



## PRINCE'S MEAD

### Safeguarding & Child Protection Policy

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## **ANNUAL REVIEW**

1. This policy is reviewed at least annually in consultation with Sarah Tice, Safeguarding Governor, and reported to the Full Board in line with relevant statutory guidance.
2. This policy was published in draft in September 2023 and will be approved by the Governing Board in December 2023.
3. Next review by Governing Board: December 2024.

## **POLICY STATEMENT**

1. Safeguarding determines the actions that we take to keep children safe and protect them from harm in all aspects of their school life. As a school, we are committed to safeguarding and promoting the welfare of all of our pupils. The school is committed to acting in the best interests of the child.
2. We recognise our moral and statutory responsibility to safeguard and promote the welfare of all children. As part of this responsibility we undertake Safer Recruitment.
3. We make every effort to provide a safe and welcoming environment underpinned by a culture of openness where both children and adults feel secure, able to talk and believe that they are being listened to. We are alert to the possibility of a safeguarding issue potentially happening within our school.
4. The purpose of this policy is to provide staff, volunteers and Governors with the framework they need in order to keep children safe and secure at Prince's Mead and to inform parents and guardians how we will safeguard their children whilst they are in our care. The actions that we take to prevent harm; to promote wellbeing; to create safe environments; to educate on rights, respect and responsibilities; to respond to specific issues and vulnerabilities all form part of the safeguarding responsibilities of the school. As such, this overarching policy will link to other policies which will provide more information and greater detail.
5. This policy includes effective and clear procedures and protocols which:
  - reflects the whole school approach to child on child abuse
  - reflects clear reporting systems
  - describes procedures in line with government guidance
  - refers to locally agreed multi-agency safeguarding arrangements put in place by our safeguarding partners
  - includes are obligations to the SEND and online safety policies
  - where appropriate, reflects serious violence
  - is reviewed annually
  - is available publicly on the school website
  - is linked to our behaviour policy and Staff code of conduct: Interaction with Children policy
  - has appropriate safeguarding arrangements in place to respond to children who go missing from education
  - shares information appropriately

## **DEFINITIONS**

Within this document:

1. Safeguarding and promoting the welfare of children refers to the process of protecting children from maltreatment, preventing the impairment of 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.
2. Child Protection is an aspect of safeguarding, but is focused on how we respond to children who have been significantly harmed or are at risk of significant harm.
3. Staff applies to all those working for or on behalf of the school, full time or part time, in either a paid or voluntary capacity. This also includes volunteer parents and Governors.
4. Child refers to all young people who have not yet reached their 18th birthday. On the whole, this will apply to children of our school; however, the policy will extend to visiting children and students from other establishments.
5. Parent refers to birth parents and other adults in a parenting role for example adoptive parents, step parents, guardians and foster carers.
6. Abuse could mean neglect, physical, emotional or sexual abuse or any combination of these. Parents, carers and other people can harm children either by direct acts and / or failure to provide proper care. Explanations of these are given within the procedure document.
7. Early Help means 'identifying as early as possible if a child or family need support and helping them to access services, working together to ensure that this has maximum impact. In other words, offering the right help at the right time.'
8. DSL is the term used for the Designated Safeguarding Lead.

## **AIMS**

1. To provide Staff with the framework to promote and safeguard the wellbeing of children and in so doing ensure they meet their statutory responsibilities
2. To ensure consistent good practice across the school
3. To demonstrate our commitment to protecting children
4. To continually strengthen the strong safeguarding culture within the school

## **PRINCIPLES AND VALUES**

1. Safeguarding is everyone's responsibility and staff must be able to reassure victims that they are taken seriously and that they will be supported and kept safe. A victim should never feel they are causing a problem by reporting abuse, sexual violence or harassment or feel ashamed to make a disclosure.
2. All staff should have an awareness of safeguarding issues that can put children at risk of harm. Behaviours linked to issues such as drug-taking and or alcohol misuse, deliberately missing education and consensual sharing of nude or semi-nude images and/or videos, can be signs that children are at risk.

3. All staff have a key role in prevention of harm and an equal responsibility to act on any suspicion or disclosure that may indicate a child is at risk of harm, either in the school or in the community taking into account contextual safeguarding, in accordance with the guidance.
4. Children have a right to feel secure and cannot learn effectively unless they do so. All children regardless of age, gender, race, ability, sexuality, religion, culture or language have a right to be protected from harm.
5. We acknowledge that working in partnership with other agencies protects children and reduces risk and so we will engage in partnership working throughout the child protection process to safeguard children.
6. Whilst the school will work openly with parents as far as possible, the school reserves the right to contact children's social care or the police, without notifying parents if this is in the child's best interests.
7. Some areas, such as Health and Safety, are a specialist area of safeguarding and this is the responsibility of the School Bursar.
8. Safeguarding processes are intended to put in place measures that minimise harm to children. There will be situations where gaps or deficiencies in the policies and processes we have in place will be highlighted. In these situations, a review will be carried out in order to identify learning and inform the policy, practice and culture of the school.
9. All pupils in our school are able to talk to any member of staff to share concerns or talk about situations which are giving them worries. The staff will listen to the pupil, take their worries seriously and share the information with the safeguarding lead.
10. Information sharing is vital in identifying and tackling all forms of abuse and neglect and in promoting children's welfare, including their educational outcomes.

We provide pupils with information of who they can talk to outside of school both within the community and with local or national organisations who can provide support or help.

## **TRAINING**

1. All staff, the Headmaster and relevant Governors will receive training that is regularly updated in line with HSCP advice to include Prevent and on-line safety, plus informal updates. . DSL has reiterated the need for key safeguarding principles to be met, namely
2. The best interests of children must always continue to come first:
  - If anyone in school has a safeguarding concern about any child they should continue to act and act immediately
  - A DSL should be available on site or remotely
  - It is essential that unsuitable people are not allowed to enter the children's workforce and/or gain access to children
  - Children should continue to be protected when they are online
3. Prince's Mead, as far as reasonably possible, will adopt a whole institution approach to safeguarding to ensure all protocols and policies in place at school are not weakened or undermine the protection of children in its care.

4. New staff and Governors will receive a briefing during their induction, which includes this policy and the staff behaviour policy, reporting and recording arrangements, and details for the DSL.
5. The DSL and Deputy DSLs receive biennial training at Level 3 for Multi-agency Working plus informal updates. A training log is kept to monitor this.
6. All staff will also receive safeguarding and child protection updates via email and staff meetings throughout the year. There is a specific focus on Safeguarding for each termly Study Day (INSET) where updates and further training are given.
7. Staff receive training to enable them to recognise the possible signs of abuse, neglect and exploitation and to know what to do if they have a concern.
8. All staff should be trained to manage a report on Child on Child Sexual Violence and Sexual Harassment, details of which are contained in Annex 5.
9. The Governing Board ensure that all governors receive appropriate safeguarding and child protection (including online) 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 and that they are effective and support the delivery of a robust whole school approach to safeguarding. Their training is updated yearly. The Governing Board is equally aware of their obligations under the Human Rights Act 1998, the Equality Act 2010, (including the Public Sector Equality Duty), and their local multi-agency safeguarding arrangements, See Appendix 15
10. The safeguarding policies and procedures are clear, transparent and readily accessible to parents and carers as well as staff and students

#### Data Protection Act 2018 and the UK GDPR

It is important that governing bodies and proprietors are aware that among other obligations, the Data Protection Act 2018, and the UK General Data Protection Regulation (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

#### LEGISLATION AND FURTHER GUIDANCE

This policy is based upon guidance from the following legislation to which Prince's Mead has regard to:

- Keeping Children Safe in Education (September 22) (KCSIE)
- Charity Commission guidance
- Safeguarding and protecting people for charities and trustees ( June 2022)
- Working Together to Safeguard Children (July 2022) (WT)
- Sexual violence and sexual harassment between children in schools and colleges (May 2018)
- Prevent Duty Guidance: for England and Wales (April 2021. Prevent is supplemented by non-statutory advice and a briefing note. Prevent is supplemented by non-statutory advice and a briefing note:
- The use of social media for on-line radicalisation (July 2015)
- The Prevent duty: Departmental advice for schools and childminders (June 2015)
- Teachers' Standards 2012
- The Safeguarding Vulnerable Groups Act 2006

- Children Act 2004 & 1989
- The Education (Independent Schools Standards) (England) Regulations 2003
- Section 157 of the Education Act 2002
- Hampshire Safeguarding Children's Partnership protocols and guidance and their procedures
- Prince's Mead Staff Code of Conduct/ Behaviour Policy
- Prince's Mead Whistleblowing procedure
- Prince's Mead Recruitment Policy

KCSIE incorporates the additional statutory guidance, Disqualification under the Childcare Act 2006 (September 2023). KCSIE also refers to the non-statutory advice for practitioners: What to do if you're worried a child is being abused (March 2015)

- Sexual Violence and Sexual Harassment between children in school 2021

## **ROLES AND RESPONSIBILITIES**

### **LOCAL SAFEGUARDING CHILDREN BOARD**

1. The local Safeguarding Children Board (SCB) for Prince's Mead is Hampshire Safeguarding Children's Partnership. Its core objectives are to coordinate local work to safeguard and promote the welfare of children. The school will operate safeguarding procedures in line with locally-agreed inter-agency procedures.
2. In line with the new focus of working with our Safeguarding partners, (the local authority, a clinical commissioning group, the chief officer of police), the DSL will work with these partners and the local MASH, Multi Agency Safeguarding Hub to ensure free flow of information about any safeguarding concerns to support the welfare of the children in our care.
3. MASH contacts are 03005551386 Office Hours and 03005551373 out of hours.

### **GOVERNING BOARD**

In accordance with Part 2 of KCSIE (September 2023), the Governing Board:

- a. Has overall strategic responsibility for the management of safeguarding within the school and must facilitate a whole school approach is developed within the school. This means ensuring safeguarding and child protection are at the forefront and underpin all aspects of process and policy development. Ultimately, all systems, processes and policies should operate with the best interests of the child at heart. The DSL and Head's role is to ensure that all staff follow and understand the protocols and procedures in place to safeguard the children.
- b. Supports this 'culture' within the school by having a nominated Safeguarding Governor, Mrs Sarah Tice, to oversee the safeguarding policy and procedures at Prince's Mead;
- c. And Mrs Tice meets with the key members of the Safeguarding team (at the very least the DSL) termly to discuss safeguarding matters (procedural and policy related); and she also meets with the wider school community to triangulate the safeguarding practices within the school



- d. Are presented with an annual audit of safeguarding at Prince's Mead, delivered by the DSL and Safeguarding Governor at a full governing body meeting (which is included in the minutes) and the Safeguarding Governor signs this off;
- e. Review any policy changes and sign off the safeguarding policy annually;
- f. Oversee and audit, during Governance meetings, the termly Health and Safety meeting where the DSL will report on any Safeguarding matters back to the Safeguarding Governor.
- g. Where there is a safeguarding concern, governing bodies and the Head and DSL must ensure the child's wishes and feelings are taken into account when determining what action to take and what services to provide. Systems should be in place, and they should be well promoted, easily understood and easily accessible for children to confidently report abuse, knowing their concerns will be treated seriously, and knowing that can safely express their views and give feedback.
- h. Governors take a proportionate risk-based approach to the level of information that is provided to temporary staff, volunteers and contractors. In addition, governors ensure:
  - child protection files are maintained as set out in Annex C of KCSiE Sept 2023
  - appropriate safer recruitment policies in accordance with Part three of KCSiE Sept 2023 are in place, embedded and effective and,
  - where reasonably possible the school hold more than one emergency contact number for each pupil or student. This goes beyond the legal minimum.
- i. Governors will ensure online safety is a running and interrelated theme whilst devising and implementing their whole school approach to safeguarding and related policies and procedures. This will include considering how online safety is reflected as required in all relevant policies and considering online safety whilst planning the curriculum, any teacher training, the role and responsibilities of the designated safeguarding lead (and deputies) and any parental engagement.

## DSL

1. Alex Greenaway (the Deputy Headmaster who sits on the Senior Leadership Team (SLT) is the DSL.
2. The Deputy DSLs are Adam King(Headmaster), Mandy Oakley (Matron), Gillian Jones (Head of Wellbeing), Ian Thomas (Head of Expeditions & Adventure), Lucy Brown (Head of Pre-prep) and Shelly Say (Head of EYFS).

### The DSL will:

- Refer cases to social care, and the police where appropriate in a timely manner avoiding any delay that could place the child at more risk.
- Assist the governing board in fulfilling their safeguarding responsibilities set out in legislation and statutory guidance.
- Attend initial training for the role and refresh every two years.
- Ensure that whole school refresher training occurs at least annually and complete re-training every three years, so that staff and volunteers can fulfil their responsibilities
- Ensure any members of staff joining the school outside of this training schedule receive induction prior to commencement of their duties
- Ensure all staff and volunteers understand their responsibilities in being alert to the signs of abuse and responsibility for referring any concerns to the DSL

- Keep written records of child protection concerns securely and separately from the main child file and use these records to assess the likelihood of risk
- When children leave the school, the designated safeguarding lead will ensure their child protection file is transferred to the new school or college as soon as possible, and within 5 days for an in-year transfer or within the first 5 days of the start of a new term to allow the new school or college to have support in place for when the child arrives. The designated safeguarding lead will ensure secure transit, and confirmation of receipt will be obtained. In addition to the child protection file, the designated safeguarding lead should also consider if it would be appropriate to share any information with the new school or college in advance of a child leaving. For example, information that would allow the new school or college to continue supporting children who have had a social worker and been victims of abuse, or those who are currently receiving support through the 'Channel' programme and can have that support in place for when the child arrives.
- Ensure that where a child transfers school and is on a child protection plan or is a child looked after, the information is passed to the new school immediately and that the child's social worker is informed
- Link with the HSCP to make sure staff are aware of training opportunities and the latest local policies on safeguarding. At present Alex Greenaway is the Independent School's representative on the HSCP Education Group.
- Develop, implement and review procedures in our school that enable the identification and reporting of all cases, or suspected cases, of abuse
- Act as the Online-Safety Officer, taking responsibility for policies surrounding Online-Safety (e-safety).
- Meet any other expectations set out for DSL in KCSiE 2023.

## **SENIOR LEADERSHIP TEAM**

The SLT will:

- Contribute to inter-agency working in line with guidance (Working Together 2018)
- Provide a coordinated offer of early help when additional needs of children are identified
- Ensure staff are alert to the various factors that can increase the need for early help
- Working with children's social care, support their assessment and planning processes including the school's attendance at conference and core group meetings
- Carry out tasks delegated by the governing board such as training of staff; safer recruitment; maintaining a single central register
- Provide support and advice on all matters pertaining to safeguarding and child protection to all staff regardless of their position within the school
- Treat any information shared by staff or children with respect and follow procedures
- Ensure that allegations or concerns against staff are dealt with in accordance with guidance from Department for Education (DfE), Hampshire Safeguarding Children's Partnership (HSCP) and Hampshire County Council (HCC)

## STAFF

All staff must read Part one of KCSiE 2023. Annex A (which is a condensed version of Part one) will be provided to staff who are not directly involved with children. The governing body at Prince's Mead think it will provide a better basis for those staff to promote the welfare of and safeguard children. Annex B contains important additional information about specific forms of abuse and safeguarding issues. School leaders and those staff who work directly with children must read this Annex.

In addition to this, all staff have a key role in identifying concerns early and in providing help for children. To achieve this, they will:

- Encourage a culture of listening to children and taking account of their wishes and feelings. Ensure children know that there are adults in the school whom they can approach if they are worried about any problems
- Adopt a culture of 'see something, say something'.
- Plan opportunities within the curriculum for children to develop the skills they need to assess and manage risk appropriately and keep themselves safe
- Attend training in order to be aware of and alert to the signs of abuse and be able to respond appropriately
- Maintain an attitude of "it could happen here" with regards to safeguarding
- Record their concerns if they are worried that a child is being abused and report these to the relevant person as soon as practical that day
- Be prepared to refer directly to social care and the police if appropriate if there is a risk of significant harm and the DSL is not available
- Record if the disclosure is an allegation against a member of staff and follow the allegations' procedures (Annex 4)
- Follow the procedures set out by the HSCP and take account of guidance issued by the DfE
- Support children in line with their child protection plan
- Treat information with confidentiality but never promising to "keep a secret"
- Notify DSL of any child on a child protection plan who has unexplained absence
- Have an understanding of early help and be prepared to identify and support children who may benefit from early help
- (In the context of early help), Notify colleagues and/or parents of any concerns about their child(ren), and provide them with, or signpost them to, opportunities to change the situation
- Liaise with other agencies that support children and provide early help
- Ensure they know who the DSL and Deputy DSL are and know how to contact them
- Have an awareness of the Behaviour policy, the Staff Behaviour policy (code of conduct), safeguarding response to children who go missing from education and the role of the DSL.
- (Especially the designated safeguarding lead and deputies) consider whether children are at risk of abuse or exploitation in situations outside their families. Extra-familial harms take a variety of

different forms and children can be vulnerable to multiple harms including (but not limited to) sexual exploitation, criminal exploitation, and serious youth violence.

- Be aware of systems within their school which support safeguarding, and these should be explained to them as part of staff induction. This should include the safeguarding and child protection policy (which should amongst other things also include the policy and procedures to deal with child-on-child abuse), the behaviour policy (which should include measures to prevent bullying, including cyberbullying, prejudice-based and discriminatory bullying), the staff handbook which should amongst other things, include low-level concerns, allegations against staff and whistleblowing. Be aware that children may not feel ready or know how to tell someone that they are being abused, exploited, or neglected, and/or they may not recognise their experiences as harmful. For example, children may feel embarrassed, humiliated, or are being threatened. This could be due to their vulnerability, disability and/or sexual orientation or language barriers. This should not prevent staff from having a professional curiosity and speaking to the designated safeguarding lead (DSL). It is also important that staff determine how best to build trusted relationships with children and young people which facilitate communication.
- (Especially the DSL and Deputy DSL), consider whether children are at risk of abuse or exploitation in situations outside their families. Extra-familial harms take a variety of different forms and children can be vulnerable to multiple harms including (but not limited to) sexual abuse (including harassment and exploitation), domestic abuse in their own intimate relationships (teenage relationship abuse), criminal exploitation, serious youth violence, county lines, and radicalisation
- Understand the processes and procedures in place to manage any safeguarding concern or allegation (no matter how small) about staff members (including supply staff, volunteers, and contractors).

If they have a safeguarding concern or an allegation is made about another member of staff (including supply staff, volunteers, and contractors) harming or posing a risk of harm to children, refer this to the headteacher. Where there is a concern/allegation about the headteacher, this should be referred to the chair of governors. In the event of a concern/allegation about the headteacher. If staff have a safeguarding concern or an allegation about another member of staff (including supply staff, volunteers or contractors) that does not meet the harm threshold, then this should be shared in accordance with the school's low-level concerns policy. All staff will teach the relevant topics included within Relationships Education (for all primary pupils) and Health Education (for all primary and secondary pupils). In teaching these subjects the school will have regard to the statutory guidance, Schools and colleges play a crucial role in preventative education.

Staff will support a culture of zero tolerance for sexism, misogyny/misandry, homophobia, biphobia and sexual violence/harassment. The school has a clear set of values and standards, upheld and demonstrated throughout all aspects of school life. These will be underpinned by the school's behaviour policy and pastoral support system, as well as by a planned programme of evidence-based RSHE delivered in regularly timetabled lessons and reinforced throughout the whole curriculum. Such a programme is fully inclusive and developed to be age and stage of development appropriate (especially when considering the needs of children with SEND and other vulnerabilities)

## **CHILD PROTECTION PROCEDURES**

### **Suspected abuse or receiving a disclosure**

If a member of staff suspects abuse or they have a disclosure of abuse made to them they must:

- Make an initial record of the information
- Report it to the DSL immediately, using the Annex 2 Form, including any peer on peer abuse that is reported by pupils or staff
- The DSL will consider if there is a requirement for immediate medical intervention, however urgent medical attention should not be delayed if the DSL is not immediately available (see point 7 below)
- Make an accurate record (which may be used in any subsequent court proceedings) as soon as possible and within 24 hours of the occurrence, of all that has happened, including details of:
  - Dates and times of their observations
  - Dates and times of any discussions they were involved in
  - Any injuries
  - Explanations given by the child / adult
  - What action was taken
  - Any actual words or phrases used by the child
- The prime concern at all stages must be the interests and safety of the child. Where there is a conflict of interest between the child and an adult, the interests of the child must be paramount.
- The records must be signed and dated by the author or /equivalent on electronic based records.
- In the absence of the DSL, be prepared to refer directly to children's social care (and the police if appropriate) if there is the potential for immediate significant harm.
- Promote the child's welfare at all times.

### **DSL ACTIONS**

1. Following a report of concerns from a member of staff, the DSL must:
  - Decide whether or not there are sufficient grounds for suspecting significant harm in which case a referral must be made to children's social care and the police if appropriate.
  - Normally the school should try to discuss any concerns about a child's welfare with the family and where possible to seek their agreement before making a referral to children's social care. However, in accordance with DfE guidance, this should only be done when it will not place the child at increased risk or could impact a police investigation. The child's views should also be considered.

- If there are grounds to suspect a child is suffering, or is likely to suffer, significant harm they must contact children's social care via the children's reception team (CRT) on 01329 225379 and make a clear statement of:
  2. the known facts
  3. any suspicions or allegations
  4. whether or not there has been any contact with the child's family
  5. If the DSL feels unsure about whether a referral is necessary they can phone children's reception team (CRT) to discuss concerns.
  6. If there is not a risk of significant harm, then the DSL will either actively monitor the situation or consider the early help process
  7. The DSL will confirm any referrals in writing to children's social care, within 24 hours, including the actions that have been taken. The written referral should be made using the inter-agency referral form (IRAF) which will provide children's social care with the supplementary information required about the child and family's circumstances. (IRAF can be accessed at the following page <https://www.hants.gov.uk/socialcareandhealth/childrenandfamilies/contacts>)
  8. If a child is in immediate danger and urgent protective action is required, the police should be called. The DSL should also notify children's social care of the occurrence and what action has been taken.
  9. Where there are doubts or reservations about involving the child's family, the DSL should clarify with children's social care or the police whether the parents should be told about the referral and, if so, when and by whom. This is important in cases where the police may need to conduct a criminal investigation.
  10. When a child needs urgent medical attention and there is suspicion of abuse the DSL or Headmaster and another adult should take the child to the accident and emergency unit at the nearest hospital, having first notified children's social care. The DSL should seek advice about what action children's social care will take and about informing the parents, remembering that parents should normally be informed that a child requires urgent hospital attention.

## REFERRAL

1. Following any concerns raised by staff, the DSL will assess the information and consider if significant harm has happened or there is a risk that it may happen. If the evidence suggests the threshold of significant harm, or risk of significant harm has been reached; or they are not clear if the threshold is met, then the DSL will contact Children's Social Care. If the DSL is not available or there are immediate concerns, the staff member can make a direct referral to Children's Social Care and the police if appropriate.
2. Generally, the DSL will inform the parents prior to making a referral however there are situations where this may not be possible or appropriate. However, parental consent is not required for referrals to statutory agencies.
3. N.B. The exception to this process will be in those cases of known FGM (Female Genital Mutilation) where there is a mandatory requirement for the teacher to report directly to the police.

## **CONFIDENTIALITY**

1. All matters relating to child protection are to be treated as confidential and only shared as per the 'working together' guidance.
2. There is a lawful basis for child protection concerns to be shared with agencies who have a statutory duty for child protection.
3. Information will only be shared with agencies who we have a statutory duty to share with or individuals within the school who 'need to know'.
4. All staff are aware that they cannot promise a child to keep a disclosure confidential.
5. As a school we will educate and encourage children to keep safe through:
  - Creating and using curriculum opportunities to encourage children to communicate about issues that concern them
  - A school ethos which helps children to feel safe, respected and able to talk freely about their concerns, believing that they will be listened to and valued and their concerns taken seriously

## **ALLEGATIONS AGAINST STAFF**

1. If a concern is raised about the practice or behaviour of a member of staff, volunteer or DSL this information must be recorded and passed to the Headmaster. The local authority designated officer (LADO) will be contacted and the relevant guidance will be followed. It is clear that all lower level concerns and allegations should be taken seriously as they could be part of grooming and must be addressed.
2. Where the school 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 first, it must consider whether to refer the case to the Teaching Regulation Agency.
3. If a concern is raised about the Headmaster, this must be communicated to the Chairman of Governors who will contact the LADO.
4. If an accused person resigns, or ceases to provide their services, this should not prevent an allegation being followed up. A referral to the DBS must be made, if the criteria are met (KCSIE 2023).
5. Ofsted must be informed as soon as practicable and within 14 days at the latest, of allegations of serious harm or abuse by any person living, working, or looking after children at the premises and the action taken in respect of such allegations.
6. If staff have safeguarding concerns, or an allegation is made concerning a member of staff, supply staff, a volunteer, a contractor, a Governor or the Headmaster, the School will follow the procedure set out in Appendix 4, which follows the Department for Education statutory guidelines published in Part 4 of KCSIE 2023. Concerns and allegations that may meet the harms test will be addressed as set out in Section One of Part 4 of KCSIE (for details of the School's procedure see Section 1 of Annex 4). "Lower level" concerns and allegations that do not meet the harms test will be addressed as set out in Section One of Part 4 of KCSIE (for details of the School's procedure see Section 2 of Annex 4).

## **WHISTLEBLOWING**

1. All staff must remember that the welfare of the child is paramount.
2. Staff who are concerned about the conduct of a colleague towards a pupil are undoubtedly placed in a very difficult situation. They may worry that they have misunderstood the situation and they will wonder whether a report could jeopardise their colleague's career.
3. The school's Whistleblowing Policy, p21-24 in the Staff Handbook, enables staff to raise concerns or allegations, initially in confidence and for a sensitive enquiry to take place. All concerns of poor practice or possible child abuse by colleagues should be reported to the Headmaster. Complaints about the Headmaster should be reported to the Chairman of Governors. Staff may also report their concerns directly to children's social care or the police if they believe direct reporting is necessary to secure action.
4. If staff need support they can contact the NSPCC new helpline on 0800 028 0285 or email [help@nspcc.org.uk](mailto:help@nspcc.org.uk)

## **ALLEGATIONS AGAINST CHILDREN**

If a concern is raised that there is an allegation of a child abusing another child within the school, the 'dealing with allegations against children' guidance will be followed. (Annex 5)

## **PART 1 – HIGH RISK AND EMERGING SAFEGUARDING ISSUES**

### **PREVENTING RADICALISATION AND EXTREMISM**

<https://www.gov.uk/government/publications/prevent-duty-guidance>

1. The prevent duty requires that all staff are aware of the signs that a child may be vulnerable to radicalisation.
2. The risks will need to be considered for political; environmental; animal rights; or faith-based extremism that may lead to a child becoming radicalised. All staff have completed Prevent on-line training and received awareness training in order that they can identify the signs of children being radicalised.
3. As part of the preventative process resilience to radicalisation will be built through the promotion of fundamental British values through the curriculum.
4. Any child who is considered vulnerable to radicalisation will be referred by the DSL to Hampshire children's social care, where the concerns will be considered in the MASH process. If the police prevent officer considers the information to be indicating a level of risk a "channel panel" will be convened and the school will attend and support this process.



## **GENDER BASED VIOLENCE / VIOLENCE AGAINST WOMEN AND GIRLS**

<https://www.gov.uk/government/policies/violence-against-women-and-girls>

The government have a strategy looking at specific issues that women and girls face. Within the context of this safeguarding policy the following sections are how we respond to violence against girls. Female genital mutilation, forced marriage, honour based violence and teenage relationship abuse all fall under this strategy.

### **FEMALE GENITAL MUTILATION (FGM)**

[www.gov.uk/government/publications/mandatory-reporting-of-female-genital-mutilation-procedural-information](http://www.gov.uk/government/publications/mandatory-reporting-of-female-genital-mutilation-procedural-information)

<https://www.gov.uk/government/publications/multi-agency-statutory-guidance-on-female-genital-mutilation>

1. FGM comprises all procedures involving partial or total removal of the external female genitalia or other injury to the female genital organs for non-medical reasons. It has no health benefits and harms girls and women in many ways. It involves removing and damaging healthy and normal female genital tissue, and hence interferes with the natural function of girls' and women's bodies. The age at which girls undergo FGM varies enormously according to the community. The procedure may be carried out when the girl is new-born, during childhood or adolescence, just before marriage or during the first pregnancy. However, the majority of cases of FGM are thought to take place between the ages of 5 and 8 and therefore girls within that age bracket are at a higher risk. FGM is illegal in the UK.
2. On the 31st October 2015, it became mandatory for teachers to report known cases of FGM to the police. In these situations, the DSL will be informed and that the member of teaching staff has called the police to report suspicion that FGM has happened. At no time will staff examine pupils to confirm this.
3. For cases where it is believed that a girl may be vulnerable to FGM or there is a concern that she may be about to be genitally mutilated, the staff will inform the DSL who will report it as with any other child protection concern.

### **HONOUR BASED VIOLENCE**

<https://www.cps.gov.uk/legal-guidance/so-called-honour-based-abuse-and-forced-marriage-guidance-identifying-and-flagging>

1. Honour based violence is a violent crime or incident which may have been committed to protect or defend the honour of the family or community.
2. It is often linked to family or community members who believe someone has brought shame to their family or community by doing something that is not in keeping with their unwritten rule of conduct. For example, honour based violence might be committed against people who:
  - become involved with a boyfriend or girlfriend from a different culture or religion
  - want to get out of an arranged marriage
  - want to get out of a forced marriage
  - wear clothes or take part in activities that might not be considered traditional within a particular culture
  - convert to a different faith from the family

3. Women and girls are the most common targets of honour-based violence however it can also affect men and boys. Crimes of 'honour' do not always include violence. Crimes committed in the name of 'honour' might include:
  - domestic abuse
  - threats of violence
  - sexual or psychological abuse
  - forced marriage
  - being held against your will or taken somewhere you don't want to go
  - assault
4. If staff believe that a pupil is at risk from honour-based violence the DSL will follow the usual safeguarding referral process, however, if it is clear that a crime has been committed or the pupil is at immediate risk the police will be contacted in the first place. It is important that if honour-based violence is known or suspected that communities and family members are NOT spoken to prior to referral to the police or social care as this could increase risk to the child.

## **SEXUAL VIOLENCE/HARASSMENT**

1. Sexual violence and sexual harassment can occur between two children of any sex. They can also occur through a group of children sexually assaulting or sexually harassing a single child or group of children.
2. Children who are victims of sexual violence and sexual harassment will likely find the experience stressful and distressing. This will, in all likelihood, adversely affect their educational attainment. Sexual violence and sexual harassment exist on a continuum and may overlap, they can occur online and offline (both physical and verbal) and are never acceptable. It is important that all victims are taken seriously and offered appropriate support.
3. It is more likely that girls will be the victims of sexual violence and more likely that sexual harassment will be perpetrated by boys.
4. Children with Special Educational Needs and Disabilities (SEND) can be especially vulnerable.
5. More information and guidance on sexual harassment and sexual violence can be found in Part 5 of KCSIE September 2023.
6. Whilst any report of sexual violence or sexual harassment should be taken seriously, staff should be aware it is more likely that girls will be the victims of sexual violence and sexual harassment and more likely it will be perpetrated by boys. Children with special educational needs and disabilities (SEND) are also three times more likely to be abused than their peers. Ultimately, it is essential that all victims are reassured that they are being taken seriously and that they will be supported and kept safe.
7. It is important to understand that children may not find it easy to tell staff about their abuse verbally. Children can show signs or act in ways that they hope adults will notice and react to. In some cases, the victim may not make a direct report. For example, a friend may make a report, or a member of school staff may overhear a conversation that suggests a child has been harmed or a

child's own behaviour might indicate that something is wrong. As per Part one of this guidance, if staff have any concerns about a child's welfare, they should act on them immediately rather than wait to be told. The initial response by a school to a report from a child is incredibly important. How the school responds to a report can encourage or undermine the confidence of future victims of sexual violence and sexual harassment to report or come forward. It is essential that all victims are reassured that they are being taken seriously, regardless of how long it has taken them to come forward, and that they will be supported and kept safe. Abuse that occurs online or outside of the school should not be downplayed and should be treated equally seriously. A victim should never be given the impression that they are creating a problem by reporting sexual violence or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report. It is important to explain that the law is in place to protect children and young people rather than criminalise them, and this should be explained in such a way that avoids alarming or distressing them.

8. As a matter of effective safeguarding practice, the school will do all they reasonably can to protect the anonymity of any children involved in any report of sexual violence or sexual harassment. Amongst other things, this will mean carefully considering, based on the nature of the report, which staff should know about the report and any support that will be put in place for the children involved.
9. When there has been a report of sexual violence, the designated safeguarding lead (or a deputy) 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 for a report of sexual violence should consider:
  - the victim, especially their protection and support
  - whether there may have been other victims
  - the alleged perpetrator(s)
  - all the other children, (and, if appropriate, adult students and staff) at the school or college, especially any actions that are appropriate to protect them from the alleged perpetrator(s), or from future harms, and
  - The time and location of the incident, and any action required to make the location safer.
10. The schools recognises that there might be a power imbalance between the children. For example, is/are the alleged perpetrator(s) significantly older, more mature, confident and a well known social standing? Does the victim have a disability or learning difficulty?

## **UPSKIRTING**

1. All staff should be aware of the need to be vigilant of 'Upskirting'.
2. 'Upskirting' typically involves taking a picture under a person's clothing without them knowing, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm. It is now a criminal offence and may constitute sexual harassment.
3. If you suspect any child of doing this inform the DSL immediately.

## SEXTING

<https://www.thinkuknow.co.uk/Teachers/Resource>

[http://www.hampshire.police.uk/internet/advice-and-](http://www.hampshire.police.uk/internet/advice-and-information/safe4me/Safe4me+%27Sexting%27https://www.ceop.police.uk/Media-Centre/Press-releases/2009/What-does-sexting-mean)

[information/safe4me/Safe4me+%27Sexting%27https://www.ceop.police.uk/Media-Centre/Press-releases/2009/What-does-sexting-mean](http://www.hampshire.police.uk/internet/advice-and-information/safe4me/Safe4me+%27Sexting%27https://www.ceop.police.uk/Media-Centre/Press-releases/2009/What-does-sexting-mean)

1. Sexting can be viewed as a form of sexual harassment and is defined as the production and/or sharing of sexual photos and videos of and by young people who are under the age of 18. It includes nude or nearly nude images and/or sexual acts. It is also referred to as 'youth produced sexual imagery'.
2. 'Sexting' does not include the sharing of sexual photos and videos of under-18 year olds with or by adults. This is a form of child sexual abuse and must be referred to the police.
3. What to do if an incident involving 'sexting' comes to your attention
  - Report it to the Designated Safeguarding Lead (DSL) immediately.
  - Never view, download or share the imagery yourself, or ask a child to share or download – this is illegal.
  - If you have already viewed the imagery by accident (e.g. if a young person has showed it to you before you could ask them not to), report this to the DSL.
  - Do not delete the imagery or ask the young person to delete it.
  - Do not ask the young person(s) who are involved in the incident to disclose information regarding the imagery. This is the responsibility of the DSL.
  - Do not share information about the incident to other members of staff, the young person(s) it involves or their, or other, parents and/or carers.
  - Do not say or do anything to blame or shame any young people involved.
  - Do explain to them that you need to report it and reassure them that they will receive support and help from the DSL.

Consensual image sharing, especially between older children of the same age, may require a different response. It might not be abusive – but children still need to know it is illegal- whilst non-consensual is illegal and abusive.

## THE TOXIC TRIO

1. The term 'Toxic Trio' has been used to describe the issues of domestic violence, mental ill-health and substance misuse which have been identified as common features of families where harm to women and children has occurred.
2. They are viewed as indicators of increased risk of harm to children and young people. In a review of Serious Cases Reviews undertaken by Ofsted in 2011, they found that in nearly 75% of these cases two or more of the issues were present.

## DOMESTIC ABUSE

<https://www.gov.uk/guidance/domestic-abuse-how-to-get-help>

1. 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. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Children may be abused by an adult or adults or by another child or children. Domestic abuse can encompass a wide range of behaviours and may be a single incident or a pattern of incidents. That abuse can be, but is not limited to, psychological, physical, sexual, financial or emotional. Children can be victims of domestic abuse. They may see, hear, or experience the effects of abuse at home and/or suffer domestic abuse in their own intimate relationships (teenage relationship abuse). All of which can have a detrimental and long-term impact on their health, well-being, development, and ability to learn. Domestic abuse is any incident or pattern of incidents of controlling, coercive or threatening behaviour, violence or abuse between those aged 16 or over who are or have been intimate partners or family members regardless of gender or sexuality. This can encompass, but is not limited to, the following types of abuse:
  - Psychological
  - Physical
  - Sexual
  - Financial
  - Emotional
2. Controlling behaviour is a range of acts designed to make a person subordinate and/or dependent by isolating them from sources of support, exploiting their resources and capacities for personal gain, depriving them of the means needed for independence, resistance and escape and regulating their everyday behaviour.
3. Coercive behaviour is an act or a pattern of acts of assault, threats, humiliation and intimidation or other abuse that is used to harm, punish, or frighten their victim.
4. Research indicates that living within a home where domestic abuse takes place is harmful to children and can have a serious impact on their behaviour, wellbeing and understanding of what a normal relationship is.
5. Children witnessing domestic abuse is recognised as 'significant harm' in law. These children may become aggressive; display anti-social behaviours; suffer from depression or anxiety; or fail to reach their educational potential.
6. Indicators that a child is living within a relationship with domestic abuse include:
  - withdrawn
  - suddenly behaves differently
  - anxious
  - clingy
  - depressed

- aggressive
  - problems sleeping
  - eating disorders
  - wets the bed
  - soils clothes
  - takes risks
  - misses school
  - changes in eating habits
  - obsessive behaviour
  - nightmares
  - drugs
  - alcohol
  - self-harm
  - thoughts about suicide
7. These behaviours themselves do not indicate that a child is living with domestic abuse, but should be considered as indicators that this may be the case.
  8. If staff believe that a child is living with domestic abuse, this will be reported to the DSL for referral to be considered to children's social care.

## **SERIOUS VIOLENCE.**

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

## **PARENTAL MENTAL HEALTH**

<https://www.gov.uk/government/publications/the-mental-health-strategy-for-england>

1. The term "mental ill health" is used to cover a wide range of conditions, from eating disorders, mild depression and anxiety to psychotic illnesses such as schizophrenia or bipolar disorder. Parental mental illness does not necessarily have an adverse impact on a child's developmental needs, but it is essential to always assess its implications for each child in the family. It is essential that the diagnosis of a parent/carer's mental health is not seen as defining the level of risk. Similarly, the absence of a diagnosis does not equate to there being little or no risk.
2. For children the impact of parental mental health can include:
  - The parent/ carer's needs or illnesses taking precedence over the child's needs
  - Child's physical and emotional needs neglected
  - A child acting as a young carer for a parent or a sibling

- Child having restricted social and recreational activities
  - Child finds it difficult to concentrate- impacting on educational achievement
  - A child missing school regularly as (s)he is being kept home as a companion for a parent / carer
  - Adopt paranoid or suspicious behaviour as they believe their parent's delusions
  - Witnessing self-harming behaviour and suicide attempts (including attempts that involve the child)
  - Obsessional compulsive behaviours involving the child
3. If staff become aware of any of the above indicators, or others that suggest a child is suffering due to parental mental health, the information will be shared with the DSL to consider a referral to children's social care.

## **PARENTAL SUBSTANCE MISUSE**

<https://learning.nspcc.org.uk/children-and-families-at-risk/parental-substance-misuse>

1. Substance misuse applies to the misuse of alcohol as well as 'problem drug use', defined by the Advisory Council on the Misuse of Drugs as drug use which has: 'serious negative consequences of a physical, psychological, social and interpersonal, financial or legal nature for users and those around them.
2. Parental substance misuse of drugs or alcohol becomes relevant to child protection when substance misuse and personal circumstances indicate that their parenting capacity is likely to be seriously impaired or that undue caring responsibilities are likely to be falling on a child in the family.
3. For children the impact of parental substance misuse can include:
  - Inadequate food, heat and clothing for children (family finances used to fund adult's dependency)
  - Lack of engagement or interest from parents in their development, education or wellbeing
  - Behavioural difficulties - inappropriate display of sexual and/or aggressive behaviour
  - Bullying (including due to poor physical appearance)
  - Isolation – finding it hard to socialise, make friends or invite them home
  - Tiredness or lack of concentration
  - Child talking of or bringing into school drugs or related paraphernalia
  - Injuries /accidents (due to inadequate adult supervision)
  - Taking on a caring role
  - Continued poor academic performance including difficulties completing homework on time
  - Poor attendance or late arrival
4. These behaviours themselves do not indicate that a child's parent is misusing substances, but should be considered as indicators that this may be the case.
5. If staff believe that a child is living with parental substance misuse, this will be reported to the DSL for referral to be considered for children's social care.

## MISSING, EXPLOITED AND TRAFFICKED CHILDREN (MET)

<https://www.portsmouthsab.uk/abuse/missing-exploited-trafficked>

Within Hampshire, the acronym MET is used to identify all children who are missing; believed to be at risk of or being sexually exploited; or who are at risk of or are being trafficked. Given the close links between all of these issues, there has been a considered response to join all three issues so that cross-over of risk is not missed.

## CHILDREN MISSING FROM EDUCATION

<https://www.gov.uk/government/publications/school-attendance>

<https://www.gov.uk/government/publications/children-missing-education>

1. Attendance, absence and exclusions are closely monitored. The updated guidance highlights that being absent, as well as missing, from education can be a warning sign of a range of safeguarding concerns, including sexual abuse, sexual exploitation or child criminal exploitation. Children being absent from education for prolonged periods and/or on repeat occasions can act as a vital warning sign to a range of safeguarding issues including neglect, child sexual and child criminal exploitation - particularly county lines. It is important the school or college's response to persistently absent pupils and children missing education supports identifying such abuse, and in the case of absent pupils, helps prevent the risk of them becoming a child missing education in the future. This includes when problems are first emerging but also where children are already known to local authority children's social care and need a social worker (such as a child who is a child in need or who has a child protection plan, or is a looked after child), where being absent from education may increase known safeguarding risks within the family or in the community.
2. 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.
3. Staff must be alert to signs of children at risk of travelling to conflict zones, female genital mutilation and forced marriage. The school will also hold at least one emergency contact number for each child on register.
4. Patterns of children missing education can be an indicator of either abuse or safeguarding risks. A relatively short length of time a child is missing does not reduce risk of harm to that child, and all absence or non-attendance should be considered with other known factors or concerns.
5. DSLs and staff should consider:
  - Missing lessons: Are there patterns in the lessons that are being missed? Is this more than avoidance of a subject or a teacher? Does the child remain on the school site or are they absent from the site?
  - Is the child being sexually exploited during this time?
  - Are they late because of a caring responsibility?
  - Have they been directly or indirectly affected by substance misuse?
  - Are other pupils routinely missing the same lessons, and does this raise other risks or concerns?
  - Is the lesson being missed one that would cause bruising or injuries to become visible?
  - Single missing days: Is there a pattern in the day missed? Is it before or after the weekend suggesting the child is away from the area? Are there specific lessons or members of staff on these



days? Is the parent informing the school of the absence on the day? Are missing days reported back to parents to confirm their awareness?

- Is the child being sexually exploited during this day?
  - Do the parents appear to be aware?
  - Are the pupil's peers making comments or suggestions as to where the pupil is at?
  - Continuous missing days: Has the school been able to make contact with the parent? Is medical evidence being provided? Are siblings attending school (either our or local schools)?
  - Did we have any concerns about radicalisation, FGM, forced marriage, honour based violence, sexual exploitation?
  - Have we had any concerns about physical or sexual abuse?
6. The school will view absence as both a safeguarding issue and an educational outcomes issue. The school may take steps that could result in legal action for attendance, or a referral to children's social care, or both.

## **CHILDREN MISSING FROM HOME OR CARE**

<https://www.gov.uk/government/publications/children-who-run-away-or-go-missing-from-home-or-care>

<http://www.childrenssociety.org.uk/what-we-do/policy-and-lobbying/children-risk/runaways>

1. Children who run away from home or from care, provide a clear behavioural indication that they are either unhappy or do not feel safe in the place that they are living. Research shows that children run away from conflict or problems at home or school, neglect or abuse, or because children are being groomed by predatory individuals who seek to exploit them. Many run away on numerous occasions.
2. The association of chief police officers has provided the following definitions and guidance.
3. "Missing person is: 'Anyone whose whereabouts cannot be established and where the circumstances are out of character or the context suggests the person may be the subject of crime or at risk of harm to themselves or another.'
4. An absent person is: 'A person not at a place where they are expected or required to be.'
5. All cases classified as 'missing' by the police will receive an active police response – such as deployment of police officers to locate a child. Cases where the child was classified as 'absent' will be recorded by the police and risk assessed regularly but no active response will be deployed.
6. The absent case will be resolved when a young person returns or new information comes to light suggesting that he/she is at risk. In the latter instance, the case is upgraded to 'missing'.
7. Within any case of children who are missing both push and pull factors will need to be considered.
8. Push factors include:
  - Conflict with parents/carers
  - Feeling powerless
  - Being bullied/abused
  - Being unhappy/not being listened to
  - The Toxic Trio

9. Pull factors include:
  - Wanting to be with family/friends
  - Drugs, money and any exchangeable item
  - Peer pressure
10. For those who have been trafficked into the United Kingdom as unaccompanied asylum seeking children there will be pressure to make contact with their trafficker.
11. As a school we will inform all parents of children who are absent (unless the parent has informed us).
12. If the parent is also unaware of the location of their child, and the definition of missing is met, we will either support the parent to/directly contact the police to inform them.

## **CHILD SEXUAL EXPLOITATION (CSE), CHILD CRIMINAL EXPLOITATION (CCE) AND COUNTY LINES**

<http://paceuk.info/>

1. Both CSE and CCE are forms of abuse and both occur where an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a child into sexual or criminal activity in exchange for something the victim wants or needs, and/or for the financial advantage or increased status of the perpetrator 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. In some cases, the abuse will be in exchange for something the victim needs or wants and/or will be to the financial benefit or other advantage (such as increased status) of the perpetrator or facilitator. The abuse can be perpetrated by individuals or groups, male or females, and children or adults. The abuse can be a one-off occurrence or a series of incidents over time, and range from opportunistic to complex organised abuse. It can involve force and/or enticement-based methods of compliance and may, or may not, be accompanied by violence or threats of violence. Victims can be exploited even when activity appears consensual and it should be noted exploitation as well as being physical can be facilitated and/or take place online. Sexual exploitation of children is not limited by the age of consent and can occur up until the age of 18. CSE involves children being in situations, contexts or relationships where they (or a third person) receive 'something' as a result of them performing sexual activities. The something can include food, accommodation, drugs, alcohol, cigarettes, affection, gifts, or money.
2. CSE is a form of child sexual abuse and include 16 and 17 year olds who can legally consent to have sex. Sexual abuse may involve physical contact, including assault by penetration (for example rape or oral sex), or non-penetrative acts such as masturbation, kissing, rubbing, and touching outside clothing. It may include non-contact activities such as involving children in the production of sexual images, forcing children to behave in sexually inappropriate ways or grooming a child in preparation for abuse including via the internet.
3. Child sexual exploitation can happen via technology without the child's being aware; for example, being persuaded to post sexual images on the internet/mobile phones without immediate payment or gain.
4. CSE can occur over time or be a one-off occurrence, and may happen without the child's immediate knowledge eg others sharing videos or images of them on social media.
5. In all cases, those exploiting the child/young person have power over them by virtue of their age, gender, intellect, physical strength and/or economic or other resources. Violence, coercion and intimidation are common, involvement in exploitative relationships being characterised in the main by

the child or young person's limited availability of choice resulting from their social/economic and/or emotional vulnerability.

6. Indicators a child may be at risk of CSE include:

- going missing for periods of time or regularly coming home late;
- regularly missing school or education or not taking part in education;
- appearing with unexplained gifts or new possessions;
- associating with other young people involved in exploitation;
- having older boyfriends or girlfriends;
- suffering from sexually transmitted infections;
- mood swings or changes in emotional wellbeing;
- drug and alcohol misuse; and
- displaying inappropriate sexualised behaviour.

7. CSE can happen to a child of any age, gender, ability or social status. Often the victim of CSE is not aware that they are being exploited and do not see themselves as a victim or they believe they are in a genuine romantic relationship.
8. As a school we educate all staff in the signs and indicators of sexual exploitation. We use the sexual exploitation risk assessment form (SERAF) and associated guidance to identify pupils who are at risk and the DSL will share this information as appropriate with children's social care. As part of the PSHEE curriculum children are taught about relationships education, relationships and sex education and health education
9. We recognise that we may have information or intelligence that could be used to both protect children and prevent risk. Any relevant information that we have will be shared on the Community Partnership Information (CPI) form
10. CCE is where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child into any criminal activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial or other advantage of the perpetrator or facilitator and/or © though violence or the threat of violence. The victim may have been criminally exploited even if the activity appears consensual. CCE does not always involve physical contact; it can also occur through the use of technology.
11. CCE can include children being forced to work in cannabis factories, being coerced into moving drugs or money across the country (county lines), forced to shoplift or pickpocket, or to threaten other young people. 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 knives for protection.
12. It is important to note that the experience of girls who are criminally exploited can be very different to boys. Girls are at risk of criminal exploitation. Both boys and girls being criminally exploited may be at higher risk of sexual exploitation.

## TRAFFICKED CHILDREN

<https://www.childrenssociety.org.uk/youngcarer/refugee-toolkit/trafficked-children>

1. Human trafficking is defined by the UNHCR in respect of children as a process that is a combination of:
  - Movement (including within the UK)
  - For the purpose of exploitation
2. Any child transported for exploitative reasons is considered to be a trafficking victim.
3. There is significant evidence that children (both of UK and other citizenship) are being trafficked internally within the UK and this is regarded as a more common form of trafficking in the UK.
4. There are a number of indicators which suggest that a child may have been trafficked into the UK, and may still be controlled by the traffickers or receiving adults. These are as follows:
  - Shows signs of physical or sexual abuse, and/or has contracted a sexually transmitted infection or has an unwanted pregnancy
  - Has a history with missing links and unexplained moves
  - Is required to earn a minimum amount of money every day
  - Works in various locations
  - Has limited freedom of movement
  - Appears to be missing for periods
  - Is known to beg for money
  - Is being cared for by adult/s who are not their parents and the quality of the relationship between the child and their adult carers is not good
  - Is one among a number of unrelated children found at one address
  - Has not been registered with or attended a GP practice
  - Is excessively afraid of being deported
5. For those children who are internally trafficked within the UK indicators include:
  - Physical symptoms (bruising indicating either physical or sexual assault)
  - Prevalence of a sexually transmitted infection or unwanted pregnancy
  - Sexual exploitation / the child has been seen in places known to be used for sexual exploitation
  - Evidence of drug, alcohol or substance misuse
  - Being in the community in clothing unusual for a child i.e. inappropriate for age, or borrowing clothing from older people
  - Relationship with a significantly older partner;
  - Accounts of social activities, expensive clothes, mobile phones or other possessions with no plausible explanation of the source of necessary funding;
  - Persistently missing, staying out overnight or returning late with no plausible explanation;
  - Returning after having been missing, looking well cared for despite having not been at home;
  - Having keys to premises other than those known about;

- Low self-image, low self-esteem, self-harming behaviour including cutting, overdosing, eating disorder, promiscuity
  - Truancy/disengagement with education
  - Entering or leaving vehicles driven by unknown adults
  - Going missing and being found in areas where the child or young person has no known links; and/or
  - Possible inappropriate use of the internet and forming on-line relationships, particularly with adults
6. These behaviours themselves do not indicate that a child is being trafficked, but should be considered as indicators that this may be the case.
  7. If staff believe that a child is being trafficked, this will be reported to the DSL for referral to be considered to children's social care.

## TECHNOLOGIES

<https://www.gov.uk/government/publications/teaching-online-safety-in-schools>

1. It is essential that children are safeguarded from potentially harmful and inappropriate online material. An effective whole school approach to online safety empowers a school to protect and educate pupils and staff in their use of technology and establishes mechanisms to identify, intervene in, and escalate any concerns where appropriate.
2. The breadth of issues clarified within online safety is considerable, but can be categorised into four risk areas:
  - a. content: being exposed to illegal, inappropriate or harmful content, for example: pornography, fake news, racism, misogyny, self-harm, suicide, anti-Semitism, radicalisation and extremism.
  - b. contact: being subjected to harmful online interaction with other users; for example: peer to peer pressure, commercial advertising and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes'
  - c. conduct: personal online behaviour that increases the likelihood of, or causes, harm, for example, making, sending and receiving explicit images (eg consensual or non-consensual sharing of nudes and semi-nudes and/or pornography, sharing explicit images and online bullying).
  - d. commerce: risks such as online gambling, inappropriate advertising, phishing and or financial scams.
3. Technological hardware and software is developing continuously with an increase in functionality of devices that people use. The majority of children use online tools to communicate with others locally, nationally and internationally. Access to the internet and other tools that technology provides is an invaluable way of finding, sharing and communicating information.
4. While technology itself is not harmful, it can be used by others to make children vulnerable and to abuse them. Abuse can take place wholly online or technically may be used to facilitate offline abuse.
5. Online safety is a running and interrelated theme and very carefully managed in all Digital learning lessons and 'Learning for Life' curriculum. All staff should report any concerns of Cyber bullying, misuse of school iPads, laptops and computers to the DSL.

6. The school is directly responsible for ensuring the appropriate level of security protection procedures are in place. All Smoothwall alerts will be investigated by the DSL to ensure all children are safeguarded whilst online. These filters are annually reviewed by the DSL, Head of Digital Learning and the Safeguarding Governor and will be informed in part, by the risk assessment required by the Prevent Duty guidance from UKSIC. The DfE have published Teaching Online Safety in Schools to support staff in the safe delivery of the curriculum. The governing body will ensure the school has appropriate filtering and monitoring systems in place and regularly reviews their effectiveness. They will ensure that the leadership team and relevant staff have an awareness and understanding of the provisions in place and manage them effectively and know how to escalate concerns when identified. The DSL should take lead responsibility for understanding the filtering and monitoring systems and processes in place. The new guidance, signposts the DfE new filtering and monitoring standards (DfE, 2023b), which supports schools to have effective systems in place. Equally the DSL will consider meeting the DfE's Cyber security standards for schools and colleges (DfE, 2023c)
7. The school has a clear policy on the use of mobile and smart technology. No mobiles are permitted by pupils.

## ON-LINE SAFETY

<https://www.thinkuknow.co.uk/Teachers/>

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

1. With the current speed of on-line change, some parents and carers have only a limited understanding of online risks and issues. Parents may underestimate how often their children come across potentially harmful and inappropriate material on the internet and may be unsure about how to respond. Staff should recognise the additional risks that children with SEN and disabilities (SEND) face online, for example, from online bullying, grooming and radicalisation and should be confident that they have the capability to support SEND children to stay safe online. Some of the risks could be:
  - unwanted contact
  - grooming
  - online bullying including sexting
  - digital footprint
2. The school will therefore seek to make provision for teaching children to keep themselves safe, including on-line through:
  - Acceptable use agreements for children, teachers, parents/carers and Governors
  - Curriculum activities involving raising awareness around staying safe online
  - Information included in letters, newsletters, web site, VLE
  - Parents evenings/sessions
  - High profile events/campaigns e.g. Safer Internet Day
  - Building awareness around information that is held on relevant web sites and or publications
  - Social Media Policy
  - Regular contact with parents and carers to reinforce the importance of children being safe and giving clarity on 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, including the sites they

will asked to access and be clear who from the school (if anyone) their child is going to be interacting with online.

## REMOTE LEARNING

1. Where children are being asked to learn online at home clear advice and procedures are set out to support parents, pupils and staff. These being:
2. Parents are reminded of the following check list if their child is working remotely from home.
  - talking to their children about not accessing age-inappropriate material on devices
  - knowing who their children are talking to online
  - setting up age-appropriate parental controls on digital devicesInternet filters should be used to block malicious websites. These are usually free, but often need to be turned on.

## CYBERBULLYING

<https://www.gov.uk/government/publications/preventing-and-tackling-bullying>

1. Central to the School's anti-bullying policy should be the principle that 'bullying is always unacceptable' and that 'all pupils have a right not to be bullied'.
2. The school should also recognise that it must take note of bullying perpetrated outside school which spills over into the school and so we will respond to any cyberbullying we become aware of carried out by pupils when they are away from the site.
3. Cyberbullying is defined as "an aggressive, intentional act carried out by a group or individual using electronic forms of contact repeatedly over time against a victim who cannot easily defend himself/herself."
4. By cyberbullying, we mean bullying by electronic media:
  - Bullying by texts or messages or calls on mobile phones
  - The use of mobile phone cameras to cause distress, fear or humiliation
  - Posting threatening, abusive, defamatory or humiliating material on websites, to include blogs, personal websites, social networking sites
  - Using e-mail to message others
  - Hijacking/cloning e-mail accounts
  - Making threatening, abusive, defamatory or humiliating remarks in on-line forums
5. Cyberbullying may be at a level where it is criminal in character.
6. It is unlawful to disseminate defamatory information in any media including internet sites.
7. Section 127 of the Communications Act 2003 makes it an offence to send, by public means of a public electronic communications network, a message or other matter that is grossly offensive or one of an indecent, obscene or menacing character.
8. The Protection from Harassment Act 1997 makes it an offence to knowingly pursue any course of conduct amounting to harassment.
9. If we become aware of any incidents of cyberbullying, we will need to consider each case individually as to any criminal act that may have been committed. The school will pass on information to the police if it feels that it is appropriate or are required to do so.

## **GAMING**

<https://www.thinkuknow.co.uk/Teachers/>

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

1. Online gaming is an activity that the majority of children and many adults get involved in. The school will raise awareness:
  - By talking to parents and carers about the games their children play and help them identify whether they are appropriate
  - By supporting parents in identifying the most effective way of safeguarding their children by using parental controls and child safety mode
  - By talking to parents about setting boundaries and time limits when games are played
  - By highlighting relevant resources.

## **ONLINE REPUTATION**

<http://www.childnet.com/resources/online-reputation-checklist>

Online reputation is the opinion others get of a person when they encounter them online. It is formed by posts, photos that have been uploaded and comments made by others on people's profiles. It is important that children and staff are aware that anything that is posted could influence their future professional reputation. The majority of organisations and work establishments now check digital footprint before considering applications for positions or places on courses.

## **GROOMING**

<http://www.childnet.com/search-results/?keywords=grooming>

<http://www.internetmatters.org/issues/online-grooming/>

1. Online grooming is the process by which one person with an inappropriate sexual interest in children will approach a child online, with the intention of developing a relationship with that child, to be able to meet them in person and intentionally cause harm.
2. The school will build awareness amongst children and parents about ensuring that the child:
  - Only has friends online that they know in real life
  - Is aware that if they communicate with somebody that they have met online, that relationship should stay online
3. That parents should:
  - Recognise the signs of grooming
  - Have regular conversations with their children about online activity and how to stay safe online
4. The school will raise awareness by:
  - Including awareness around grooming as part of their curriculumIdentifying with both parents and children how they can be safeguarded against grooming



### PUPILS WITH MEDICAL CONDITIONS IN SCHOOL

[www.gov.uk/government/publications/supporting-pupils-at-school-with-medical-conditions--3](http://www.gov.uk/government/publications/supporting-pupils-at-school-with-medical-conditions--3)

1. As a school we will make sure that sufficient staff are trained to support any pupil with a medical condition.
2. All relevant staff will be made aware of the condition to support the child and be aware of medical needs and risks to the child.
3. An individual healthcare plan may be put in place to support the child and their medical needs.

### PUPILS WITH MEDICAL CONDITIONS OUT OF SCHOOL

[www3.hants.gov.uk/education/parents-info/inclusion-service.htm](http://www3.hants.gov.uk/education/parents-info/inclusion-service.htm)

1. There will be occasions when children are temporarily unable to attend our school on a full-time basis because of their medical needs. These children and young people are likely to be:
  - children and young people suffering from long-term illnesses
  - children and young people with long-term post-operative or post-injury recovery periods
  - children and young people with long-term mental health problems (emotionally vulnerable)
2. Where it is clear that an absence will be for more than 15 continuous school days the Education and Inclusion Service will be contacted to support with the pupil's education.

### INTIMATE CARE

<https://www.health-ni.gov.uk/publications/intimate-care-policy-and-guidelines-regrading-children>

See Guidelines for good practice above (adapted from the Chailey Heritage Centre)

### FABRICATED OR INDUCED ILLNESS

<https://www.gov.uk/government/publications/safeguarding-children-in-whom-illness-is-fabricated-or-induced>

1. There are three main ways that a carer could fabricate or induce illness in a child. These are not mutually exclusive and include:
  - fabrication of signs and symptoms. This may include fabrication of past medical history;
  - fabrication of signs and symptoms and falsification of hospital charts and records, and specimens of bodily fluids. This may also include falsification of letters and documents;
  - induction of illness by a variety of means.
2. If we are concerned that a child may be suffering from fabricated or induced illness we will follow the established procedures of the Hampshire Safeguarding Children Board.

## MENTAL HEALTH

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

<https://www.gov.uk/government/publications/the-mental-health-strategy-for-england>

<https://www.gov.uk/government/publications/mental-health-and-behaviour-in-schools--2>

1. Form tutors and class teachers see their pupils day in, day out. They know them well and are well placed to spot changes in behaviour that might indicate an emerging problem with the mental health and emotional wellbeing of pupils. If staff have mental health concern about a child that is also a safeguarding concern, immediate action should be taken. Speak directly to the DSL or Deputy DSL.
2. The balance between the risk and protective factors are most likely to be disrupted when difficult events happen in pupils' lives. These include:
  - loss or separation – resulting from death, parental separation, divorce, hospitalisation, loss of friendships (especially in adolescence), family conflict or breakdown that results in the child having to live elsewhere, being taken into care or adopted;
  - life changes – such as the birth of a sibling, death of a relative, moving house or changing schools or during transition from primary to secondary school, or secondary school to sixth form; and
  - traumatic events such as abuse, domestic violence, bullying, violence, accidents, injuries or natural disaster.
3. When concerns are identified, school staff will provide opportunities for the child to talk or receive support within the school environment. Parents will be informed of the concerns and a shared way to support the child will be discussed.
4. Where the needs require additional professional support referrals will be made to the appropriate team or service with the parent's agreement (or child's if they are competent as per Fraser guidelines). All staff should recognise that the mental health and wellbeing of pupils and their parents will have a direct consequence on pupil behaviour and may highlight or cause a safeguarding concern of an individual pupil.
5. The government have published advice and guidance on Preventing and Tackling Bullying, and Mental Health and Behaviour in Schools. In addition, Public Health England has produced a range of resources to support teachers to promote positive health, wellbeing and resilience among young people including its guidance Promoting children and young people's emotional health and wellbeing.
6. Annex 13 details the protocols and advice staff should seek to support mental health

## SERIOUS VIOLENCE

1. All staff should be aware of the indicators, which may signal children are a risk from, or are involved with serious crime. These may include increased absence from school, a change in friendships or relationships with older individuals or groups, a significant decline in performance, signs of self-harm or a significant change in well-being, 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.

2. All staff should be aware of the range of risk factors which increase the likelihood of involvement in serious violence, such as being male, having been frequently absent or permanently excluded from school, having experienced child maltreatment and having been involved in offending, such as theft or robbery.

## **PART 3 – OTHER SAFEGUARDING ISSUES IMPACTING PUPILS**

### **CHILD ON CHILD ABUSE**

<https://educationinspection.blog.gov.uk/2019/10/04/what-is-peer-on-peer-abuse/>

1. All staff should be aware that children are capable of abusing their peers. This can manifest itself in a whole spectrum of behaviours including:
  - Bullying including cyberbullying, prejudice based and discriminatory bullying
  - Abuse in intimate personal relationships between peers
  - Physical abuse such as hitting, kicking, shaking, biting, hair pulling or otherwise causing physical harm (this may include an online element which facilitates, threatens and/or encourages physical abuse)
  - Sexual violence, such as rape, assault by penetration and sexual assault (this may include an online element which facilitates, threatens and/or encourages physical abuse)
  - Sexual harassment, such sexual comments, remarks, jokes and online sexual harassment, which may be standalone or part of a broader pattern of abuse
  - Causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party
  - Consensual and non-consensual sharing of nude and semi nudes images and or videos (also known as Sexting or youth produced imagery)
  - Upskirting, which typically involves taking a picture under a person's clothing without permission
  - Initiation/hazing type violence and rituals (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element)
2. All staff should be clear as to the school's policy and procedures with regards to peer or peer abuse the and the important role they have to play in preventing it and responding where they believe a child may be at risk from it. All staff should understand that even if there are no reports in their school it does not mean it is not happening, it may be that it is not being reported. It is important that all staff recognise the indicators and signs of peer on peer abuse and know how to identify it and respond to reports. Any concerns must be reported directly to the DSL or one of the Deputy DSLs.
3. Children will be given plenty of guidance on how to report concerns and know they will be listened to and supported. Allegations will be recorded on the individual pupil behaviour record on Engage. The DSL and SLT review all behaviour records weekly to track trends and inform duty staff to carefully monitor. Any trends of notable areas of concern are shared with the academic staff at the Wednesday weekly meetings.
4. It is essential that all staff understand the importance of challenging inappropriate behaviour between peers and that there is a zero tolerance to this type of abuse. Downplaying certain behaviours, for

example dismissing sexual harassment as “just banter”, “just having a laugh”, “part of growing up” or “boys being boys” can lead to a culture of unacceptable behaviours, an unsafe environment for children and in worst case scenarios a culture that normalises abuse leading to children accepting it as normal and not coming forward to report it.

## **BULLYING**

<https://www.gov.uk/government/publications/preventing-and-tackling-bullying>

The school has clear processes and protocols to deal with bullying in its Behaviour Policy.

## **PREJUDICE BASED ABUSE**

<https://www.cps.gov.uk/crime-info/hate-crime>

1. Prejudice based abuse or hate crime is any criminal offence which is perceived by the victim or any other person to be motivated by a hostility or prejudice based on a person's real or perceived:
  - Disability
  - Race
  - Religion
  - Gender identity
  - Sexual orientation
2. Although this sort of crime is collectively known as 'Hate Crime' the offender doesn't have to go as far as being motivated by 'hate', they only have to exhibit 'hostility'.
3. This can be evidenced by:
  - threatened or actual physical assault
  - derogatory name calling, insults, for example racist jokes or homophobic language
  - hate graffiti (e.g. on school furniture, walls or books)
  - provocative behaviour e.g. wearing of badges or symbols belonging to known right wing, or extremist organisations
  - distributing literature that may be offensive in relation to a protected characteristic
  - verbal abuse
  - inciting hatred or bullying against pupils who share a protected characteristic
  - prejudiced or hostile comments in the course of discussions within lessons
  - teasing in relation to any protected characteristic e.g. sexuality, language, religion or cultural background
  - refusal to co-operate with others because of their protected characteristic, whether real or perceived
  - expressions of prejudice calculated to offend or influence the behaviour of others
  - attempts to recruit other pupils to organisations and groups that sanction violence, terrorism or hatred.
4. As a school we will respond by:

- clearly identifying prejudice-based incidents and hate crimes and monitor the frequency and nature of them within the school
- taking preventative action to reduce the likelihood of such incidents occurring
- recognising the wider implications of such incidents for the school and local community
- providing regular reports of these incidents to the Governing Body
- ensuring that staff are familiar with formal procedures for recording and dealing with prejudice-based incidents and hate crimes
- dealing with perpetrators of prejudice-based abuse effectively
- supporting victims of prejudice-based incidents and hate crimes
- ensuring that staff are familiar with a range of restorative practices to address bullying and prevent it happening again

## **FAITH ABUSE**

<https://www.gov.uk/government/publications/national-action-plan-to-tackle-child-abuse-linked-to-faith-or-belief>

1. The number of known cases of child abuse linked to accusations of “possession” or “witchcraft” is small, but children involved can suffer damage to their physical and mental health, their capacity to learn, their ability to form relationships and to their self-esteem.
2. Such abuse generally occurs when a carer views a child as being “different”, attributes this difference to the child being “possessed” or involved in “witchcraft” and attempts to exorcise him or her.
3. A child could be viewed as “different” for a variety of reasons such as, disobedience; independence; bed-wetting; nightmares; illness; or disability. There is often a weak bond of attachment between the carer and the child.
4. There are various social reasons that make a child more vulnerable to an accusation of “possession” or “witchcraft”. These include family stress and/or a change in the family structure.
5. The attempt to “exorcise” may involve severe beating, burning, starvation, cutting or stabbing and isolation, and usually occurs in the household where the child lives.
6. If the school become aware of a child who is being abused in this context, the DSL will follow the normal referral route in to children’s social care.

## **GANGS AND YOUTH VIOLENCE**

<https://www.gov.uk/government/publications/advice-to-schools-and-colleges-on-gangs-and-youth-violence>

1. The vast majority of young people will not be affected by serious violence or gangs. However, where these problems do occur, even at low levels there will almost certainly be a significant impact.
2. As a school we have a duty and a responsibility to protect our pupils. It is also well established that success in learning is one of the most powerful indicators in the prevention of youth crime. Dealing with violence also helps attainment. While pupils generally see educational establishments as safe places, even low levels of youth violence can have a disproportionate impact on any education.

3. Primary schools are also increasingly recognised as places where early warning signs that younger children may be at risk of getting involved in gangs can be spotted. Crucial preventive work can be done within school to prevent negative behaviour from escalating and becoming entrenched.
4. As a school we will:
  - develop skills and knowledge to resolve conflict as part of the curriculum;
  - challenge aggressive behaviour in ways that prevent the recurrence of such behaviour;
  - understand risks for specific groups, including those that are gender-based, and target interventions;
  - safeguard, and specifically organise child protection, when needed;
  - make referrals to appropriate external agencies;
  - carefully manage individual transitions between educational establishments and work with local partners to prevent anti-social behaviour or crime.

## PRIVATE FOSTERING

<https://www.gov.uk/government/publications/children-act-1989-private-fostering>

1. Private fostering is an arrangement by a child's parents for their child (under 16 or 18 if disabled) to be cared for by another adult who is not closely related and is not a legal guardian with parental responsibility for 28 days or more.
2. It is not private fostering if the carer is a close relative to the child such as grandparent, brother, sister, uncle or aunt.
3. The Law requires that the carers and parents must notify the children's services department of any private fostering arrangement.
4. If the school becomes aware that a pupil is being privately fostered we will inform the children's services department and inform both the parents and carers that we have done so.

## PARENTING

1. All parents will struggle with the behaviour of their child(ren) at some point. This does not make them poor parents or generate safeguarding concerns. Rather it makes them human and provides them with opportunities to learn and develop new skills and approaches to deal with their child(ren).
2. Some children have medical conditions and/or needs e.g. Tourette's, some autistic linked conditions, ADHD; that have a direct impact on behaviour and can cause challenges for parents in dealing with behaviours. This does not highlight poor parenting either.
3. Parenting becomes a safeguarding concern when the repeated lack of supervision, boundaries, basic care or medical treatment places the child(ren) in situations of risk or harm.
4. In situations where parents struggle with tasks such as setting boundaries and providing appropriate supervision, timely interventions can make drastic changes to the wellbeing and life experiences of the child(ren) without the requirement for a social work assessment or plan being in place.

5. As a school we will support parents in understanding the parenting role and provide them with strategies to make a difference by discussing the issue with the parent and supporting them in making their own plans of how to respond differently (using evidence based parenting programmes).

## **USE OF MOBILE PHONES**

1. Prince's Mead recognises that mobile phones have the potential to be misused in certain contexts. (Misuse includes the taking and distribution of indecent images, exploitation and bullying.) The ICT Acceptable Use Policy sets out guidelines for use of mobile devices by teachers in the school. Prince's Mead School operates a "No use of personal devices policy" for teachers during the school day, where a teacher is in direct contact with a child. Mobile phones are only allowed to be used on the top floor of Worthy Park House.
2. In the School (including EYFS), no personal devices should be used when a child/children are present during lesson times. All mobile phones, personal iPads or other personal devices must be securely put away and may only be used on the top floor of Worthy Park House.
3. School devices may be used by teachers where there are children present, but any images captured must be erased from the device if a teacher leaves the school site with this device, unless this is for the purposes of an educational school trip.

## **CONTEXTUAL SAFEGUARDING**

<https://www.safeguardingschools.co.uk/contextual-safeguarding/>

1. All staff should be aware that safeguarding incidents and/or behaviours can be associated with factors outside school and can occur between children outside of these environments. All staff, but especially the DSL (and deputies) should consider whether children are at risk of abuse or exploitation in situations outside their families.
2. Extra-familial harms take a variety of different forms and children can be vulnerable to multiple harms including (but not limited to) sexual exploitation, criminal exploitation and serious youth violence.
3. Concerns about a child's welfare should be referred to local authority children's social care. Where a child is suffering, or is likely to suffer from harm, it is important that a referral to children's social care (and if appropriate the police) is made immediately. Referrals should follow the local referral process.
4. Children's social care assessments should consider where children are being harmed in contexts outside the home, so it is important that schools should provide as much information as possible as part of the referral process. This will allow any assessment to consider all the available evidence and enable a contextual approach to address such harm.
5. The online toolkit Report Child Abuse to Your Local Council directs to the relevant local children's social care contact number.

## SEND – PUPILS WITH SPECIAL EDUCATIONAL NEEDS AND DISABILITIES

<https://www.gov.uk/topic/schools-colleges-childrens-services/special-educational-needs-disabilities>

Children with specific educational needs and disabilities can face additional safeguarding challenges. Governing bodies and proprietors should ensure their child protection policy reflects the fact that additional barriers can exist when recognising abuse and neglect in this group of children. Children with special educational needs or disabilities (SEND) or certain medical or physical health conditions can face additional safeguarding challenges both online and offline.

1. All staff must be aware that additional barriers can exist when recognising abuse and neglect in this group of children. These can include:
  - assumption that indicators of possible abuse such as behaviour, mood and injury relate to the child's disability without further exploration;
  - being more prone to peer group isolation, child on child abuse, than other children;
  - the potential for children with SEN and disabilities being disproportionately impacted by behaviours such as bullying without outwardly showing any signs; and
  - communication barriers and difficulties in overcoming these barriers
  - cognitive understanding – 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.
2. To address barriers and difficulties additional pastoral support may be required for children with SEN and disabilities.

LGBT - Children who are lesbian, gay, bi, or trans

The fact that a child or a young person may be LGBT is not in itself an inherent risk factor for harm. However, children who are LGBT can be targeted by other children. In some cases, a child who is perceived by other children to be LGBT (whether they are or not) can be just as vulnerable as children who identify as LGBT. Risks can be compounded where children who are LGBT lack a trusted adult with whom they can be open. It is therefore vital that staff endeavour to reduce the additional barriers faced and provide a safe space for them to speak out or share their concerns with members of staff. LGBT inclusion is part of the statutory Relationships Education, Relationship and Sex Education and Health Education curriculum and there is a range of support available to help schools counter homophobic, biphobic and transphobic bullying and abuse.



## PART 4 – SAFEGUARDING PROCESSES

### SAFER RECRUITMENT

[www.gov.uk/government/publications/keeping-children-safe-in-education--2](https://www.gov.uk/government/publications/keeping-children-safe-in-education--2)

1. The school operates a separate safer recruitment process as part of the school's Recruitment Policy. On all recruitment panels there is at least one member who has undertaken safer recruitment training.
2. The process checks the identity, criminal record (enhanced DBS), mental and physical capacity, right to work in the U.K., professional qualification and seeks confirmation of the applicant's experience and history through references. In line with KCSiE 2023 guidance the school will inform shortlisted candidates that online searches will be carried out.
3. The recruitment of Governors requires s128 checks (not required for associate members on committees).

### STAFF INDUCTION AND TRAINING

1. The DSL or his deputies will provide all new staff with training to enable them to both fulfil their role and also to understand the child protection policy, the safeguarding policy, the staff behaviour policy/code of conduct, and part one of Keeping Children Safe in Education.
2. This induction may be covered within the annual training if this falls at the same time; otherwise it will be carried out separately during the initial starting period.
3. All staff should be aware of the systems which support safeguarding and these will be explained to them as part of staff induction. This will include:
  - the safeguarding and child protection policy;
  - the behaviour policy;
  - the staff behaviour policy (Staff code of conduct: Interaction with Children agreement);
  - the safeguarding response to children who go missing from education (CME);
  - Online safety
  - Whistleblowing
  - Acceptable use of IT and communications including use of social media
  - the role of the designated safeguarding lead (including the identity of the designated safeguarding lead and any deputies).
  - Copies of policies and a copy of Part one of KCSiE should be provided to staff at induction.
4. The Governing Board must ensure that, as part of the requirement for staff to undergo regular updated safeguarding training, including online safety and the requirement to ensure that children are taught about safeguarding, including online safety, that safeguarding training for staff is integrated, aligned and considered as part of the whole school safeguarding approach and wider staff training and curriculum planning.
5. Whilst considering the above training requirements, the Governing Board must have regard to the Teachers Standards which set out the expectation that all teachers manage behaviour effectively to

ensure good and safe educational environment and requires teachers to have a clear understanding of the needs of all pupils.

## **OPPORTUNITIES TO TEACH SAFEGUARDING**

1. As part of the schools 'Learning for life' curriculum there is scope for staff to use the DfE on Gov.UK to support the relationships, sex and health education. This resource includes modules on RSHE topics and non-statutory implementation guidance. The following resources may also help teachers understand and teach about safeguarding:
  - DfE advice for schools: teaching online safety in schools
  - UK Council for Internet Safety (UKCIS) - Education for a connected world
  - UKCIS guidance: sharing nudes and semi-nudes: advice for education settings working with children
  - UKCIS external visitors guidance to maximise external visitors delivering sessions on online safety
  - National Crime Agency's CEOP education programme: Thinkuknow
  - Public Health England: Rise Above

## **HEALTH AND SAFETY**

[www.gov.uk/government/publications/health-and-safety-advice-for-schools](http://www.gov.uk/government/publications/health-and-safety-advice-for-schools)

<http://www.hse.gov.uk/services/education/>

1. The site, the equipment and the activities carried out as part of the curriculum are all required to comply with the Health and Safety at Work act 1974 and regulations made under the act.
2. All risks are required to be assessed and recorded plans of how to manage the risk are in place. The plans should always take a common sense and proportionate approach to allow activities to be safe rather than preventing them from taking place. The school has a Health and Safety policy which details the actions that we take in more detail.

## **SITE SECURITY**

[www.gov.uk/government/publications/school-security](http://www.gov.uk/government/publications/school-security)

1. We aim to provide a secure site, but recognise that the site is only as secure as the people who use it. Therefore, all people on the site have to adhere to the rules which govern it. These are:
  - The car park gates are locked except at the start and end of the school day
  - Visitors and volunteers enter at the reception and must sign in
  - Children are only allowed home during the school day with adults/carers with parental responsibility or permission being given
  - All children leaving or returning during the school day have to sign out and in
  - A school 'lock-down' protocol has been shared with all staff in the event of an intruder or emergency situation taking place

## **OFF SITE VISITS**

[www.hampshireoutdoors.com](http://www.hampshireoutdoors.com)

<http://oeapng.info/evc/>

A particular strand of health and safety is looking at risks when undertaking off site visits. Some activities, especially those happening away from the school and residential visits, can involve higher levels of risk. If these are annual or infrequent activities, a review of an existing assessment may be all that is needed. If it is a new activity, a visit involving adventure activities, residential, overseas or an 'Open Country' visit, a specific assessment of significant risks must be carried out. Prince's Mead has a thorough 'Educational Trips' Policy which guides staff in managing risks and offers support with off site visits. Matron plays a key role in this area.

## **FIRST AID**

[www.gov.uk/government/publications/first-aid-in-schools](http://www.gov.uk/government/publications/first-aid-in-schools)

There is a separate First Aid policy.

## **PHYSICAL INTERVENTION (USE OF REASONABLE FORCE)**

<https://www.gov.uk/government/publications/use-of-reasonable-force-in-schools>

As a school we have a separate policy outlining how we will use physical intervention.

## **TAKING AND THE USE AND STORAGE OF IMAGES**

<https://ico.org.uk/for-the-public/schools/photos>

1. As a school we will seek consent from the parent of a pupil and from teachers and other adults before taking and publishing photographs or videos that contain images that are sufficiently detailed to identify the individual in school publications, printed media or on electronic publications.
2. We will not seek consent for photos where you would not be able to identify the individual.
3. We will seek consent for the period when the pupil is admitted into the school and beyond should some images be used in our prospectus and on the website.
4. Photographs will only be taken on school owned equipment and stored on the school network. No images of pupils will be taken or stored on privately owned equipment

## **TRANSPORTING PUPILS**

<https://www.gov.uk/government/publications/home-to-school-travel-and-transport-guidance>

1. On occasions parents and volunteers support with the task of transporting children to visits and off-site activities arranged by the school. (This is in addition to any informal arrangements made directly between parents for after school clubs etc.)
2. In managing these arrangements, the school will put in place measures to ensure the safety and welfare of young people carried in parents' and volunteers' cars. This is based on guidance from the local authority and follows similar procedures for school staff using their cars on school business.

3. Where parents'/volunteers' cars are used on school activities the school will notify parents/volunteers of their responsibilities for the safety of pupils, to maintain suitable insurance cover and to ensure their vehicle is roadworthy.
4. Please see Annex 10.

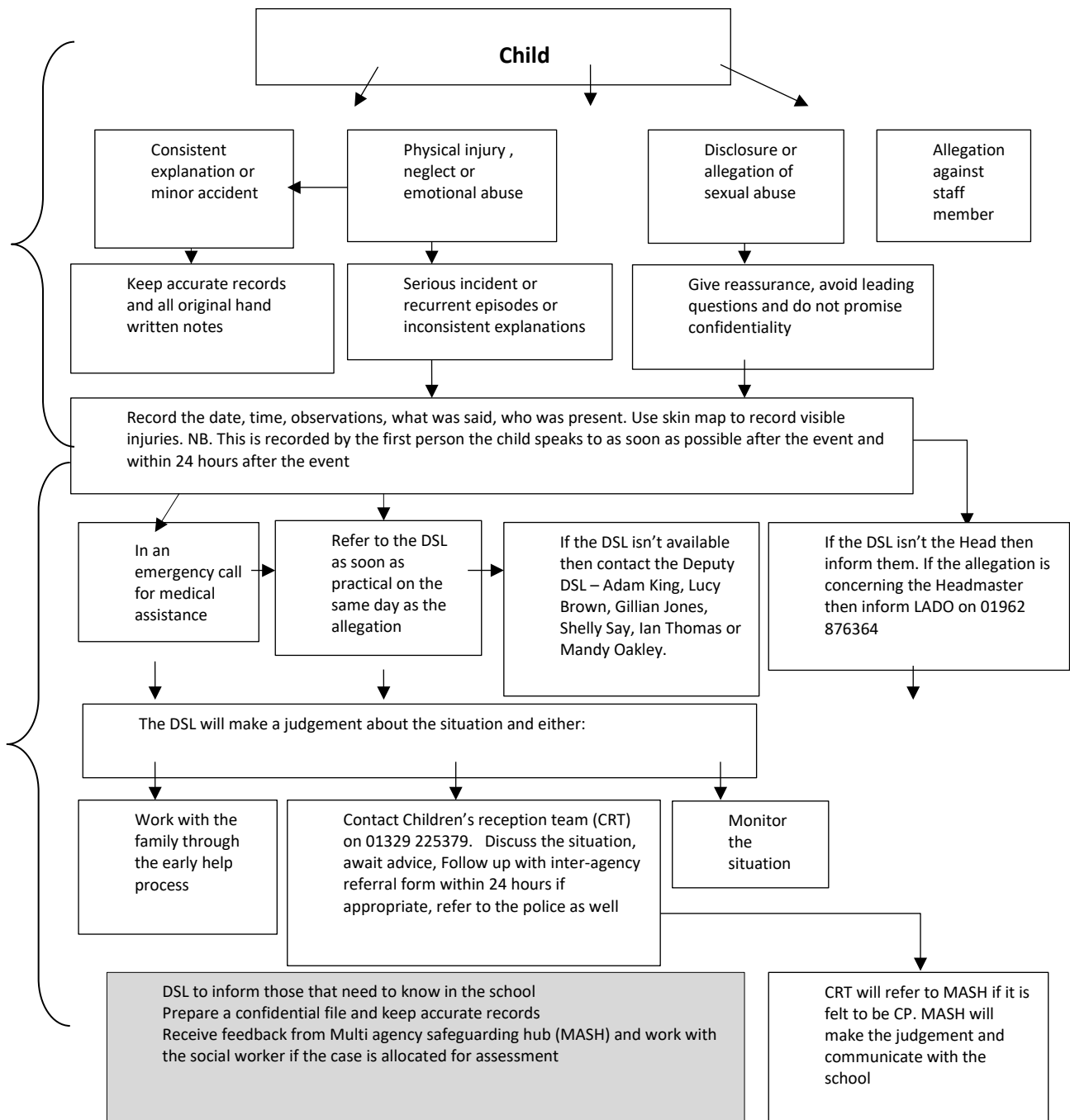
## **DISQUALIFICATION UNDER THE CHILD CARE ACT**

<https://www.gov.uk/government/publications/disqualification-under-the-childcare-act-2006>

1. The Child Care Act of 2006 was put in place to prevent adults who have been cautioned or convicted of a number of specific offences from working within childcare.
2. Staff (meaning individuals employed by the school or local authority, those undertaking training in schools (both salaried and unsalaried), casual workers and volunteers) are covered by this legislation in the following circumstances:
  - they are employed and/or provide early years childcare (this covers the age range from birth until 1 September following a child's fifth birthday, i.e. up to and including reception age). This includes education in nursery and reception classes (e.g. teachers and support staff in a reception class) and/or any supervised activity (such as breakfast clubs, lunchtime supervision and after school care provided by the school) both during and outside of school hours for children in the early years age range; and
  - they work in childcare provided by the school outside of school hours for children who are above reception age but who have not attained the age of 8. This includes before school settings, such as breakfast clubs, after school provision and holiday clubs. It does NOT include education or supervised activity for children above reception age during school hours including extended school hours for co-curricular learning activities, such as the school's choir or sports teams.
3. The legislation also applies to any staff directly concerned in the management of such early or later years' provision.
4. In 2009 additional regulations were made to include those living in the same household as another person who is (or would be) disqualified under the Act.
5. As a school we require all staff to complete a self-declaration form and to inform the Headmaster immediately if they become aware of any changes to their circumstances that would require us to be aware.
6. If a member of staff is impacted by the disqualification by association provisions we will ask them to apply for a waiver from Ofsted and put in place appropriate risk management plans while the waiver is being processed.
7. If a waiver is not granted we will seek advice from our HR provider and/or the LADO as to how risk is most effectively managed.

## ANNEXES

### ANNEX 1: FLOWCHART FOR CHILD PROTECTION PROCEDURES



## ANNEX 2: RECORDING FORM

Child's name:			
Date and time		D.o.B	
Name and role of person raising concern:			

Details of concern (where? when? what? who? behaviours? use child's words)

Actions taken			
Date	Person taking action	Action taken	Outcome of action

Name: \_\_\_\_\_

Designation: \_\_\_\_\_

Copied to:

### ANNEX 3: DEALING WITH DISCLOSURES

1. A member of staff who is approached by a child should:

- Listen positively and try to reassure them. They cannot promise complete confidentiality and should explain that they may need to pass information to other professionals to help keep the child or other children safe. The degree of confidentiality should always be governed by the need to protect the child.
- Consider additional needs to be given to children with communication difficulties and for those whose preferred language is not English. It is important to communicate with them in a way that is appropriate to their age, understanding and preference.
- Know who the DSL is and who to approach if the DSL is unavailable. Ultimately, all staff have the right to make a referral to the police or social care directly and should do this if, for whatever reason, there are difficulties following the agreed protocol, e.g. they are the only adult on the school premises at the time and have concerns about sending a child home.
- All concerns, discussions and decisions made, and the reasons for those decisions, should be recorded in writing. Information should be kept confidential and stored securely. All concerns and referrals are kept on a separate safeguarding section of Engage which can only be accessed by the DSL Team.
- Records should include:
  - a clear and comprehensive summary of the concern
  - detail of how the concern was followed up and resolved
  - a note of any action taken, decision reached and the outcome

Guiding principles, the Seven R's:

#### RECEIVE

1. Listen to what is being said, without displaying shock or disbelief
2. Accept what is said and take it seriously
3. Make a note of what has been said as soon as practicable

#### REASSURE

1. Reassure the child, but only so far as is honest and reliable
2. Don't make promises you may not be able to keep e.g. 'I'll stay with you' or 'everything will be alright now' or 'I'll keep this confidential'
3. Do reassure e.g. you could say: 'I believe you', 'I am glad you came to me', 'I am sorry this has happened'; 'We are going to do something together to get help'.

#### RESPOND

1. Respond to the child only as far as is necessary for you to establish whether or not you need to refer this matter, but do not interrogate for full details
2. Do not ask 'leading' questions i.e. 'did he touch your private parts?' or 'did she hurt you?' Such questions may invalidate your evidence (and the child's) in any later prosecution in court

3. Do not criticise the alleged perpetrator; the child may care about him/her, and reconciliation may be possible
4. Do not ask the child to repeat it all for another member of staff. Explain what you have to do next and whom you have to talk to. Reassure the child that it will be a senior member of staff

#### REPORT

1. Share concerns with the DSL as soon as possible
2. If you are not able to contact your DSL, and the child is at risk of immediate harm, contact the children's services department directly
3. If you are dissatisfied with the level of response you receive following your concerns, you should press for re-consideration

#### RECORD

1. If possible make some very brief notes at the time, and write them up as soon as possible
2. Keep your original notes on file
3. Record the date, time, place, persons present and noticeable nonverbal behaviour, and the words used by the child. If the child uses sexual 'pet' words, record the actual words used, rather than translating them into 'proper' words
4. Complete a body map to indicate the position of any noticeable bruising
5. Record facts and observable things, rather than your 'interpretations' or 'assumptions'

#### REMEMBER

1. Support the child: listen, reassure, and be available
2. Complete confidentiality is essential. Share your knowledge only with appropriate professional colleagues
3. Try to get some support for yourself if you need it

#### REVIEW (LED BY DSL)

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

#### WHAT HAPPENS NEXT?

1. It is important that concerns are followed up and it is everyone's responsibility to ensure that they are. The member of staff should be informed by the DSL what has happened following the report being made. If they do not receive this information they should be proactive in seeking it out.
2. If they have concerns that the disclosure has not been acted upon appropriately they might inform the safeguarding governor of the school and/or may ultimately contact the children's services department.



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

## **ANNEX 4: ALLEGATIONS AGAINST STAFF**

PROCEDURES FOR DEALING WITH ALL DISCLOSURES/ALLEGATIONS OF ABUSE AGAINST MANAGEMENT AND ALL STAFF AT Prince's Mead.

Allegations of abuse may be made against a member of staff, supply or agency staff, a volunteer, a governor, a pupil, parent or other person connected to the school.

KCSiE (Sept 2023) outlines two levels of allegations – those that meet the threshold and those which are low level allegations and concerns which are not classed as meeting the threshold.

### **1. Allegations that may meet the harms threshold**

These are allegations that might indicate a person would pose a risk of harm if they continued to work in their present position or in any capacity in a school or college.

This could include:

- Behaving in a way that has harmed a child, or may have harmed a child and/or;
- Possibly committing a criminal offence against or related to a child and/or;
- Behaving towards a child or children in a way that indicates he or she may pose a risk of harm to children; and/or
- Behaving in a way that indicates they may not be suitable to work with children (including outside of school) also known as “transferable risk” where the individual is involved in an incident outside of school which did not involve children but which might have an impact on their suitability to work with children, for example, a member of staff who is involved in domestic violence at home. In such an incident, even if no children were involved, the School needs to consider what triggered these actions and could a child in the School trigger the same reaction, therefore being put at risk.

Allegations of abuse against teachers and other staff (including supply staff) will be dealt with according to the statutory guidance set out in part four of KCSiE (Sept 22). The School will ensure allegations against any supply or temporary staff are dealt with in the appropriate manner, and liaise with the LADO to determine a suitable outcome, even if the School is not the employer of the individual.

If a member of staff is made aware of any allegation of abuse, or if knowledge of possible abuse comes to his/her attention it is his/her duty to listen to the child, to provide re-assurance and to record the child's statements, but not to probe or put words into the child's mouth.

On hearing an allegation of abuse or complaint about abuse directly from a child, a member of staff should limit questioning to the minimum necessary for clarification. Leading questions should be avoided. No inappropriate guarantees of confidentiality should be given; rather the child should be told that the matter will be referred in confidence to the appropriate people in positions of responsibility. Staff should never promise a child that they will not tell anyone about an allegation.

The member of staff should inform the Headmaster and the DSL immediately and should make and submit an accurate written record so that appropriate agencies can be informed within 24 hours and the matter resolved without delay. In the absence of the Headmaster the DSL will inform the Governor for Safeguarding issues. Cover will be provided to allow the member of staff time to write up accurately any disclosure as soon as possible. Records 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.

Where there is a safeguarding concern the School will ensure the pupil's wishes and feelings are considered when determining what action to take and what services to provide.

The DSL is responsible for ensuring pupils are able to express their views and provide feedback. When dealing with allegations the School will ensure it:

- Applies common sense and judgement;
- Deals with allegations quickly, fairly and consistently; and
- Provides effective protection for the child and support for the person subject to the allegation.

The DSL will contact the Local Authority Designated Officer (LADO) for advice or direction and will inform Ofsted if appropriate. In relation to our Nursery/EYFS setting, the school will inform 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 that allegation relates to harm or abuse committed on the premises or elsewhere) or any other abuse which is alleged to have taken place on the premises, and of the action taken in respect of these allegations.

The DSL will liaise with the LADO if there is any doubt whether a report should be made.

Should the allegation of abuse concern the DSL the member of staff should inform the Headmaster and the Deputy DSL who will act in the place of the DSL. Should the allegation be against the Headmaster the DSL will immediately inform the Chairman of Governors and the LADO without the Headmaster being informed first.

The Headmaster or DSL will refer all allegations or suspicions of abuse or cases where there is reasonable cause to suspect a child is suffering, or is likely to suffer significant harm, to the local authority designated officer (LADO) within 24 hours.

Borderline cases will be discussed with the LADO without identifying individuals in the first instance and following discussions the LADO will judge whether or not an allegation or concern meets the relevant threshold. The LADO and the Headmaster or DSL will decide in the circumstances what further steps should be taken. This could involve informing parents and calling the police at which point the DSL will follow the guidance from NPCC “When to Call The Police” for help in deciding on this step.

If the allegation concerns a member of staff, a volunteer or another pupil he/she would normally be informed as soon as possible after the result of any initial investigation authorised or conducted by the LADO is known. Advice will always be sought from the LADO first, however and should a strategy discussion be required, or police or children’s social care services need to be involved, no information will be shared with the accused until these agencies have been consulted and confirmed what information may be disclosed. The School is responsible for both investigating and supporting the person subject to the allegation and will normally appoint a senior member of staff to keep the person informed of the likely course of action and the progress of the case and to provide support for the individual accused. If a live-in member of the boarding staff is suspended pending an allegation alternative accommodation away from the children will be provided.

The outcome of investigation of an allegation will record whether it is substantiated (sufficient evidence either to prove or disprove 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 unfounded (no evidence or proper basis which supports the allegation being made). If it is established that the allegation is malicious, no details of the allegation will be retained on the individual's personnel records nor on any future employer references. In all other circumstances a written record will be made of the decision and retained on the individual's personnel file in accordance with DfE advice including a clear and comprehensive summary of the allegation, details of how the allegation was followed up and resolved, and a note of any action taken or decisions reached and a copy provided to the person concerned. The School will retain records containing allegations of sexual abuse as required for the Independent Inquiry into Child Sexual Abuse. All other records will be retained until the accused has reached normal pension age or for a period of 10 years from the date of the allegation if this is longer.

If an allegation is shown to be unsubstantiated, unfounded, false or malicious, the LADO should consider if the child who made the allegation is in need of help or may have been abused by someone else and this was a cry for help and therefore requires further support. In such cases a referral to children’s social care may be appropriate. If an allegation is shown to be deliberately invented or malicious the Headmaster will consider whether any disciplinary action is appropriate against a pupil who made it; 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.

If the LADO or any of the statutory child protection authorities decide to take the case further, any staff member concerned may be suspended if this is felt appropriate although all options to avoid suspension must first be considered. The reasons and justification for suspension will be recorded and the staff member informed of them. In the case of staff the matter will be dealt with in accordance with the Staff Handbook In the case of a pupil the matter will be dealt with under the School's Behaviour Policy.

During the course of the investigation the school in consultation with the LADO will decide what information should be given to parents, staff and other pupils and how press enquiries are to be dealt with. In reaching their decision due consideration will be given to the provisions in the Education Act 2011 relating to reporting restrictions identifying teachers who are the subject of allegations from pupils.

Any pupils who are involved will receive appropriate care. If an investigation leads to the dismissal or resignation prior to dismissal of a member of teaching staff, the school will consider making a referral to the Teaching Regulation Agency (TRA) and a prohibition order may be appropriate (because that teacher has displayed unacceptable professional conduct, conduct that may bring the profession into disrepute or could result in a conviction at any time for a relevant offence). The school will also consider making a referral to the DBS for consideration of whether inclusion on the barred lists is required. The school will also make a serious incident report to the Charity Commission whenever the Commission's guidelines deem it appropriate to do so.

We follow Disclosure and Barring Services (DBS) guidance and procedures regarding referrals and barring decisions and the Safeguarding Vulnerable Groups Act 2006, as amended by the Protection of Freedoms Act 2012, and Safeguarding Vulnerable Groups Act (Prescribed Criteria and Miscellaneous Provisions) Regulations 2009. The school will always report to the DBS, as soon as possible, and ordinarily on conclusion of an investigation, when an individual is removed from regulated activity including where any person's services (whether employed, contracted, a volunteer or a student) are no longer used because he or she is considered unsuitable to work with children, been cautioned or convicted of a relevant offence, because they have caused harm, are likely to harm or posed a risk of harm to a child. This includes dismissal, non-renewal of a fixed term contract, no longer using a supply teacher engaged directly or supplied by an agency, terminating the placement of a trainee or volunteer, no longer using staff employed by a contractor and resignation and voluntary withdrawal from any of the above. The School acknowledges that this is a legal duty and failure to make a referral to the DBS when the criteria have been met is a criminal offence.

Where a teacher is dismissed because of serious misconduct, or might have been dismissed had they not left first, the School must consider whether to refer the case to the Secretary of State (via the Teaching Regulation Agency).

In line with the guidance issued in KCSIE (Sept 21) the School will where appropriate report any historical abuse allegations to the police.

On conclusion of any case, a review, led by the DSL and in conjunction with the LADO, will examine the circumstances of the case to determine whether there are any improvements to be made to the school's safeguarding procedures or practices to help prevent similar events in the future.

## **2. Concerns that do not meet the harm threshold – Low Level Concerns**

The governors are responsible for ensuring the School has policies in place to deal with concerns which do not meet the harm thresholds.

Low level concerns can arise in several ways and from a number of sources. For example, suspicion, complaint or disclosure made by a child, parent or any other adult, or as a result of vetting checks.

As part of the whole School approach to safeguarding the School promotes an open and transparent culture in which all concerns about all adults working on site (including temporary and contract staff) are dealt with promptly and appropriately. Staff are also encouraged to self-refer in the event that they have found themselves in a situation which may be misinterpreted, might appear compromising to others, and/or on reflection they believe they have behaved in a way that may be considered to fall below the expected professional standard. All concerns will be handled sensitively and will be dealt with appropriately and proportionately.

Low Level Concerns do not mean these concerns are insignificant or should be ignored. Any concern is still a concern – no matter how small. This term is used only to identify concerns which do not meet the threshold described above.

Low Level Concerns could include:

- a sense of unease or nagging doubt about the behaviour of a member of staff / adult on site;
- behaviour which is inconsistent with the Staff Code of Conduct and this Policy including inappropriate conduct outside of work;
- being over friendly with children including having favourites;
- taking photographs of children on their own personal phones;
- engaging with children on a 1:1 basis including in secluded or closed areas;

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

If a Low Level Concern is raised about an agency or contract worker the concern will also be shared with their employer so any patterns of inappropriate behaviour can be identified. The DSL will review records kept to identify any patterns of concerning, problematic or inappropriate behaviour. Where patterns are identified the DSL should decide on a course of action in line with KCSiE (Sept 2023).

Low Level Concerns will not be provided in any references for staff leaving employment unless they relate to issues which would normally be included in a reference for example misconduct or poor performance. Otherwise only substantiated allegations are to be referred to in a reference.

If a Low-Level Concern meets the threshold for referral to the LADO and is found to be substantiated this would then be recorded on references. Equally, 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.

The School will be part of discussions with statutory safeguarding partners to agree the levels for the different types of assessment and services to be commissioned and delivered, as part of the local arrangements.

The School recognises that children who have experienced sexual violence display a very wide range of responses to their experience, including in some cases clear signs of trauma, physical and emotional responses, or no overt signs at all. The Schools will remain alert to the possible challenges of detecting those signs and show sensitivity to the needs of the child (e.g. about attendance in lessons) irrespective of how overt the child's distress is.

When it is clear that ongoing support will be required, the school should ask the victim if they would find it helpful to have a designated trusted adult (for example, their form tutor or designated safeguarding lead) to talk to about their needs and be present when being interviewed by the police. The choice of any such adult should be the victim's (as far as is reasonably possible). The School should respect and support this.

## **ANNEX 5: CHILD ON CHILD ABUSE**

1. In most instances, the conduct of students towards each other will be covered by the school's behaviour policy.
2. Some allegations may be of such a serious nature that they may raise safeguarding concerns. These are most likely to include, but may not be limited to:
  - bullying (including cyberbullying);
  - physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm;
  - sexual violence and sexual harassment;
  - sexting (also known as youth produced sexual imagery); and
  - initiation/hazing type violence and rituals.
3. It is likely that incidents dealt with under this policy will involve older students and their behaviour towards younger students or those who are vulnerable.
4. Abuse is abuse and should never be tolerated or passed off as 'banter' or 'just having a laugh' or 'part of growing up'.
5. All targets are taken seriously and offered appropriate support. Staff should be aware that some groups are potentially more at risk. Evidence shows girls, children with SEND and LGBT children are at greater risk.
6. Any form of abuse or harmful behaviour is dealt with immediately and consistently to reduce the extent of harm to the young person, with full consideration to impact on that individual child's emotional and mental health and well-being.
7. Targets and perpetrators of peer-on-peer/child on child abuse will be supported through the pastoral care system which includes form teacher support, PSHE lessons, pastoral support from the Safeguarding Team (including Matron and Gillian Jones- Head of Pastoral Care), to name a few.
8. All disclosures or concerns regarding Peer on peer/Child on child abuse should be recorded on Annex 2

## **CHILD ON CHILD SEXUAL VIOLENCE AND SEXUAL HARASSMENT**

1. Reports of sexual violence and sexual harassment are likely to be complex and require difficult professional decisions to be made, often quickly and under pressure. Preplanning, effective training and effective policies will provide schools and colleges with the foundation for a calm, considered and appropriate response to any reports.
2. Full details can be found in Part 5 of KCSIE.

## **SAFEGUARDING IMPLICATIONS OF SEXUAL ACTIVITY BETWEEN YOUNG PEOPLE**

1. The intervention of child protection agencies in situations involving sexual activity between children can require difficult professional judgements. Some situations are statutorily clear – for example, a child under the age of 13 cannot consent to sexual activity. But it will not necessarily be appropriate to initiate safeguarding procedures where sexual activity involving children and young people below the age of legal consent (16 years) comes to notice.

2. In our society generally, the age at which children become sexually active has steadily dropped. It is important to distinguish between consensual sexual activity between children of a similar age (where at least one is below the age of consent), and sexual activity involving a power imbalance, or some form of coercion or exploitation. It may also be difficult to be sure that what has or has been alleged to have taken place definitely does have a sexual component.
3. As usual, important decisions should be made on a case by case basis, on the basis of an assessment of the children's best interests. Referral under safeguarding arrangements may be necessary, guided by an assessment of the extent to which a child is suffering, or is likely to suffer, significant harm. Key specific considerations will include:
  - The age, maturity and understanding of the children;
  - Any disability or special needs of the children;
  - Their social and family circumstance;
  - Any evidence in the behaviour or presentation of the children that might suggest they have been harmed;
  - Any evidence of pressure to engage in sexual activity;
  - Any indication of sexual exploitation;
  - There are also contextual factors. Gender, sexuality, race and levels of sexual knowledge can all be used to exert power. A sexual predator may sometimes be a woman or girl and the victim a boy.

## **PREVENTION**

1. As a school we will minimise the risk of allegations against other children by:
  - Providing a developmentally appropriate PSHEE syllabus which develops children's understanding of acceptable behaviour and keeping themselves safe
  - Having systems in place for any children to raise concerns with staff, knowing that they will be listened to, believed and valued
  - Delivering targeted work on assertiveness and keeping safe those children identified as being at risk
  - Developing robust risk assessments & providing targeted work for children identified as being a potential risk to other children.

## **ALLEGATIONS AGAINST CHILDREN WHO ARE SAFEGUARDING ISSUES**

1. Occasionally, allegations may be made against students by others in the school, which are of a safeguarding nature. Safeguarding issues raised in this way may include physical abuse, emotional abuse, sexual abuse and sexual exploitation. It is likely that, to be considered a safeguarding allegation against a child, some of the following features will be found.
2. If the allegation:
  - Is made against an older child and refers to their behaviour towards a younger child or a more vulnerable child
  - Is of a serious nature, possibly including a criminal offence
  - Raises risk factors for other children in the school

- Indicates that other children may have been affected by this student
- Indicates that young people outside the school may be affected by this student

3. Examples of safeguarding issues against a student could include:

#### Physical Abuse

- Violence, particularly pre-planned
- Forcing others to use drugs or alcohol

#### Initiation/hazing type violence and rituals/Emotional Abuse

- Blackmail or extortion
- Threats and intimidation

#### Sexual Abuse

- Indecent exposure, indecent touching or serious sexual assaults
- Forcing others to watch pornography or take part in sexting
- Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children. The sexual abuse of children by other children is a specific safeguarding issue in education

#### Sexual Exploitation

- a. Encouraging other children to engage in inappropriate sexual behaviour (For example - having an older boyfriend/girlfriend, associating with unknown adults or other sexually exploited children, staying out overnight)
- b. Photographing or videoing other children performing indecent acts
- c. Sexting

### PROCEDURE

1. When an allegation is made by a child against another student, members of staff should consider whether the complaint raises a safeguarding concern. If there is a safeguarding concern the DSL should be informed
2. A factual record should be made of the allegation, but no attempt at this stage should be made to investigate the circumstances
3. The DSL should contact the children's reception team (CRT) to discuss the case
4. The DSL will follow through the outcomes of the discussion and make a referral where appropriate
5. If the allegation indicates that a potential criminal offence has taken place, CRT will refer the case to the multi-agency safeguarding hub where the police will become involved
6. Parents, of both the student being complained about and the alleged victim, should be informed and kept updated on the progress of the referral
7. The DSL will make a record of the concern, the discussion and any outcome and keep a copy in the files of both children's files
8. It may be appropriate to exclude the child being complained about for a period of time according to the school's behaviour policy and procedures



9. Where neither social services nor the police accept the complaint, a thorough school investigation should take place into the matter using the school's usual disciplinary procedures
10. In situations where the school considers a safeguarding risk is present, a risk assessment should be prepared along with a preventative, supervision plan
11. The plan should be monitored and a date set for a follow-up evaluation with everyone concerned

## **ANNEX 6: BRIEFING SHEET FOR SUPPLY STAFF AND THOSE ON SHORT CONTRACTS**

1. While working in Prince's Mead School, you have a duty of care towards the children here. This means that at all times you should act in a way that is consistent with their safety and welfare.
2. In addition, if at any time you have a concern about a child or young person, particularly if you think they may be at risk of abuse or neglect, it is your responsibility to share that concern with the DSL.
3. This is not an exhaustive list but you may have become concerned as a result of:
  - observing a physical injury, which you think may have been non-accidental
  - observing something in the appearance of a child or young person which suggests they are not being sufficiently well cared for
  - observing behaviour that leads you to be concerned about a child or young person
  - a child or young person telling you that they have been subjected to some form of abuse
4. In any of the circumstances listed here, you must write down what you saw or heard, date and sign your account, and give it to the DSL. This may be the beginning of a legal process – it is important to understand that legal action against a perpetrator can be seriously damaged by any suggestion that the child has been led in any way.
5. If a child talks to you about abuse, you should follow these guidelines:
  - Rather than directly questioning the child, just listen and be supportive
  - Never stop a child who is freely recalling significant events, but don't push the child to tell you more than they wish
  - Make it clear that you may need to pass on information to staff in other agencies who may be able to help – do not promise confidentiality. You are obliged to share any information relating to abuse or neglect
  - Write an account of the conversation immediately, as close to verbatim as possible. Put the date and timings on it, and mention anyone else who was present. Then sign it, and give your record to the designated person/child protection officer, who should contact children's social care if appropriate
6. The school has a policy on safeguarding children and young people which you can find, together with the local procedures to be followed by all staff, in the CRL – Policies – Safeguarding.
7. Remember, if you have a concern, discuss it with the DSL.

## **ANNEX 7: WHAT IS CHILD ABUSE?**

The following definitions are taken from working together to safeguard children HM Government (2018). In addition to these definitions, it should be understood that children can also be abused by honour-based violence, forced marriage or female genital mutilation. To support the local context, all staff have access to the Hampshire Safeguarding children board (HSCB) threshold chart.

### **TYPES OF ABUSE**

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. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Children may be abused by an adult or adults, or another child or children.

#### **PHYSICAL ABUSE**

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

#### **EMOTIONAL ABUSE**

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

#### **SEXUAL ABUSE**

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

#### **CHILD SEXUAL EXPLOITATION**

Child sexual exploitation is a form of child sexual abuse. It occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or young person under the age of 18 into sexual activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial advantage or increased status of the perpetrator or facilitator. The victim may have been sexually exploited even if the sexual activity appears consensual. Child sexual exploitation does not always involve physical contact; it can also occur through the use of technology.

## **NEGLECT**

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

- provide adequate food, clothing and shelter (including exclusion from home or abandonment)
- protect a child from physical and emotional harm or danger
- ensure adequate supervision (including the use of inadequate caregivers)
- ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

The HSCB neglect strategy is used to provide a more detailed summary of neglect and the local thresholds for referrals.

## **INDICATORS OF ABUSE**

### **PHYSICAL ABUSE**

The nature of physical abuse

1. Most children collect cuts and bruises quite routinely as part of the rough and tumble of daily life. Clearly, it is not necessary to be concerned about most of these minor injuries. But accidental injuries normally occur on the bony prominences – e.g., shins. Injuries on the soft areas of the body are more likely to be inflicted intentionally and should therefore make us more alert to other concerning factors that may be present.
2. Indicators of physical abuse / factors that should increase concern:
  - Multiple bruising or bruises and scratches (especially on the head and face)
  - Clusters of bruises – e.g., fingertip bruising (caused by being grasped)
  - Bruises around the neck and behind the ears – the most common abusive injuries are to the head
  - Bruises on the back, chest, buttocks, or on the inside of the thighs
  - Marks indicating injury by an instrument – e.g., linear bruising (stick), parallel bruising (belt), marks of a buckle
  - Bite marks
  - Deliberate burning may also be indicated by the pattern of an instrument or object – e.g., electric fire, cooker, cigarette
  - Scalds with upward splash marks or tide marks
  - Untreated injuries
  - Recurrent injuries or burns
  - Bald patches
3. In the social context of the school, it is normal to ask about a noticeable injury. The response to such an enquiry is generally light-hearted and detailed. So, most of all, concern should be increased when:
  - the explanation given does not match the injury
  - the explanation uses words or phrases that do not match the vocabulary of the child (adult's words)

- no explanation is forthcoming
  - the child (or the parent/carer) is secretive or evasive
  - the injury is accompanied by allegations of abuse or assault
4. You should be concerned if the child or young person:
- is reluctant to have parents/carers contacted
  - runs away or shows fear of going home
  - is aggressive towards themselves or others
  - flinches when approached or touched
  - is reluctant to undress to change clothing for sport
  - wears long sleeves during hot weather
  - is unnaturally compliant in the presence of parents/carers
  - has a fear of medical help or attention
  - admits to a punishment that appears excessive

## **EMOTIONAL ABUSE**

### The nature of emotional abuse

- Most harm is produced in poor nurturing, high criticism homes, not from single incidents
- Emotional abuse is difficult to define, identify/recognise and/or prove
- Emotional abuse is chronic and cumulative and has a long-term impact
- All kinds of abuse and neglect have emotional effects although emotional abuse can occur by itself
- Children can be harmed by witnessing someone harming another person – as in domestic violence
- It is sometimes possible to spot emotionally abusive behaviour from parents and carers to their children, by the way that the adults are speaking to, or behaving towards children. An appropriate challenge or intervention could affect positive change and prevent more intensive work being carried out later on.

### Indicators of emotional abuse

#### Developmental issues

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

#### Behaviour

- Acceptance of punishment which appears excessive
- Over-reaction to mistakes
- Continual self-deprecation (I'm stupid, ugly, worthless etc)
- Neurotic behaviour (such as rocking, hair-twisting, thumb-sucking)
- Self-mutilation

- Suicide attempts
- Drug/solvent abuse
- Running away
- Compulsive stealing, scavenging
- Acting out
- Poor trust in significant adults
- Regressive behaviour – e.g., wetting
- Eating disorders
- Destructive tendencies
- Neurotic behaviour
- Arriving early at school, leaving late

#### Social issues

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

#### Emotional responses

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

## **SEXUAL ABUSE**

#### The nature of sexual abuse

- Sexual abuse is often perpetrated by people who are known and trusted by the child – e.g., relatives, family friends, neighbours, babysitters, people working with the child in school, faith settings, clubs or activities. Children can also be subject to child sexual exploitation.
- Sexual exploitation is seen as a separate category of sexual abuse. Indicators of CSE can be found in the schools’ safeguarding policy.

#### Characteristics of child sexual abuse:

- it is often planned and systematic – people do not sexually abuse children by accident, though sexual abuse can be opportunistic grooming the child – people who abuse children take care to choose a vulnerable child and often spend time making them dependent grooming the child's environment – abusers try to ensure that potential adult protectors (parents and other carers especially) are not suspicious of their motives.
- Most people who sexually abuse children are men, but some women sexually abuse too.

#### Indicators of sexual abuse

##### Physical observations

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

##### Behavioural observations

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

## **NEGLECT**

### The nature of neglect

- Neglect is a lack of parental care but poverty and lack of information or adequate services can be contributory factors.
- Far more children are registered to the category of neglect on child protection plans than to the other categories. As with abuse, the number of children experiencing neglect is likely to be much higher than the numbers on the plans.

Neglect can include parents or carers failing to:

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

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

- frequently going hungry
  - frequently having to go to school in dirty clothes
  - regularly having to look after themselves because of parents being away or having problems such as drug or alcohol misuse
  - being abandoned or deserted
  - living at home in dangerous physical conditions
  - not being taken to the doctor when ill
  - not receiving dental care
1. Neglect is a difficult form of abuse to recognise and is often seen as less serious than other categories. It is, however, very damaging: children who are neglected often develop more slowly than others and may find it hard to make friends and fit in with their peer group.
  2. Neglect is often noticed at a stage when it does not pose a risk to the child. The duty to safeguard and promote the welfare of children (what to do if you are worried a child is being abused) would suggest that an appropriate intervention or conversation at this early stage can address the issue and prevent a child continuing to suffer until it reaches a point when they are at risk of harm or in significant need.
  3. Neglect is often linked to other forms of abuse, so any concerns school staff have should at least be discussed with the DSL.

## **INDICATORS OF NEGLECT**

The following is a summary of some of the indicators that may suggest a child is being abused or is at risk of harm. It is important to recognise that indicators alone cannot confirm whether a child is being abused. Each child should be seen in the context of their family and wider community and a proper assessment carried out by appropriate persons. What is important to keep in mind is that if you feel unsure or concerned, do something about it. Don't keep it to yourself. The HSCB neglect strategy provides a more detailed list of indicators of neglect and is available to all staff.

### Physical indicators of neglect

- Constant hunger and stealing food



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

#### Behavioural indicators of neglect

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

## ANNEX 8: BROOK SEXUAL BEHAVIOURS TRAFFIC LIGHT TOOL

### BEHAVIOURS: AGE 0 TO 5

All green, amber and red behaviours require some form of attention and response. It is the level of intervention that will vary.

What is a green behaviour?	What is an amber behaviour?	What is a red behaviour?
Green behaviours reflect safe and healthy sexual development. They are displayed between children or young people of similar age or developmental ability. They are reflective of natural curiosity, experimentation, consensual activities and positive choices.	Amber behaviours have the potential to be outside of safe and healthy behaviour. They may be of potential concern due to age, or developmental differences. A potential concern due to activity type, frequency, duration or context in which they occur.	Red behaviours are outside of safe and healthy behaviour. They may be excessive, secretive, compulsive, coercive, degrading or threatening and involving significant age, developmental, or power differences. They may pose a concern due to the activity type, frequency, duration or the context in which they occur.
What can you do?	What can you do?	What can you do?
Green behaviours provide opportunities to give positive feedback and additional information.	Amber behaviours signal the need to take notice and gather information to assess the appropriate action.	Red behaviours indicate a need for immediate intervention and action.
Green behaviours	Amber behaviours	Red behaviours
<ul style="list-style-type: none"> <li>• holding or playing with own genitals</li> <li>• attempting to touch or curiosity about other children's genitals</li> <li>• attempting to touch or curiosity about breasts, bottoms or genitals of adults</li> <li>• games e.g. mummies and daddies,</li> <li>• doctors and nurses</li> <li>• enjoying nakedness</li> <li>• interest in body parts and what they do</li> <li>• curiosity about the differences between boys and girls.</li> </ul>	<ul style="list-style-type: none"> <li>• preoccupation with adult sexual behaviour</li> <li>• pulling other children's pants down/skirts up/trousers down against their will</li> <li>• talking about sex using adult slang</li> <li>• preoccupation with touching the genitals of other people</li> <li>• following others into toilets or changing rooms to look at them or touch them</li> <li>• talking</li> </ul>	<ul style="list-style-type: none"> <li>• persistently touching the genitals of other children</li> <li>• persistent attempts to touch the genitals of adults</li> <li>• simulation of sexual activity in play</li> <li>• sexual behaviour between young children involving penetration with objects</li> <li>• forcing other children to engage in sexual play.</li> </ul>

Please refer to the guidance tool at <https://www.brook.org.uk/our-work/the-sexual-behaviours-traffic-light-tool> for further information

## BEHAVIOURS: AGE 5 TO 9 AND 9 TO 13

All green, amber and red behaviours require some form of attention and response. It is the level of intervention that will vary.

What is a green behaviour?	What is an amber behaviour?	What is a red behaviour?
Green behaviours reflect safe and healthy sexual development. They are displayed between children or young people of similar age or developmental ability and reflective of natural curiosity, experimentation, consensual activities and positive choices.	Amber behaviours have the potential to be outside of safe and healthy behaviour. They may be of potential concern due to age, or developmental differences. A potential concern due to activity type, frequency, duration or context in which they occur.	Red behaviours are outside of safe and healthy behaviour. They may be excessive, secretive, compulsive, coercive, degrading or threatening and involving significant age, developmental, or power differences. They may pose a concern due to the activity type, frequency, duration or the context in which they occur.
What can you do?	What can you do?	What can you do?
Green behaviours provide opportunities to give positive feedback and additional information.	Amber behaviours signal the need to take notice and gather information to assess the appropriate action.	Red behaviours indicate a need for immediate intervention and action.
Green behaviours 5-9	Amber behaviours 5-9	Red behaviours 5-9
<ul style="list-style-type: none"> <li>• feeling and touching own genitals</li> <li>• curiosity about other children's genitals</li> <li>• curiosity about sex and relationships, e.g. differences between boys and girls, how sex happens, where babies come from, same-sex relationships</li> <li>• sense of privacy about bodies</li> <li>• telling stories or asking questions using swear and slang words for parts of the body</li> </ul>	<ul style="list-style-type: none"> <li>• questions about sexual activity which persist or are repeated frequently, despite an answer having been given</li> <li>• sexual bullying face to face or through texts or online messaging</li> <li>• engaging in mutual masturbation</li> <li>• persistent sexual images and ideas in talk, play and art</li> <li>• use of adult slang language to discuss sex</li> </ul>	<ul style="list-style-type: none"> <li>• frequent masturbation in front of others</li> <li>• sexual behaviour engaging significantly younger or less able children</li> <li>• forcing other children to take part in</li> <li>• sexual activities</li> <li>• simulation of oral or penetrative sex</li> <li>• sourcing pornographic material online in sexual play.</li> </ul>

Green behaviours 9-13	Amber behaviours 9-13	Red behaviours 9-13
<ul style="list-style-type: none"> <li>solitary masturbation</li> <li>use of sexual language including swear and slang words</li> <li>having girl/boyfriends who are of the same, opposite or any gender</li> <li>interest in popular culture, e.g. fashion, music, media, online games, chatting online</li> <li>need for privacy</li> <li>consensual kissing, hugging, holding hands with peers</li> </ul>	<ul style="list-style-type: none"> <li>uncharacteristic and risk-related behaviour, e.g. sudden and/or provocative changes in dress, withdrawal from friends, mixing with new or older people, having more or less money than usual, going missing</li> <li>verbal, physical or cyber/virtual sexual bullying involving sexual aggression</li> <li>LGBT (lesbian, gay, bisexual, transgender) targeted bullying</li> <li>exhibitionism, e.g. flashing or mooning</li> <li>giving out contact details online</li> <li>viewing pornographic material</li> <li>worrying about being pregnant or having STIs</li> </ul>	<ul style="list-style-type: none"> <li>exposing genitals or masturbating in public</li> <li>distributing naked or sexually provocative images of self or others</li> <li>sexually explicit talk with younger children</li> <li>sexual harassment</li> <li>arranging to meet with an online acquaintance in secret</li> <li>genital injury to self or others</li> <li>forcing other children of same age, younger or less able to take part in sexual activities</li> <li>sexual activity e.g. oral sex or intercourse</li> <li>presence of sexually transmitted infection (STI)</li> <li>evidence of pregnancy</li> </ul>

## ANNEX 9: USEFUL CONTACTS

Key Personnel	Name (s)	Contact
Head	Adam King	01962 888102 07714245154
DSL	Alex Greenaway	01962 888104 07885984605
Deputy DSL(s)	Adam King  Mandy Oakley  Gillian Jones  Lucy Brown  Ian Thomas  Shelly Say	07714245154  01962 888102  07584904593  075323123031  07554991381  07714202455
School's named "Prevent" lead	Alex Greenaway	01962 888104 07885984605
Nominated Governor	Mrs Sarah Tice	07787513497
Children's referral team		01329 225379
Out of hours social care		0300 555 1373
Police		101 or in emergencies 999
Safeguarding advisors / local authority designated officers (LADOs)	Fiona Armfield Barbara Piddington	Landline 01962 876364 Mobile Phone 07540 930 259

School nurse	Mandy Oakley	01962 888000 07584904593
Children's service department district manager		0300 555 1384 childrens.services@hants.gov.uk
Early help hub manager		0300 555 1384 childrens.services@hants.gov.uk
NSPCC – Whistleblowing support	If you need support about whistleblowing. Weston House, 42 Curtain Road, London EC2A 3NH	0800 028 0285 help@nspcc.org.uk
DBS		Customerservices@dbs.gov.uk 03000200190
OFSTED		Enquiries@ofsted.gov.uk 0300 123 1231
ISI	ISI CAP House, 9-12 Long Lane, London, EC1A 9HA	Info@isi.net 02076000100
TRA		Misconduct.teacher@education.gov.uk 020 7593 5393
NSPCC Report Abuse in Education Advice Line.		0808 8005000

## Annex 10: Transporting of pupils by parents

Dear Parent / Volunteer

On occasions parents and volunteers are kind enough to help with the task of transporting children to visits and off-site activities arranged by the school. (This is in addition to any informal arrangements made directly between parents for after school clubs etc.) The school is very grateful for this help. In managing these arrangements, the school would like to put in place sensible measures to ensure the safety and welfare of young people carried in parents and volunteers' cars. This is based on guidance from the local authority and follows similar procedures for school staff using their cars on school business.

Where parents'/volunteers' cars are used on school activities, the Headmaster should notify parents/volunteers of their responsibilities for the safety of pupils, to maintain suitable insurance cover and to ensure their vehicle is roadworthy.

The Headmaster or Party Leader will need to consider the suitability of parents or volunteers to carry young people in their car and whether vetting is necessary. It is advisable that parents or volunteers are not put in a position where they are alone with a young person.

All parents are therefore asked to complete and return the attached form to the school before they offer to use their car to help with transporting pupils.

This form will only need to be completed once for each driver. However, please inform the school if your circumstances change and you can no longer comply with these arrangements.

Many thanks, once again, to all parents and volunteers who have been able to help with the provision of transport. Naturally our primary concern is the safety and welfare of pupils.

However, we also want to maintain a wide range of opportunities for young people to participate in off-site activities and visits.

Signed \_\_\_\_\_

## DECLARATION FORM

### SAFEGUARDING STATEMENT

At Prince's Mead, we recognise the need for strong vigilance of safeguarding issues. It is important that all staff have appropriate training and induction so that they understand their roles and responsibilities and are confident about carrying them out. Staff, pupils, parents and Governors should feel secure that they could raise any issues or concerns about the safety or welfare of children and know that they will be listened to and taken seriously. This will be achieved by maintaining an ethos of safeguarding and promoting the welfare of children and young people and protecting staff. This is supported by clear behaviour, anti-bullying and child protection policies, appropriate induction and training, briefing and discussion of relevant issues and relevant learning in line with current legislation and guidelines.

The school may require parents or volunteers who have regular unsupervised access to young people to be checked through arrangements with the Disclosure and Barring Service.

#### All drivers must:

- Hold a valid driving licence for the type of vehicle being driven
- Be fit to drive
- Have no medical condition which affects their ability to drive
- Have a valid MOT for any vehicle older than 3 years old
- Ensure that any vehicle is roadworthy, including brakes, lights, tyres, bodywork, wipers, mirrors etc.
- Ensure that any vehicle used has current road tax
- Ensure that they adhere to the appropriate speed limit
- Ensure that all seat belts are working and worn by everybody in the vehicle

#### Insurance:

- Maintain valid insurance, as a minimum, for third part liability
- Check with their insurance company and inform them that the driver occasionally conveys children on school activities. (This is unlikely to affect the cost of your insurance premium.)

#### Safety:

- Be familiar with, and drive in accordance with, the Highway Code at all times
- Drive safely and observe the speed limit
- Before driving not to consume alcohol or drugs which may impair driving
- Ensure that all passengers wear seat belts as appropriate
- Use child proof locks on rear doors where necessary
- Child seats such as booster seats are to be used at all times according to the height and age of each child in the vehicle
- I have read and understood the above requirements and agree to comply with them. I agree to inform the school if circumstances change and I can no longer comply with these arrangements.



Signature: \_\_\_\_\_

Name (Please print): \_\_\_\_\_

Date: \_\_\_\_\_

## ANNEX 11 - ONLINE PROTECTION

1. It is important that all staff who interact with children, including online zoom lessons, continue to look out for signs a child may be at risk. Any such concerns should be dealt with as per the Prince's Mead Safeguarding and Child Protection policy and where appropriate referrals should continue to be made, by the DSL, to children's social care and as required the police.
2. An essential part of the online planning process will be ensuring children who are being asked to work online have very clear reporting routes in place so they can raise any concerns whilst online. As well as reporting routes back to the school or DSL, this should also signpost children to age-appropriate practical support from the likes of:
  - Childline - for support
  - UK Safer Internet Centre - to report and remove harmful online content
  - CEOP - for advice on making a report about online abuse
3. DSL, Alex Greenaway, will be in regular contact with parents and carers, via clarion call or a message in The Link. These communications will continue to be used to reinforce the importance of children being safe online. It will be especially important for parents and carers to be aware of what their children are being asked to do online, including the sites they will be asked to access and be clear who from the school or college (if anyone) their child is going to be interacting with online.
4. Parents and carers may choose to supplement the school or college online offer with support from online companies and in some cases individual tutors. In their communications with parents and carers, schools and colleges should emphasise the importance of securing online support from a reputable organisation/individual who can provide evidence that they are safe and can be trusted to have access to children.
5. Support for parents and carers to keep their children safe online includes:
  - Thinkuknow provides advice from the National Crime Agency (NCA) on staying safe online
  - Parent info is a collaboration between Parentzone and the NCA providing support and guidance for parents from leading experts and organisations
  - Childnet offers a toolkit to support parents and carers of children of any age to start discussions about their online life, to set boundaries around online behaviour and technology use, and to find out where to get more help and support
  - Internet Matters provides age-specific online safety checklists, guides on how to set parental controls on a range of devices, and a host of practical tips to help children get the most out of their digital world
  - London Grid for Learning has support for parents and carers to keep their children safe online, including tips to keep primary aged children safe online
  - Net-aware has support for parents and carers from the NSPCC and O2, including a guide to social networks, apps and games
  - Let's Talk About It has advice for parents and carers to keep children safe from online radicalisation
  - UK Safer Internet Centre has tips, advice, guides and other resources to help keep children safe online, including parental controls offered by home internet providers and safety tools on social networks and other online services

6. Government has also provided:

- support for parents and carers to keep children safe from online harms, includes advice about specific harms such as online child sexual abuse, sexting, and cyberbullying
- support to stay safe online includes security and privacy settings, blocking unsuitable content, and parental controls

7. The department encourages schools and colleges to share this support with parents and carers.

## ANNEX 12 - MENTAL HEALTH

1. Prince's Mead has an important role to play in supporting the mental health and wellbeing of their pupils.
2. 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.
3. Negative experiences and distressing life events, such as the current circumstances, can affect the mental health of children and their parents. Where they have children of critical workers and vulnerable children on site, and/or more children returning to school from 1 June onwards, Prince's Mead will ensure appropriate support is in place for them.
4. Prince's Mead understands how mental health issues can bring about changes in a child's behaviour or emotional state which can be displayed in a range of different ways, all of which could be an indication of an underlying problem. This can include for example being fearful or withdrawn; aggressive or oppositional; or excessive clinginess. Support for pupils in the current circumstances has been by offering a 'Virtual Biscuit' daily session with DDSL and Matron, Mandy Oakley. This has given opportunities for pupils to air their worries or concerns.
5. Teachers should be aware of the impact the current circumstances can have on the mental health of those students/pupils (and their parents) who are continuing to work from home, including when setting expectations of children's' work.
6. DSL/Deputy Headmaster, Alex Greenaway, is also available by phone, 07885984605, to receive staff concerns and worries.
7. Only appropriately trained professionals should attempt to make a diagnosis of a mental health problem. Staff however, are well placed to observe children day-to-day and identify those whose behaviour suggests that they may be experiencing a mental health problem or be at risk of developing one.
  - Where children have suffered abuse and neglect, or other potentially traumatic adverse childhood experiences, this can have a lasting impact throughout childhood.
  - Prince's Mead can access a range of advice from external agencies to help identify children in need of extra mental health support. The DfE Mental health and behaviour in schools guidance below is key.

<https://www.gov.uk/government/publications/mental-health-and-behaviour-in-schools--2>

## ANNEX 13 - SAFER RECRUITMENT

It remains essential that people who are unsuitable are not allowed to enter the children's workforce or gain access to children. Prince's Mead School will use our own judgement on whether recruitment is needed and how this can best be done given the circumstances. In recruiting new staff, we will follow the relevant safer recruitment processes for their setting, including, as appropriate, relevant sections in part 3 of KCSIE. In response to coronavirus, the Disclosure and Barring Service (DBS) has made changes to its guidance on standard and enhanced DBS ID checking to minimise the need for face-to-face contact. The Home Office and Immigration Enforcement have also temporarily adjusted the right to work checks due to the coronavirus outbreak.

If Prince's Mead School utilises volunteers, we will continue to follow the checking and risk assessment process as set out in KCSIE September 2023. Under no circumstances should a volunteer who has not been checked be left unsupervised or allowed to work in regulated activity.

Regarding members of Prince's Mead school's workforce already engaging in regulated activity and who already have the appropriate DBS check, there is no expectation that a new DBS check should be obtained where that member of the workforce temporarily moves to another school or college. The type of setting on the DBS check, for example a specific category of school, is not a barrier. The same principle applies if childcare workers move to work temporarily in a school setting. The receiving institution should risk assess as they would for a volunteer (see above). Whilst the onus remains on schools and colleges to satisfy themselves that someone in their setting has had the required checks, including as required those set out in part 3 of KCSIE, in the above scenario this can be achieved, if the receiving institution chooses to, via seeking assurance from the current employer rather than requiring new checks.

There is no requirement to obtain a new DBS check for returning staff who have continued to be employed but have not been working in regulated activity during partial school closures. If for any reason the school or college have concerns about the individual, they may obtain a new check in the usual way.

Schools and colleges must continue to follow their legal duty to refer to the DBS anyone who has harmed or poses a risk of harm to a child or vulnerable adult. Full details can be found in KCSIE September 2023.

Schools and colleges should continue to consider and make referrals to the Teaching Regulation Agency (TRA) as per KCSIE September 2023 and the TRA's advice for making a referral. . Where referrals on serious safeguarding matters are received and it is deemed that there is a public interest in doing so consideration will be given as to whether an interim prohibition order (IPO) should be put in place. The TRA will continue to progress all cases but will not schedule any hearings at the current time.

Whilst acknowledging the challenge of the current environment, it is essential from a safeguarding perspective that Prince's Mead is aware, on any given day, which staff/volunteers will be in the school, and that appropriate checks have been carried out, especially for anyone engaging in regulated activity. This will be more important than ever as more children and staff return. As such, Prince's Mead must continue to keep the single central record (SCR) up to date as outlined in KCSIE September 2023. The SCR can, if Prince's Mead chooses, provide the means to log everyone that will be working or volunteering in a school or college on any given day, including any staff who may be on loan from other institutions. The SCR can also, if Prince's Mead chooses, be used to log details of any risk assessments carried out on volunteers and staff on loan from elsewhere.

All offers of appointment should be conditional until satisfactory completion of the mandatory pre-employment checks. As a condition of employment we verify a candidate's identity, it is important to be sure that the person is who they claim to be, this includes being aware of the potential for individuals changing their name. Best practice is checking the name on their birth certificate, where this is available. Further identification checking guidelines can be found on the GOV.UK website.

The School and will only accept copies of a curriculum vitae alongside an application form. A curriculum vitae on its own will not provide adequate information.

In addition, as part of the shortlisting process the school should will carrying out an online search as part of their due diligence on the shortlisted candidates. This may help identify any incidents or issues that have happened, and are publicly available online, which the school might want to explore with the applicant at interview.

When asked to provide references the school will ensure that the information confirms whether they are satisfied with the applicant's suitability to work with children, and provide the facts (not opinions) of any substantiated safeguarding concerns/allegations that meet the harm threshold. They should not include information about concerns/allegations which are unsubstantiated, unfounded, false, or malicious.

The School has different types of visitors, those with a professional role i.e. educational psychologists, social workers etc. those connected with the building, grounds maintenance, children's relatives or other visitors attending an activity in school such as a sports day. The does not request DBS checks or barred list checks, or ask to see existing DBS certificates, for visitors such as children's relatives or other visitors attending a sports day. The Head uses their professional judgement about the need to escort or supervise such visitors. For visitors who are there in a professional capacity the school will check ID and be assured that the visitor has had the appropriate DBS check (or the visitor's employers have confirmed that their staff have appropriate checks. The school should not ask to see the certificate in these circumstances). Supervision of volunteers

It is for schools to determine whether a volunteer is considered to be supervised. Where an individual is supervised, to help determine the appropriate level of supervision, the school will have regard to the statutory guidance issued by the Secretary of State (replicated at KCSiE September 2023, Annex E). For a person to be considered supervised, the supervision must be:

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

Separate barred list checks must only be carried out in the following circumstances:

- for newly appointed staff who are engaging in regulated activity, pending the receipt of an Enhanced Certificate with Barred List information from the Disclosure and Barring Service (DBS) (and where all other relevant checks have been carried out); or,
- where an individual has worked in a post in a school or college that brought them into regular contact with children or young persons which ended not more than three months prior to that person's appointment to the organisation (and where all other relevant checks have been carried out).

Secretary of state section under 128 directions

1. The school clearly follows the directive of section 128 direction which prohibits or restricts an unsuitable individual from participating in the management of an independent school, including academies and free schools. An individual who is subject to a section 128 direction is unable to:
  - take up a management position in an independent school, academy, or in a free school as an employee;

- be a trustee of an academy or free school trust; a governor or member of a proprietor body of an independent school; or
  - be a governor on any governing body in an independent school, academy or free school that retains or has been delegated any management responsibilities.
2. The school can check TRA, Teachers Employer Access device for prohibitions, direction, sanctions and restrictions. The service is free to use and is available via the TRA's web page. Users will require a DfE Sign-in account to log onto the service.
  3. Individuals who have lived or worked outside the UK must undergo the same checks as all other staff in schools or colleges. This includes obtaining (via the applicant) an enhanced DBS certificate (including barred list information, for those who will be engaging in regulated activity) even if the individual has never been to the UK. In addition, the school will make any further checks they think appropriate so that any relevant events that occurred outside the UK can be considered. Following the UK's exit from the EU, the school will apply the same approach for any individuals who have lived or worked outside the UK regardless of whether or not it was in an EEA country or the rest of the world. These checks could include, where available: criminal records checks for overseas applicants - Home Office guidance can be found on GOV.UK; and for teaching positions obtaining a letter (via the applicant) from the professional regulating authority in the country (or countries) in which the applicant has worked confirming that they have not imposed any sanctions or restrictions, and or that they are aware of any reason why they may be un-suitable to teach. Applicants can find contact details of regulatory bodies in the EU/EEA and Switzerland on the Regulated Professions database. Applicants can also contact the UK Centre for Professional Qualifications who will signpost them to the appropriate EEA regulatory body.

## **ANNEX 14 - USE OF SCHOOL OR COLLEGE PREMISES FOR NON-SCHOOL ACTIVITIES**

1. When the school rents out its facilities/premises to organisations or individuals (for example to community groups, sports associations, and service providers to run community or extra-curricular activities) we always ensure that appropriate arrangements are in place to keep children safe. Specifically, all the arrangements for child protection, will apply. The Safeguarding policy for each third-party organisation will be also be sought.
2. The Bursar also ensures safeguarding requirements are included in any transfer of control agreement (i.e. lease or hire agreement), as a condition of use and occupation of the premises; and that failure to comply with this would lead to termination of the agreement.
3. When services or activities are provided by the governing body, under the direct supervision or management of their school staff, their arrangements for child protection will apply. However, where services or activities are provided separately by another body this is not necessarily the case. The governing body will therefore seek assurance that the body concerned has appropriate safeguarding and child protection policies and procedures in place (including inspecting these as needed); and ensure that there are arrangements in place 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 governing body will also ensure safeguarding requirements are included in any transfer of control agreement (i.e. lease or hire agreement), as a condition of use and occupation of the premises; and that failure to comply with this would lead to termination of the agreement.

The guidance on Keeping children safe in out-of-school settings details the safeguarding arrangements that schools and colleges should expect these providers to have in place. The updated guidance in KCSiE 2023 includes information on responding to allegations relating to incidents occurring when an individual or organisation uses a school's premises. As with all safeguarding allegations, schools should follow their safeguarding policies and procedures, including informing the LADO.



## **ANNEX 15- UPDATED OBLIGATIONS**

### **HUMAN RIGHTS ACT**

The Human Rights Act 1998 (HRA) sets out the fundamental rights and freedoms that everyone in the UK is entitled to and contains the Articles and protocols of the European Convention on Human Rights (ECHR) (the Convention) that are deemed to apply in the UK. It compels public organisations to respect and protect an individual's human rights when they make individual decisions about them. Under the HRA, it is unlawful for schools and colleges to act in a way that is incompatible with the Convention. The specific Convention rights applying to schools and colleges are: Article 3: the right to freedom from inhuman and degrading treatment (an absolute right) • Article 8: the right to respect for private and family life (a qualified right) includes a duty to protect individuals' physical and psychological integrity • Article 14: requires that all of the rights and freedoms set out in the Act must be protected and applied without discrimination,<sup>25</sup> and • Protocol 1, Article 2: protects the right to education. Being subjected to harassment, violence and or abuse, including that of a sexual nature, may breach any or all of these rights, depending on the nature of the conduct and the circumstances.

### **Equality Act 2010**

Schools and colleges have obligations under the Equality Act 2010 (the Equality Act). According to the Equality Act, schools and colleges must not unlawfully discriminate against pupils because of their sex, race, disability, religion or belief, gender reassignment, pregnancy and maternity, or sexual orientation (protected characteristics). Whilst all of the above protections are important in the context of safeguarding, this guidance and the legal duties placed on schools and colleges, in relation to safeguarding and promoting the welfare of children, governing bodies and proprietors should carefully consider how they are supporting their pupils and students with regard to particular protected characteristics - including disability, sex, sexual orientation, gender reassignment and race. Provisions within the Equality Act allow schools and colleges to take positive action, where it can be shown that it is proportionate, to deal with particular disadvantages affecting pupils or students with a particular protected characteristic in order to meet their specific need. This includes a duty to make reasonable adjustments for disabled children and young people, including those with long term conditions. A school or college, could, for example, consider taking positive action to support girls if there was evidence they were being disproportionately subjected to sexual violence or sexual harassment.

### **Public Sector Equality Duty**

The Public Sector Equality Duty (PSED) is found in the Equality Act. Compliance with the PSED is a legal requirement for state-funded schools and colleges. The PSED places a general duty on schools and colleges to have, in the exercise of their functions, due regard to the need to eliminate unlawful discrimination, harassment and victimisation (and any other conduct prohibited under the Equality Act), to advance equality of opportunity and foster good relations between those who share a relevant protected characteristic and those who do not. The duty applies to all protected characteristics and means that whenever significant decisions are being <sup>26</sup> made or policies developed, specific consideration must be given to the equality implications of these such as, for example, the need to eliminate unlawful behaviours that relate to them, such as sexual violence and sexual harassment, misogyny/misandry and racism. This is one reason why good record-keeping and monitoring of all forms of abuse and harassment is essential. The PSED helps schools and colleges (which are subject to it) to focus on key issues of concern and how to improve pupil and student outcomes. Some pupils or students may be more at risk of harm from specific issues such as sexual violence, homophobic, biphobic or transphobic bullying or racial discrimination. Such concerns will differ between education settings, but it is important schools and colleges are conscious of disproportionate vulnerabilities and integrate this into their safeguarding policies and procedures.

## Annex 16 - RACI Matrix for Safeguarding, Child Protection and Safer Recruitment

Key KCSIE and Related Regulations	Activity	Governing Body	Safeguarding Governor	Head	DSL / Deputy Head	Deputy DSLs	Bursar	SLT	Digital / IT Lead	Matron	Staff
<b>Policies</b>	Safeguarding, Child Protection and Online Safety Policy	A			R	C	I	I	I	C	I
	Behaviour Policy			A	R	C	C	C	I		I
	Staff Code of Conduct			A	R	I	C	I	I		I
	Adoption of policies			A	R	R	R	R	R	R	R
<b>Board Reporting and Oversight</b>	Termly Report to Board				R						
	Annual Report to Board		R								
	Ongoing monitoring of effectiveness of processes, and culture	R									
<b>Part One: Safeguarding information for staff</b>	Procedures, Training and Implementation			A	R	C		C		C	I
	Monitoring: Compliance and Effectiveness			A	R	R				C	
<b>Part Two: Management of Safeguarding</b>	Procedures, Training and Implementation			A	R	C		C		C	I
	Monitoring: Compliance and Effectiveness			A	R	R				C	
	Management of Online Safety			A	R	R			C		
<b>Part Three: Safer Recruitment</b>	Management of SCR			A			R				
	Procedures, Training and Implementation			A	C		R				I
	Monitoring: Compliance and Effectiveness	R	R	A	R	R	R	R			
<b>Part Four: Allegations and Concerns relating to teachers and staff</b>	Procedures, Training and Implementation			A	R						I
	Monitoring: Compliance and Effectiveness			A	R						
<b>Part Five: Child on Child Sexual Violence and Harassment</b>	Procedures, Training and Implementation			A	R					C	I
	Monitoring: Compliance and Effectiveness			A	R	R					

**Statutory Background:** ISSRs Part 8 - Quality of leadership in and management of schools

34.—(1): The standard about the quality of leadership and management is met if the proprietor ensures that persons with leadership and management responsibilities at the school

- (a) demonstrate good skills and knowledge appropriate to their role so that the independent school standards are met consistently;
- (b) fulfil their responsibilities effectively so that the independent school standards are met consistently; and
- (c) actively promote the well-being of pupils. (2) For the purposes of paragraph (1)(c) “well-being” means well-being within the meaning of section 10(2) of the Children Act 2004(1).

**Supporting Notes:**

**RACI Definitions:**

- Responsible:** The person or team who actually carries out the process or task assignment. Responsible for getting the job done
- Accountable:** The person or team ultimately accountable for the process or task being completed satisfactorily. Responsible ‘person’ is accountable to this ‘person’. Where ‘the buck stops’
- Consulted:** People who are not directly involved with carrying out the task but who are consulted. May be a stakeholder or subject matter expert
- Informed:** Those who receive output from the process or task, or who have a need to stay informed

**Matrix**

- Persons appear in only one column per row – one RACI assignment per person
- Policy / strategic - Implementation / management

**Annual Safeguarding Policy Update Process:**

- 1) Prompt
  - a) Information/Draft KCSiE updates published in May/June
  - b) Advice and guidance rapidly produced by ISBA, NSPCC and others
- 2) Policy Update
  - a) DSL draft a school policy update through Summer
  - b) Interim policy approved by NSG/CGC/Chair, on recommendation of DSL, by end August
- 3) Review (email)
  - a) NSG recommends updated policy to Board
  - b) All governors review updated policy with feedback to NSG and CGC
- 4) Implementation
  - a) Updated policy posted on web site and Intranet before term starts
  - b) Training for staff at Inset. c. Other changes made in parallel.
- 5) Ratification
  - a) Governance Committee recommendations for any further changes (based on 3b above)
  - b) Ratification by Board at Autumn meeting with DSL/Head update on implementation