



## Contents

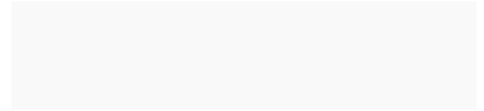
1.	Key Contacts .....	2
2.	School Contact Details .....	4
3.	Policy Statement .....	6
4.	Equality Act 2010 .....	6
5.	Concerns about a child .....	6
6.	Procedures for dealing with concerns about a child .....	7
7.	Arrangements for dealing with child-on-child allegations .....	14
8.	Safeguarding concerns or allegations made about staff .....	18
9.	Safeguarding concerns and allegations about supply teachers and contractors .....	21
10.	Safeguarding concerns and allegations about organisations or individuals using school premises.....	22
11.	Dealing with concerns or allegations that do not meet the harm threshold.....	22
12.	Safer Recruitment.....	24
13.	Management of safeguarding.....	25
14.	Training .....	26
15.	Oversight of safeguarding, including arrangements for reviewing policies and procedures .....	27
16.	The school’s arrangements to fulfil other safeguarding responsibilities .....	28
17.	Early years provision safeguarding arrangements.....	33
	Appendix 1 - Signs and Types of Abuse.....	35
	Appendix 2 – Safeguarding referral flow chart.....	47

## 1. Key Contacts


### External Contact Details

<b>Local Authority Designated Officer</b>	TEL: 0330 222 6450 EMAIL: <a href="mailto:LADO@westsussex.gov.uk">LADO@westsussex.gov.uk</a>	To be contacted with any safeguarding concern that meets the harm threshold and if the School receives any historical (non-recent) allegations of abuse
<b>Local Authority Children's Social Services</b>	TEL: 01403 229900 EMAIL: <a href="mailto:WSChildrenServices@westsussex.gov.uk">WSChildrenServices@westsussex.gov.uk</a> OUT OF HOURS EMERGENCY DUTY TEAM TEL: 0330 222 6664	To be contacted (or the Police on 999) if you believe a child is in immediate risk of harm.  To be contacted if a pupil 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
<b>Multi Agency Safeguarding Hub</b>	TEL: 01403 22 9900 TEL OUT OF HOURS: 0330 222 6664 EMAIL: <a href="mailto:WSChildrenServices@westsussex.gov.uk">WSChildrenServices@westsussex.gov.uk</a>	To be contacted for advice on investigation of child-on-child abuse allegations
<b>Support and Advice about Extremism</b>	<b>Police</b> SUSSEX POLICE PREVENT TEAM EMERGENCY: 999 NON-EMERGENCY NUMBER: 101 (asking for the Prevent Team) EMAIL: <a href="mailto:prevent@sussex.pnn.police.uk">prevent@sussex.pnn.police.uk</a>  <b>Local Authority</b> WEST SUSSEX COUNTY COUNCIL TEL: 01403 229 900 EMAIL: <a href="mailto:WSChildrenServices@westsussex.gov.uk">WSChildrenServices@westsussex.gov.uk</a>  <b>Department for Education</b> NON-EMERGENCY NUMBER: 020 7340 7264 EMAIL: <a href="mailto:counter.extremism@education.gov.uk">counter.extremism@education.gov.uk</a>	To be contacted if you have concerns that there is an immediate/significant risk of a child being drawn into terrorism they must call 999
<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>	To be contacted if staff and volunteers feel unable to raise an issue with the School or feel that their genuine concerns are not being addressed

<b>NSPCC Report Abuse in Education Advice Line</b>	TEL: 0800 136 663 EMAIL: <a href="mailto:help@nspcc.org.uk">help@nspcc.org.uk</a>	Helpline for people who have experienced sexual harassment or abuse in education
<b>Disclosure and Barring Service</b>	ADDRESS: DBS customer services PO Box 3961 Royal Wootton Bassett SN4 4HF TEL: 03000 200 190 EMAIL: <a href="mailto:customerservices@dbb.gov.uk">customerservices@dbb.gov.uk</a>	To be promptly contacted by the School to report any person (whether employed, contracted, a volunteer or a pupil) who has harmed, or poses a risk of harm, to a child
<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>	To be contacted by the School if an investigation leads to the dismissal (or resignation prior to dismissal) of a member of teaching staff
<b>OFSTED Safeguarding Children</b>	TEL: 0300 123 4666 (Monday to Friday from 8am to 5pm) EMAIL: <a href="mailto:CIE@ofsted.gov.uk">CIE@ofsted.gov.uk</a>	To be notified by the School within 14 days of any allegations of serious harm or abuse by any person living, working, or looking after children at the premises
<b>Independent Schools Inspectorate</b>	TEL: 0207 6000 100 EMAIL: <a href="mailto:info@isi.net">info@isi.net</a>	Parents are encouraged to speak to the School with any safeguarding concerns but can contact the ISI directly
<b>Police</b>	TEL: 101 (999 in an emergency)	To be contacted: If the School receives any allegations against a teacher who is no longer teaching. If it is suspected an act of FGM appears to have been carried out. May be informed of any harmful sexual behaviours which are potentially criminal in nature (including child on child). If the School receives Historical (non-recent) allegations of abuse If a child is at immediate risk
<b>West Sussex Safeguarding Children Partnership (WSSCP)</b>	ADDRESS: Floor 1, County Hall North, Chart Way, Horsham, West Sussex, RH12 1XH TEL: 0330 222 7799 EMAIL: <a href="mailto:wsscp@westsussex.gov.uk">wsscp@westsussex.gov.uk</a>	Comprises Sussex Police, West Sussex Authority and West Sussex County Council (statutory requirement)



## 2. School Contact Details

<b>Governors</b>	<p>Chair of Governors Mark Bishop <a href="#">c/o Clerk to the Governors, Alex Warburton</a> <a href="mailto:AlexWarburton@charterhouse.org.uk">EMAIL AlexWarburton@charterhouse.org.uk</a> <a href="tel:01483291786">TEL: 01483 291786</a></p> <p><a href="#">Charterhouse Group Safeguarding Governor</a> <a href="#">Helen Goatley</a> <a href="mailto:HelenGoatleyGB@Charterhouse.org.uk">EMAIL: HelenGoatleyGB@Charterhouse.org.uk</a> <a href="tel:01483291786">TEL: Clerk to the Governors, Alex Warburton</a> <a href="tel:01483291786">01483 291786</a></p> <p><a href="#">Windlesham House School Safeguarding Governor</a> <a href="#">Louisa Wilkins</a> <a href="mailto:LXW@charterhouse.org.uk">EMAIL: LXW@charterhouse.org.uk</a> <a href="tel:01483291786">TEL: Clerk to the Governors, Alex Warburton</a> <a href="tel:01483291786">01483 291786</a></p>	<p>To be contacted with any safeguarding concerns about the Headteacher.</p> <p>To be contacted with any concerns about the Schools safeguarding framework.</p>
<b>Designated Safeguarding Lead ("DSL")</b>	<p><b>DSL for the School</b> Jim Taylor TEL: 01903 87 47 54 EMAIL: <a href="mailto:jtaylor@windlesham.com">jtaylor@windlesham.com</a></p> 	<p>Lead responsibility for safeguarding and child protection matters. To be contacted:</p> <ul style="list-style-type: none"><li>• if you have any safeguarding concerns about child-on-child abuse or if you consider that a pupil may benefit from early help</li><li>• if you are concerned a child is at risk of involvement with serious violent crime</li><li>• if you become aware of an incident of nudes or semi-nudes being shared by a pupil or of a pupil</li><li>• in the event you wish to raise a low-level concern and the Headteacher is unavailable</li></ul>

<b>Deputy DSLs</b>	<p><b>Deputy DSLs</b></p> <p>Sarah Sutherland (Senior Deputy Head) TEL: 01903 87 47 48 EMAIL: <a href="mailto:ssutherland@windlesham.com">ssutherland@windlesham.com</a></p> <p>Lex Bolton (Head of Senior Phase) TEL 01903 87 47 48 EMAIL <a href="mailto:abolton@windlesham.com">abolton@windlesham.com</a></p> <p>Marie Kelleway (Head of Girls Boarding) TEL: 01903 874748) EMAIL: <a href="mailto:mkelleway@windlesham.com">mkelleway@windlesham.com</a></p> <p>Will Kerr-Dineen (Head of Boys Boarding) TEL: 01903 874748 EMAIL: <a href="mailto:wkerr-dineen@windlesham.com">wkerr-dineen@windlesham.com</a></p> <p>Kate Hooper (Head Nurse) TEL 01903 874748 EMAIL: <a href="mailto:khooper@windlesham.com">khooper@windlesham.com</a></p> <p>Erica Warbey (EYFS) TEL: 01903 874748 EMAIL: <a href="mailto:ewarbey@windlesham.com">ewarbey@windlesham.com</a></p>	To be contacted in the absence of the DSL
<b>Designated Teacher for Looked After Children</b>	<p><b>DSL for the School</b></p> <p>Jim Taylor TEL: 01903 87 47 54 EMAIL: <a href="mailto:jtaylor@windlesham.com">jtaylor@windlesham.com</a></p>	
<b>Head</b>	<p>Ben Evans TEL: 01903 87 47 00 EMAIL: <a href="mailto:bevans@windlesham.com">bevans@windlesham.com</a></p>	To be contacted regarding any safeguarding concerns about a member of staff (including low level concerns). This includes supply staff, agency staff, volunteers and contractors

### 3. Policy Statement

This policy applies to WINDLESHAM HOUSE SCHOOL ("the School") which includes the EYFS setting. This policy is reviewed and updated at least annually and is available on the School website or on request from the School Office.

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 (September 2018)
  - KCSIE also provides links to various toolkits and additional advice and support
- Working Together to Safeguard Children (December 2023) ("*WT*")
  - WT refers to non-statutory advice: Information Sharing : Advice for practitioners providing safeguarding services for children, young people, parents and carers (May 2024)
- Prevent duty guidance: Guidance for specified authorities in England and Wales December 2023. Relationships Education, Relationships and Sex Education (RSE) and Health Education (September 2021)
- Behaviour in schools (Published February 2024)
- Working together to improve school attendance: statutory guidance for maintained schools, academies, independent schools and local authorities (August 2024)
- Children Missing Education (August 2024)
- Digital and technology standards in Schools and colleges (March 2025)
- After-school clubs, community activities and tuition (safeguarding guidance for providers) (September 2023)
- The Charity Commission guidance Safeguarding and protecting people for charities and trustees (June 2022)
- Early Years Foundation Stage Statutory Framework for group and school-based providers (July 2025)
- The National Minimum Standards for boarding schools (September 2022)

This policy also takes into account the procedures and practice of West Sussex County Council as part of the multi-agency safeguarding procedures set up by the West Sussex Safeguarding Children's Partnership.

### 4. Equality Act 2010

The School understands and welcomes its obligations under the Equality Act and that the School must not discriminate against pupils because of a protected characteristic including sex, race, disability, religion or belief, gender reassignment, pregnancy, maternity, or sexual orientation. In the context of safeguarding, the School will consider how to support pupils with regard to particular protected characteristics in order to meet their specific needs. The School will also consider their duty to make reasonable adjustments for disabled people.

The School also complies with its legal duties under the Equality Act 2010, including putting special provision in place to support dialogue with children who may not be able to convey their wishes and feelings as they may want to. This might include, for example, those who have communication difficulties and those who do not speak English and for whom English is not their first language.

### 5. 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 at the School and ensuring 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 or DfE directly if they wish.

The School has arrangements for listening to children and providing early help. The School has two independent listeners who children can contact from any of our phones around the School. There are signs displayed throughout the School, near to our phones and boarding houses, which provide the independent listeners' numbers and other contacts including Childline and the Office of the Children's Commissioner.

In addition to the independent listeners, the children can talk to a variety of staff and peers should they have concerns. These include their Form Teacher, Heads of House, Phase Leaders, Boarding staff, Peer Listeners or indeed any member of staff they feel comfortable talking with. A Circle of Care poster reminds the children who in the school they can talk to should they have any concerns.

The School can also arrange children to have access to a Counsellor who is on site three days a week.

### **Definitions of child protection and 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.

## **6. Procedures for dealing with concerns about a child**

If staff suspect or hear any allegation or complaint of abuse, exploitation, or neglect 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 take action and share information that might be critical in keeping children safe.

The guidance, *Information Sharing: Advice for Practitioners Providing Safeguarding Services to Children, Young People, Parents and Carers* (May 2024) supports staff who must make decisions about sharing information. The governing body 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. Fears regarding sharing information under the Data Protection Act 2018 and the UK General Data Protection Regulations (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 will ensure that staff understand the relevant data protection principles which allow them to share (and withhold) personal information, including:

- being confident about 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 the child's 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 (including the rationale for those decisions) made under these procedures should be recorded in writing. This includes instances where referrals were or were not made to another agency, such as children's social care or the Prevent programme. This will help if/when responding to any complaint about the way a case has been handled. The record should include a clear and comprehensive summary of the concern, details of how the concern was followed up and resolved and a note of any action taken, the decision reached and the outcome.

The School uses 'My Concern' to report safeguarding concerns. The record should include the date, time and place of the conversation and detail of what was said and done by whom and in whose presence and signed by the person making it. The information is 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 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).

Where there is a safeguarding concern, the School will ensure the pupil's wishes and feelings are taken into account 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 is committed to working collaboratively and in partnership with parents and carers as far as possible the wishes and feelings of the child and what in their best interests is always central to the School's decision-making process.

As part of its remit, the Safeguarding Committee consider 'lessons learnt' arising from any reported safeguarding concerns.

### **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 deputy DSLs, 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 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 and association with organised crime groups or county lines
- is frequently missing/goes missing from care or from home
- 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 or alcohol themselves
- is at risk of modern slavery, trafficking, 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 identify a pupil who 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 the West Sussex Safeguarding Children’s Partnership referral threshold document. The DSL will support staff in liaising with external agencies and professionals in an inter-agency assessment, as appropriate. Further guidance on effective assessment of the need for early help can be found in Working Together to Safeguard Children (December 2023).

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 governors, supply staff, agency 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.

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; they should maintain an attitude of "it could happen here". 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 governors, supply staff, agency 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 make a decision 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.

The School’s Local Safeguarding Children Executive is West Sussex Safeguarding Children’s Partnership. A full copy of their local procedures can be found at [www.westsussexscp.org.uk/](http://www.westsussexscp.org.uk/)

#### **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 susceptible to radicalisation or terrorism. 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. Advice and support can be sought from children's social care.

The School, in recognition that pupils may be susceptible to being drawn into terrorism or other forms of extremism, carries out appropriate risk assessments (following consultation where relevant with local partners, such as the Police) which assess how their learners or staff may be at risk of being radicalised into terrorism, including online. Such risk assessments are discussed with the Head, DSL and the lead governor for safeguarding to ensure the School's safeguarding arrangements are sufficiently robust to ensure that those at risk of radicalisation are identified and appropriate support is provided and is regularly revised as needed.

### **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. 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 notable 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 persons 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. The term 'nudes' is used as it is most commonly recognised by young people and more appropriately covers all types of image sharing incidents. Alternative terms used by children and young people may include 'dick pics' or 'pics'.

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 s33-35 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.

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" (March 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 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 suggest the content depicts sexual acts which are unusual for the young person's developmental stage, or are violent
- The images involve 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 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. If 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 goes missing from education**

Children who are absent from education, particularly on repeat occasions and/or for prolonged periods, and children missing education can function as a vital warning sign to a range of safeguarding issues, including neglect and child sexual abuse 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.

The School procedures for unauthorised absence and for dealing with children who are absent, repeatedly and/or for prolonged periods and children missing from education are available in the School Absence Policy.

The DSL will monitor unauthorised absence and take appropriate action including notifying the local authority, particularly where children go missing on repeated occasions and/or are missing for periods during the School day.

Where reasonably possible, the School holds 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 who is repeatedly absent and/or absent for prolonged periods is also identified as a welfare and/or safeguarding concern.

The School will report to West Sussex County Council 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.

When working with local authority children's services where school absence indicates safeguarding concerns, the School will have regard to the statutory DfE guidance 'Working together to improve School attendance: statutory guidance for maintained schools, academies, independent schools and local authorities (August 2024)' and to EYFS Statutory Framework for children aged 0-5 years.

### **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 and complex family circumstances. A child's experiences of adversity and trauma can leave them vulnerable 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**

The School has an important role to play in supporting the mental health and wellbeing of its pupils. 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.

The School aims to prevent health problems by promoting resilience as part of a whole School approach to social and emotional wellbeing of our pupils.

Staff can access a range of advice to help them identify children in need of extra mental health support, this includes working with external agencies. More information can be found in the DfE Mental Health and Behaviour in Schools guidance. Public Health England has produced a range of resources to support School teachers to promote positive health, wellbeing, and resilience among young people.

**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, agency staff, volunteers and contractors), then this should be referred to the Head. Where there are concerns about the Head, this should be referred to the Chair of Governors. In the event of allegations of abuse being made against the Head, staff are referred to the procedures below regarding managing allegations of abuse against staff (including supply staff, agency staff, volunteers, and contractors) and refer the matter directly to the designated officer(s) at West Sussex County Council.

**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 procedures which can be found on the School website. 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.

**7. Arrangements for dealing with child-on-child allegations (including child on child sexual violence and harassment)**

'Child on child' abuse is abuse by one or more children against another child. It can be standalone or as part of wider abuse and can happen both inside and outside of School, and online. It can manifest itself in many ways and can include abuse within intimate partner relationships, bullying (including cyber bullying, prejudice-based and discriminatory bullying), abuse within intimate partner relationships between peers, physical abuse (such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm), initiation/hazing type violence and rituals, upskirting, sexting, consensual and non-consensual sharing of nudes and/or semi-nudes, sexual assault, gender-based issues, sexual behaviours including child on child sexual violence and sexual harassment, 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. It can also occur through a group of children sexually assaulting or sexually harassing a single child or group of children.

These arrangements apply to all reports and concerns of child-on-child abuse, whether they have happened in School or outside of it, and/or online. Abuse that occurs online or outside of School should not be downplayed and should be treated equally seriously.

The School takes a zero- tolerance approach and abusive comments and interactions should never be passed off or dismissed as "banter" or "part of growing up". Nor will harmful sexual behaviours including sexual comments, remarks or jokes and online sexual harassment be dismissed as the same or "just having a laugh" or "boys being boys". Staff will also challenge physical behaviours (that are potentially criminal in nature), such as grabbing bottoms, breasts and genitalia, pulling down trousers, flicking bras and lifting skirts. Dismissing or tolerating such behaviours risks normalising them.

The School acknowledges that even if there have been no reported cases of child-on-child abuse in relation to pupils within the School, such abuse may still be taking place and is simply not being reported. The School will ensure that children are aware of how they can report abuse, and that they are aware of the procedures that the School will follow once a report has been made. These procedures will be well promoted and in a format that is easily accessible and easily understood by children.

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. The School also recognises that children may not find it easy to tell staff about their abuse verbally and that instead they may show signs or act in ways they hope adults will notice and react to. It is also recognised that an incident may come to a member of staff's attention through a report of a friend, or by overhearing conversations. It is therefore important that all staff are clear on the School's policy and procedures with regards to child-on-child abuse and can recognise the indicators and signs of child-on-child abuse and know how to identify it and how to respond to reports.

The School recognises that a child's first disclosure to a trusted adult may not be the only incident of concern, and it should not be assumed that it relates to a single event. All reports of abuse will be taken seriously, regardless of how much time has passed before the child has spoken out. Staff will respond immediately and provide appropriate support to the child when they raise a concern.

The School recognises that children with special educational needs and disabilities (SEND) or certain health conditions are three times more likely to be abused by their peers, can face additional safeguarding challenges and may be more prone to peer-on-peer group isolation or bullying (including prejudice-based bullying) than other children. The School will consider extra pastoral support for those children. The School also recognises that certain children may face additional barriers to reporting an incident of abuse because of their vulnerability, disability, sex, ethnicity and/or sexual orientation.

The School recognises that children can be particularly vulnerable in residential settings (such as boarding houses) and are alert to the potential for child-on-child abuse. The School will comply with its obligations as set out in the National Minimum Standards in relation to safeguarding at all times.

All boarding staff receive safeguarding training at induction and regular intervals.

The Heads of Boarding are members of the pastoral committee and can raise issues through this or the School's normal pastoral procedures.

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

- An open and honest environment where young people feel safe to share information about anything that is upsetting or worrying them.
- Assemblies are used to provide a moral framework outlining acceptable behaviour and stressing the effects of bullying.
- RS, PSHE and RSE are used to reinforce the message through stories, role play, current affairs and other suitable activities.

- Staff will endeavour always to create surroundings where everyone feels confident and at ease in School.
- We will ensure that the School is well supervised, especially in areas where children might be vulnerable.
- Internal reporting systems in place are promoted, understood and easily accessible.
- The School adopts a reflective approach, regularly reviewing decisions and actions and updating policies and procedures to reflect learning.

All allegations of child-on-child abuse should be passed to the DSL immediately. A clear, detailed, factual record must be kept and updated with all actions and outcomes. Any allegations will then be investigated and dealt with as follows.

**Information gathering** – children, staff and witnesses will be spoken with as soon as possible to gather relevant information quickly to understand the situation and assess whether there was intent to cause harm.

**Decide on action** – if it is believed that any young person is at risk of significant harm, a referral will be made to children’s social care. The DSL will then work with children’s social care to decide on next steps, which may include contacting the police.

**Inform parents** - as with other concerns of abuse, the School will normally seek to discuss concerns about a pupil with parents. Our focus is the safety and wellbeing of the pupil and so if the School believes that notifying parents could increase the risk to the child or exacerbate the problem, advice will first be sought from children’s social care and/or the police before parents are contacted.

Where an issue of pupil behaviour or bullying gives ‘reasonable cause to suspect that a child is suffering, or is likely to suffer, 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 MASH 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(s).

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 MASH, 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 MASH and/ or the police as appropriate. The School will have regard to the procedures set out in KCSIE (at all times).

The victim may ask the School not to tell anyone about the sexual violence or sexual harassment. Advice should be sought from the DSL (or Deputy DSLs) who should consider: parents or carers should normally be informed unless doing so would put the victim at greater risk; the basic safeguarding principle that if a child is at risk of harm, is in immediate danger, or has been harmed, a referral should be made to local authority children’s social care; and whether a crime has been committed. U l t i m a t e l y , the DSL (or Deputy DSL) will balance the victim’s wishes against their duty to protect the victim and other children.

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 be passed to the police. Where a report has been made to the police, the School will consult the police and agree what information can be disclosed to staff and others, in particular, the alleged perpetrator(s) and their parents or carers. 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 may also decide that the children involved may benefit from early help and may make the necessary referral in accordance with MASH.

The School's approach to sexting includes educating parents and guardians through safeguarding advice provided in information letters and educating pupils through the PSHE curriculum, IT lessons and form tutor pastoral presentations. When an incident is brought to the School's attention (in or out of School), the incident, if required, will be treated in line with our anti bullying procedures and disciplinary action taken.

The School will follow the DDMSC / UKIS guidance "Sharing nudes and semi-nudes: advice for education settings working with children and young people" (March 2024) when responding to an allegation that nudes and/or semi-nudes have been shared.

In the event of disclosures about 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 DSL and pastoral support 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. The risk and needs assessment should consider:

- the victim
- whether there may have been other victims
- the alleged perpetrator(s) and
- all the other children (and if appropriate staff) at the School especially any actions that are appropriate to protect them from the alleged perpetrator(s) or from future harms.

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 because 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 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.

## **8. Dealing with safeguarding concerns or allegations made about staff (including the head, governors, volunteers and contractors)**

The School's procedures for managing concerns or allegations against staff (including supply staff, volunteers and contractors) who are currently working in the School whether in a paid or unpaid capacity follows DfE statutory guidance and WSCC safeguarding arrangements and applies when staff (including volunteers) have (or are alleged to have):

- Behaved in a way that has harmed a pupil, 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.

In this section reference to 'allegations' also covers concerns. Allegations that do not meet the above harm test should be dealt with using the School's procedure for handling low level concerns set out below.

All staff must report behaviour which would affect their DBS status.

Allegations against a teacher who is no longer employed at the School (including those who have since left the teaching profession) should be referred to the police. Historical (non-recent) allegations of abuse should be referred to the police and also the LADO. Non-recent allegations made by a child will be reported to the LADO in line with the local authority's procedures for dealing with non-recent allegations. The LADO will coordinate with children social care and the police.

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.

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.

1. Allegations which appear to meet the above reporting criteria are to be reported straight away to the 'case

manager' who is the Head. Where the Head is absent reports should be made to the DSL and the DSL will keep the Head informed. Where the Head is the subject of the allegation or concern, reports should be made to the Chair of Governors. The Head must not be informed of the allegation prior to contact with the Chair of Governors. However, staff may consider discussing any concerns with the DSL and may make any referral via them.

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, or it is an emergency situation, the case manager should contact children's social care and as appropriate 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. The DSL is responsible for ensuring the child is not at risk (and as such the Chair of Governors may discuss any allegation received directly by them, with the DSL).
3. Where the case manager is concerned about the welfare of other children in the community, or the member of staff's family, they will discuss these concerns with the LADO and make a risk assessment of the situation. It may be necessary for the LADO to make a referral to children's social care.
4. When to inform the individual who is the subject of the allegation will be considered on a case-by-case basis and with guidance from the LADO, and if appropriate, the police and/or children's social care. Subject to any objection, the case manager will ensure that the individual who is subject of the allegation is informed as soon as possible and given an explanation of the likely course or action. 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.
5. The case manager should give careful consideration as to whether the circumstances of the case warrant suspension from contact with children at the School or whether alternative arrangements should be put in place until the allegation is resolved. The following alternative arrangements should be considered by the case manager before suspending a member of staff:
  - redeployment within the School so that the individual does not have direct contact with the child or children concerned,
  - providing an assistant to be present when the individual has contact with children.
  - redeploying to alternative work in the School so the individual does not have unsupervised access to children,
  - moving the child or children to classes where they will not come into contact with the member of staff, but this decision should only be made if it is in the best interest of the child or children concerned and takes accounts of their views. It should be made making it clear that this is not a punishment and parents have been consulted or
  - temporarily redeploying the member of staff to another role in a different location, for example to an alternative school where available.

These alternatives allow time for an informed decision regarding the suspension. This will, however, depend upon the nature of the allegation.

6. Suspension should not be an automatic response when an allegation is reported. It should be considered only in cases where there is cause to suspect a child or other children at the School is/are at risk of harm, or the case is so serious that it might be grounds for dismissal. The case manager will give due weight to the views of the LADO, *WT* and *KCS/E* when making a decision about suspension (including with respect

to considering alternatives). Where the individual is suspended, the case manager will confirm the decision within one working day and will ensure they know who their point of contact is in the School and shall provide them with their contact details. The case manager will also record the rationale and justification for the suspension, including what alternatives were considered and why they were rejected.

7. Where a member of residential boarding staff is suspended pending an investigation, the case manager will consider whether arrangements for alternative accommodation away from children should be made.
8. Where further enquiries are required to enable a decision about how to proceed, the LADO and case manager should discuss how and by whom the investigation will be undertaken. The LADO will provide advice and guidance to the School to ensure that an appropriate investigation is carried out. In straightforward cases, the investigation should usually be undertaken by a senior member of staff at the School. Where there is lack of resource, or the nature or complexity of the allegation requires it, an independent investigator may be appointed to undertake the investigation.
9. 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. Parents and others will be made aware that there are restrictions on publishing information which may lead to the identification of the teacher subject to the allegation.
10. The case manager will monitor the progress of cases to ensure they are dealt with as quickly as possible in a thorough and fair process. The outcome of the investigation of an allegation will record whether it is substantiated (sufficient evidence to prove it), unsubstantiated (insufficient evidence either to prove or disprove it), false (sufficient evidence to disprove it), malicious (sufficient evidence to disprove it and that there has been a deliberate act to deceive or cause harm to the person subject of the allegation) or unfounded (to reflect cases where there is no evidence or proper basis which supports the allegation being made).
11. Reviews are conducted at fortnightly or monthly intervals, depending on the complexity of the case. The first review will take place no later than four weeks after the initial assessment and subsequent review dates will be set at the review meeting.
12. The case manager will discuss with the LADO whether a referral to the Disclosure and Barring Service (DBS) or Teaching Regulation Agency (TRA) 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 DBS any person (whether employed, contracted, a volunteer or a pupil) 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, 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 the teacher has displayed unacceptable professional conduct, conduct that may bring the profession into disrepute or a conviction at any time for a relevant offence).
13. Once a case has concluded, the case manager should review the circumstances with the LADO to consider whether any improvements are needed to the School's safeguarding procedures or practices to help prevent similar incidents in the future. Even where an allegation is found to be unfounded, false, malicious, or unsubstantiated, the case manager (and the LADO, if involved) should still review the facts to identify any lessons to be learned and potential areas for improvement.

Where an individual is removed from regulated activity, or would have been removed had the individual not left, including when they are suspended, redeployed to work that is not regulated activity, are dismissed, or have resigned, and the individual has engaged in relevant conduct in relation to children and/or adults, and/or satisfied the harm test in relation to children and/or vulnerable adults, and/or been cautioned or convicted of a relevant (automatic barring either with or without the right to make representations) offence, the School will make a referral to the DBS.

The School has a duty of care to its staff, and whilst the welfare of a child is paramount, the School must offer appropriate welfare support to the adult subject to the investigation and potentially their family. The School will also make every reasonable effort to maintain confidentiality and guard against unwanted publicity whilst an allegation is being investigated or considered. Information will also not ordinarily be shared with other staff or with children or parents who are not directly involved in the investigation.

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 *KCSIE* 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.

In all cases where there are concerns or allegations of abuse, the School will make a serious incident report to the Charity Commission whenever the Commission's guidelines deem it appropriate to do so.

## **9. Dealing with safeguarding concerns and allegations about supply teachers and contractors**

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 (because they have their own policies and procedures) and co-operate with any enquiries from the LADO, police and/or children's social care.

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 (or agencies where the supply teacher is working across a number of Schools) whether it is appropriate to suspend the supply teacher, or redeploy them to another part of the School, whilst they conduct 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 considered 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 TRA).

## **10. Dealing with safeguarding concerns and allegations about 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 its safeguarding policy and procedures, including informing the LADO.

When services or activities at the School are provided under the direct supervision of 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 and 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 '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.

## **11. 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:

- 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).

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.

The School's 'Staff Code of Conduct' and 'Child Protection Code of Practice' can be found on the staff drive and on request from the School Office. The aim of the Code of Conduct and Child Protection Code of Practice is to provide clear guidance about the standards of appropriate behaviour and actions of staff so as not to 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 these documents at all times.

The procedure for sharing confidentially any such concerns is for staff to complete and submit a 'low level concerns form' which can be found on the School intranet. Completed forms are received directly by the Head. Staff must share all concerns without delay so that they can be recorded and dealt with appropriately, sensitively, proportionately and in a timely manner. Where there is a low-level concern regarding the Head, this should be referred to the Chair of Governors.

Staff are also encouraged to self-refer if 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 managed 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 for as long as any living victim may bring a claim (NB civil claim limitation periods can be set aside in cases of abuse) or until the individual has left employment, whichever is longer.

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 to identify any patterns of concerning, problematic or inappropriate behaviour which may indicate an unacceptable culture, or any weaknesses in the School's 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 individual's 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.

## **12. 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.

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.

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

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

Volunteers, including governors, will undergo checks commensurate with their work in the School, their contact with pupils and the supervision provided to them. In addition, visiting speakers are checked prior to arrival as suitable and always supervised. Under no circumstances will a volunteer who has not been appropriately checked be left unsupervised.

The School checks the identity of all contractors working on site and requests DBS with barred list checks where required by statutory guidance. Contractors who have not undergone checks will not be allowed to work unsupervised during the School day.

Visitors to the School, including contractors, are asked to sign in and are given a badge, which confirms they have permission to be on site. Parents who are simply delivering or collecting their children do not need to sign in but are only permitted in the Front Hall reception area (which includes Highden function room) or Chapel Lobby. All visitors are expected to observe the School's safeguarding and health and safety regulations. The Receptionist will determine whether any visitor should be escorted or supervised while on site.

### **13. Management of safeguarding**

The School's DSL is Jim Taylor who is a member of the senior leadership team. The DSL's role covers the whole school including the Early Years Foundation Stage.

Sarah Sutherland (Senior Deputy Head), Lex Bolton (Head of Senior Phase), Kate Hooper (Head Nurser), Marie Kelleway (Head of Girls Boarding), Will Kerr-Dineen (Head of Boys Boarding), Erica Warbey (EYFS), and are the Deputy DSLs 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 DSL's (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 has in place. The DSL collaborates with the governors to review and update the School's safeguarding policy and online safety 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 for staff in the School to discuss any safeguarding concerns. If a DSL is not available in person (such as out of term time) they can be contacted via the School Office.

The DSL or Deputy DSL should liaise with the West Sussex Children's Services and work with other agencies in line with *WT*. "NPCC - When to call the police: guidance for schools and colleges" ([npcc.police.uk](https://npcc.police.uk)) can assist the DSL (or Deputy DSLs) 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 DDSLs) 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 DDSLs) 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 and neglect, are understood and followed by all staff, and the Governors are 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*.

## 14. Training

Induction and training are in line with best practice amongst schools and sector advice including ISBA's.

### All Staff

All new staff (including temporary staff) will be provided with induction training that includes:

- the child protection safeguarding policy (including the policy and procedures to deal with child-on-child abuse)
- the role and identity of the DSL and the DDSLs
- the behaviour management policy (including measures to prevent bullying, including cyberbullying, prejudice-based and discriminatory bullying)
- the staff 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
- the safeguarding response to children who are absent from education, particularly on repeat occasions and/or prolonged periods or children missing education.
- the online safety policy, including an understanding of the expectations, applicable roles and responsibilities in relation to filtering and monitoring:
- a copy of Part one of *KCSIE* at least (or, for staff that do not work directly with children Annex A) ;
- School leaders and staff who work directly with children will also be required to read Annex B of *KCSIE* (and part five of *KCSIE*)
- The School Child Protection Code of Good Practice

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

All staff are also required to:

- Read at least 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 inset training and email communication from the DSL
- Understand key information contained in Part one of *KCSIE*. The School will ensure staff understanding by conducting online quizzes administered by the DSL
- Receive training in safeguarding and child protection regularly, in line with advice from WSCC. Training will include online safety (including the expectations, applicable roles and responsibilities in relation to filtering and monitoring) and harmful sexual behaviours (including child on child sexual violence and harassment). It will also include Prevent awareness training to equip staff to understand the factors that lead people to support terrorist ideologies or engage in terrorist related activity, be able to recognise susceptibility to terrorism and be aware of what action to take in response, including the School's internal Prevent arrangements
- Undertake regular informal updates, at least annually, to provide them with relevant skills and knowledge to safeguard children effectively, including online. The School provides these via, for example, emails, information letters and staff meetings.

All EYFS staff are required to attend safeguarding training specifically designed for staff caring for 0-5 year olds which must cover the areas set out in Annex C to the EYFS Statutory Framework 'Criteria for effective safeguarding training'.

Training must be renewed every two years by the DSL and all staff are required to attend. EYFS staff are supported to put their training into practice via regular updates and reminders from the DSL and inset training sessions, as well as regular meetings with their line manager which will always include safeguarding as an agenda item.

The governing body 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 governing body is aware of its obligations under the Human Rights Act 1998 (HRA), the Equality Act 2010, the Data Protection 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 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 complies with the DfE's Data Protection guidance for schools, ensuring school staff and governors 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.

### **DSL(s)**

The DSL receives updated child protection training at least every two years to provide them with the knowledge and skills required to conduct the role. This includes local inter-agency working protocols, participation in child protection case conferences, supporting children in need, identifying children susceptible to radicalisation, record keeping and promoting a culture of listening to children, training in WSCC's approach to *Prevent* duties. The DSL also receives more in-depth training, including on extremist and terrorist ideologies, how to make referrals and how to work with Channel panels. This training is updated at least every two years, enabling the DSL to support other staff on Prevent matters and update them on relevant issues. Further details of the required training content for the DSL are set out in Annex C of *KCSIE*.

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 DDSLs are trained to the same level as the DSL.

## **15. Oversight of safeguarding, including arrangements for reviewing policies and procedures**

Louisa Wilkins in the safeguarding lead governor on the Windlesham House School Committee and Helen Goatley is the [Charterhouse Group Safeguarding Governor](#).

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, including lessons learnt. This includes reflecting on updates to Government and sector guidance and best practice. The Governing Body receives a termly report on safeguarding arrangements. The School draws on the expertise of staff, including the DSL, in shaping the School's safeguarding arrangements and policies.

The School's safeguarding policies and procedures should be transparent, clear and easy to understand for staff, pupils, parents and carers.

If there has been a substantiated allegation against a member of staff, the School will work with the LADO 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.

## **16. The school's arrangements to fulfil other safeguarding responsibilities**

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

The Head and Governing Body ensure 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 SEND children might be needed.

Internet safety (including when children are online at home) is an integral part of the School's ICT curriculum and also embedded in PSHE and Relationships Education and/or 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 when using the School's IT infrastructure. These systems are comprehensive and include several key components.

#### **1. Smoothwall Filtering:**

- All internet traffic is filtered through Smoothwall, which blocks access to websites deemed inappropriate.
- Internet searches are scrutinised and filtered to exclude profanities, spam and any content considered unsuitable for a school environment.

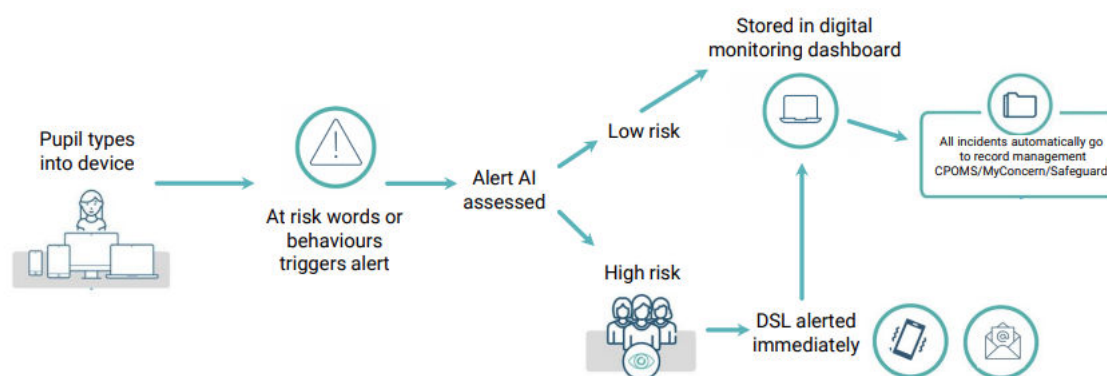
#### **2. Smoothwall Monitoring:**

- Smoothwall Monitor provides active oversight of user activity on the network.
- It monitors keystrokes, search queries, website content, and overall computer usage.
- This monitoring system captures screenshots of suspicious activity and, if necessary, blocks access to certain resources as deemed appropriate by the Network Manager.
- The primary focus is on safeguarding, security, and preventing behavioural misuse of the school's computer systems.

#### **3. Microsoft Defender for Business:**

- Microsoft Defender offers comprehensive virus protection across all desktop and mobile devices within the school.
- The system ensures that virus definitions and security signatures are updated daily to maintain a high level of protection against the latest threats.

## Digital monitoring - how it works - Smoothwall only



Such systems aim to reduce the risk of children being exposed to illegal,

inappropriate or harmful materials online for example: pornography, racism, misogyny, self-harm, suicide, anti-Semitism, radicalisation, extremism, misinformation, disinformation (including fake news) and conspiracy theories (**content risk**); reduce the risk of children being subjected to harmful online interaction with others including 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 (**contact risk**); restrict access to online risks such as online gambling, inappropriate advertising, phishing and/or financial scams (**commerce risk**); and help manage online behaviour that can increase a child's likelihood of, or causes, harm for example making, sending and receiving explicit images e.g. consensual and non-consensual sharing of nudes and semi-nudes and/or pornography, sharing other explicit images and online bullying (**conduct risk**).

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 School ensures compliance with the DfE's 'Cyber security/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

The School has in place a separate AI Policy which sets out further detail in this regard.

Further detail of the School's policy and procedures in relation to online safety can be found in the School's Online 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 Relationships and Sex Education ("RSE")**

The School understands that children and young people need knowledge and skills that will enable them to make informed and ethical decisions about their wellbeing, health and relationships.

Relationships Education is compulsory for all pupils receiving primary education and Relationships and Sex Education (RSE) is compulsory for all pupils receiving secondary education (at Windlesham this relates to years 7 and 8) although the school has flexibility to decide how it discharges its duties within the first year of compulsory teaching.

The School's Relationships Education/RSE curriculum is delivered as part of a whole school approach to wellbeing and positive relationships 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 focusses on building positive attitudes and skills, promoting healthy norms about relationships, including sexual relationships where relevant, and about health, including mental health. The School recognises that discussions about sensitive topics in Relationships Education/RSE can lead to increased safeguarding reports. All staff know what to do if they have concerns that a pupil is being neglected or abused, including those who have seen, heard or experienced the effects of domestic abuse.

The School has 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 and RSE.

### **Looked after children**

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

The DSL (Jim Taylor)) 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 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. 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 of democracy.

The School will undertake a risk assessment 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.

All visiting speakers will be subject to the School's usual visitors signing in protocol. This will include signing in and out at Reception, the wearing of a visitor's badge always and being escorted by a fully vetted member of staff.

Further information is available in the School Visiting Speakers Procedure.

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 are in use, whether the activity is a school or non-school activity and regardless as to whether the children attending are on the school roll.

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

During term time, the DSL and/ or a DDSL will always be available in person during School hours. If the DSL or a DDSL is not contactable, the main School telephone number should be contacted (01903 874700). The Duty team can be contacted on option 1 and in an emergency the Headmaster can be contacted on option 2. If you believe a child to be in immediate danger, please contact the police.

When considering the safeguarding arrangements any providers have in place the School will have regard to the DfE's non statutory guidance *'After school clubs, community activities, and tuition (safeguarding guidance for providers)'* (September 2023).

### **Arrangements for Off Site Activities**

All Educational Visits require completion of a risk assessment and educational visits checklist. Safeguarding issues (including child on child abuse) are included as standard in all risk assessments with oversight and implementation of control measures to be implemented by the lead staff member.

### **Arrangements for Co-Curricular Activities**

All external activity leaders delivering co-curricular activities in School are DBS checked. They are also required to sign a School Code of Conduct for Co-Curricular Clubs and provide risk assessments for their activities.

### **Arrangements for One-to-One Tuition**

As stated in our Child Protection Code of Good Practice, staff must ensure that if they are in a one-to-one situation with a young person, that the door is either open or contains a glass panel and that another adult is aware of the meeting/lesson. Mandatory safeguarding training and recruitment checks apply to all staff including peripatetic staff.

### **Arrangements for visiting specialists**

Staff planning for a visiting specialist to come into the School will need to notify HR in the Bursary. HR will then ensure that the necessary checks are made including requesting a copy of the visitors' identification and DBS certificate. All visitors report to reception on arrival.

### **Arrangements for Safeguarding - Child Protection Code of Practice**

The School produces an A5 'Child Protection Code of Good Practice' guide for all staff. This document provides the contact details of the DSL and Deputy DSLs, a summary of the key actions to take if a pupil makes a disclosure and the Code of Behaviour for staff. A copy of the card is provided to all staff at induction and is reviewed and re-issued annually (as a minimum) and in the event of a key change to safeguarding arrangements

### **Use of mobile phones and cameras (see also staff code of conduct)**

To ensure the responsible use of mobile phones by staff, safeguarding pupils, and maintaining professional standards, staff must not use mobile phones in the presence of pupils, except:

- In the case of an emergency.
- To contact the school during off-site visits.
- For educational purposes if a suitable school device is not available.

If a staff member needs to use their personal mobile phone for educational purposes, they must first register their name with the Bursar and sign a disclaimer confirming they are content for the school to conduct security checks of images on their phone.

Staff working in the Early Years setting are not permitted to access their mobile phones for either educational or social purposes during the school day. They must use a school-owned device to take any images of children participating in activities.

Before publication/use of any photo/video containing pupils, staff must have checked the individual photo consent provided for each child which is shown on an excel sheet accessed from the home page of the staff intranet. Staff who act in breach of this may be subject to disciplinary action.

Parents, visitors and others attending School events can take photographs and videos of those events for domestic purposes. For example, parents and visitors can take video recordings of a School performance involving their child. The School does not prohibit this as a matter of policy, unless to do so would breach the requirements of a show's licence or infringe copyright. We ask parents and visitors not to take photographs of other pupils on their own without the prior agreement of the child's parents and not to upload any photographs and videos to social media whereby a child, other than their own, is identifiable.

### **Operation Encompass**

The School is part of Operation Encompass, a national police and early intervention safeguarding partnership which supports children who experience domestic abuse.

Through Operation Encompass the police are required to share information with the School about **all** police attended domestic abuse incidents which involve any of our children who are related to either of the adults involved in the incident. This sharing of information should occur prior to the start of the next school day. The notification should be sent to the DSL (known as the Key Adult) and inform us about the context of the incident and will include the child's perspective.

The Operation Encompass notification is stored in line with all other confidential safeguarding and child protection information.

## **17. Early years provision safeguarding arrangements**

The School adheres to the requirements set out in the EYFS Statutory Framework including the requirements regarding paediatric first aid training, safer eating and children's privacy in relation to toileting.

### **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 Safer Recruitment 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 Staff Code of Conduct. To ensure the responsible use of mobile phones by staff, safeguarding pupils, and maintaining professional standards, staff must not use mobile phones in the presence of pupils, except in the case of an emergency, to contact the school during off-site visits, for educational purposes if a suitable school device is not available. If a staff member needs to use their personal mobile phone for educational purposes, they must first register their name with the Bursar and sign a disclaimer confirming they are content for the school to conduct security checks of images on their phone.

Staff working in the Early Years setting are not permitted to access their mobile phones for either educational or social purposes during the school day. They must use a school-owned device to take any images of children participating in activities.

Staff who act in breach of this may be subject to disciplinary action.

### **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 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).

### **Safeguarding training**

The School ensures staff are trained in line with the criteria set out in Annex C of the EYFS Statutory Framework and are supported to implement the Policy on an ongoing basis.

The DSL provides support, advice and guidance to all staff on an ongoing basis, and on specific safeguarding issues that may arise. The DSL attends a training course, consistent with the criteria set out in Annex C of the EYFS Statutory Framework.

The School's safeguarding training will be renewed at least every two years and the School will consider whether staff need to undertake annual refresher training during any two-year period and to keep up to date with changes to safeguarding procedures or as a result of any safeguarding concerns that may occur at the school.

## 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.

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.

The Centre of Expertise on Child Sexual Abuse has introduced new resources to help education professionals identify and respond to concerns of child sexual abuse and abusive behaviours. There are also the below resources available:

Tackling Child Sexual Abuse Strategy – Home Office policy paper

Together we can stop child sexual abuse – HM Government campaign

**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.

The Lucy Faithfull Foundation in collaboration with the Home Office, has developed 'Shore Space', an online resource which works to prevent harmful sexual behaviour. Shore Space offers a confidential chat service supporting young people who are concerned about their own or someone else's sexual thoughts and behaviour.

The Lucy Faithfull Foundation has developed a harmful sexual behaviour toolkit, which amongst other things, provides support, advice and information on how to prevent it, links to organisations and helplines, resources about harmful sexual behaviour by children, internet safety, sexual development and preventing child sexual abuse.

The NSPCC provides free and independent advice about harmful sexual behaviour: NSPCC Learning: Protecting children from harmful sexual behaviour and NSPCC - Harmful sexual behaviour framework.

Beyond Referrals | The Contextual Safeguarding programme based at the University of Durham provides a school self-assessment toolkit and guidance for addressing harmful sexual behaviour in schools.

StopItNow – Preventing harmful sexual behaviour in children: provides a guide for parents, carers and professionals to help everyone do their part in keeping children safe, they also run a free confidential helpline.

**Sharing of nudes and/or semi-nudes:** 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'. 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.

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 or use artificial intelligence (AI) to generate a new nude or semi-nude image of a young person
- images created or shared are used to abuse or blackmail peers. Situations could include:
  - children and young people selling nudes or semi-nudes of others online
  - 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

- 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*" (March 2024) sets out the classification of incidents, and how each should be handled.

**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 sex 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.<sup>228</sup> 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*".<sup>23</sup> The Children's Society and Home Office has also published guidance on Preventing Child Sexual Exploitation. 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 and The Children's Society County Lines Toolkit For Professionals.

**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 (June 2025)”.*

**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, exploitation 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, attendance and progress at school.

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 DDSL).

More information can be found in the Mental health and behaviour in schools guidance. Public Health England has produced a range of resources to support secondary school teachers to promote positive health, wellbeing and resilience among children.

**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 speak to the DSL (or DDSL) who will (where appropriate) activate local safeguarding procedures, using existing national and local protocols for multi-agency liaison with police and Children’s Social Care.

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. Teachers should 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) [or it involves a pupil over 18], 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.<sup>243</sup> 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:** is the process of a person legitimising support for, or use of, terrorist violence.

Extremism is the vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of those with different faiths and beliefs.

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 radicalisation into terrorism, there are factors that may indicate concern. However, it is possible to protect people from extremist ideology and intervene to prevent those at risk of radicalisation being drawn to terrorism. 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 susceptible 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 (SEND), or pupils with certain health conditions:** 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 introduces a 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.

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

**Operation Encompass:** operates in all police forces across England. It helps police and schools work together to provide emotional and practical help to children. The system ensures that when the police

are called to an incident of domestic abuse, where there are children in the household who have experienced the domestic incident, the police will inform the key adult (usually the designated safeguarding lead (or a deputy)) in school before the child or children arrive at school the following day. This ensures that the school has up to date relevant information about the child's circumstances and can enable immediate support to be put in place, according to the child's needs.

Operation Encompass does not replace statutory safeguarding procedures. Where appropriate, the police and/or schools should make a referral to local authority children's social care if they are concerned about a child's welfare.

More information about the scheme and how schools can become involved is available on the Operation Encompass website. Operation Encompass provides an advice and helpline service for all staff members from educational settings who may be concerned about children who have experienced domestic abuse. The helpline is available 8:00 to 13:00, Monday to Friday on 0204 513 9990 (charged at local rate).

**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. The School's procedure for dealing with children who are absent and/or missing can be found in the Pupil Absence Policy. All unexplained absences will be followed up in accordance with the Pupil Absence Policy.

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 School Attendance (Pupil Registration) (England) Regulations 2024. 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 of any pupil who fails to attend school regularly, or has been absent without the School's permission for a continuous period of 10 school days or more, at such intervals as are agreed between the School and the local authority.

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 5-11 year 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.

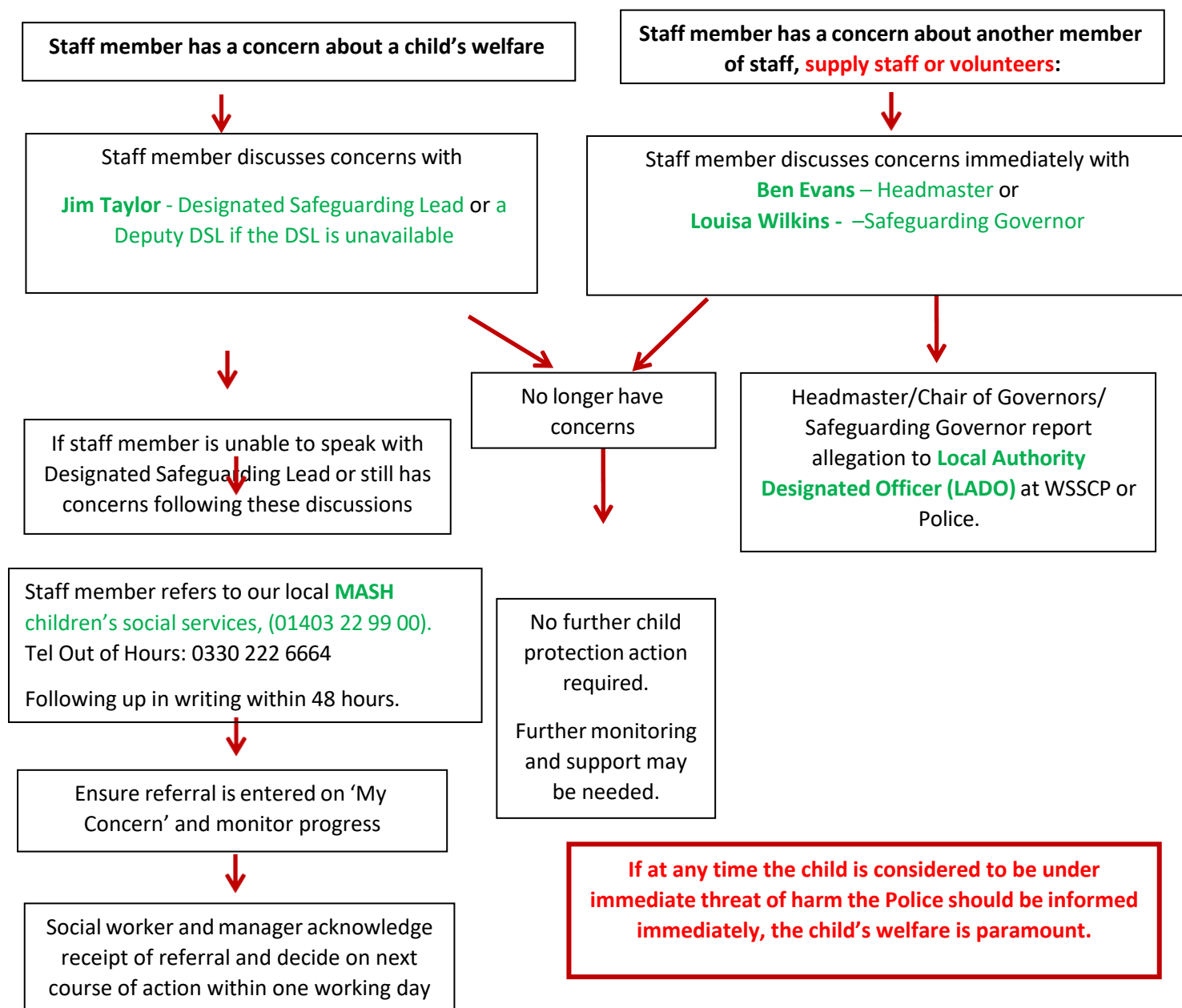
Making child arrangements via the family courts following separation can be stressful and entrench conflict in families. This can be stressful for children. The Ministry of Justice has launched an online child arrangements information tool with clear and concise information on the dispute resolution 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.

**Appendix 2 – Safeguarding referral flow chart**  
**Summary of in-School procedures to follow where there are concerns**



**Disclosure of abuse by the pupil: The Seven Rs**

When a pupil discloses that he/she has been abused the following guidelines must be followed:

**Receive:** Listen without shock, disgust or disbelief and accept what is said. Give child time and a safe place

**Reassure:** Stay calm, do not promise confidentiality – empathise but don't express opinions

**React:** Do not ask leading questions – make no judgments – explain what you will do next – stay connected

**Record:** Brief 'factual' notes as soon as possible – date/time/place etc. – be objective – use child's words only – use diagram. Do not destroy original notes even if you later write things up more neatly and fully

**Refer:** Refer all cases to the DSL who will consult with SSWB or LADO, or other agencies for such cases. The Headmaster or DSL will disclose any information about a pupil to other members of staff on a need-to-know basis only

**Remember:** To support the child by listening and reassuring. Seek support for yourself if needed

**Review:** DSL led review of the process to identify positive and negative outcomes.