to relevant policies. Where a pattern is identified the School will decide on an appropriate course of action.

In the event that a report is proven to be false, unsubstantiated, unfounded 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 Head will consider whether any disciplinary action is appropriate against the individual who made it in accordance with the School's behaviour policy.

## **6. ARRANGEMENTS FOR DEALING WITH SAFEGUARDING CONCERNS OR ALLEGATIONS OF ABUSE ABOUT TEACHERS AND OTHER STAFF (INCLUDING THE HEAD, GOVERNORS, SUPPLY STAFF AND VOLUNTEERS)**

The School's procedures for managing allegations against staff (including supply staff and volunteers) who are currently working in the School whether in a paid or unpaid capacity follows DfE statutory guidance and [Leicestershire and Rutland Safeguarding Children Partnership](#) [three safeguarding partners] arrangements and applies when staff (including volunteers) have (or are alleged to have):

- 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 indicated that they may pose a risk of harm if they were to work regularly or closely with children; and/or
- Behaved or may have behaved in a way that indicates they may not be suitable to work with children, including behaviour that may have happened outside of school.

There is also a school 'Low-level concerns policy' (Appendix 2) which should be followed if the concern does not meet the allegations threshold above or is not considered serious enough to make a referral to the LADO.

Allegations against a teacher who is no longer teaching should be referred to the Police. Historical (non-recent) allegations of abuse should be referred to the Police and also the LADO.

If an allegation is made against anyone working with children in the School, before contacting the LADO, the School will conduct a basic enquiry in line with local procedures to establish the facts in order to determine whether there appears to be any foundation to the allegation. The School should not undertake their own investigation of the allegation(s) without prior consultation with the LADO or, in the most serious cases, the police, so as not to jeopardise statutory investigations.

Concerns including allegations about a staff member should be investigated as a priority to avoid any delay. When dealing with an allegation about a staff member the School will apply common sense and judgment, deal with allegations quickly, fairly and consistently and will support the person subject to the allegation.

**If staff have safeguarding concerns or an allegation is made about another member of staff (including supply staff, volunteers, and contractors) posing a risk of harm to children, then:**

- this should be referred to the headteacher;
- where there are concerns/allegations about the headteacher or Proprietor (or a situation where there is a conflict of interest in reporting the matter to the headteacher), this should be reported directly to the local authority designated officer (LADO).

1. Concerns including allegations which appear to meet the above reporting criteria are to be reported straight away to the 'case manager' who is the Headteacher. Where the Head is the subject of the allegation or concern, the Head must not be informed of the allegation prior to contact with the school proprietor and designated officer. Anyone may refer their concerns direct to the LADO/LRSCP/Police.
2. The case manager should immediately discuss the allegation with the LADO and consider the nature, content and context of the allegation and agree a course of action including any involvement of the Police. (Where the case manager deems there to be an immediate risk to children or there is evidence of a possible criminal offence, the case manager may involve the Police immediately.) All discussions should be recorded in writing, and any communication with both the individual and the parents of the child(ren) agreed. The LADO should be informed within one working day of all allegations that come to the School's attention and appear to meet the criteria or that are made directly to the Police and/or children's social care.
3. The case manager will ensure that the individual who is the subject of the allegation is informed as soon as possible and given an explanation of the likely course or action, unless there is an objection by children's social care or the Police. The case manager will appoint a named representative to keep the individual informed of the progress of the case and will consider what other support is appropriate for the individual. The procedure for investigation is outlined below.
4. The case manager should give careful consideration as to whether the circumstances of the case warrant suspension or whether alternative arrangements should be put in place until the allegation is resolved. The case manager will give due weight to the views of the LADO, *WT* and *KCSIE* when making a decision about suspension. Where the individual is suspended, the case manager will ensure they know who their point of contact is in the School and shall provide them with their contact details.
5. The case manager will ensure that parents are informed as soon as possible and kept informed about progress of the case, subject to any advice from children's social care or the Police.
6. The case manager will discuss with the LADO whether a referral to the Disclosure and Barring Service or Teaching Regulation Agency should be made where an allegation is substantiated and the person is dismissed or the School ceases to use their services, or the person resigns or otherwise ceases to provide their services. The School has a legal obligation to report promptly to the Disclosure and Barring Service any person (whether employed, contracted, a volunteer or a student) who has harmed, or poses a risk of harm, to a child, or if there is reason to believe the member of staff has committed one of a number of listed offences, and who has been removed from working (paid or unpaid) in regulated activity, or would have been removed had they

not left. Further, or in the alternative, if an investigation leads to the dismissal or resignation prior to dismissal of a member of teaching staff specifically, the School must consider making a referral to the Teaching Regulation Agency and a prohibition order may be appropriate (because that teacher has displayed unacceptable professional conduct, conduct that may bring the profession into disrepute or a conviction at any time for a relevant offence).

7. On conclusion of the case, the case manager should review the circumstances of the case with the LADO to determine whether there are any improvements to be made to the School's safeguarding procedures or practices to help prevent similar events in the future.

**Procedure for investigation:**

- Case manager to contact LADO for advice and to discuss course of action
- Consideration given to suspension of staff member
- Determine Investigating officer (Senior member of staff)
- Identify potential witnesses
- Identify key questions
- Written invitation to interview to member of staff concerned (They have right to be accompanied). Specific allegation should be made clear to the member of staff to allow opportunity for response/preparation.

**Interview protocol:**

- Investigating officer to be accompanied by a scribe
- All statements to be signed
- Witness statements to not have to be shared with staff member at this stage

**Next steps:**

- Assessment of information made and decision made. Decision shared in writing with staff member

The School will make every reasonable effort to maintain confidentiality and guard against unwanted publicity whilst an allegation is being investigated or considered.

Where initial discussions lead to no further action, the case manager and the LADO should record the decision and justification for it and agree on what information should be put in writing to the individual concerned, and by whom.

Allegations found to be malicious or false will be removed from the individual's personnel records unless the individual gives consent for retention of the information. In all other circumstances a written record will be made of the decision and retained on the individual's personnel file in accordance with *KCS/E* and a copy will only be provided to the individual concerned. The information to be kept on file includes a clear and comprehensive summary of the allegation, details of how the allegation was followed up and resolved, a note of any action taken, decisions reached and the outcomes, and a declaration on whether the information will be referred to in any future reference. All records should be retained until the accused has reached pension age, or for a period of 10 years from the date of the allegation, whichever is longer. Records should be reviewed at the end of the retention period in case it is necessary to keep it for longer.

Allegations proven to be false, unsubstantiated, unfounded or malicious will not be included in employer references. If an allegation is shown to be deliberately invented or malicious, the DSL should consider whether the child and/or the person who has made the allegation is in need of help or may have been abused by someone else and this is a cry for help. In such circumstances, a referral to children's social care may be appropriate. If a report is shown to

be deliberately invented or malicious, the Head will consider whether any disciplinary action is appropriate against a pupil who made it in accordance with the School's behaviour policy; or whether the police should be asked to consider if action might be appropriate against the person responsible even if they are not a pupil.

## **7. ARRANGEMENTS FOR DEALING WITH SAFEGUARDING CONCERNS OR ALLEGATIONS OF ABUSE ABOUT SUPPLY TEACHERS**

The School's procedures for managing allegations against staff above also apply to staff not directly employed by the School, for example, supply teachers provided by an employment agency or business ('the agency'). The School will usually take the lead but agencies should be fully involved and co-operate in any enquiries from the LADO, police and/or children's social services.

In no circumstances will the School decide to cease to use a supply teacher due to safeguarding concerns, without finding out the facts and liaising with the LADO to determine a suitable outcome. The School will discuss with the agency whether it is appropriate to suspend the supply teacher, or redeploy them to another part of the school, whilst they carry out their investigation.

The School will advise supply teachers being investigated to contact their trade union representative if they have one, or a colleague for support. The allegations management meeting which is often arranged by the LADO should address issues such as information sharing, to ensure that any previous concerns or allegations known to the agency are taken into account by the School during the investigation.

When using an agency, the School should inform the agency of its process for managing allegations but also take account of the agency's policies and their duty to refer to the DBS as personnel suppliers. This should include inviting the agency's human resource manager or equivalent to meetings and keeping them up to date with information about its policies.

Where the agency dismisses or ceases to use the services of a teacher because of serious misconduct, or might have dismissed them or ceased to use their services had they not left the School first, the School must consider whether to refer the case to the Secretary of State (via the Teaching Regulation Agency).

### **Organisations or Individuals using school premises**

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

When services or activities at the School are provided under the direct supervision or management of school staff, this Policy will apply in relation to any safeguarding concerns or allegations. Where services or activities are not under the direct supervision or management of the School, the School will seek assurance that any individual or organisation has appropriate safeguarding and child protection policies and procedures in place (and the School will inspect these as needed); and ensure that there are arrangements in place for the provider to liaise with the School on these matters where appropriate. The School will expect

,where appropriate, providers to fully comply with the DfE guidance *After school clubs, community activities, and tuition (safeguarding guidance for providers) (September 2023)* and will seek assurance in this regard.

The School has arrangements in place for the use of school premises for non-school activities including the availability of the DSL or DDSL and how they can be contacted.

## **DEALING WITH CONCERNS OR ALLEGATIONS (THAT DO NOT MEET THE HARM THRESHOLD)**

A low-level concern is any concern that an adult working in or on behalf of the School may have acted in a way that<sup>121</sup>:

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

A 'low-level' concern does not mean that it is insignificant. A concern may be a low-level concern, no matter how small, even if it does no more than give a sense of unease or a "nagging doubt". 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 (for example, grooming-type behaviours).<sup>122</sup>

The School takes all concerns about safeguarding seriously and recognises that addressing even low-level concerns is important to create and embed a culture of openness, trust and transparency in which the School's values and expected behaviour of its staff are constantly lived, monitored and reinforced by all staff.<sup>123</sup>

The School has a separate Low-Level Concerns Policy (Appendix 2) which enables all staff to share concerns – no matter how small – about their own or another member of staff's behaviour. The aim of the policy is to provide clear guidance about the standards of appropriate behaviour and actions of its staff so as to not place pupils or staff at risk of harm or of allegation of harm to a pupil. All staff are expected to comply with the standards contained within this policy at all times.

The procedure for sharing confidentially any such concerns is set out in the Low-Level Concerns Policy. The Head is the ultimate decision-maker in respect of all low-level concerns.

Staff must share all concerns with the Head without delay so that it can be recorded and dealt with appropriately, sensitively, and proportionately and in a timely manner. Where a low-level concern is raised about the Head, it should be referred to the Proprietor

Staff are also encouraged to self-refer in the event that they have found themselves in a situation which may be misinterpreted, might appear compromising to others, and/or on reflection they believe they have behaved in a way that may be considered to fall below the expected professional standard. All concerns will be handled sensitively and will be dealt with appropriately and proportionately.

If a concern is raised by a third party, the Head will collect as much evidence as possible by speaking to the person who has raised the concern (if known), to the individual involved and any witnesses. The concern will be recorded in accordance with this policy, in the usual way.

The School will address unprofessional behaviour at an early stage and will support the individual to correct it.

All low-level concerns will be recorded in writing. The record will include details of the concern, the context within which the concern arose, and details of the action taken. The name of the reporting individual should also be included, unless they have asked to remain anonymous, which will be respected as far as reasonably possible. The records will be kept confidential, will be held securely and in compliance with the Data Protection Act 2018 and the UK GDPR at all times. The information will be retained until the individual has left employment.

Low-level concerns will not be included in references unless they relate to issues which would normally be disclosed, for example, misconduct or poor performance.

The School will also reflect on reported concerns in order to identify any patterns of concerning, problematic or inappropriate behaviour which may indicate a unacceptable culture, or any weaknesses in the Schools safeguarding system which may require additional training or modified policies. Where a pattern is identified, the School will decide on a course of action, either through its disciplinary procedures, or, where the pattern moved from a concern to meeting the harms threshold, it will follow the above procedure and refer the matter to the LADO.

Where a low-level concern relates to a person employed by a supply agency or a contractor, the individuals employer will be notified about the concern, so that any potential patterns of inappropriate behaviour can be identified.

If the School is in any doubt as to whether a low-level concern in fact meets the harm threshold, the Head will consult with the LADO and take a more collaborative decision-making approach.

## **8. STAFF BEHAVIOUR POLICY / CODE OF CONDUCT**

The School's Staff Behaviour Policy (code of conduct) can be found on the Department Drive. The aim of the Staff Behaviour Policy is to provide clear guidance about behaviour and actions so as to not place pupils or staff at risk of harm or of allegation of harm to a pupil.

### **Restrictive Intervention (including Reasonable Force)**

The school recognises that the use of restrictive interventions, including reasonable force, may in some circumstances constitute a safeguarding concern, particularly where it is frequent, involves pupils with SEND or who are vulnerable, or gives rise to injury, distress or unmet need. Restrictive interventions should only be used as a last resort, for the purpose of maintaining safety, and in accordance with statutory guidance. In line with DfE guidance 'Restrictive interventions, including use of reasonable force in schools' (DfE, April 2026), the school has arrangements in place to record all significant incidents, to inform parents/carers promptly on the same day, and to ensure appropriate safeguarding oversight. The DSL reviews relevant incidents and patterns of use, and the Proprietor receives oversight

information as part of their safeguarding responsibilities. Full details of procedures, recording, reporting and governance arrangements are set out in the school's Restrictive Interventions policy.

**Duncan Flint and Duncan Flint have both completed Team Teach Level 3.**

## **9. SAFER RECRUITMENT**

The School is committed to safer recruitment processes to create a culture that safeguards and promotes the welfare of children in the School whilst deterring and preventing people who are unsuitable to work with children from applying or securing employment, or volunteering opportunities, within the School.<sup>135</sup>

Members of the teaching and non-teaching staff at the School including part-time staff, temporary and supply staff, and visiting staff, such as musicians and sports coaches are subject to the necessary statutory child protection checks before starting work, for example, right to work checks, additional overseas checks (if necessary), verifying identity, taking up references, checking work history and confirming medical fitness for the role. For most appointments, an enhanced DBS check with "barred list" information will be appropriate. A DBS certificate will be obtained from the candidate before or as soon as practicable after appointment. Alternatively, if the applicant has subscribed to it and gives permission, the School may undertake an online update check through the DBS Update Service.

As part of the shortlisting process, the School will also consider carrying out an online search on shortlisted candidates as part of its due diligence. This may help to identify any incidents or issues that have happened and are publicly available online, which the School may want to explore with an applicant at interview. This forms part of the School's wider safeguarding due diligence which aims to prevent and/or deter individuals who may be unsuitable to work with children from working in a school environment<sup>140</sup>.

Full details of the School's safer recruitment procedures for checking the suitability of staff, Proprietor and volunteers to work with children and young people is set out in the School's Recruitment and Selection Policy.

The School's protocols for ensuring that any visiting speakers, whether invited by staff or pupils themselves, are suitable and appropriately supervised is set out in the School's Visiting Speaker Policy

## **10. MANAGEMENT OF SAFEGUARDING**

The School's DSL is Duncan Flint who is a member of the leadership team.

Duncan Flint (Head) and Suzie McMurray are the DDSL and the people to whom reports should be made in the absence of the DSL. This ensures there is the required cover for the role at all times. The DDSL are trained to the same level as the DSL.

The DSL and DDSL's contact details can be found on the Key Contacts page at the start of this policy.

The DSL's role is to take lead responsibility for safeguarding and child protection matters in the School. The DSL's responsibility is to maintain an overview of safeguarding within the School, to open channels of communication with local statutory agencies, refer incidents to third parties (including the local authority children's services, the DBS, Channel and the police) where appropriate, to support staff in carrying out their safeguarding duties and to monitor the effectiveness of the School's policies and procedures in practice. The DSL will also take lead responsibility for online safety and understanding the filtering and monitoring systems and

processes the School have in place. The DSL works with the proprietor to review and update the School's safeguarding policy.

Where a pupil leaves the School, including for in-year transfers, the DSL will also ensure their child protection file is transferred to the new school (separately from the main pupil file) 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. The DSL will ensure secure transit and obtain confirmation of receipt. In addition to the child protection file, the DSL should also consider if it would be appropriate to share any additional information with the new school 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.

The DSL regularly reviews the School's and their own practices and concerns about welfare and safeguarding matters. This includes the personal and professional duty of all staff to report welfare and safeguarding concerns to the DSL, or in the absence of action, directly to local children's services.

During term time, the DSL or a DDSL will always be available (during school hours) for staff in the School to discuss any safeguarding concerns. If a DSL or DDSL is not available in person, they can be contacted via their mobile telephone. For out of hours/out of term activities, the School's arrangements are to contact the DSL or DDSL using the contact details provided in the key contacts section.

The DSL or DDSL should liaise with the three safeguarding partners and work with other agencies in line with *WT*. "*NPCC When to call the police: guidance for schools and colleges*" ([npcc.police.uk](http://npcc.police.uk)) can assist the DSL {or DDSL} understand when they should consider calling the police and what to expect when they do. If the School has questions about any police investigation, it will ask the police. The DSL {or DDSL} will also be responsible for liaising with the senior mental health lead and, where available, the Mental Health Support Team, where safeguarding concerns are linked to mental health. The DSL and DDSL should be confident as to what local specialist support is available to support all children involved in sexual violence and sexual harassment and be confident as to how to access this support when required.

Whilst the Head should ensure that the policies and procedures adopted, particularly those concerning referrals of cases of suspected abuse, exploitation and neglect, are understood and followed by all staff, and the Proprietor is ultimately responsible for ensuring staff are competent, supported and regularly reviewed in relation to safeguarding, the ultimate lead responsibility for safeguarding and child protection remains with the DSL and this responsibility should not be delegated.

Full details of the DSL's role can be found at Annex C of *KCSIE*.

## 11. TRAINING

Induction and training are in line with advice from the [Leicestershire and Rutland Safeguarding Children Partnership](#) [three safeguarding partners].

### All Staff

All new staff will be provided with induction training that includes:

- the child protection policy;
- the role and identity of the DSL and any DDSL
- the behaviour policy
- the staff behaviour policy or code of conduct including the School's whistleblowing procedure and the acceptable use of technologies policy, staff/pupil relationships and

communications including the use of social media, responsibilities in relation to filtering and monitoring online

- the safeguarding response to children who are absent from education;
- expectations in relation to online filtering and monitoring as set out in the DfE publication
- a copy of Part One of *KCSIE*
- School leaders and staff who work directly with children will also be required to read Annex B of *KCSIE*.

Copies of the above documents are provided to all staff during induction.

Temporary staff and volunteers are provided with appropriate training to suit the role (as set out in the School's Induction and Training Policy)

All staff are also required to:

- Read Part one of *KCSIE* and confirm that they have done so. Each time Part one of *KCSIE* is updated by the Department for Education, staff will be updated on the changes via internal training delivered by the DSL.
- Understand key information contained in Part one of *KCSIE*. The School will ensure staff understanding by the completion of induction training for new staff and an annual check for all staff through online questioning (2021 – Microsoft Forms)
- Receive training in safeguarding and child protection regularly, in line with advice from the LRSB [three safeguarding partners]. Training will include online safety and harmful sexual behaviours (including peer on peer sexual violence and harassment). It will also include Prevent awareness training to equip staff to raise concerns appropriately by ensuring all staff have the knowledge and confidence to identify children at risk of being drawn into terrorism; are able to challenge extremist ideas; and know how to refer children and young people for further help.
- Undertake regular informal updates, at least annually, to provide them with relevant skills and knowledge to safeguard children effectively. The School provides these via, for example, emails and staff meetings.
- Complete an online staff radicalisation training of general awareness:  
<https://www.elearning.prevent.homeoffice.gov.uk/edu/screen1.html#>  
[www.elearning.prevent.homeoffice.gov.uk](http://www.elearning.prevent.homeoffice.gov.uk)

The proprietor will ensure that all governors receive appropriate safeguarding and child protection (including online safety which, amongst other things, includes an understanding of the expectations, applicable roles and responsibilities in relation to filtering and monitoring) training at induction. This training should equip them with the knowledge to provide strategic challenge to test and assure themselves that the safeguarding policies and procedures in place in the School are effective and support the delivery of a robust whole school approach to safeguarding. Their training should be regularly updated.

The proprietor are aware of their obligations under the Human Rights Act 1998 (HRA), the Equality Act 2010, the Data Protection Act 2018, the UK GDPR, and their local multi-agency safeguarding arrangements. Under the Human Rights Act 1998, it is unlawful for the School to act in a way that is incompatible with the European Convention on Human Rights (ECHR) Convention. Being subjected to harassment, violence, exploitation and or abuse, including that of a sexual nature, may breach conventions set out in the European Convention on Human Rights (ECHR) Convention. The Data Protection Act 2018 and the UK GDPR place duties on organisations and individuals to process personal information fairly and lawfully and to keep the information they hold safe and secure.

In addition, [the governing body or the proprietor] complies with the DfE's Data Protection guidance for schools, ensuring school staff, [governors and trustees] know how to comply with data protection law, develop their data policies and processes, what staff and pupil data to keep and the importance of good practices for preventing personal data breaches.

## 12. DSL

The DSL receives updated child protection training at least every two years to provide them with the knowledge and skills required to carry out the role. This includes local inter-agency working protocols, participation in child protection case conferences, supporting children in need, identifying children at risk of radicalisation, record keeping and promoting a culture of listening to children, training in the LRSB's [three safeguarding partners'] approach to *Prevent* duties and harmful sexual behaviours. Further details of the required training content for the DSL are set out in Annex C of *KCS/E*. The DSL/DDSL training log is updated regularly as part of the Safeguarding Review.

In addition to their formal training, the DSL's knowledge and skills are updated at least annually to keep up with any developments relevant to their role. In particular, the School will support the DSL in developing their knowledge and skills to understand the views of children including to encourage a culture of listening to children and taking account of their wishes, as well as having an awareness of the difficulties children may face in approaching staff with a disclosure. The DDSL are trained to the same level as the DSL.

## 13. OVERSIGHT OF SAFEGUARDING, INCLUDING ARRANGEMENTS FOR REVIEWING POLICIES AND PROCEDURES

Mark Thomas is the board-level lead designated to take a lead in relation to responsibility for the safeguarding arrangements in the School.

The School considers its obligation to review safeguarding practices a matter of its everyday concerns. A review of the School's child protection policies takes place at least annually, including an update and review of the effectiveness of procedures and their implementation. Once the annual review has taken place the policy and all information will be shared with the board-level lead. The annual review will take place in the summer holidays each year where an audit, commentary, changes and training requirements will be presented and recorded. Duncan Flint, who is the Designated Safeguarding Lead (DSL), will carry out an annual review of the School's safeguarding policy and procedures and is also responsible for all day-to-day issues with support from Senior Management and the Deputy DSL. Elizabeth Bell, Proprietor, is responsible for:

- reviewing the procedures for and the efficiency with which the safeguarding duties have been discharged;
- ensuring that any deficiencies or weaknesses in safeguarding arrangements are remedied without delay; and
- approving amendments to safeguarding arrangements in the light of changing Regulations or recommended best practice.

The School draws on the expertise of staff, including the DSL and DDSLs, in shaping the School's safeguarding arrangements and policies.

If there has been a substantiated allegation against a member of staff, the School will work with the Local Authority designated officer to determine whether there are any improvements to be made to the School's procedures or practice to help prevent similar events in the future.

## 14. THE SCHOOL'S ARRANGEMENTS TO FULFIL OTHER SAFEGUARDING RESPONSIBILITIES

### Teaching children how to keep safe

The Proprietor ensures that all pupils are taught about safeguarding, including online safety, through the curriculum and PSHE to help children to adjust their behaviours, both inside and outside of School, in order to reduce risks and build resilience, including to radicalisation and extremism. This includes teaching pupils about the safe use of electronic equipment and the internet and the risks posed by adults or young people, who use the internet and social media to bully, groom, abuse or radicalise other people, especially children, young people and vulnerable adults. The School recognises that a "one size fits all" approach may not be appropriate for all children, and a more personalised or contextualised approach for more vulnerable children, victims of abuse and some children with SEND might be needed.

Internet safety (including when children are online at home) is an integral part of the School's computing curriculum and also embedded in PSHE and Relationships and Sex Education ("RSE").

### Filtering and monitoring

The School has appropriate filters and monitoring systems in place to safeguard children from potentially harmful and inappropriate material online in accordance with the published [DfE publication of Filtering and Monitoring standards and guidance](#). The School's systems are: we monitor the filtering of online traffic through on and off-site means. Off-site, all traffic is monitored through a proxy server managed by Exa Networks, which scans both encrypted and non-encrypted traffic. On-site, we use a Cisco router as our server fire wall, monitoring both incoming and outgoing traffic, individual devices all use the installed Windows fire wall. Our school email provider is currently RM, which uses a strict educational filtering system. This service is currently being migrated to Office 365. Every machine runs E Set antivirus, which is kept up to date and managed by Arc ( [helpdesk@ark.me.uk](mailto:helpdesk@ark.me.uk) ). This has a three-tiered process, scanning first off-site then on the server and finally on the individual machine.

Such systems aim to reduce the risk of children being exposed to illegal, inappropriate or harmful materials online (content risk); reduce the risk of children being subjected to harmful; **Content:** being exposed to illegal, inappropriate, or harmful content, for example: pornography, racism, misogyny, self-harm, suicide, anti-Semitism, radicalisation, extremism, misinformation, disinformation (including fake news) and conspiracy theories.

**Contact:** being subjected to harmful online interactions 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:** online behaviour that increases the likelihood of, or causes harm. For example: making, sending and receiving explicit images, sharing other explicit images and online bullying.

**Commerce:** risks such as online gambling, inappropriate advertising, phishing and/or financial scams.

The School recognises however that children have unlimited and unrestricted access to the internet via mobile phone networks (i.e. 3G, 4G and 5G) which means that children may consensually and/or non-consensually share indecent images, sexually harass their peers via mobile and smart technology, and view and share pornography and other harmful content whilst at school undetected. The use of personal smart devices (mobile phones, tablets, watches) is not permitted by pupils in school.

The School ensures compliance with the DfE's 'filtering and monitoring standards for schools' by:

- Identifying and assigning roles and responsibilities to manage filtering and monitoring systems.
- Reviewing the filtering and monitoring provision at least annually.
- Blocking harmful and inappropriate content without unreasonably impacting teaching and learning.
- Having effective monitoring strategies in place that meet our safeguarding needs.

Further detail of the Schools policy and procedures in relation to online safety can be found in the School's E-Safety Policy which also includes detail on the use of mobile and smart technology in School, including the School's management of the associated risks, and the School's filtering and monitoring arrangements to ensure that children are safe from harmful and inappropriate content, including terrorist and extremist material when accessing the internet through the School's systems.

The School will liaise with parents to reinforce the importance of children being safe online and the systems the School uses to filter and monitor online use. Parents and carers will be made aware of what their children are being asked to do online when undertaking remote learning, including the sites they will be asked to access and who from the School their child is going to be interacting with online.

### **Relationships Education AND/OR Relationships and Sex Education ("RSE")**

Relationships Education and / or RSE is compulsory from September 2020 although the School has flexibility to decide how it discharges its duties within the first year of compulsory teaching. The School understands that preventative education is most effective in the context of a whole-school approach that prepares children for life in modern Britain and creates a culture of zero tolerance for sexism, misogyny/misandry, homophobia, biphobic, and sexual violence/harassment. The School will have regard to the DfE's statutory guidance *Relationships Education, Relationships and Sex Education (RSE) and Health Education* when making arrangements for and teaching Relationships Education.

Relationships Education and RSE will form part of the School's PSHE programme, and information can be found in the School's RSE policy.

### **Looked after children**

The School Proprietor 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.

Duncan Flint (DSL) is the designated member of staff who has responsibility for their welfare and progress. The School ensures that the designated member of staff receives appropriate training in order to carry out their role.

### **Arrangements for visiting speakers**

The School has clear protocols for ensuring that any visiting speakers are appropriately supervised and suitable as set out in the Visiting Speaker Policy and the Guidelines for Visiting Speakers information. 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.

The School is required to undertake a risk assessment (Visiting Speaker at BPS form) before agreeing to a Visiting Speaker being allowed to attend the School. This will take into account any vetting requirements considered appropriate in the circumstances, and may include a DBS check if relevant.

Visiting speakers will be expected to understand that, where appropriate, their session should actively promote the British values of democracy, the rule of law, individual liberty and mutual respect and tolerance of those with different faiths and beliefs and at no point undermine these. In some cases, the School may request a copy of the Visiting Speaker's presentation and/or footage in advance of the session being provided.

Visiting Speakers, whilst on the School site, will be supervised by a School employee. On attending the School, Visiting Speakers will be required to show original current identification document including a photograph such as a passport or photo card driving licence. The School shall also keep a formal register of visiting speakers retained in line with its Data Protection Policy.

### **Arrangements for use of school premises for non-school activities**

When services or activities at the School are provided under the direct supervision or management of school staff, this Policy will apply in relation to any safeguarding concerns or allegations.

Where services or activities are not under the direct supervision or management of the School, the School will seek assurance that any individual or organisation has appropriate safeguarding and child protection policies and procedures in place (and the School will inspect these as needed); and ensure that there are arrangements in place for the provider 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 are children on the school roll.

The School will ensure that the DSL or DDSL can be contacted and/or is available at all times the school premises is in use, whether that activity is a school or non-school activity and regardless as to whether the children attending are on the school roll.

Contact details for the DSL / DDSL can be found on posters around the school and are given to all external providers. Key contact details are found in the key contact section.

The School will ensure that safeguarding requirements are included in any agreement for use of the school premises (such as a lease or hire agreement) as a condition of use and occupation of the premises and that failure to do so by the provider to comply with this will lead to termination of the agreement.<sup>199</sup>

When considering the safeguarding arrangements any providers have in place the School will have regard to the DfE's non statutory guidance '*Keeping children safe in out-of-school settings*' (April 2022) and '*After school clubs, community activities, and tuition (safeguarding guidance for providers)*' (September 2023).

## **Additional Measures**

All staff, including full time, part time, temporary and permanent members of staff, and volunteers, must adhere to the School's relevant staff code of conduct. Staff are obliged to keep the School informed of any reason why they should not work with children.

Staff should be mindful of the need to consider safeguarding arrangements where children are engaged in close one to one teaching, particularly in music, performing arts and sports activities. Specific guidance can be provided on a case-by-case basis by consulting with the DSL or Head as required.

Trip-specific safeguarding risks are assessed as part of the trip's risk assessment.

## **15. EARLY YEARS PROVISION SAFEGUARDING ARRANGEMENTS**

### **Disqualification from working in childcare**

Where staff work in, or are involved in the management of, the School's early years or provision of care of pupils under the age of eight, the School will take steps to check whether those staff are disqualified under the Childcare Act 2006. These checks will be undertaken pre-appointment, and from time to time during employment. This forms part of the School's safer recruitment practices, further details of which can be found in the School's Recruitment and Selection Policy.

The School records all checks of staff employed to work in or manage relevant childcare on the Single Central Register. This includes the date disqualification checks were completed.

Where a member of staff is found to be disqualified or if there is doubt over that issue then, pending resolution, the School will remove them from the work from which they are or may be disqualified. Suspension or dismissal will not be an automatic response; the School will consider if there is scope in principle to redeploy them with other age groups or in other work from which they are not disqualified, subject to assessing the risks and taking advice from the LADO when appropriate.

### **Use of mobile phones and cameras**

The School's policy on the use of mobile phones and cameras in the setting can be found in the School's E-Safety Policy. Mobile phones are prohibited in the EYFS setting.

### **DSL for the EYFS**

The practitioner designated to take lead responsibility for safeguarding children in the early years setting is Suzie McMurray – DDSL.

### **Duty to notify Ofsted**

The School will inform Ofsted of any significant event which is likely to affect the suitability of any person who is in regular contact with children on the premises where childcare is provided. For example, where the School is satisfied that a person working in a relevant setting falls within one of the disqualification criteria. Any significant event must be notified to Ofsted as soon as reasonably practicable, but at the latest within 14 days of the date the School became aware (or ought reasonably to have become aware) of it.

The School will notify Ofsted within 14 days of any allegations of serious harm or abuse by any person living, working or looking after children at the premises (whether the allegations relate to harm or abuse committed on the premises or elsewhere).

## 16. APPENDIX 1 – SIGNS AND TYPES OF ABUSE

All School staff should be aware that abuse, neglect, exploitation and safeguarding issues are rarely standalone events and cannot be covered by one definition or one label alone. In most cases, multiple issues will overlap. Therefore staff should always be vigilant and always raise any concerns with the DSL (or DDSL).

All staff should 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 DSL {and DDSL}, should consider whether children are at risk of abuse or exploitation in situations outside the home. This is often referred to as “extra-familial harm.’ Extra-familial harm can occur in a range of extra-familial contexts, including in school, peer groups, or within community/public spaces, and/or online. Children may experience this type of harm from other children and/or from adults. Forms of extra-familial harm include exploitation by criminal and organised crime groups and individuals (such as county lines and financial exploitation), serious violence, modern slavery and trafficking, online harm, sexual exploitation, teenage relationship abuse, and the influences of extremism which could lead to radicalisation. Children of all ages can experience extra-familial harm.

All staff should be aware that technology is a significant component in many safeguarding and wellbeing issues and should recognise that children are at risk of abuse online as well as face to face. In many cases abuse will take place concurrently online and in daily life. Staff should be aware that children can also abuse their peers online, this can take the form of abusive, harassing, and misogynistic/misandrist messages, the non-consensual sharing of indecent images, especially around chat groups, and the sharing of abusive images and pornography, to those who do not want to receive such content.

**In all cases, if staff are unsure, they should always speak to the DSL (or DDSL).**

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

**Emotional abuse:** the persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child’s emotional development. It may involve conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the child opportunities to express their views, deliberately silencing them or ‘making fun’ of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child’s developmental capability as well as 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 cyberbullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.

**Sexual abuse:** involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving 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 (including via the internet). Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.<sup>218</sup> Sexual abuse also includes sexual violence and sexual harassment (see below) which can occur between two children of any sex (also known as child on child abuse). This can also occur through a group of children sexually assaulting or sexually harassing a single child or group of children.<sup>219</sup> Sexual violence are sexual offences under the Sexual Offences Act 2003, such as rape, sexual assault, and assault by penetration. Schools should be aware that sexual assault covers a very wide range of behaviour so a single act of kissing someone without consent or touching someone's bottom/breasts/genitalia without consent, can still constitute sexual assault.

**Sexual harassment:** is 'unwanted conduct of a sexual nature' that can occur online and offline and both inside and outside of school. Sexual harassment is likely to violate a child's dignity, and/or make them feel intimidated, degraded, or humiliated and/or create a hostile, offensive or sexualised environment. Sexual harassment can include sexual comments, such as telling sexual stories, making lewd comments, making sexual remarks about clothes and appearance and calling someone sexualised names; sexual "jokes" or taunting; physical behaviour, such as deliberately brushing against someone, interfering with someone's clothes; or upskirting, and sharing of unwanted explicit content (for example displaying pictures, photos or drawings of a sexual nature); and online sexual harassment, which might include consensual or non-consensual sharing of sexual images and videos (often referred to as the sharing of nudes/semi-nudes, or sexting – see below); inappropriate sexual comments on social media; exploitation; coercion and threats. Online sexual harassment may be standalone, or part of a wider pattern of sexual harassment and/or sexual violence.

**Sexual violence:** refers to sexual offences under the Sexual Offences Act 2003, including rape, assault by penetration, sexual assault, and/or causing someone to engage in sexual activity without consent. Consent to sexual activity may be given to one sort of sexual activity, but not another, or penetration with conditions, such as wearing a condom. Consent can be withdrawn at any time during sexual activity and each time activity occurs. A child under the age of 13 can never consent to any sexual activity. The age of consent is 16, and sexual intercourse without consent is rape.

**Child-on-child sexual violence and/or harassment:** Sexual violence and sexual harassment (as defined above) can occur between two children of any age and sex, from primary through to secondary stage and into colleges. It can occur through a group of children sexually assaulting or sexually harassing a single child or group of children. It is more likely that girls will be the victims of sexual violence and harassment, and it is more likely that it will be perpetrated by boys. It can however occur between children of any sex. Sexual violence and sexual harassment exist on a continuum and may overlap; they can occur online and face to face (both physically and verbally) and are never acceptable. Children who are victims of sexual violence and/or sexual harassment wherever it happens, will likely find the experience stressful and distressing. This will, in all likelihood, adversely affect their educational attainment and will be exacerbated if the alleged perpetrator(s) attends the same school or college.

**Harmful sexual behaviour:** problematic, abusive and violent sexual behaviour is developmentally inappropriate and may cause developmental damage. A useful umbrella term is "harmful sexual behaviour". Harmful sexual behaviour can occur online and/or face-to-face and can also occur simultaneously between the two. Sexual behaviour between children can be considered harmful if one of the children is much older, particularly if there is more than

two years' age difference, or if one of the children is pre-pubescent and the other is not. However, a younger child can abuse an older child, particularly if they have power over them, for example, if the older child is disabled or smaller in stature.

**Sharing of nudes and/or semi-nudes (Peer on Peer abuse):** the sending or posting of nude or semi-nude images, videos or live streams online by young people under the age of 18. 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 sharing of nudes and semi-nudes can happen publicly online, in 1:1 messaging or via group chats and closed social media accounts and may include images or footage of more than one child or young person.

Alternative terms used by children and young people may include 'dick pics' or 'pics', or may be referred to by adults or professionals as 'youth produced/involved sexual imagery', 'indecent imagery', 'image based sexual abuse' or 'sexting'.

The motivations for taking and sharing nude and semi-nude images, videos and live streams are not always sexually or criminally motivated. Such images may be created and shared consensually by young people who are in relationships, as well as between those who are not in a relationship. It is also possible for a young person in a consensual relationship to be coerced into sharing an image with their partner. Incidents may also occur where:

- children and young people find nudes and semi-nudes online and share them claiming to be from a peer
- children and young people digitally manipulate an image of a young person into an existing nude online
- images created or shared are used to abuse or blackmail peers. Situations could include:
  - o children and young people selling nudes or semi-nudes of others online
  - o children and young people coercing a peer into sharing a nude or semi-nude to blackmail them for money, further images, or force them into illegal activity
  - o children and young people hacking a peer's account to share images more widely without consent to publicly shame
- children and young people create and share a nude or semi-nude with an adult who has presented themselves as someone under the age of 18 to groom, sexually abuse or blackmail them.

For this reason, incidents can either be classified as 'aggravated' or 'experimental'. The DDCMS / UKIS guidance "Sharing nudes and semi-nudes: advice for education settings working with children and young people" sets out the classification of incidents, and how each should be handled.

*The sharing of nudes and semi-nudes of under 18s by adults (18 and over) constitutes child sexual abuse and police will be contacted as a matter of urgency.*

**Upskirting:** is a criminal offence and 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. Anyone of any gender can be a victim.

**Neglect:** the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may 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); or ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

**Serious violence:** indicators which may signal that children are at risk from, or are involved with serious violent crime include increased absence from School, a change in friendships or relationships with older individuals or groups, a significant decline in performance, signs of self-harm or a significant change in wellbeing, or signs of assault or unexplained injuries. Unexplained gifts or new possessions could also indicate that children have been approached by, or are involved with, individuals associated with criminal networks or gangs and may be at risk of criminal exploitation. All staff should be aware of the associated risks which increase the likelihood of involvement in serious violence (for example, being male, frequent absence from school or permanently excluded from school, experienced child maltreatment or having been involved in offending) and understand the measures in place to manage these.

**Specific safeguarding issues:** behaviours linked to drug taking, alcohol abuse, unexplainable and/or persistent absences from education and sexting put children in danger.<sup>227</sup> Safeguarding issues can also manifest themselves via child on child abuse, such as abuse within intimate partner relationships, bullying (including cyberbullying), gender-based violence/sexual assaults, sexting and upskirting. Safeguarding issues can also be linked to, for example, children being absent, repeatedly and/or for prolonged periods, children missing from education; child sexual exploitation; domestic violence; fabricated or induced illness; faith abuse (including ostracism of families); female genital mutilation; forced marriage; gangs and youth violence; gender-based violence / violence against women and girls; hate; mental health; preventing radicalisation; relationship abuse; sexting; consensual and non-consensual sharing of nudes and semi-nudes; and trafficking.

**Child sexual exploitation (CSE):** CSE is a form of child sexual abuse (see above) which occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into taking part in sexual activity . It may involve an exchange for something the victim needs or wants (for example, money, gifts or affection), and/or the financial advantage or increased status of the perpetrator or facilitator. Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including gender, sexual identity, cognitive ability, physical strength, status, and access to economic or other resources.

The victim may have been sexually exploited even if the sexual activity appears consensual. CSE does not always involve physical contact; it can also occur through the use of technology. CSE can affect any persons (male or female) under the age of 18 years (including 16 and 17 year olds who can legally consent to have sex) who has been coerced into engaging in sexual activities. It can include both contact (penetrative and non-penetrative acts) and non-contact sexual activity and may occur without the child or young person's immediate knowledge (e.g. through others copying videos or images they have created and posted on social media). Some children may not realise they are being exploited e.g. they believe they are in a genuine romantic relationship.

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

The below CCE indicators can also be indicators of CSE, as can:

- children who have older boyfriends or girlfriends, and
- children who suffer from sexually transmitted infections, display sexual behaviours beyond expected sexual development or become pregnant.

The DfE has published guidance on this entitled “*Child sexual exploitation: guide for practitioners*”.

CSE may occur alone, or may overlap with CCE, and/or county lines, as well as other forms of abuse.

**Child criminal exploitation (CCE):** CCE is where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child into taking part in any criminal activity. It may involve an exchange for something the victim needs or wants (for example, money, gifts or affection), and/or (for the financial or other advantage (such as increased status) of the perpetrator or facilitator and/or through violence or the threat of violence. Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including gender, sexual identity, cognitive ability, physical strength, status, and access to economic or other resources. The victim may have been criminally exploited even if the activity appears consensual. CCE does not always involve physical contact; it can also occur through the use of technology.

CCE can include children being forced to work in cannabis factories, being coerced into moving drugs or money across the country (county lines, see below), forced to shoplift or pickpocket. 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. Children can be exploited by adult males or females, as individuals or in groups. They may also be exploited by other children, who themselves may be experiencing exploitation – where this is the case, their vulnerability as victims is not always recognised by adults and professionals (especially when they are older children). It is important in these circumstances that the child perpetrator is also recognised as a victim.

Some of the following can be indicators of CCE:

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

The experience of girls who are criminally exploited can be very different to that of boys. The indicators may not be the same, however staff should be aware that girls are at risk of criminal exploitation too. It is also important to note that both boys and girls being criminally exploited may be at higher risk of sexual exploitation.

CCE may occur alone, or may overlap with CSE, and/or county lines, as well as other forms of abuse.

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

**County lines:** County lines is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs, using dedicated mobile phone lines or other form of “deal line”.

This activity can happen locally as well as across the UK – no specified distance of travel is required. Children and vulnerable adults exploited to sell drugs and move and store drugs and money. Offenders will often use coercion, intimidation, violence (including sexual violence) and weapons to ensure compliance of victims. Children can be targeted and recruited into county lines in a number of locations including schools (mainstream and special), further and higher educational institutions, pupil referral units, children’s homes and care homes. Children are increasingly being targeted and recruited online using social media. Children can easily become trapped by this type of exploitation as county lines gangs can manufacture drug debts which need to be worked off or threaten serious violence and kidnap towards victims (and their families) if they attempt to leave the county lines network.

A number of the ways of identifying indicators for CSE and CCE as detailed above may be applicable to where children are involved in county lines. Some additional specific indicators that may be present where a child is criminally exploited through involvement in county lines are children who:

- go missing (from school or home) and are subsequently found in areas away from their home;
- that have been the victim, perpetrator or alleged perpetrator of serious violence (e.g. knife crime);
- are involved in receiving requests for drugs via a phone line, moving drugs, handing over and collecting money for drugs;
- are exposed to techniques such as ‘plugging’, where drugs are concealed internally to avoid detection;
- are found in accommodation that they have no connection with, often called a ‘trap house or cuckooing’ or hotel room where there is drug activity;
- owe a ‘debt bond’ to their exploiters;
- have their bank accounts used to facilitate drug dealing.

Further information on the signs of a child’s involvement in county lines is available in guidance published by the Home Office.

**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. Further information on the signs that someone may be a victim of modern slavery, the support available to victims and how to refer them to the National Referral Mechanism is available in the statutory guidance “*Modern slavery: how to identify and support victims (May 2022)*”.

**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; and,
- 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 (or a deputy), should consider referring into the Cyber Choices programme. This is a nationwide police programme supported by the Home Office and led by the National Crime Agency, working with regional and local policing. It 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. Cyber Choices does not currently cover 'cyber-enabled' crime such as fraud, purchasing of illegal drugs on-line and child sexual abuse and exploitation, nor other areas of concern such as on-line bullying or general on-line safety.

Additional advice can be found at: Cyber Choices, 'NPCC- When to call the Police' and National Cyber Security Centre – NCSC.gov.uk.

**Mental health:** all staff should be aware that mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation.

Only appropriately trained professionals should attempt to make a diagnosis of a mental health problem. Staff, however, are well placed to observe children day-to-day and identify those whose behaviour suggests that they may be experiencing a mental health problem or be at risk of developing one.

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

If staff have a mental health concern about a child that is also a safeguarding concern, immediate action should be taken, following this policy and speaking to the DSL or a deputy.

The DfE has published advice and guidance on Preventing and Tackling Bullying, and Mental Health and Behaviour in Schools. In addition, Public Health England has produced a range of resources to support secondary and senior school teachers to promote positive health, wellbeing and resilience among young people including its guidance Promoting Children and Young People's Emotional Health and Wellbeing. Its resources include social media, forming positive relationships, smoking and alcohol.

**So called 'honour based' abuse:** encompasses crimes which have been committed to protect or defend the honour of the family and/or the community, including Female Genital Mutilation (FGM)], forced marriage, and practices such as breast ironing.

Abuse committed in the context of preserving “honour” often involves a wider network of family or community pressure and can include multiple perpetrators. It is important to be aware of this dynamic and additional risk factors when deciding what form of safeguarding action to take.

FGM comprises all procedures involving partial or total removal of the external female genitalia or other injury to the female genital organs. Guidance on the warning signs that FGM may be about to take place, or may have already taken place, can also be found on pages 38-41 of the Multi-agency statutory guidance on FGM. To give an example of indications that a girl has already been subjected to FGM:

- A pupil may have difficulty walking, sitting or standing and may even look uncomfortable.
- A pupil may have frequent urinary, menstrual or stomach problems or spend longer than normal in the bathroom due to difficulties urinating.
- There may be prolonged or repeated absences from School and/or noticeable behaviour changes (e.g. withdrawal or depression) on the pupil’s return.
- A pupil is reluctant to undergo medical examination.

**If staff have a concern that a pupil may be at risk of FGM, they should activate local safeguarding procedures, using existing national and local protocols for multi-agency liaison with Police and Children’s Social Care. If in any doubt, staff should speak to the DSL.**

There is a statutory duty on teachers to personally report to the Police where they discover (either through disclosure by the victim or visual evidence) that FGM appears to have been carried out on a girl under 18. Unless the teacher has a good reason not to, they should still consider and discuss any such case with the DSL and involve children’s social care as appropriate. If the teacher is unsure whether this reporting duty applies, they should discuss their concerns with the DSL in accordance with this policy. Where a teacher suspects that a pupil is at risk (i.e. where the teacher does not discover that an act of FGM appears to have been carried out, either through disclosure by the victim or visual evidence) teachers should follow the School’s local safeguarding procedures.

Further information can be found in the *Multi-agency statutory guidance on female genital mutilation and the FGM resource pack*, particularly section 13.]

**Forced marriage:** Forcing a person into a marriage is a crime in England and Wales. A forced marriage is one entered into without the full and free consent of one or both parties and where violence, threats or any other form of coercion is used to cause a person to enter into a marriage. Threats can be physical or emotional and psychological. A lack of full and free consent can be where a person does not consent or where they cannot consent (if they have learning disabilities, for example). Nevertheless, some communities use religion and culture as a way to coerce a person into marriage. 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 18<sup>th</sup> 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.

Schools and colleges can play an important role in safeguarding children from forced marriage. There are a range of potential indicators that a child may be at risk of forced marriage, details of which can be found in the *Multi-agency guidelines: Handling cases of forced marriage (last updated April 2023)* Further information on forced marriage is available in guidance published on gov.uk and by the Forced Marriage Unit. School staff can also

contact the Forced Marriage Unit if they need advice or information: Contact: 020 7008 0151 or email [fm@fcdo.gov.uk](mailto:fm@fcdo.gov.uk).

**Radicalisation:** Radicalisation refers to the process by which a person comes to support terrorism and forms of extremism. Extremism is vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs. It can also call for the death of members of the armed forces, whether in this country or overseas. 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 must be designed to influence the government or to intimidate the public and is made for the purpose of advancing a political, religious or ideological cause.

There is no single way of identifying whether a child is likely to be susceptible to an extremist ideology. Background factors combined with specific influences such as family and friends may contribute to a child's vulnerability. Similarly, radicalisation can occur through many different methods (such as social media or the internet) and settings (such as within the home). As with other safeguarding risks, staff should be alert to changes in children's behaviour, which could indicate that they may be in need of help or protection. Staff should use their judgement in identifying children who might be at risk of radicalisation and act proportionately, which may include making a Prevent referral. Designated safeguarding leads and other senior leaders in colleges should familiarise themselves with the revised Prevent duty guidance: for England and Wales especially paragraphs 141-210, which are specifically concerned with education. Staff should contact the DSL or the DDSL, who should be aware of the local procedures in place, before making a Prevent referral.

In the event of a child leaving, the DSL should consider if it would be appropriate to share any information with the new school or college. For example, information that would allow the new school or college to continue supporting victims of abuse or those who are currently receiving support through the 'Channel' programme and have that support in place for when the child arrives at the new school.

**Special educational needs and/or disabilities:** Pupils with SEND or certain health conditions can face additional safeguarding challenges. These children may not outwardly show signs of abuse and/or may have difficulties in communication about abuse or neglect, or bullying.

These can include:

- assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's condition without further exploration;
- these children being more prone to peer group isolation or bullying (including prejudice-based bullying) than other children;
- the potential for children with SEND or certain health conditions being disproportionately impacted by behaviours such as peer group isolation or bullying (including prejudice-based bullying), without outwardly showing any signs;
- communication barriers and difficulties in managing or reporting these challenges; being unable to understand the difference between fact and fiction in online content and then repeating the content/behaviours in School or the consequences of doing so.

Staff will support such pupils in expressing any concerns they may have and will be particularly vigilant to any signs or indicators of abuse, discussing this with the DSL as appropriate.

**Lesbian, gay, bisexual or gender questioning :** A child or young person being lesbian, gay or bisexual is not in itself an inherent risk factor for harm, however, they can sometimes be

targeted by other children. In some cases, a pupil who is perceived by their peers to be lesbian, gay or bisexual (whether they are or not) can be just as vulnerable as children who are.

When supporting a gender questioning child, the School will take a cautious approach and consider the broad range of the pupils individual needs, in partnership with the parents (other than in the exceptionally rare circumstances where involving parents would constitute a significant risk of harm to the child), including any clinical advice that is available and how to address wider vulnerabilities such as the risk of bullying. The School will adopt (to the extent that it is reflected in *KCSIE*), the draft DfE guidance for schools and colleges in relation to Gender Questioning Children, when deciding how to proceed.

Risks can be compounded where children lack trusted adults with whom they can be open. The School endeavours to reduce the additional barriers faced and create a culture where they can speak out or share their concerns with members of staff.

**Domestic abuse:** The Domestic Abuse Act 2021 received Royal Assent on 29 April 2021. The Act introduces the first ever statutory definition of domestic abuse and recognises the impact of domestic abuse on children, as victims in their own right, if they see, hear, or experience the effects of abuse. The statutory definition of domestic abuse, based on the previous cross-government definition, ensures that different types of relationships are captured, including ex-partners and family members. The definition captures a range of different abusive behaviours, including but not limited to, psychological, sexual, physical, emotional, and economic abuse and coercive and controlling behaviour. Both the person who is carrying out the behaviour and the person to whom the behaviour is directed towards must be aged 16 or over and they must be “personally connected” (as defined in section 2 of the 2021 Act).

Types of domestic abuse include intimate partner violence, abuse by family members, teenage relationship abuse and child/adolescent to parent violence and abuse.

Anyone can be a victim of domestic abuse, regardless of gender, age, ethnicity, socio-economic status, sexuality or background and domestic abuse can take place inside or outside of the home. The government will issue statutory guidance to provide further information for those working with domestic abuse victims and perpetrators, including the impact on children.

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

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, child safeguarding procedures should be followed and both young victims and young perpetrators should be offered support. The Act’s provisions, including the new definition, will be commenced over the coming months.

Domestic Abuse may lead to other safeguarding concerns and should therefore be managed under this policy.

School staff can contact Operation Encompass on 0204 513 9990 (8 am to 1pm, Monday to Friday) for advice in respect of children who have experienced domestic abuse.

**Homelessness:** Being homeless, or at risk of homelessness presents a real risk to a child's welfare. The School should be aware of potential indicators of homelessness including: household debt, rent arrears, domestic abuse and anti-social behaviour, as well as a family being asked to leave a property. If staff are made aware, or suspect that a pupil may be at risk of homelessness they should talk to the DSL in the first instance. Whilst referrals to the Local Housing Authority should be progressed as appropriate, and in accordance with local procedures, this does not and should not replace a referral to the LADO where a child has been harmed or is at risk of harm, in accordance with this policy.

**Children who are absent from school:** A child being absent from school, particularly repeatedly and/or for prolonged periods, and children missing education is a potential indicator of a range of safeguarding issues such as abuse, neglect, sexual abuse, CSE and CCE. It can also be a sign of child criminal exploitation including involvement in county lines. It may indicate mental health problems, risk of substance abuse, risk of travelling to conflict zones, risk of FGM, so-called 'honour'-based abuse or risk of forced marriage. Staff must follow the School's procedures for dealing with children who are absent, particularly persistently or for prolonged periods.<sup>252</sup> The School's procedure for dealing with children who are absent and/or missing can be found in the School's Attendance Policy and Child Missing in Education Policy. All unexplained absences will be followed up in accordance with these policies.

The School shall inform the local authority of any pupil who is going to be added to or deleted from the School's admission register at non-standard transition points in accordance with the requirements of the Education (Pupil Registration) (England) Regulations 2006 (as amended). This will assist the local authority to:

- a) fulfil its duty to identify children of compulsory school age who are missing from education; and
- b) follow up with any child who might be in danger of not receiving an education and who might be at risk of abuse, neglect, exploitation or radicalisation.

School attendance registers are carefully monitored to identify any trends. The School will inform the local authority (and the local authority where the child is normally resident) of any pupil who fails to attend school regularly, or has been absent without the School's permission for a continuous period of 10 school days or more.

Action should be taken in accordance with this policy if any absence of a pupil from the School gives rise to a concern about their welfare. The School's policy supports identification of abuse and provides preventative measures against the risk of the child being absent and/or becoming a child missing education in the future. This applies when issues are first emerging as well as where children are already known to the local authority children's social care and need a social worker.

**Child abduction and community safety incidents:** Child abduction is the unauthorised removal or retention of a minor from a parent or anyone with legal responsibility for the child. Child abduction can be committed by parents or other family members; by people known but not related to the victim (such as neighbours, friends, and acquaintances); and by strangers.

Other community safety incidents in the vicinity of a school can raise concerns amongst children and parents, for example, people loitering nearby or unknown adults engaging children in conversation.

As children get older and are granted more independence (for example, as they start walking to school on their own) it is important they are given practical advice on how to keep themselves safe. Many schools provide outdoor-safety lessons run by teachers or by local police staff.

It is important that lessons focus on building children's confidence and abilities rather than simply warning them about all strangers. Further information is available at: [www.actionagainstabduction.org](http://www.actionagainstabduction.org) and [www.clevernevergoes.org](http://www.clevernevergoes.org).

**Children and the court system:** Children are sometimes required to give evidence in criminal courts, either for crimes committed against them or for crimes they have witnessed. There are two age appropriate guides to support children 5-11year olds and 12-17 year olds available on the gov.uk website.

The guides explain each step of the process and support and special measures that are available. There are diagrams illustrating the courtroom structure and the use of video links is explained.

Making child arrangements via the family courts following separation can be stressful and entrench conflict in families. This can be stressful for children. The Ministry of Justice has launched an online child arrangements information tool with clear and concise information on the dispute resolution service. The School may refer some parents and carers to this service where appropriate.

**Children with family members in prison:** Approximately 200,000 children in England and Wales have a parent sent to prison each year. These children are at risk of poor outcomes including poverty, stigma, isolation, and poor mental health.

The Prison Service will undertake a child safeguarding enquiry with children's social care for all sentenced prisoners to identify any who present an ongoing risk to children from within custody. Prisons will also decide on the level of contact, if any, they will allow between a prisoner and a child based on a child contact risk assessment.

The National Information Centre on Children of Offenders (NICCO) provides information designed to support professionals working with offenders and their children, to help mitigate negative consequences for those children.

Signed \_\_\_\_\_

Date \_\_\_\_\_

## 17. APPENDIX 2 – LOW-LEVEL CONCERNS POLICY

### 1.0 Purpose

1.1 This policy sets out a framework whereby staff are expected to report concerns, no matter how small, about their own behaviour or that of another member of staff, volunteer, supply teacher, contractor or other person working in school. Its purpose is to help create and embed a culture of openness, trust and transparency in which the clear values and expected behaviour set out in the "Guidance for safer working practice for those working with children and young people in education settings"

(February 2022) (sometimes called the safeguarding code of conduct) are lived, monitored, and reinforced.

- 1.2 The policy should be read in conjunction with the current statutory guidance – “Keeping Children Safe in Education” Part 4, Section 2.

## **2.0 Who does the policy apply to?**

- 2.1 This policy applies to all staff and other individuals who work or volunteer in school.

## **3.0 Definition of a low-level concern**

- 3.1 A low-level concern is any concern, no matter how small, even if no more than causing a sense of unease or a ‘nagging doubt’, that a person working in or on behalf of the school may have acted in a way that:

- is inconsistent with the “Guidance for safer working practice” (February 2022), including inappropriate conduct outside of work, and
- does not meet the allegations threshold or is otherwise not considered serious enough to make a referral to the LADO

3.2

## **4.0 Reporting low-level concerns**

- 4.1 Where a low-level concern has been identified this will be reported as soon as possible to the **headteacher**. However, it is never too late to share a low-level concern if this has not already happened.

- 4.2 Where the headteacher is not available, the information will be reported to the Proprietor (or in the Proprietor’s absence, the Bursar).

- 4.3 Low-level concerns about the Designated Safeguarding Lead will be reported to the headteacher and those about the headteacher will be reported to the Proprietor.

- 4.4 Where the low-level concern has been reported to the Proprietor (or Bursar), they will inform the headteacher of the details as soon as possible.

## **5.0 Recording concerns**

- 5.1 A summary of the low-level concern should be written down, signed, timed, dated and shared by the person bringing the information forward.

- 5.2 Where concerns are reported verbally to the headteacher a record of the conversation will be made by the headteacher which will be signed, timed, and dated.

- 5.3 Records are kept in secure staff low-level concerns files.

## **6.0 Responding to low-level concerns**

6.1 Where a low-level concern has been raised this will be taken seriously and dealt with promptly. The headteacher will:

- Speak to the person reporting the concern to gather all the relevant information
- Consider speaking to the individual about the concern raised to ascertain their response, unless advised not to do so by the LADO or Police (HR advice may also need to be taken).
- Where necessary further investigation will be carried out to gather all relevant information. This may involve speaking to any potential witnesses.
- Take wider cultural issues into account.
- The information reported and gathered will then be reviewed to determine whether the behaviour,
  - i) is consistent with the “Guidance for safer working practice for those working with children and young people in education settings” (February 2022): no further action will be required,
  - ii) constitutes a low-level concern: no further action is required, or additional training/guidance/support may be required to rectify the behaviour via normal day to day management processes. The employee should understand that failure to improve or a repeat of the behaviour may lead to further action being taken, e.g. either via the Induction and Training Policy or Staff Disciplinary Policy.
  - iii) is serious enough to consult with or refer to the LADO: a referral should be made to the LADO and advice taken from HR. In this case the school’s Managing Allegations procedure within the Safeguarding Policy and Staff Disciplinary Policy will be followed.
  - iv) when considered with any other low-level concerns that have previously been raised about the same individual, should be reclassified as an allegation and referred to the LADO or Police: a referral should be made to the LADO and advice taken from HR. In this case the school’s Managing Allegations procedure within the Safeguarding Policy and Staff Disciplinary Policy will be followed.
- Records will be made of, i) all internal conversations including any relevant witnesses, ii) all external conversations eg with the LADO iii) the decision and the rationale for it, iv) any action taken

## **7.0 Can the reporting person remain anonymous?**

7.1 The person bringing forward the concern will be named in the written record. Where they request to remain anonymous this will be respected as far as possible. However, there may be circumstances where this is not possible e.g. where a fair disciplinary investigation is needed or where a later criminal investigation is required.

## **8.0 Should staff report concerns about themselves (i.e. self-report)?**

8.1 It may be the case that a person finds themselves in a situation which could be misinterpreted, or might appear compromising to others; or they may have behaved in a manner which on reflection they consider falls below the standard set out in the “Guidance for safer working practice”. In these circumstances they should self-report.

This will enable a potentially difficult situation to be addressed at an early opportunity if necessary.

## **9.0 Where behaviour is consistent with the “Guidance for safer working practice” (February 2022)**

- 9.1 Feedback will be given to both parties to explain why the behaviour was consistent with the “Guidance for safer working practice”.

## **10.0 Should the low-level concerns file be reviewed?**

- 10.1 The records will be reviewed periodically, and whenever a new low-level concern is added, so that potential patterns of concerning, problematic or inappropriate behaviour can be identified and referred to the LADO if required. A record of these reviews will be retained.

## **11.0 References**

- 11.1 Low-level concerns will not be included in references unless a low-level concern, or group of concerns, has met the threshold for referral to the LADO and found to be substantiated.

## **12.0 What is the role of the Proprietor?**

- 12.1 The headteacher will regularly inform the Proprietor about the implementation of the low-level concerns policy including any evidence of its effectiveness eg with relevant data. The Proprietor may also review an anonymised sample to ensure that these concerns have been handled appropriately.

## 18. APPENDIX 3 – DSL/DDSL JOB DESCRIPTIONS

### JOB DESCRIPTION FOR DESIGNATED SAFEGUARDING LEAD (to include all elements of KCSIE Appendix C)

Job purpose	<p>To take responsibility for safeguarding at Brooke Priory School including online safety.</p> <p>To embrace and demonstrate the characteristics of Professional Teacher Standards: to be Caring, Effective, Engaged, Confident, Creative and Reflective practitioners.</p> <p>To demonstrate high standards of professional conduct at all times.</p>
Accountable to:	The Headmaster and Proprietor
Responsible for:	Safeguarding at Brooke Priory School including training
Accountabilities:	<p><b>Manage Referrals</b></p> <ol style="list-style-type: none"> <li>1. The DSL is expected to: <ul style="list-style-type: none"> <li>Refer cases of suspected abuse to the local authority children’s social care as required;</li> <li>Support staff who make referrals to local authority children’s social care;</li> <li>Refer cases to the Channel programme where there is a radicalisation concern as required (with consent);</li> <li>Refer cases for guidance to the LADO involving staff misconduct</li> <li>Refer cases where a person is dismissed, or leaves owing to risk/harm to a child, to the Disclosure and Barring Service as required;</li> <li>Refer cases where a crime may have been committed to the police as required.</li> </ul> </li> <li>2. The DSL has direct referral links with the Rutland and Leicestershire Social Care (or other relevant local authority Children’s Social Care). For avoidance of doubt the DSL or deputy DSL should be the point of contact with regard to referring a child if there are concerns about possible abuse</li> <li>3. The DSL must make child protection and safeguarding protocols clear to staff.</li> </ol> <p><b>Records</b></p> <ol style="list-style-type: none"> <li>4. The <b>DSL keeps all written records of concerns about a child</b> even if there is no need to make an immediate referral for action; this will include any online misuse issues that may cause indirect abuse to a child. Online safety will be treated as any other form of abuse and recognition that bullying can transgress across all four defined categories of abuse including bullying and harassment;</li> </ol>

	<p>5. The DSL will ensure that <b>all such records are kept confidentially and securely</b> and are separate from pupil records, ensuring that an indication of further record keeping in terms of child protection is marked on the pupil's records.</p> <p><b>Work with others</b></p> <p>6. The DSL will form part of the management team at Brooke Priory School present in monthly leadership meetings.</p> <p>7. The DSL will have a directed slot to lead safeguarding updates and where appropriate training at staff meetings.</p> <p>8. To monitor the education outcomes of any child with a Social Worker.</p> <p><b>9. The DSLs will liaise with the Headmaster</b> to inform him of issues, especially ongoing enquiries under section 47 of the Children Act 1989 and police investigations; The DSL will, as required, liaise with the 'case manager' (i.e. the person who initially holds the information from whatever source) and the LADO (termed Designated Officer in KCSIE 2020) in cases which concern a member of staff;</p> <p>10. The DSL will liaise with staff on matters of safety and safeguarding (including e-safety and online safety) and when deciding whether to make a referral by liaising with relevant agencies;</p> <p>11. The DSL will be responsible for updating the child protection, e-safety (With support) and acceptable use policy.</p> <p>12. The DSL will update all teaching staff on relevant updates as appropriate.</p> <p>13. The DSL will keep his/her training up to date.</p> <p>14. The DSL will ensure whole school training takes place every two years.</p> <p>15. The DSL will ensure appropriate filtering and monitoring systems are in place and adhered to.</p>
General requirements	<p><b>All teaching staff are expected to:</b></p> <ol style="list-style-type: none"> <li>a. Work towards and support the school vision and the current school objectives outlined in the School Development Plan.</li> <li>b. Maintain high professional standards of attendance, punctuality, appearance, and conduct. Demonstrate positive and courteous relations with students, colleagues, parents and any external personnel.</li> <li>c. Adhere to school policies, as amended from time to time, and as set out in the school handbook and website.</li> <li>d. Contribute towards organising, participating in or delivering on the school's programme of extracurricular activities.</li> </ol>

	<ul style="list-style-type: none"> <li>e. In accordance with school policy, provide cover for absent colleagues by supervising and so far as is practicable, teaching pupils.</li> <li>f. Participate in meetings at the school which relate to the curriculum or the administration or organisation of the school, including pastoral arrangements, or for any purpose as reasonably decided by the Head.</li> <li>g. Carry out lunchtime duties – supervising pupils at lunch, as reasonable.</li> <li>h. Attend all relevant parents’ meetings, which may take place in the evening.</li> <li>i. Support children and colleagues by attending some school productions, functions, trips and events as appropriate, and contributing, where possible, to the wider life of the school.</li> <li>j. Carry out such other associated duties as are reasonably assigned by the Headmaster.</li> </ul>
Review and amendment	This job description should be seen as enabling rather than restrictive and will be subject to regular review.

**JOB DESCRIPTION FOR DEPUTY DESIGNATED SAFEGUARDING LEAD  
(Responsibility for EYFS) (to include all elements of KCSIE Appendix C)**

Job purpose	<p>To take responsibility for safeguarding in Brooke Priory School under the leadership of the DSL.</p> <p>To be responsible for Safeguarding in the EYFS</p> <p>To embrace and demonstrate the characteristics of Professional Teacher Standards: to be Caring, Effective, Engaged, Confident, Creative and Reflective practitioners.</p> <p>To demonstrate high standards of professional conduct at all times.</p>
Accountable to:	The DSL, Headmaster and Proprietor
Responsible for:	Supporting safeguarding at Brooke Priory School.
	<p><b>Manage Referrals in the absence of the DSL or with the authority of the DSL</b></p> <ol style="list-style-type: none"> <li>1. The DDSL is expected to: <ul style="list-style-type: none"> <li>Refer cases of suspected abuse to the local authority children’s social care as required;</li> <li>Support staff who make referrals to local authority children’s social care;</li> <li>Refer cases to the Channel programme where there is a radicalisation concern as required (with consent);</li> <li>Refer cases for guidance to the LADO involving staff misconduct</li> <li>Refer cases where a person is dismissed, or leaves owing to risk/harm to a child, to the Disclosure and Barring Service as required;</li> <li>Refer cases where a crime may have been committed to the police as required.</li> </ul> </li> <li>2. The DDSL has direct referral links with the Rutland and Leicestershire Social Care (or other relevant local authority Children’s Social Care). For avoidance of doubt the DSL or deputy DSL should be the point of contact with regard to referring a child if there are concerns about possible abuse</li> <li>3. The DDSL must make child protection and safeguarding protocols clear to staff in support of the DSL.</li> </ol> <p><b>Records</b></p> <ol style="list-style-type: none"> <li>4. The <b>DDSL keeps all written records of concerns about a child</b> even if there is no need to make an immediate referral for action; this will include any online misuse issues that may cause indirect abuse to a child. Online safety will be treated as any</li> </ol>

	<p>other form of abuse and recognition that bullying can transgress across all four defined categories of abuse including bullying and harassment;</p> <p>5. The DDSL will support the DSL to ensure that <b>all such records are kept confidentially and securely</b> and are separate from pupil records, ensuring that an indication of further record keeping in terms of child protection is marked on the pupil's records.</p> <p><b>Work with others</b></p> <p>6. <b>All DSL/DDSL will liaise with the Headmaster</b> to inform him of issues, especially ongoing enquiries under section 47 of the Children Act 1989 and police investigations;</p> <p>7. The DDSL will liaise with staff on matters of safety and safeguarding (including e-safety and online safety) and when deciding whether to make a referral by liaising with relevant agencies;</p> <p>8. The DDSL will be responsible for supporting the updating the child protection, e-safety (With support) and acceptable use policy.</p> <p>11. The DDSL will keep his/her training up to date.</p> <p>12. To monitor the education outcomes of any child with a Social Worker.</p>
<p>General requirements</p>	<p><b>All teaching staff are expected to:</b></p> <ol style="list-style-type: none"> <li>a. Work towards and support the school vision and the current school objectives outlined in the School Development Plan.</li> <li>b. Maintain high professional standards of attendance, punctuality, appearance, and conduct. Demonstrate positive and courteous relations with students, colleagues, parents and any external personnel.</li> <li>c. Adhere to school policies, as amended from time to time, and as set out in the school handbook and website.</li> <li>d. Contribute towards organising, participating in or delivering on the school's programme of extracurricular activities.</li> <li>e. In accordance with school policy, provide cover for absent colleagues by supervising and so far as is practicable, teaching pupils.</li> <li>f. Participate in meetings at the school which relate to the curriculum or the administration or organisation of the school, including pastoral arrangements, or for any purpose as reasonably decided by the Head.</li> <li>g. Carry out lunchtime duties – supervising pupils at lunch, as reasonable.</li> <li>h. Attend all relevant parents' meetings, which may take place in the evening.</li> <li>i. Support children and colleagues by attending some school productions, functions, trips and events as appropriate, and contributing, where possible, to the wider life of the school.</li> <li>j. Carry out such other associated duties as are reasonably assigned by the Headmaster.</li> </ol>

Review and amendment

This job description should be seen as enabling rather than restrictive and will be subject to regular review.

**JOB DESCRIPTION FOR DEPUTY DESIGNATED SAFEGUARDING LEAD (to include all elements of KCSIE Appendix C)**

Job purpose	<p>To take responsibility for safeguarding in Brooke Priory School under the leadership of the DSL.</p> <p>To embrace and demonstrate the characteristics of Professional Teacher Standards: to be Caring, Effective, Engaged, Confident, Creative and Reflective practitioners.</p> <p>To demonstrate high standards of professional conduct at all times.</p>
Accountable to:	The DSL, Headmaster and Proprietor
Responsible for:	Supporting safeguarding at Brooke Priory School.
	<p><b>Manage Referrals in the absence of the DSL or with the authority of the DSL</b></p> <ol style="list-style-type: none"> <li>1. The DDSL is expected to: <ul style="list-style-type: none"> <li>Refer cases of suspected abuse to the local authority children’s social care as required;</li> <li>Support staff who make referrals to local authority children’s social care;</li> <li>Refer cases to the Channel programme where there is a radicalisation concern as required (with consent);</li> <li>Refer cases for guidance to the LADO involving staff misconduct</li> <li>Refer cases where a person is dismissed, or leaves owing to risk/harm to a child, to the Disclosure and Barring Service as required;</li> <li>Refer cases where a crime may have been committed to the police as required.</li> </ul> </li> <li>2. The DDSL has direct referral links with the Rutland and Leicestershire Social Care (or other relevant local authority Children’s Social Care). For avoidance of doubt the DSL or deputy DSL should be the point of contact with regard to referring a child if there are concerns about possible abuse</li> <li>3. The DDSL must make child protection and safeguarding protocols clear to staff in support of the DSL.</li> </ol> <p><b>Records</b></p> <ol style="list-style-type: none"> <li>4. The <b>DDSL keeps all written records of concerns about a child</b> even if there is no need to make an immediate referral for action; this will include any online misuse issues that may cause indirect abuse to a child. Online safety will be treated as any other form of abuse and recognition that bullying can transgress</li> </ol>

	<p>across all four defined categories of abuse including bullying and harassment;</p> <p>5. The DDSL will support the DSL to ensure that <b>all such records are kept confidentially and securely</b> and are separate from pupil records, ensuring that an indication of further record keeping in terms of child protection is marked on the pupil’s records.</p> <p><b>Work with others</b></p> <p>6. <b>All DSL/DDSL will liaise with the Headmaster</b> to inform him of issues, especially ongoing enquiries under section 47 of the Children Act 1989 and police investigations;</p> <p>7. The DDSL will liaise with staff on matters of safety and safeguarding (including e-safety and online safety) and when deciding whether to make a referral by liaising with relevant agencies;</p> <p>8. The DDSL will be responsible for supporting the updating the child protection, e-safety (With support) and acceptable use policy.</p> <p>11. The DDSL will keep his/her training up to date.</p> <p>12. To monitor the education outcomes of any child with a Social Worker.</p>
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<p><b>Work with others</b></p>
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