

C5. CHILD PROTECTION AND SAFEGUARDING POLICY 2024

*Our mission is to develop happy, confident and successful children
who are well prepared for their future.*

ISSR no.	7
Policy Owner	Designated Safeguarding Lead (DSL)
Reviewed by DSL	19.09.24
Reviewed by Headteacher	23.09.24
Reviewed by Governing Body (FGB)	27.11.24
Renewal date (by)	30.09.25



KEY EXTERNAL CONTACT DETAILS

Team Manager Lado and CPSLO	Kassianne Papageorgiou kassianne.papageorgiou@hertfordshire.gov.uk lado.referral@hertfordshire.gov.uk
Dacorum Child Protection School Liaison Officer CPSLO Additional support for all SEND educational settings in Hertfordshire	Josh Pollard josh.pollard@hertfordshire.gov.uk 01992 531954
The Consultation Hub: CPSLO's Social Workers Families First Co-ordinators	CPSLOadmin@hertfordshire.gov.uk https://www.hertfordshire.gov.uk/microsites/families-first/families-first.aspx 01438 737575 (Families First)
The Hertfordshire Safeguarding Children Partnership (HSCP)	0300 123 4043 https://www.hertfordshire.gov.uk/services/Childrens-social-care/Child-protection/Hertfordshire-Safe-guarding-Children-Partnership/hscp.aspx
Multi-Agency Safeguarding Hub (MASH)	To make a child protection referral call 0300 123 4043
Support and Advice about Extremism	Hertfordshire Constabulary: Anti-Terrorist Hotline: 0800 789 321 EMERGENCY: 999 NON EMERGENCY NUMBER: 101 https://www.herts.police.uk/advice/advice-and-information/t/prevent/prevent/ Hertfordshire Grid for Learning: http://www.thegrid.org.uk/leadership/safeguarding/anti-radicalisation.shtml Department for Education NON EMERGENCY NUMBER: 020 7340 7264 Report-extremism@education.gov.uk counter.extremism@education.gov.uk
NSPCC Whistleblowing Advice Line	ADDRESS: Weston House 42 Curtain Road London EC2A 3NH



	<p>TEL: 0800 028 0285 help@nspcc.org.uk</p>
NSPCC Report Abuse in Education	<p>TEL: 0800 136 663 help@nspcc.org.uk</p>
Disclosure and Barring Service	<p>ADDRESS: DBS customer services PO Box 3961 Royal Wootton Bassett SN4 4HF</p> <p>03000 200 190 customerservices@dbb.gov.uk</p>
Teaching Regulation Agency	<p>ADDRESS: Teacher Misconduct Ground Floor South Cheylesmore House 5 Quinton Road Coventry CV1 2WT</p> <p>0207 593 5393 misconduct.teacher@education.gov.uk</p>
OFSTED Safeguarding Children	<p>0300 123 4666 (Monday to Friday from 8am to 5pm) CIE@ofsted.gov.uk</p>
Independent Schools Inspectorate	<p>0207 6000 100 concerns@isi.net</p>

KEY SCHOOL CONTACT DETAILS

Governors	<p>Chair of Governors Diana Robinson diana_robinson@westbrookhay.co.uk</p> <p>Nominated Safeguarding Governor Christopher Best Chris_Best@westbrookhay.co.uk</p>
Designated Safeguarding Lead ("DSL") and Deputy Designated Safeguarding Lead ("DDSL")	<p>The Safeguarding Team (ST) available on 01442 256143</p> <p>Main DSL for the School Samantha Taylor, ELSA/PIP/Member of Executive Group 07807 756328 samantha_taylor@westbrookhay.co.uk</p> <p>Deputy DSL Dickon Baird, Senior Deputy Head (Member of Executive Group) dickon_baird@westbrookhay.co.uk</p>



	<p>Emilie Loveless, Deputy Head Pastoral (Member of Executive Group) Emilie_Loveless@westbrookhay.co.uk</p> <p>Andy Lloyd, Head of Prep (Member of Executive Group) Andy_Lloyd@westbrook.co.uk</p> <p>Hannah Lewington, Head of Music Hannah_Lewington@westbrookhay.co.uk</p> <p>EYFS DSL Deputy DSL Patrick Ross, Pre-Prep Pastoral Lead and After School Manager patrick_ross@westbrookhay.co.uk</p>
Designated Teacher for Looked After Children	<p>Dickon Baird dickon_baird@westbrookhay.co.uk</p>
Head Teacher	<p>Mark Brain mark_brain@westbrookhay.co.uk</p>



POLICY STATEMENT

This policy applies to Westbrook Hay School ("the School") which includes the EYFS setting. This policy is reviewed and updated annually (as a minimum). This policy, and all policies referred to in this document are available on the School website, in the Staff Handbook or a hard copy can be requested from the School Office.

This policy has regard to the following guidance and advice:

Keeping Children Safe in Education (September 2024) ("KCSIE")

- KCSIE incorporates the additional statutory guidance Disqualification under the Childcare Act 2006 (September 2018). KCSIE also provides links to various toolkits and additional advice and support

Working Together to Safeguard Children (December 2023) ("WT")

WT refers to the non-statutory advice: Information sharing (May 2024)

What to do if you're worried a child is being abused (March 2015)

Prevent duty guidance: Guidance for specified authorities in England and Wales (December 2023). Prevent Duty is supplemented by non-statutory advice and a briefing note:

The use of social media for on-line radicalisation (July 2015)

Relationships education, relationships, and sex education (RSE) and health education (September 2021)

- Behaviour in Schools (February 2024)
- Working together to improve school attendance: statutory guidance for maintained schools, academies, independent schools and local authorities (August 2024)
- Multi Agency Guidance on FGM (July 2020)
- Children Missing in Education (August 2024)
- Working together to improve school attendance: Statutory Guidance for maintained schools, academies, independent schools and local authorities (August 2024)
- Using after-school clubs, community activities and tuition: safeguarding guidance for providers (September 2023)
- Digital and technology standards in schools and colleges (May 2024)
- After-school clubs, community activities and tuition: safeguarding guidance for providers (September 2023)
- The Charity Commission guidance Safeguarding and protecting people for charities and trustees (June 2022)

This policy also takes into account the procedures and practice of Hertfordshire Safeguarding Children' Partnership (HSCP) as part of the multi-agency safeguarding arrangements set up by Hertfordshire County Council, Hertfordshire Constabulary and The Two Local Clinical Commissioning Groups.

References to "**Staff**" throughout this policy relate to all members of employed staff, including teaching and support; governors; volunteers; peripatetic and contract; temporary; supply and agency; student placement, including those undertaking initial teacher training and apprentices.

EQUALITY ACT 2010

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

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

CONCERNS ABOUT A CHILD

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

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

The School has arrangements for listening to children and providing early help. Details of these arrangements can be found in HSCP.

DEFINITIONS OF SAFEGUARDING AND TYPES AND SIGNS OF ABUSE

Safeguarding and promoting the welfare of children is defined as providing help and support to meet the needs of children as soon as problems emerge; protecting children from maltreatment whether that is in or outside the home including online; preventing impairment of children's mental and physical health or development; ensuring that children grow up in circumstances consistent with the provision of safe and effective care; and taking action to enable all children to have the best outcomes. neglect

Child Protection is part of safeguarding and promoting the welfare of children is defined as activity that is undertaken to protect children who are suspected to be suffering, or likely to suffer, significant harm. This includes harms that occur inside or outside the home including online.

Abuse is a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Harm can include ill treatment that is not physical as well as the impact of witnessing ill treatment of others. This can be particularly relevant, for example, in relation to the impact on children of all forms of domestic abuse, including where they see, hear or experience its effects. Children may be abused in a family or in an institutional or

community setting by those known to them or, more rarely, by others (e.g. via the internet). Abuse can take place wholly online, or technology may be used to facilitate offline abuse. They may be abused by an adult or adults or by another child or children.

Abuse can be:

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

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

PROCEDURES FOR DEALING WITH CONCERNS ABOUT A CHILD

If staff suspect or hear an allegation or complaint of abuse, exploitation or neglect from a child or any third party, they must act immediately and follow the relevant procedure below. Staff should not assume that somebody else will take action and share information that might be critical in keeping children safe.

The guidance; Information Sharing: advice for practitioners providing safeguarding services to children, young people, parents and carers supports staff who have to make decisions about sharing information.

The governing body recognises the importance of information sharing between practitioners and local agencies, including ensuring arrangements for sharing information within the School and with local authority children's social care, the safeguarding partners and other organisations, agencies, and practitioners as required. Fears regarding sharing information under the Data Protection Act 2018 and the UK General Data Protection Regulation ("UK GDPR") must not be allowed to stand in the way of safeguarding and promoting the welfare and protect the safety of children, and neither the DPA 2018 or the UK GDPR prevent the sharing of information for the purposes of keeping children safe. If in doubt about what information can and should be shared, staff should speak to the Designated Safeguarding Lead ("DSL").

The governing body will ensure that staff understand the relevant data protection principles which allow them to share (and withhold) personal information, including:

- being confident of the processing conditions which allow them to store and share information for safeguarding purposes, including information, which is sensitive and personal and should be treated as 'special category personal data';
- understanding that 'safeguarding of children and individuals at risk' is a processing condition that allows the sharing of special category personal data, including without consent where there is good reason to do so. For example, information may be shared without consent where: it is not possible to gain consent; it cannot be reasonably expected to gain consent; and, gaining consent would place a child at risk;
- not providing pupils' personal data where the serious harm test is met.

All staff should:

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

All concerns, discussions, and decisions including the rationale for those decisions made under these procedures should be recorded in writing. This includes instances where referrals were or were not made to another agency, such as children's social care or the Prevent programme. This will help if/when responding to any complaint about the way a case has been handled. The record should include a clear and comprehensive summary of the concern, details of how the concern was followed up and resolved and a note of any action taken, the decision reached and the outcome. As soon as possible after the conversation using the school's online child protection recording system: RecordMy. An icon shortcut is on every desktop. A paper version of the record of concern sheet is available for staff members who do not have access to a computer or the internet, from the School Office. This will help if/when responding to any complaint about the way a case has been handled. The record should include a clear and comprehensive summary of the concern, details of how the concern was followed up and resolved and a note of any action taken, the decision reached and the outcome.

Staff must:

- ensure the date, time, place of the conversation, any noticeable non-verbal behaviour, the words used by the child and detail of what was said and done by whom and in whose presence;
- use the body map to indicate the position of any injuries and a clear description of the injury; record statements and observations rather than interpretations or assumptions;
- do not destroy the original records in case they are needed by a court.
- The information is kept confidential and stored securely ensuring that the file is only accessible to those who need to see it, and is shared in accordance with the guidance set out in Parts 1 and 2 of KCSIE.

All records must be given to the DSL promptly. No copies should be retained by the member of staff. Paper records of concern must be signed by the person recording the concern.

The DSL will ensure that all safeguarding records are managed in accordance with the Education (Pupil Information) (England) Regulations 2005.

Where the allegation relates to harmful sexual behaviours, if possible the disclosure should be managed with two members of staff present (preferably one of them being the DSL or a member of the Designated Safeguarding Team (DST).

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

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

Contextual safeguarding

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

Early help

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

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

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

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

In the first instance, staff identify a pupil who may benefit from early help should discuss this with the School's DSL. If appropriate the DSL will work with the HSCP to undertake an assessment of the need for early help. The DSL will support staff in liaising with external agencies and professionals in an inter-agency assessment, as appropriate. Further guidance on effective assessment of the need for early help can be found in Working Together to Safeguard Children December 2023.

If early help is appropriate, the matter will be kept under review and consideration given to a referral to children's social care if the pupil's situation does not appear to be improving.

Children who may require early help

Families First is Hertfordshire's strategy for early help for families. All staff should be aware of the early help process, and understand their role in identifying emerging problems, sharing information with other professionals to support early identification and assessment of a child's needs. It is important for children to receive the right help at the right time to address risks and prevent issues escalating. This also includes staff monitoring the situation and feeding back to the DSL any ongoing/escalation of concerns so that consideration can be given to a Child Protection Contact Referral to Children's Services if the child's situation does not appear to be improving.

If early help is appropriate, the DSL or a member of the DST will generally lead on liaising with other agencies and setting up a Families First Assessment as appropriate, or liaising out of county with Bedfordshire: Early Help for Families or Buckinghamshire: Early Help for Families.

What staff should do if they have concerns about a child

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

As set out above, staff should not assume that somebody else will take action and share information that might be critical to keep a child safe; they should maintain an attitude of "it could happen here". If anyone other than the DSL makes a referral, they should inform the DSL as soon as possible that a referral has been made. If a child's situation does not appear to be improving, the DSL should press children's social care for reconsideration. Staff should challenge any inaction and follow this up with the DSL and children's social care as appropriate. All concerns, discussions and decisions made and the reasons for those decisions should be recorded in writing.

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

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

School's safeguarding partners are HSCP. A full copy of their local procedures can be found at HSCP.

Specific arrangements for 1-1 teaching

Where 1-1 teaching may take place, for example peripatetic instrumental/singing lessons, SEN/ additional support teaching, counselling, PIP (Pastoral Intervention Practitioner) and ELSA (Emotional Literacy Support Assistant) the following arrangements are in place:

- Class/practice room doors have windows;
- Where doors do not have glass insert they are left open;
- Staff are regularly reminded through training and inset of the importance in ensuring the safety of both themselves and the children in their care.

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

Staff should follow the School's normal referral processes when there are concerns about children who may be susceptible to radicalisation in to terrorism.. This may include a Prevent referral or referral to children's social care depending on the level of risk. However, if staff have concerns that there is an immediate/significant risk of a child being drawn into terrorism they must either call 101 and ask for the PREVENT Team or in an emergency dial 999. Advice and support can also be sought from children's social care.

HSCP guidance on Prevent outlines the specific duties in Hertfordshire. This guidance also features advice on making a Prevent referral.

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

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

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

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

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

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

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

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

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

The term 'nudes' is most commonly recognised by young people and more appropriately covers all types of image sharing incidents. Alternative terms shared by children and young people may include "dick pics" or "pics".

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

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

Terms such as 'revenge porn' and 'upskirting' are also used to refer to specific incidents of nudes and semi-nudes being shared. However, these terms are more often used in the context of adult-to-adult non-consensual image sharing offences

outlined in s.33–35 of the Criminal Justice and Courts Act 2015, Voyeurism (Offences) Act 2019 and 67A of the Sexual Offences Act 2003.

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

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

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

This will include:

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

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

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

If none of the above apply, the School may decide to respond to the incident without involving the police or children's social care. All incidents relating to nudes and semi-nudes being shared need to be recorded, whether they have been referred externally or not. The decision to respond to an incident without involving the police or children's social care will only be made in cases where the DSL (or equivalent) is confident that they have enough information to assess the risks to

any child or young person involved and the risks can be managed within the School's pastoral support and disciplinary framework.

Any decision in this regard will be made by the DSL (or equivalent) with input from the Head. The decision will be made and recorded in line with this Policy and will be based on consideration of the best interests of any child or young person involved. Any decision will take into account proportionality as well as the welfare and protection of any child or young person. The decision will be reviewed throughout the process of responding to the incident. If doubts remain local safeguarding arrangements will be followed.

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

What staff should do if a child is absent from education

Children who are absent from education particularly on repeat occasions and/or for prolonged periods and children missing education can act as a vital warning sign to a range of safeguarding issues, including neglect and child sexual and/or criminal exploitation, particularly county lines. It is important that the School's response to persistently absent pupils and children missing education supports identifying such abuse, and in the case of absent pupils, helps prevent the risk of them becoming a child missing education in the future.

The School's procedures for unauthorised absence and for dealing with children who are absent repeatedly and/or for prolonged periods and children missing from education are detailed in our Attendance Policy. Further detail can also be found in Appendix 1 of this policy.

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

This will assist the local authority to:

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

Where reasonably possible, the School will hold more than one emergency contact number for each pupil to provide the School with additional options to make contact with a responsible adult particularly when a child who is repeatedly absent and/or absent for prolonged periods is also identified as a welfare and/or safeguarding concern. School attendance registers are carefully monitored to identify any trends.

The School will report to Hertfordshire Local Authority via the Absence Reporting Form found at <https://thegrid.org.uk> a pupil who fails to attend school regularly or who has been absent from School without the School's permission for a continuous

period of 10 school days or more. The Absence Reporting Form will be submitted to Hertfordshire Local Authority no less than once per calendar month.

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

The School's Missing Pupil Policy and Procedure is to be used for searching for, and if necessary reporting, any pupil missing from school (once registered as attending), or when a child has not been collected from School on time.

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

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

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

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

What staff should do if a child requires mental health support

The School has an important role to play in supporting the mental health and wellbeing of its pupils. Mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation. The School aims to prevent health problems by promoting resilience as part of a whole School approach to the social and emotional wellbeing of our pupils.

The School has systems and processes in place for identifying possible mental health problems, including routes to escalate and clear referral pathways to seek professional support.

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

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

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

We have five members of staff who are trained Mental Health First Aiders. This includes two to support adults and three to support children. The School's Senior Mental Health Lead is the DSL, Samantha Taylor.

We have a qualified Emotional Literacy Support Assistant (ELSA) to whom children can be referred, if it is felt a further intervention is needed for more than a one-off situation.

The school also has links to a NLP Practitioner specialising in therapy for children, who can work with pupils during the school day. The parents work with the therapist (covering the additional cost) and also work closely with the DSL/Pastoral Team to ensure the best support is given to the child.

If staff have a mental health concern about a child that is also a safeguarding concern, immediate action should be taken by following the procedures in this policy and speaking to the School's DSL/Pastoral Leadership Team.

What staff should do if they have a safeguarding concern or an allegation about another staff member

If staff have safeguarding concerns about another member of staff (including DSL, supply staff, agency staff, volunteers and contractors) this should be referred to the Headteacher or in his absence the Chair of Governors. Where there are concerns about the Headteacher, this should be referred to the Chair of Governors, without informing the Headteacher. In case of serious harm, the police should be informed from the outset; for supply staff, agency and contractors, the agency/employment business must be kept fully informed and involved. In the event of an allegation or suspicion of abuse being made, it will be reported within 24 hours to the LADO by either the Headteacher or the Chair of Governors. The School will not investigate before the referral to the LADO.

If the School dispenses with a person's services because of unsuitability to work with children, or would have done so had the person not resigned, a referral will be sent, promptly, to the Disclosure and Barring Service. A referral will also be made to the Disclosure and Barring Service if a member of staff is suspended or redeployed because of concerns that they pose a risk of harm.

Consideration is given to making a referral to the TRA (Teaching Regulation Agency) where a teacher has been dismissed, or would have been dismissed if they had not resigned, and a prohibition order may be appropriate, because of 'unacceptable professional conduct', 'conduct that may bring the profession into disrepute', or a 'conviction at any time for a relevant offence'.

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

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

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

ARRANGEMENTS FOR DEALING WITH CHILD ON CHILD ALLEGATIONS (INCLUDING CHILD ON CHILD SEXUAL VIOLENCE AND HARASSMENT)

Child on child abuse is abuse by one or more children against another child. It can be standalone or as part of wider abuse and can happen both inside and outside of school, and online. It can manifest itself in many ways and can include abuse within intimate partner relationships, bullying (including cyber bullying, prejudice-based and discriminatory bullying), abuse within intimate partner relationships between peers, physical abuse (such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm), initiation/hazing type violence and rituals, upskirting, sexting, consensual and non-consensual sharing of nudes and/or semi-nudes, sexual assault, gender-based issues, sexual behaviours including child on child sexual violence and sexual harassment, causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party. It can also occur through a group of children sexually assaulting or sexually harassing a single child or group of children.

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

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

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

The School recognises that a child is likely to disclose an allegation to someone they trust: this could be any member of staff. By making such a disclosure the pupil is likely to feel that the member of staff is in a position of trust. The School also recognises that children may not find it easy to tell staff about their abuse verbally and that instead they may show signs or act in ways they hope adults will notice and react to. It is also recognised that an incident may come to a member of staff's attention through a report of a friend, or by overhearing conversations. It is therefore important that all staff are clear on the School's policy and procedures

with regards to child on child abuse, and can recognise the indicators and signs of child on child abuse and know how to identify them and how to respond to reports.

The School recognises that a first disclosure to a trusted adult may only be the first incident reported. It is not necessarily representative of a singular incident. Staff will take all reports of abuse seriously regardless of how long it has taken for the child to come forward. Staff will act immediately and will support the victim when they raise a concern.

The School recognises that children with special educational needs and disabilities (SEND) or certain health conditions are three times more likely to be abused by their peers, can face additional safeguarding challenges and may be more prone to child on child group isolation or bullying (including prejudice-based bullying) than other children.

The School will consider extra pastoral support for those children:

- Form Teacher.
- Pastoral Leadership Team;
- SENCO;
- Pastoral Intervention Practitioner (PIP) / ELSA.

The School also recognises that certain children may face additional barriers to reporting an incident of abuse because of their vulnerability, disability, sex, ethnicity and/or sexual orientation.

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

Staff receive training through:

- inset and Safeguarding refresher training;
- annual online Child Protection training provided by Educare;
- weekly Pastoral Leadership Team and general Staff Meetings;
- child on child posters are displayed around the school as a visual prompt;
- specialist visiting speakers.

Pupil awareness is raised through:

- School Values:
Courage, Integrity, Independence, Togetherness, Responsibility, Reflective Learner
- PSHE lessons;
- RSE curriculum teaching;
- Focus weeks (e.g. Anti-Bullying week);
- Whole School assemblies;
- Specialist visiting speakers.

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

A pupil against whom an allegation of abuse has been made may be suspended from the School during the investigation. The School will take advice from the HSCP on the investigation of such allegations and will take all appropriate action to



ensure the safety and welfare of all pupils involved including the alleged victim and perpetrator. If it is necessary for a pupil to be interviewed by the Police in relation to allegations of abuse, the School will ensure that, subject to the advice of the HSCP, parents are informed as soon as possible and that the pupils involved are supported during the interview by an appropriate adult and until the investigation is completed. Confidentiality will be an important consideration for the School and advice will be sought as necessary from the HSCP and/or the Police as appropriate. The School will have regard to the procedures set out in KCSIE at all times.

The victim may ask the School not to tell anyone about the sexual violence or sexual harassment. Advice should be sought from the DSL who should consider:

- parents or carers should normally be informed unless doing so would put the victim at greater risk;
- the basic safeguarding principle that if a child is at risk of harm, is in immediate danger, or has been harmed, a referral should be made to local authority children's social care; and
- whether a crime has been committed.

Ultimately, the DSL will balance the victim's wishes against their duty to protect the victim and other children.

Police may be informed of any harmful sexual behaviours which are potentially criminal in nature, such as grabbing bottoms, breasts and genitalia. Rape, assault by penetration and sexual assaults will be passed to the Police. When a report has been made to the police, the School will consult the police and agree what information can be disclosed to staff and others, in particular, the alleged perpetrator(s) and their parents or carers. If the DSL decides to make a referral to children's social care and/or a report to the Police against a victim's wishes, the reasons should be explained to the pupil and appropriate specialist support offered. The DSL may also decide that the children involved may benefit from early help, and may make the necessary referral in accordance with the HSCP referral process.

The School's approach to sexting is:

- Report it to your 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 shown 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.

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

In the event of disclosures about child on child abuse, all children involved (both victim and perpetrator) will be treated as being at risk, and safeguarding

procedures in accordance with this policy will be followed. Victims will be supported by the DSL and support from external agencies will be sought, as appropriate.

When there has been a report of sexual violence, the DSL will make an immediate risk and needs assessment. Where there has been a report of sexual harassment, the need for a risk assessment should be considered on a case-by-case basis.

The risk and needs assessment should consider:

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

Risk assessments will be recorded (written or electronic) and kept under review. In relation to a report of sexual violence or sexual harassment, the DSL (and indeed all staff) will reassure any victim that they are being taken seriously and that they will be supported and kept safe. The victim will never be made to feel ashamed for making a report nor will they be given the impression that they are creating a problem by reporting sexual violence or sexual harassment; nor would a victim ever be made to feel ashamed for making a report or have their experience minimised.

The School will explain to the child in a way that avoids alarming or distressing them that the law is in place to protect children rather than to criminalise them. The School will consider the age and the developmental stage of the victim, the nature of the allegations and the potential risk of further abuse. The School acknowledges that, by the very nature of sexual violence and sexual harassment, a power imbalance is likely to have been created between the victim and alleged perpetrator(s).

The DSL will consider the risks posed to pupils and put adequate measures in place to protect them and keep them safe and to ensure their educational attainment is not adversely affected as far as possible. This may include careful consideration of the proximity of the victim and alleged perpetrator and considerations regarding shared classes, sharing School premises (including during any before or after school-based activities), and School transport. The School will also consider the risks posed to the victim from other health needs, including physical, mental and sexual health problems, as well as unwanted pregnancy which may arise as a result of the incident, and will consider recommending additional support.

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

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

The School will reflect on reported concerns, including the decisions made and actions taken, in order to identify any patterns of concerning, problematic or inappropriate behaviour which may indicate an unacceptable culture, or any weaknesses in the School's safeguarding system which may require additional training or amendments to relevant policies. Where a pattern is identified the School will decide on an appropriate course of action.

In the event that a report is proven to be false, unsubstantiated, unfounded or malicious, the DSL will consider whether the child and/or the person who has made the allegation is in need of help or may have been abused by someone else and this is a cry for help. In such circumstances, a referral to children's social care may be appropriate. If a report is shown to be deliberately invented or malicious, the Head Teacher will consider whether any disciplinary action is appropriate against the individual who made it in accordance with the School's Behaviour Policy.

DEALING WITH SAFEGUARDING CONCERNS OR ALLEGATIONS MADE ABOUT STAFF INCLUDING SUPPLY TEACHERS, VOLUNTEERS AND CONTRACTORS

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

- behaved in a way that has harmed a child, or may have harmed a child; and/or
- possibly committed a criminal offence against or related to a child; and/or
- behaved towards a child or children in a way that indicated that they may pose a risk of harm if they were to work regularly or closely with children; and/or
- behaved or may have behaved in a way that indicates they may not be suitable to work with children, including behaviour that may have happened outside of school.

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

ARRANGEMENTS FOR DEALING WITH SAFEGUARDING CONCERNS OR ALLEGATIONS OF ABUSE MADE AGAINST STAFF

The aim of the School's Allegations Against Staff Policy (AASP) is to create and embed a culture of openness, trust and transparency in which the School's values and expected behaviour, as detailed in the Staff Behaviour Policy are constantly lived, monitored and reinforced by all staff. The AASP provides clear guidance about the acceptable behaviours of staff who are currently working in the School, whether in a paid or unpaid capacity. It follows DfE statutory guidance and HSCP arrangements, detailing the procedures to follow when these behaviours are breached.

The School's procedures apply when staff have (or are alleged to have):

- behaved in a way that has harmed a pupil, or may have harmed a child; and/or
- possibly committed a criminal offence against or related to a child; and/or
- behaved towards a child or children in a way that indicated that they may pose a risk of harm if they were to work regularly or closely with children; and/or
- behaved or may have behaved in a way that indicates they may not be suitable to work with children, including behaviour that may have happened outside of school.

Low-Level Concerns

WHAT IS A LOW -LEVEL CONCERN?

The School understands the importance of a positive culture where concerns can be identified and spoken about openly and acknowledges that this is a key element

of a strong safeguarding system. The School seeks to ensure that all staff who work with children behave appropriately and to enable the early identification and prompt and appropriate management of concerns.

As part of its whole school approach to safeguarding, the School will ensure that it promotes an open and transparent culture in which all safeguarding concerns and allegations about all adults working with children are dealt with promptly and appropriately.

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

Creating a culture in which all safeguarding concerns and allegations about adults (including those that do not meet the harm threshold) are shared responsibly and with the right person, recorded and dealt with appropriately, is crucial. If implemented correctly, this should encourage an open and transparent culture; enable the School to identify inappropriate, problematic or concerning behaviour early; minimise the risk of abuse and ensure that adults working in or on behalf of the School are clear about professional boundaries and act within these boundaries and in accordance with the ethos and values of the School.

DEFINITION

The term low-level concern does not mean that it is insignificant. A low-level concern is any concern no matter how small, and even if no more than causing a sense of unease or a 'nagging doubt' that an adult working in or on behalf of the School may have acted in a way that way:

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

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

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

- Being overly friendly with children.
- Having favourites.
- Taking photographs of children on their mobile phone, contrary to School policy
- Engaging with a child on a one-to-one basis in a secluded area or behind a closed door.
- Using inappropriate, intimidating or offensive language.
- Humiliating children

All staff need to be informed about and be able to identify appropriate, problematic or concerning behaviour and understand the importance of sharing concerns when they observe behaviour which violates the School's Staff Behaviour Policy. Staff do not need to be able to determine in each case whether the behaviour in question constitutes a low-level concern, or if it may meet the harm threshold. Once staff share what they believe to be a low-level concern, that determination should be made by the Headteacher in consultation with the DSL as appropriate.

The School's Staff Behaviour Policy can be found in the staff handbook and should be read in conjunction with the Westbrook Charter. The aim of the Staff Behaviour Policy is to provide clear guidance about the standards of appropriate behaviour and actions of its staff so as to not place pupils or staff at risk of harm or of allegation of harm to a pupil. All staff are expected to comply with the standards contained within this policy at all times.

Staff must share all concerns with the Head Teacher or the DSL in their absence without delay or discussion with any other person so that it can be recorded and dealt with appropriately, sensitively, and proportionately and in a timely manner. If the Headteacher is absent for any reason, low-level concerns should be shared with the DSL who will ensure they inform the Headteacher immediately on their return.

The Headteacher is the ultimate decision maker in respect of all low-level concerns.

Where a low-level concern is raised about the Headteacher, it should be referred to the Chair of Governors. If there is conflict of interest in sharing a low-level concern with the Headteacher, the low-level concern should be shared with the Chair of Governors.

SHARING LOW-LEVEL CONCERNS

We recognise the importance of creating a culture of openness, trust and transparency to encourage all staff to share low-level concerns so that they can be addressed promptly and appropriately, this should enable the school to identify

appropriate, problematic or concerning behaviour early; minimise the risk of abuse; and ensure that adults working in or on behalf of the School are clear about professional boundaries and act within these boundaries, and in accordance with the ethos and values of the School.

We will create this culture by:

- ensuring staff are clear about what appropriate behaviour is, and are confident in distinguishing expected and appropriate behaviour from concerning, problematic or inappropriate behaviour, in themselves and others, and the delineation of professional boundaries and reporting lines;
- empowering staff to share any low-level concerns with the Headteacher, or in their absence the DSL, and to help all staff to interpret sharing of such concerns as a neutral act;
- enabling opportunities for staff to speak to the Headteacher (for example, through weekly drop-in sessions);
- empowering staff to self-report;
- addressing unprofessional behaviour and supporting the individual to correct it at an early stage;
- providing a responsive, sensitive and proportionate handling of such concerns when they are raised;
- helping to identify any weakness in the school's safeguarding system;
- identify inappropriate, problematic or concerning behaviour- including patterns- that may need to be consulted upon with (on a no-names basis if appropriate), or referred to, the LADO.

HOW TO SHARE A LOW-LEVEL CONCERN

It is important that concerns are shared initially with the Headteacher or the DSL in their absence as soon as reasonably possible and, in any event within 24 hours of becoming aware of it (where the concern relates to a particular incident) although it is never too late to share a low-level concern.

Any concern can be shared verbally with the Headteacher, or DSL in their absence, in the first instance, or in writing if more appropriate.

Where the low-level concern is provided verbally, the Headteacher or DSL in the Headteacher's absence will make an appropriate record of the conversation, either contemporaneously or immediately following the discussion and will exercise

sound professional judgement in determining what information is necessary to record for safeguarding purposes.

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

SELF-REPORTING

Staff are also encouraged to self-report either by reporting verbally or in writing to the Headteacher or in their absence the DSL, 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.

Staff should wherever possible, proactively self-report- for example if they know they are going to be in a situation which would be deemed a breach of the School's Staff Behaviour Policy, including, for example, where a member of staff:

- (i) has a child who is a student in the school – they may have the mobile number of the child's friend
- (ii) plays in an external team with a current student and may be within a Whatsapp group with them and;
- (iii) is having to drive a student somewhere, for example an urgent medical appointment.

Equally, a member of staff may, for whatever reason, have behaved in a manner which, on reflection, they consider falls below the standard set out in the School's Staff Behaviour Policy.

Self-reporting in these circumstances can be positive for a number of reasons, and staff are encouraged to report on the basis that:

- it is self-protective, in that it enables a potentially difficult issue to be addressed at the earliest opportunity;
- it demonstrates awareness of the expected behavioural standards and self-awareness as to the member of staff's own actions or how they could be perceived;
- crucially it is an important means of maintaining a culture where everyone aspires to the highest standards of conduct and behaviour.

The School's aim is to create an environment where staff are encouraged and feel confident to self-report.

If a concern is raised by a third party, the Headteacher will collect as much evidence as possible by speaking to the person who has raised the concern (name noted and respecting their wishes to remain anonymous as far as reasonably possible), to the individual involved and any witnesses. The concern will be recorded in accordance with this policy, in the usual way.

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

All concerns will be handled sensitively and will be dealt with appropriately and proportionately.

RESPONDING TO LOW-LEVEL CONCERNS

Once the Headteacher has received what is believed to be a low-level concern, they will (not necessarily in the below order but in an appropriate sequence according to the nature and detail of the particular concern, shared with them):

- Speak with the person who raised the low-level concern (unless it has been raised anonymously).
- Speak to the potential witnesses (unless advised not to do so by the LADO/or relevant external agencies, where they have been contacted).
- Speak to the individual about whom the low-level concern has been raised (unless advised not to do so by the LADO/other external agencies, where they have been contacted).

Review the information and determine whether:

- a) the behaviour is in fact appropriate – i.e. entirely consistent with the School's Staff Behaviour Policy and the law;
- b) the behaviour constitutes a low-level concern;
- c) there is any doubt as to whether the information which has been shared about a member of staff as a low-level concern meet the harm threshold, in which case they will consult with the LADO;
- d) in and of itself the behaviour may meet the harm threshold, and should be referred to the LADO/other external agencies; or

- e) when considered with any other low-level concerns that have previously been shared about the same individual, the behaviour may meet the harm threshold and should be referred to the LADO/other external agencies.

Ensure that appropriate and detailed records are kept of all internal and external conversations regarding the concern or allegation, their determination, the rationale for their decision and any actions taken, and retain records in accordance with the Data Protection Act 2018 and the UK General Data Protection Regulation (UK GDPR).

Consider whether the concern or allegation also potentially raises misconduct or capability issues – taking advice from HR on a no named basis where necessary – and if so, refer the matter to HR.

What action will be taken if it is determined that the behaviour is entirely consistent with the School's Staff Behaviour Policy and the law?

- The Headteacher will update the individual in question and inform them of any action taken (as above).
- The Headteacher will speak to the person who shared the low-level concern – to provide them with feedback about how and why the behaviour is consistent with the School's Staff Behaviour Policy and the law.

What action will be taken if it is determined that the behaviour constitutes a low-level concern?

- Any investigation of low-level concerns will be done discreetly and on a need-to-know basis.
- Most low-level concerns by their very nature are likely to be minor. Some will not give rise to any ongoing concern and, accordingly, will not require any further action. Others may be most appropriately dealt with by means of management guidance and/or training. In many cases, a low-level concern will simply require a conversation with the individual about whom the concern has been raised.
- Any such conversation with individuals in these circumstances will include being clear with them as to why their behaviour is inappropriate, problematic or concerning, what change is required in their behaviour, enquiring what, if any, support they might need in order to achieve and

maintain that and being clear about the consequences if they fail to reach the required standard or repeat the behaviour in question. Ongoing and transparent monitoring of the individual's behaviour may be appropriate. An action plan or risk assessment which is agreed with the individual, and regularly reviewed with them, may also be appropriate.

- Some low-level concerns may also raise issues of misconduct or poor performance which are unrelated to safeguarding. The Headteacher will also consider whether this is the case – by referring to the School's disciplinary and/or capability procedure and taking advice from HR on a named or no-names basis where necessary.
- If the Headteacher considers that the School's disciplinary or capability procedure may be triggered, they will refer the matter to HR. If HR advise that the School's disciplinary or capability procedure is triggered, the individual will have a full opportunity to respond to any factual allegations which form the basis of capability concerns or a disciplinary case against them.
- Staff should be aware that when they share what they believe to be a low-level concern, the Headteacher will speak to the adult who is the subject of that concern (unless advised not to do so by the LADO/other relevant external agencies, where they have been contacted) – no matter how 'low' level the concern may be perceived to be, to gain the subject's account – and to make appropriate records (as above), which may need to be referenced in any subsequent disciplinary proceedings.
- How the School responds to a low-level concern may be different depending on the employment status of the individual who is the subject of the concern – i.e. whether they are an employee or worker to whom the School's disciplinary and/or capability procedure would apply; or a contractor, Governor, Trustee, Director or volunteer. The School's response will be tailored accordingly.

What action will be taken if it is determined that the behaviour:

In and of itself may meet the harm threshold, or when considered with any other low-level concerns that have previously been shared about the same individual, may meet the harm threshold?

Then it will be referred to the LADO/other relevant external agencies, and in accordance with the School's Child Protection Policy and Allegations Against Staff-

see above, Part 4 of KCSIE and the relevant procedures and practice guidance stipulated by the School's Local Safeguarding Partnership.

How low-level concerns are held

- The School will retain all records of low-level concerns (including those which are subsequently deemed by the Headteacher/DSL to relate to behaviour which is entirely consistent with the School's Staff Behaviour Policy) in a central low-level concerns file.
- Where multiple low-level concerns have been shared regarding the same individual these will be kept in chronological order as a running record, and with a timeline alongside. These records will be kept confidential and held securely with access afforded only to a limited number of individuals such as the Headteacher, Chair of Governors, DSL and HR Officer.

How often should the central low-level concerns file be reviewed?

- The Headteacher or DSL will review the central low-level concerns file periodically to ensure that all such concerns are being dealt with promptly and appropriately, and that any potential patterns of inappropriate, problematic or concerning behaviour are identified. A record of these reviews will be made.
- Where a pattern of behaviour is identified in respect of a specific individual, the Headteacher/DSL will also consider whether any wider cultural issues are at play that may have enabled the behaviour and/or whether the School should arrange for additional training or a review of any of its policies to reduce the risk of it happening again.

Record Keeping

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

Low-level concerns will be retained securely by the school for as long as deemed relevant and necessary for a safeguarding purpose unless the School is required to disclose by law (for example, where the harm threshold is met in respect of the individual in question). In most cases, once a staff member leaves the School, any low-level concerns which are held relating to them:

- will be retained at least until the individual leaves the School/for the same duration as that individual's personnel file and
- will not be included in any onward reference (for more information and exceptions, please see 'References' paragraph below).

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

All staff may, under data protection law, ask to see the content of any low-level concern(s) retained by the school as it relates to them personally, and may make any reasonable objection as to the fairness or the accuracy of the content. The school will process such requests within the period prescribed by law, subject always to any necessary protection of the rights of the third parties and unless any other relevant exemptions apply.

All personal data processed will be processed in accordance with the School's Privacy Notices and its Data Protection Policy.

REFERENCES

Low-level concerns will not be included in references unless:

- the concern (or group of concerns) has met the threshold for referral to the LADO at the local authority and is found to be substantiated. A low-level concern which relates exclusively to safeguarding (and not to misconduct or poor performance) will not be referred to in a reference;
- the concern (or group of concerns) relates to issues which would ordinarily be included in a reference, such as misconduct or poor performance.

IDENTIFYING PATTERNS OF BEHAVIOUR

The School will also reflect on reported concerns in order to identify any patterns of concerning, problematic or inappropriate behaviour which may indicate an

unacceptable culture, or any weaknesses in the School's safeguarding system which may require additional training or modified policies. Where a pattern is identified, the School will decide on a course of action, either through its disciplinary procedures, or, where the pattern moved from a concern to meeting the harm threshold, it will follow the above procedure and refer the matter to the LADO. The rationale for all decisions and actions taken will be recorded by the School.

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

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

ROLE OF GOVERNING BODY

The Governing Body will review an anonymised sample of low-level concerns at regular intervals within safeguarding reports, in order to ensure that these concerns have been responded to promptly and appropriately.

STAFF BEHAVIOUR POLICY

The aim of the School's Staff Behaviour Policy is to provide clear guidance about behaviour and actions so as to not to place pupils or staff at risk of harm or of an allegation of harm to a pupil.

SAFER RECRUITMENT

The School is committed to safer recruitment processes to create a culture that safeguards and promotes the welfare of children in the School whilst deterring and preventing people who are unsuitable to work with children from applying or securing employment, or volunteering opportunities, within the School. The School ensures that sufficient relevant staff are trained in the safer recruitment processes.

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

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

Full details of the School's safer recruitment procedures for checking the suitability of staff, are set out in the School's Recruitment Policy.

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

The School's procedures for managing contractors attending the School site can be found in the Contractor Management Policy in the Staff Handbook.

MANAGEMENT OF SAFEGUARDING

The School's DSL is Samantha Taylor who is a member of the Pastoral Leadership Team and a member of the Executive Group.

There are five DDSL's who, along with the DSL, form the Designated Safeguarding Team (DST). This ensures there is the required cover for the role at all times. Reports should be made to a member of the DST in the absence of the DSL. The Safeguarding Team's contact details can be found on the Key Contacts page at the start of this policy.

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

Where a pupil leaves the School, including for in-year transfers, the DSL will also ensure their child protection file is transferred to the new school (separately from the main pupil file) as soon as possible and within 5 days for an in-year transfer or within the first 5 days of the start of a new term. The DSL will ensure secure transit and obtain confirmation of receipt. In addition to the child protection file, the DSL should also consider if it would be appropriate to share any additional information with the new school in advance of a child leaving to help them put in place the right support to safeguard this child and to help the child thrive in the school.

The DSL regularly reviews the School's and their own practices and concerns about welfare and safeguarding matters. This includes the personal and professional duty

of all staff to report welfare and safeguarding concerns to the DSL, or in the absence of action, directly to local children's services.

The DSL or a member of the DST will always be available to discuss safeguarding concerns, either via RecordMy or in person during term time school hours. During out of hours/out of term activities, the DSL may be contacted via RecordMy or via the School Office on 01442 256143. At all times The DSL maintains an overview and may also be contacted via mobile phone, please see contact details on page 4 of this document.

The DSL or a member of the DST will liaise with HSCP and work with other agencies in line with WT. NPCC – When to call the police: [guidance for schools and colleges](#) can assist the DSL or a member of the DST to understand when they should consider calling the Police and what to expect when they do. If the School has questions about any police investigation, it will ask the police. Samantha Taylor, DSL and Senior Mental Health Lead, will be responsible when safeguarding concerns are linked to mental health. The DSL and DST should be confident as to what local specialist support is available to support all children involved in sexual violence and sexual harassment and be confident as to how to access this support when required.

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

Full details of the DSL's role can be found in Appendix 2 of this policy and at Annex C of KCSIE.

TRAINING

Induction and training are in line with HSCP. All staff in regulated activity are required to have face to face CPSLO led child protection training. Where it is not possible to complete this training prior to commencing their role at the school, it must be completed within the first half term. Thereafter CPSLO led training is refreshed every 3 years. The training can be in person or via a Teams session online.

The Headteacher receives training in safeguarding and child protection regularly, in line with advice from HSCP. Training includes online safety (including the expectations, applicable roles and responsibilities in relation to filtering and monitoring) and harmful sexual behaviours (including child on child sexual violence and harassment). It also includes Prevent awareness training to equip the Headteacher's understanding on the factors that lead people to support terrorist ideologies or engage in terrorist related activity, enabling them to recognise susceptibility to terrorism and awareness of what action to take in response, including the School's internal Prevent arrangements.

All Staff

Prior to commencing their role, all new staff will be provided with induction training that includes:



- The Child Protection Policy; (including the policy and procedures to deal with child on child abuse).
- the role and identity of the DSL and Safeguarding Team (DDSL's).
- The Behaviour Management Policy and the Anti-Bullying Policy (including measures to prevent bullying, including cyberbullying, prejudice-based and discriminatory bullying).
- The Staff Behaviour Policy
- The Allegations Against Staff Policy
- The Whistleblowing Policy and procedure
- The E-Safety Policy and IT Acceptable Use Policy including an understanding of the expectations, applicable roles and responsibilities in relation to filtering and monitoring.
- Staff/pupil relationships and communications including the use of Social Media and Taking, Storing and Using Images of Children.
- The safeguarding response to children who are absent from education, particularly on repeat occasions and/or prolonged periods or children missing from education (see Attendance Policy).
- The Missing Pupil Policy including the procedure for when a child is not collected on time.
- The Reasonable Force and Restraint Policy
- Part one of KCSIE at least (or, for staff that do not work directly with children, Annex A).
- Annex B of KCSIE (and Part five of KCSIE) for school leaders and staff who work directly with children.
- KCSIE in its entirety for Governors, HR, Compliance and staff who are in a management role.

Copies of the above documents are provided to all new staff who are required to sign a declaration to confirm having read these prior to the induction training taking place.

Temporary staff and volunteers will be made aware of the safeguarding policies and procedures by the DSL, including The Child Protection Policy and the Staff Behaviour Policy. Further documentation may be made available depending on the role they are undertaking.

All staff are also required to:

- Confirm having read the relevant sections of KCSIE each time it is updated by the Department for Education. Staff will be updated on the changes via email, staff meetings and inset and will be required to sign a further declaration.
- Understand key information contained in Part one (or, for staff that do not work directly with children, Annex A) of KCSIE. The School will ensure staff understanding through training at staff meetings and inset.
- Receive training in safeguarding and child protection regularly, in line with advice from the HSCP. Training will include online safety (including the expectations, applicable roles and responsibilities in relation to filtering and monitoring) and harmful sexual behaviours (including child on child sexual violence and harassment). It will also include Prevent awareness training to equip staff to understand the factors that lead people to support terrorist ideologies or engage in terrorist related activity, be able to recognise susceptibility to terrorism and be aware of what action to take in response, including the School's internal Prevent arrangements.
- Undertake regular informal updates, at least annually, to provide them with relevant skills and knowledge to safeguard children effectively, including online.

The School provides these via, for example: email, staff meetings and inset and online refreshment courses.

- Sign a declaration to confirm they have read the annually reviewed Child Protection, Staff Behaviour and Allegations Against Staff Policies. Staff will be updated on the changes via email, staff meetings and inset.

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

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

In addition, the governing body complies with the DfEs Data Protection guidance for schools, ensuring school staff and governors know how to comply with data protection law, develop their data policies and processes, what staff and pupil data to keep and the importance of developing good practices for preventing data breaches.

DSL

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

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

The members of the Safeguarding Team are trained to the same level as the DSL.

OVERSIGHT OF SAFEGUARDING, INCLUDING ARRANGEMENTS FOR REVIEWING POLICIES AND PROCEDURES

Christopher Best is the board-level lead designated Safeguarding Governor, who takes a lead in relation to responsibility for the safeguarding arrangements in the School.

The School considers its obligation to review safeguarding practices a matter of its everyday concerns. A review of the School's Child Protection and Safeguarding Policy takes place at least annually, including an update and review of the effectiveness of procedures and their implementation including lessons learnt. Safeguarding is a standard item on the Board Meeting Agenda. The DSL meets with the Safeguarding Governor each term prior to the Governors' Board Meeting to discuss the termly Safeguarding Audit. Relevant information is then reported formally to the Board. The DSL will attend the Board Meeting annually in the Autumn Term to present the Annual Safeguarding Audit and update the Governors on any changes to Child Protection legislation. The Child Protection and Safeguarding Policy, which is reviewed at least annually, is formally approved at this meeting. The School draws on the expertise of staff, including the DSL and DST, in shaping the School's safeguarding arrangements and policies.

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

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

THE SCHOOL'S ARRANGEMENTS TO FULFIL OTHER SAFEGUARDING RESPONSIBILITIES

Teaching children how to keep safe

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

Internet safety (including when children are online at home) is an integral part of the School's IT curriculum and also embedded in PSHE and Relationships and Sex Education (RSE). Further information can be found in the Schools E-Safety and IT Acceptable Use Policy.

Filtering and Monitoring

The School has appropriate filters and monitoring systems in place to safeguard children from potentially harmful and inappropriate material online when using the School's IT system. The School's systems are Securly, Smoothwall and Impero.

Pupils Chromebooks and iPads are managed by the school. Chromebooks are each installed with a keyword detection software called Securly. The software picks up on keywords, for example self-harm, offensive language and terrorism. Once detected, it sends an email to key members of staff, where a thorough investigation is carried out.

The School's Internet Filtering System is Smoothwall. All school emails go through the Google spam and Anti-Viral systems.

The School has a filtering system called Impero, which allows staff to monitor screens during lessons and enables the IT Manager and the DSL to close inappropriate content. Impero also provides keyword capture and blocking capabilities. The IT Manager checks the logs monthly to look for patterns or gaps in the system.

Such systems aim to reduce the risk of children being exposed to illegal, inappropriate or harmful materials online (content risk); reduce the risk of children being subjected to harmful online interaction with others including commercial advertising and grooming (contact risk); restrict access to online risks such as online gambling, phishing or financial scams (commerce risk); and help manage online behaviour that can increase a child's likelihood of, or causes, harm for example making, sending and receiving explicit images. The School recognises however that children have unlimited and unrestricted access to the internet via mobile phone networks (i.e. 3G, 4G and 5G) which means that children may consensually and/or non-consensually share indecent images, sexually harass their peers via mobile and smart technology, and view and share pornography and other harmful content whilst at school undetected.

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

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

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

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

Relationships and Sex Education (RSE)

The School understands that preventative education is most effective in the context of a whole-school approach that prepares children for life in modern Britain and creates a culture of zero tolerance for sexism, misogyny/misandry, homophobia, biphobic, sexual violence/harassment.

The School has regard to the DfE's statutory guidance Relationships Education, Relationships and Sex Education (RSE) and Health Education when making arrangements for, and teaching, RSE. The teaching of RSE forms part of the School's PSHE programme, details of which can be found in the Relationship Sex Education Policy.

Looked after children

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

Dickon Baird, Senior Deputy Head, DDSL designated member of staff who has responsibility for their welfare and progress. The School ensures that the designated member of staff receives appropriate training in order to carry out their role.

Arrangements for visiting speakers

The School has clear protocols for ensuring that any visiting speakers are appropriately supervised and suitable. The School's responsibility to pupils is to ensure that they can critically assess the information they receive as to its value to themselves, and that the information is aligned to the ethos and values of the School and British values of democracy.

In line with the Visitor Policy, staff are required to undertake a risk assessment before agreeing to a Visiting Speaker being allowed to attend the School. This will take into account any vetting requirements considered appropriate in the circumstances, and may include a DBS check if relevant.

Visiting speakers will be expected to understand that, where appropriate, their session should actively promote the British values of democracy, the rule of law, individual liberty and mutual respect and tolerance of those with different faiths and beliefs and at no point undermine these.

The School will request a copy of the Visiting Speaker's presentation and/or footage in advance of the session being provided.

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

Arrangements for use of school premises for non-school activities

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

Where services or activities are not under the direct supervision or management of the School, the School will seek assurance that any individual or organisation has

appropriate safeguarding and child protection policies and procedures in place (and the School will inspect these as needed); and ensure that there are arrangements in place for the provider to liaise with the School on these matters where appropriate. This applies regardless of whether or not the children who attend any of these services or activities are children on the school roll.

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

- The DSL Team can be contacted on the school number 01442 256143, during and outside of term time. The DSL is also available by mobile phone (contact details on page 4).
- If an allegation arises or is made relating to an incident that happened when an individual or organisation was using our school premises for the purposes of running activities, we would as with any safeguarding allegation follow our safeguarding policies and procedures, including informing the LADO and advice in KCSIE 2024.

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

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

EARLY YEARS PROVISION SAFEGUARDING ARRANGEMENTS

Disqualification from working in childcare

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

The School records all checks of staff employed to work in or manage relevant childcare on the Single Central Register. This includes the date disqualification checks were completed as part of the appointment process. Subsequent annual checks are recorded on the Training and Safeguarding Log.

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

Use of mobile phones and cameras

The School's policy on the use of mobile phones and cameras in the EYFS can be found in the School's E-Safety and IT Acceptable Use Policy. Staff are not permitted to use their personal mobile devices, cameras and other electronic devices with imaging and sharing capabilities in School. Staff in Nursery and Reception use the Tapestry app on the iPad to record observations. They can also take photographs and record videos for observational purposes on the tablets. There are three devices in Nursery and two devices in Reception which is secured by a pin code. Photos and videos are removed from the devices at regular intervals.

If any member of staff suspects that their login details have been compromised in any way, they must inform the managers and new login details will be created.

Staff who wish to use their personal mobile devices or cameras, or any device with imaging and sharing capabilities in School for any other reason must first speak with the Head Teacher to obtain their approval.

Staff who act in breach of this may be subject to disciplinary action. Parents are not permitted to use their mobile phones or camera in or around the EYFS setting or in any area of the School where EYFS children may be present, at any time, without prior approval from the Head Teacher.

DSL for the EYFS

The practitioner designated to take lead responsibility for safeguarding children in the early years settings is Samantha Taylor, DSL supported by the EYFS DDSL Patrick Ross.

Duty to notify Ofsted

The School will inform Ofsted of any significant event which is likely to affect the suitability of any person who is in regular contact with children on the premises where childcare is provided. For example, where the School is satisfied that a person working in a relevant setting falls within one of the disqualification criteria.

Any significant event must be notified to Ofsted as soon as reasonably practicable, but at the latest within 14 days of the date the School became aware (or ought reasonably to have become aware) of it.

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

APPENDIX 1

SIGNS AND TYPES OF ABUSE

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

All staff should be aware that safeguarding incidents and/or behaviours can be associated with factors outside the School and/or can occur between children outside of these environments. All staff, but especially the DSL and deputies, should consider whether children are at risk of abuse or exploitation in situations outside the home. This is often referred to as 'extra-familial harm'. Extra-familial harm can occur in a range of extra-familial contexts, including in school, peer groups, or within community/public spaces, and/or online. Children may experience this type of harm from other children and/or adults. Forms of extra-familial harm include exploitation by criminal and organised crime groups and individuals (such as county lines and financial exploitation), serious violence, modern slavery and trafficking, online harm, sexual exploitation, teenage relationship abuse, and the influences of extremism which could lead to radicalisation. Children of all ages can experience extra-familial harm.

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

In all cases, if staff are unsure, they should always speak to the DSL or member of the DST.

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

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



Sexual abuse: involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing, and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (including via the internet). Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children. Sexual abuse also includes sexual violence and sexual harassment (see below) which can occur between two children of any sex (also known as child on child abuse). This can also occur through a group of children sexually assaulting or sexually harassing a single child or group of children. Sexual violence are sexual offences under the Sexual Offences Act 2003, such as rape, sexual assault, and assault by penetration. Schools should be aware that sexual assault covers a very wide range of behaviour so a single act of kissing someone without consent or touching someone's bottom/breasts/genitalia without consent, can still constitute sexual assault.

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

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

Child-on-child sexual violence and/or harassment: Sexual violence and sexual harassment (as defined above) can occur between two children of any age and sex, from primary through to secondary stage and into colleges. It can occur through a group of children sexually assaulting or sexually harassing a single child or group of children. It is more likely that girls will be the victims of sexual violence and harassment, and it is more likely that it will be perpetrated by boys. It can however occur between children of any sex. Sexual violence and sexual harassment exist on a continuum and may overlap; they can occur online and face to face (both physically and verbally) and are never acceptable. Children who are



victims of sexual violence and/or sexual harassment wherever it happens, will likely find the experience stressful and distressing. This will, in all likelihood, adversely affect their educational attainment and will be exacerbated if the alleged perpetrator(s) attends the same school or college.

Harmful sexual behaviour: problematic, abusive and violent sexual behaviour is developmentally inappropriate and may cause developmental damage. A useful umbrella term is "harmful sexual behaviour". Harmful sexual behaviour can occur online and/or face-to-face and can also occur simultaneously between the two. Sexual behaviour between children can be considered harmful if one of the children is much older, particularly if there is more than two years' age difference, or if one of the children is pre-pubescent and the other is not. However, a younger child can abuse an older child, particularly if they have power over them, for example, if the older child is disabled or smaller in stature.

Sharing of nudes and/or semi-nudes: the sending or posting of nude or semi-nude images, videos, or live streams online by young people under the age of 18. This could be via social media, gaming platforms, chat apps or forums. It could also involve sharing between devices via services like Apple's AirDrop which works offline. The sharing of nudes and semi-nudes can happen publicly online, in 1:1 messaging or via group chats and closed social media accounts and may include images or footage of more than one child or young person.

Alternative terms used by children and young people may include 'dick pics' or 'pics' or may be referred to by adults or professionals as 'youth produced/involved sexual imagery', 'indecent imagery', 'image based sexual abuse' or 'sexting'. Terms such as 'deep fakes' and 'deep nudes' may be used by adults and young people to refer to digitally manipulated and AI generated nudes and semi-nudes.

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

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

For this reason, incidents can either be classified as 'aggravated' or 'experimental'. The DDCMS/UKIS guidance "Sharing nudes and semi-nudes: advice for education settings working with children and young people" (March 2024) sets out the classification of incidents, and how each should be handled.

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

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

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

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

Child sexual exploitation (CSE): CSE is a form of child sexual abuse (see above) which occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into sexual activity. It may involve an exchange for something the victim needs or wants (for example, money, gifts or affection), and/or for the financial advantage or increased status of the perpetrator or facilitator. Whilst age may be the most obvious, this power imbalance can also

be due to a range of other factors including gender, sexual identity, cognitive ability, physical strength, status, and access to economic or other resources.

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

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

The below CSE indicators can also be indicators of CCE:

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

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

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

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

CCE can include children being forced to work in cannabis factories, being coerced into moving drugs or money across the country (county lines, see below), forced to shoplift or pickpocket. They can also be forced or manipulated into committing vehicle crime or threatening/committing serious violence to others.

Children can become trapped by this type of exploitation as perpetrators can threaten victims (and their families) with violence or entrap and coerce them into debt. They may be coerced into carrying weapons such as knives or begin to carry a knife for a sense of protection from harm from others. Children can be exploited by adult males or females, as individuals or in groups. They may also be exploited by other children, who themselves may be experiencing exploitation – where this is the case, their vulnerability as victims is not always recognised by adults and



professionals (especially when they are older children). It is important in these circumstances that the child perpetrator is also recognised as a victim.

Some of the following can be indicators of CCE:

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

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

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

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

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

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

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

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



- who have their bank accounts used to facilitate drug dealing.

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

Modern Slavery: Modern slavery encompasses human trafficking and slavery, servitude and forced or compulsory labour. Exploitation can take many forms, including sexual exploitation, forced labour, slavery, servitude, forced criminality and the removal of organs. Further information on the signs that someone may be a victim of modern slavery, the support available to victims and how to refer them to the National Referral Mechanism is available in the statutory guidance "Modern slavery: how to identify and support victims May 2022 (Updated May 2024)".

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

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

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

If there are concerns about a child in this area, the DSL or member of the DST should consider referring into the Cyber Choices programme. This is a nationwide police programme supported by the Home Office and led by the National Crime Agency, working with regional and local policing. It aims to intervene where young people are at risk of committing, or being drawn into, low level cyber-dependent offences and divert them to a more positive use of their skills and interests. Cyber Choices does not currently cover 'cyber-enabled' crime such as fraud, purchasing of illegal drugs on-line and child sexual abuse and exploitation, nor other areas of concern such as on-line bullying or general on-line safety.

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

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

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

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

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

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

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

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

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

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

If staff have a concern that a pupil may be at risk of FGM, they should speak to the DSL or member of the DST who will (where appropriate) activate local safeguarding procedures, using existing national and local protocols for multi-agency liaison with Police and Children's Social Care.

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



carried out, either through disclosure by the victim or visual evidence or it involves a pupil over 18, teachers should follow the School's local safeguarding procedures.

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

Forced marriage: Forcing a person into a marriage is a crime in England and Wales. A forced marriage is one entered into without the full and free consent of one or both parties and where violence, threats or any other form of coercion is used to cause a person to enter into a marriage. Threats can be physical or emotional and psychological. A lack of full and free consent can be where a person does not consent or where they cannot consent (if they have learning disabilities, for example). Nevertheless, some communities use religion and culture as a way to coerce a person into marriage. Since February 2023 it has been a crime to carry out any conduct whose purpose is to cause a child to marry before their 18th birthday, even if violence, threats or another form of coercion are not used. As with existing forced marriage law, this applies to non-binding, "unofficial marriages" as well as legal marriages.

Schools and colleges can play an important role in safeguarding children from forced marriage. There are a range of potential indicators that a child may be at risk of forced marriage, details of which can be found in the [on pages 13-14 of the Multi-agency guidelines: Handling cases of forced marriage \(last updated April 2023\)](#). Further information on forced marriage is available in guidance published on gov.uk. School staff can also contact the Forced Marriage Unit if they need advice or information: Contact: 020 7008 0151 or email fmu@fcdo.gov.uk or call 999 in an emergency or if out of hours.

Radicalisation: is the process of a person legitimising support for, or use of, terrorist violence.

Extremism is vocal or active opposition to Fundamental British Values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs. It can also call for the death of members of the armed forces, whether in this country or overseas.

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

There is no single way of identifying whether a child is likely to be susceptible to radicalisation into terrorism, there are factors that may indicate concern. However it is possible to protect people from extremist ideology and intervene to prevent those at risk of radicalisation being drawn into terrorism. As with other safeguarding risks, staff should be alert to changes in children's behaviour, which could indicate that they may be in need of help or protection. Staff should use their judgement in identifying children who might be susceptible and act proportionately, which may include making a Prevent referral.

Designated Safeguard Leads and other senior leaders in the School should familiarise themselves with the Prevent Duty guidance: for England and Wales (updated March 2024) especially, paragraphs 141-210 which are specifically concerned with education. Staff should contact the DSL or Designated Safeguard Team who should be aware of the local procedures in place, before making a Prevent referral.

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

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

These can include:

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

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

Lesbian, gay, bi-sexual or gender questioning: A child or young person being lesbian, gay or bi-sexual is not in itself an inherent risk factor for harm, however, they can sometimes be targeted by other children. In some cases, a pupil who is perceived by their peers to be lesbian, gay or bi-sexual (whether they are or not) can be just as vulnerable as children who are.

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

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

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

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

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

All children can witness and be adversely affected by domestic abuse in the context of their home life where domestic abuse occurs between family members. Experiencing domestic abuse and/or violence can have a serious, long lasting emotional and psychological impact on children. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result.

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

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

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

Homelessness: Being homeless, or at risk of homelessness presents a real risk to a child’s welfare. The School should be aware of potential indicators of homelessness

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

Children who are absent from school: A child being absent from school, particularly repeatedly and/or for prolonged periods, and children missing education is a potential indicator of a range of safeguarding issues such as abuse, neglect, sexual abuse, CSE and CCE. It can also be a sign of child criminal exploitation including involvement in county lines. It may indicate mental health problems, risk of substance abuse, risk of travelling to conflict zones, risk of FGM, so-called 'honour'-based abuse or risk of forced marriage.

Staff must follow School's procedures for dealing with children who are absent particularly persistently or for prolonged periods. The School's procedure for dealing with children who are absent and or missing can be found on in the Attendance and Missing Child Policies. All unexplained absence will be followed up in accordance with procedures set out in the Attendance Policy and Missing Child Policy.

The school shall inform the local authority of any pupil who is going to be added or deleted from the School's admission register at non-standard transition points in accordance with requirements of the The School Attendance (Pupil Registration) (England) Regulations 2024

This will assist the local authority to:

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

School attendance registers are carefully monitored to identify any trends. The School will inform the local authority and the local authority where the child is normally resident of any pupil who fails to attend school regularly (where absences amount to more than 10 or more days, either consecutively or irregularly and have been unauthorised) at such intervals as are agreed between the School and the local authority. Hertfordshire Local Authority have stipulated that the Unexplained Absence Form be submitted no less frequently than once per calendar month.

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

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



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

As children get older and are granted more independence (for example, as they start walking to school on their own) it is important they are given practical advice on how to keep themselves safe.

It is important that lessons focus on building children's confidence and abilities rather than simply warning them about all strangers.

Further information is available at:

www.actionagainstabduction.org and www.clevernevergoes.org.

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

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

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

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

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

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

APPENDIX 2 – THE ROLE OF THE DSL

ROLE OF THE DESIGNATED SAFEGUARDING LEAD (DSL)

The governing body has ensured an appropriate senior member of staff who is part of the school leadership team, is appointed to the role of designated safeguarding lead. The designated safeguarding lead will take lead responsibility for safeguarding and child protection (including online safety and understanding the filtering and monitoring systems and processes in place).

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

DEPUTY DESIGNATED SAFEGUARDING LEADS (DDSL)

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

AVAILABILITY

During term time the DSL and/or DDSL's will be available during school hours for staff in the school to discuss any safeguarding concerns. Whilst generally speaking the DSL (or DDSL) would be expected to be available in person, if for any reason the DSL is not available, safeguarding concerns will be referred to the DDSL. For safeguarding concerns raised outside of term-time the Office School number should be called on 01442 256143, and the DSL should be asked for. The School will take the name and telephone number of the caller and the School will then alert the DSL or DDSL (if the DSL is unavailable). The DSL or DDSL will then telephone back as soon as possible. The DSL is also available by mobile telephone (please see contact details on front sheet).

MANAGE REFERRALS

The designated safeguarding lead is expected to refer cases of suspected abuse and neglect to:

- the Hertfordshire Safeguarding Children' Partnership (HSCP) or relevant local authority for pupils who reside outside Hertfordshire as required and to support staff who make referrals to the HSCP; and to support staff who make referrals to local authority children's social care;
- to the Channel programme where there is a radicalisation concern as required and to support staff who make referrals to the Channel programme;
- where a person is dismissed or left due to risk/harm to a child to the Disclosure and Barring Service as required, and;
- where a crime may have been committed to the Police as required. NPCC – When to call the police should help understand when to consider calling the police and what to expect when working with the police.

WORKING WITH OTHERS

The DSL is expected to:

- act as a source of support, advice and expertise for all staff;
- act as a point of contact with the safeguarding partners;
- liaise with the Head Teacher to inform them of issues- especially ongoing enquiries under section 47 of the Children Act 1989 and police investigations. This should include being aware of the requirement for children to have an Appropriate Adult. Further information can be found in the Statutory guidance - PACE Code C 2019.
- as required, liaise with the "case manager" (as per Part four of KCSIE) and the local authority designated officer(s) (LADO) for child protection concerns in cases which concern a staff member;
- liaise with staff (especially teachers, pastoral support staff, school nurses, IT technicians, senior mental health leads and special educational needs co-ordinators (SENCO's) and senior mental health leads) on matters of safety and safeguarding and welfare (including online and digital safety) and when deciding whether to make a referral by liaising with relevant agencies so that children's needs are considered holistically;
- liaise with the senior mental health lead and, where available, the mental health support team, where safeguarding concerns are linked to mental health;
- promote supportive engagement with parents and/or carers in safeguarding and promoting the welfare of children, including where families may be facing challenging circumstances;
- work with the Head Teacher, Designated Teacher for Looked After Children and relevant strategic leads, taking lead responsibility for promoting educational outcomes by knowing the welfare, safeguarding and child protection issues that children in need are experiencing, or have experienced, and identifying the impact that these issues might be having on children's attendance, engagement and achievement at school.

This includes:

- ensuring that the school knows who its cohort of children who have or have had a social worker are, understanding their academic progress and attainment, and maintaining a culture of high aspirations for this cohort, and
- support teaching staff to provide additional academic support or reasonable adjustments to help children who have or have had a social worker reach their potential, recognising that even when statutory social care intervention has ended, there is still a lasting impact on children's educational outcomes.

INFORMATION SHARING AND MANAGING THE CHILD PROTECTION FILE

The DSL is responsible for ensuring that child protection files are kept up to date. The information is kept confidential and stored securely with concerns and referrals kept in a separate child protection file for each child. The School operates the online referral system RecordMy.

Records should include:

- a clear and comprehensive summary of the concern;
- details of how the concern was followed up and resolved;
- a note of any action taken, decisions reached and the outcome.

**It is the DSL's responsibility to:**

- ensure files are only accessed by those who need to see them and where the file or content within it is shared, this happens in line with information sharing advice as set out in Part one and Part two of KCSIE;
- ensure files for children leaving the school (including in year transfers) are transferred to the new school 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. Files are transferred separately from the main pupil file, ensuring secure transit, and confirmation of receipt obtained;
- ensure key staff such as DDSL's and special educational needs co-ordinator (SENCO) are made aware as required or any files received for children joining the school;
- consider if it would be appropriate to share any additional information with a new school in advance of a child leaving to help them put in place the right support to safeguard this child and to help the child thrive in the school. For example, information that would allow the new school or college to continue supporting children who have had a social worker and been victims of abuse and have that support in place for when the child arrives.

RAISING AWARENESS**The DSL should:**

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

TRAINING, KNOWLEDGE AND SKILLS

The DSL and DDSL's are required to undergo training to provide them with the knowledge and skills required to carry out the role. This training will be updated at least every two years. The DSL and DDSL's also undertake Prevent awareness training.

Training should provide DSL's with a good understanding of their own role, how to identify, understand and respond to specific needs that can increase the vulnerability of children, as well as specific needs that can increase the vulnerability of children, as well as specific harms that can put children at risk, and the processes, procedures and responsibilities of other agencies, particularly local authority children's social care, so they:



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

In addition to the formal training set out above, the DSL'S knowledge and skills will be refreshed (this might be via e-bulletins, meeting other designated safeguarding leads, or simply taking time to read and digest safeguarding developments) at regular intervals, as required, and at least annually, to allow the DSL to understand and keep up with any developments relevant to their role.

PROVIDING SUPPORT TO STAFF

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

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

UNDERSTANDING THE VIEWS OF CHILDREN

It is important that all children feel heard and understood. Therefore, DSL and DDSL's are supported in developing knowledge and skills to:

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

HOLDING AND SHARING INFORMATION

The critical importance of recording, holding, using and sharing information effectively is set out in Parts one, two and five of KCSIE, and therefore the DSL should be equipped to:

- be fully conversant with the Hertfordshire Safeguarding Children Partnership: Child Protection Procedures <https://hertfordshirescp.trixonline.co.uk/>
- understand the importance of information sharing, both within the school and college, and with other schools on transfer including in-year and between primary and secondary education, and with the safeguarding partners, other agencies, organisations and practitioners;
- understand relevant data protection legislation and regulations, especially the Data Protection Act 2018 and the UK General Data Protection Regulation (UK GDPR); and
- be able to keep detailed, accurate, secure written records of concerns, discussions and decisions made including the rationale for those decisions. This should include instances where referrals were or were not made to another agency such as Hertfordshire Safeguarding Children Partnership or the Prevent program etc.