



NEWCASTLE UNDER LYME SCHOOL

Child Protection (Safeguarding) Policy

This policy relates to Newcastle-under-Lyme School, including the EYFS. This policy is available upon request to parents and prospective parents and is published to parents and prospective parents on the School's website.

The Designated Safeguarding Lead and Deputy Designated Safeguarding Leads are:

Mrs J A Simms (01782 631197 ext 316)

Mr I Dicksee (01782 631197 ext 212)

Mr N Vernon (01782 664616 ext 410)

Mr M Erian (01782 664616 ext 412)

Mrs A Smith (01782 664623)

This policy complies with the DfE statutory guidance, *'Keeping Children Safe in Education: information for all school and college staff'* (published September 2019). The School has regard to *KCSIE* (September 2019) when carrying out our duties to safeguard and promote the welfare of children meaning it will be complied with except where exceptional circumstances arise.

This policy should be read alongside the following:

- Part One of *KCSIE including Annex A*,
- Staff Behaviour Policy
- Whistleblowing Policy
- Behaviour Rewards and Sanctions Policy and Anti Bullying and Anti Cyber Bullying Policy
- Missing Pupil Policy
- Social Media Policy for Staff
- Staff Handbook

In this policy the term 'staff' refers those who work with children as an adult in our School.

As well as being familiar with this document all staff at the School will be sent each year (digitally), the DfE booklet *'Keeping Children Safe in Education: Part One: for school and college staff including Annex A'* (published September 2019). As well as receiving annual

training they will confirm that they have read *KCSIE: Part 1 including Annex A* and are helped to understand and discharge their responsibilities as outlined in *Part 1 of KCSIE*.

In all matters relating to child protection, the School will follow the procedures laid down by our own local safeguarding partnership which is Staffordshire Safeguarding Children Board (SSCB) together with DfE guidance contained in *Working Together to Safeguard Children* (2018 updated in 2019 but without changing the date on the published version) and *What to do if you are worried a child is being abused: advice for practitioners and Keeping Children Safe in Education*:
<https://www.gov.uk/government/publications/keeping-children-safe-in-education> (KCSIE).

This policy is applicable to the whole school community. Governors, all members of staff and volunteers have duty to safeguard our pupils' welfare and must therefore familiarise themselves and comply at all times with this policy, along with the School's **Staff Behaviour Policy**. They must also read and retain a copy of *KCSIE: Part 1 (including Annex A)*.

The School recognises that its duty is to safeguard and promote the welfare of all its pupils. This includes a duty to both 'children in need' (Section 17: Children's Act 1989) and to 'children at risk of harm' (Section 47: Children's Act 1989). All School staff, should be aware that safeguarding incidents, and particularly referrals in cases of suspected abuse and neglect, can happen at any time and anywhere and are required to be alert to any possible concerns.

Safeguarding and promoting the welfare of children is everyone's responsibility. Everyone who comes into contact with children and their families and carers has a role to play in safeguarding children. All School staff, including frequent volunteers, club providers and students, should make sure that their approach is child centred. This means that what is in the best interest of the child is paramount. No single professional can have a full picture of a child's needs and circumstances. If children and families are to receive the right help at the right time, everyone who comes into contact with them has a role to play in identifying concerns, sharing information and taking prompt action. Children includes everyone under the age of 18 years.

1. Statement of Intent

The safety and well-being of all our pupils at Newcastle-under-Lyme School is our highest priority. Our business is to know everyone as an individual and to provide a secure and caring environment, so that every pupil can learn in safety.

We expect respect, good manners and fair play to be shown by everyone so that every pupil can develop his/her full potential and feel positive about him/herself as an individual. All pupils should care for and support each other.

2. Transparency

Newcastle-under-Lyme School prides itself on its respect and mutual tolerance. Parents and guardians have an important role to play in supporting the School in safeguarding children. Copies of this policy, together with other policies relating to issues of child protection are on our website. We hope that parents and guardians will always feel able to take up any issues or worries that they may have with the School. Allegations of child abuse or concerns about the welfare of any child will be dealt with consistently in accordance with this policy. Open communications are essential. We will never ignore an allegation of child abuse and will always deal with any concerns appropriately.

3. Related Policies

This Child Protection (Safeguarding) Policy should be read together with the School's *Anti-Bullying and Anti Cyber Bullying Policy, Behaviour Rewards and Sanctions Policy, Missing Pupil Policy, Preventing Extremism and Radicalisation Policy* and *Safer Recruitment Policy*, which can be accessed on the School's website. Staff, including frequent volunteers, club providers, must also read the *Staff Behaviour Policy* and the *Staff Handbook*, the *Whistleblowing Policy*, and *Social Media Policy for Staff* which are available on Firefly.

4. Definitions and Types of Child Abuse and Neglect

Safeguarding children consists of the following:

- Protecting children from maltreatment, including abuse and neglect
- Preventing impairments to their health and development
- Ensuring that they are safely and effectively cared for, and
- Taking action to ensure that they have the best outcomes.

Child 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 protect a child from harm. A child might be abused by an adult or adults, or another child or children. Children may be abused in a family or in an institutional setting by those known to them, or by others. They may be abused by an adult or adults or another child or children. Abuse can take place online and abuse online can be used to facilitate off line abuse.

Child abuse can take a number forms, all of which can cause long term damage to a child: physical abuse, emotional abuse, neglect, and child sexual abuse. Bullying and domestic violence are also forms of child abuse. All staff should be aware that abuse, neglect and safeguarding issues are rarely stand-alone events that can be covered by one definition or label. In most cases multiple issues will overlap with one another. Some of the main forms of child abuse are set out below:

- **Physical abuse:** a form of abuse which may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm. It 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 over-protection 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 for example, through acts of domestic violence. 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 a high level of violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (eg. 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.
- **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 also occur during pregnancy as a result of maternal substance abuse. 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.
- **Potential abuse:** children are entitled to protection from situations where they have not been abused but where social and medical assessments indicate a high degree of risk that they might be abused in the future.

Child abuse can take other forms, including 'honour based' violence, female genital mutilation (FGM), child sexual exploitation (CSE), peer on peer abuse, radicalisation and violent extremism. Further details of these and other DfE identified safeguarding issues are included in greater detail in Appendix 1. Appendix 1 also offers advice on where to access further guidance.

The following signs may or may not be indicators that abuse has taken place. The lists are not exhaustive. Consequently, any person with responsibilities under this policy must share their concerns with the DSL or DDSs.

The NSPCC gives the following possible indications that a child is being abused:

- Frequently dirty, hungry or inadequately dressed
- Left in unsafe situations, or without medical attention
- Constantly put down, insulted, sworn at or humiliated
- Seems afraid of parents or carers
- Severely bruised or injured
- Displays sexual behaviour which doesn't seem appropriate for their age
- Growing up in a home where there is domestic violence
- Living with parents or carers involved in serious drug or alcohol abuse

This list does not cover every child abuse possibility. There may be other things in a child's behaviour or circumstances that could cause concern.

Abuse is always wrong, and it is never the young person's fault.

4. Symptoms and signs of Child Abuse

Some of the signs and behaviours which may indicate that a child is being abused include:

- repeated minor injuries, such as scalds or burns
- children who are dirty, smelly, poorly clothed or who appear under-fed
- children who have lingering illnesses or injuries that are not attended to
- deterioration in school work
- significant changes in behaviour
- aggressive behaviour or severe tantrums
- an air of detachment or an attitude of indifference
- overly-compliant behaviour
- a frozen awareness (a combination of a lack of expression, lethargy and watchfulness)
- sexually explicit behaviour, such as continual open masturbation, or aggressive and inappropriate sex play
- playing games that show a sexual awareness that is inappropriate and abnormal for the child's age
- a child who is reluctant to go home or is kept away from school for no apparent reason
- a lack of trust in adults, particularly in those who are close
- stomach pains with no medical reason
- eating problems, including over-eating or a loss of appetite
- disturbed sleep, nightmares or bed-wetting
- running away from home
- self-inflicted wounds
- attempts at suicide

- reverting to younger behaviour
- depression or withdrawal
- relationships between child and adults that are secretive and exclusive
- unexplained money or gifts
- pregnancy

The School is aware that these signs are not evidence in themselves, and that there may be other explanations for them. However, they may be a warning, particularly if a child exhibits several of them or if a pattern emerges. Abuse is not easy to diagnose, even for experts. Some guidance is provided here:

- **Signs of possible physical abuse:** any injuries not consistent with the explanation given for them; injuries which occur to the body in places which are not normally exposed to falls or rough games; injuries which have not received medical attention; reluctance on the part of a child to change for, or participate in, games or swimming; bruises, bites, burns and fractures which do not have an accidental explanation; object shaped bruises; inconsistent accounts given by the child for the cause of injuries.
- **Signs of possible emotional abuse:** depression, aggression, extreme anxiety, changes or regression in mood or behaviour; obsessions or phobias; sudden underachievement or lack of concentration; seeking adult attention and not mixing well with other children; negative statements made by the child about him or herself; acts of aggression or cruelty to others; extreme shyness or passivity; stealing and lying.
- **Signs of possible sexual abuse:** any allegations made by a child concerning sexual abuse; excessive preoccupation by the child with sexual matters and age-inappropriate knowledge of adult sexual behaviour; regular engagement in age-inappropriate sexual play; sexual activity through words, play or drawing; repeated urinary infections or unexplained stomach pains; eating disorders.
- **Signs of possible neglect:** dirty skin, body smells, unwashed, uncombed hair and untreated lice; clothing that is dirty, too big or small, or inappropriate for weather conditions; frequent occurrences where the child is left alone or unsupervised; frequent diarrhoea, tiredness and/or hunger; untreated illnesses, infected cuts or physical complaints; overeating.
- **Signs of possible child sexual exploitation:** sexual exploitation can be very difficult to identify. Warning signs can easily be mistaken for 'normal' teenage behaviour. Young people who are being sexually exploited may: be involved in abusive relationships, intimidated and fearful of certain people or situations; hang out with groups of older people, or anti-social groups, or with other vulnerable peers; associate with other young people involved in sexual exploitation; get involved in gangs, gang fights, gang membership; have older boyfriends or girlfriends; spend time at places of concern, such as hotels or known brothels; not know where they are, because they have been moved around the country; go missing from home, care or education. They may also show signs of sexual abuse or grooming.

- **Signs that children might be at risk from serious crime:** The Serious Violence Strategy, introduced in 2018, sets out the government response to serious violence and recent increase in knife crime, gun crime and homicide. The impact of serious crime on the individual and the community is significant. Staff need to be aware of indicators that might suggest that a child is at risk from or involved with serious crime. These may include increased absences from school, a change in friendships or relationships with older individuals or groups, a significant decline in performance, signs of self harm or a significant change in well being or signs of assault or unexplained injuries. Unexplained gifts or possessions could also indicate that a child has been approached by or are involved with individuals associated with criminal networks or gangs.
- **Signs of possible extremism/radicalisation:** Different people display various signs of radicalisation. Some people are able to hide it so well that they are indistinguishable from anybody else, making it hard to identify them as radicalised and understand what their intentions are or could be. The following are some signs that could mean somebody could be at risk of radicalisation or is going through a radicalisation process:
 - Physical changes: sudden or gradual change in physical appearance; sudden or unexpectedly wearing religious attire; getting tattoos displaying religious or political messages; unexpectedly growing a beard; unexpectedly shaving their head (skinhead); possessing unexplained gifts and clothing (groomers will sometimes use gifts such as mobile phones and clothing to bribe a young person).
 - Social changes: cutting ties with their friends, family or community; starting to become socially withdrawn; becoming dependent on social media and the internet; beginning to associate with others who hold radical views; bullying or demonising other people freely; beginning to attend rallies and demonstrations for extremist causes; associating with known radicals; visiting extremist websites, networks and blogs.
 - Emotional and verbal changes: beginning to complain, often with anger, about governmental policies, especially foreign policy; advocating violence or criminal behaviour; beginning to believe in government conspiracies; exhibiting erratic behaviour such as paranoia and delusion; speaking about seeking revenge; starting to exhibit extreme religious intolerance; demonstrating sympathy to radical groups; displaying hatred or intolerance of other people or communities because they are different.

5. Multi-Agency Procedures

Newcastle-under-Lyme School falls within the jurisdiction of the Staffordshire Safeguarding Children Board (SSCB). In compliance with *'Keeping Children Safe in Education: information for all school and college staff'* (September 2019), the Safeguarding Policy of Newcastle-under-Lyme School is in accordance with local SSCB procedures.

The Duty Staffordshire LADO (Local Area Designated Officer) can be contacted on 0800 1313126.

In all matters relating to safeguarding, the School will follow the procedures laid down by SSCB; together with relevant DfE guidance such as *'Working Together to Safeguard Children'* (August 2018) and *KCSIE* (September 2019). *KCSIE* can be accessed at <https://www.gov.uk/government/publications/keeping-children-safe-in-education--2>.

The School works with social care, the police, health services and other services to promote the welfare of children and protect them from harm. This includes a co-ordinated offer of early help when additional needs of children are identified and contributing to multi agency plans to provide additional support to children subject to child protection plans.

The School has a wide catchment area with the result that the relevant external agencies may be those in the counties of Cheshire, Shropshire or Staffordshire or in the unitary authority of the City of Stoke-upon-Trent, according to the address at which the pupil normally resides. In all situations involving alleged child abuse, the School works closely with the appropriate agency and follows the advice received in respect of the case.

Important contact Information:

The key agencies with which the School is involved are:

- LADO (at SSCB) 0800 1313 126
- Staffordshire First Response 0800 1313 126
Out of hours: 0345 6042886
- Stoke on Trent Safeguarding Children Board 01782 235100
Out of hours: 01782 234234
- Cheshire East
Safeguarding Children in Education Settings Team 0300 1235012
Out of hours 0300 1235022
- Shropshire Safeguarding Partnership 0345 678 9021.
Out of hours 0345 6789040

Prevent and Counter Extremism

Helplines for non-emergency advice on religious or political extremism:

- Department for Education 020 7340 7264
counter-extremism@education.gsi.gov.uk
- Police 101

The following numbers may be useful to pupils:

- Childline 0800 1111
- NSPCC 0808 800 5000
- Barnardo's 0800 942 8787

6. Designated Persons

The School has appointed a senior member of staff as Designated Safeguarding Lead for both parts of Newcastle-under-Lyme School. The DSL, Mrs J A Simms, is responsible for all matters related to child protection and welfare. The DSL is the Deputy Head Pastoral and is a member of the Senior Management Team. The School has also appointed four Deputy Designated Safeguarding Leads who will carry out the duties of the DSL if she is unavailable.

The DSL and DDSLs have close links with the SSCB. The DSL reports termly to governors on safeguarding and child protection including on the suitability and workings of this policy.

The DSL and DDSLs undergo refresher training every two years and the training meets the requirements of the DfE's Keeping Children Safe in Education. They also keep up to date with safeguarding developments. (See Appendix 2 for further details of the role of the DSL). The ultimate lead responsibility for safeguarding and child protection remains with the DSL and cannot be delegated.

The DSL (Mrs J A Simms) reports to the Headmaster (Mr M J Getty), who in turn reports to the Chair of Governors (Mr D Wallbank).

The DSL and DDSLs are:

In the Senior School:	Deputy Head Pastoral (Mrs J A Simms) DSL Deputy Head Academic (Mr I Dicksee) DDSL
In the Junior School:	Head of the Junior School (Mr N Vernon) DDSL Deputy Head of the Junior School (Mr M Erian) DDSL
For the EYFS:	Nursery Manager (Mrs A Smith) DDSL

During term time (during school hours) there will be a DSL / DDSL available for staff to discuss any safeguarding issues. Staff should consult with the DSL / DDSL in their section of the School. If any of the persons designated above are unavailable for any reason, then any of the others may act in their place. In the absence of the above, there should be no delay in action to be taken and staff are advised to contact the child's Social Care.

7. Governing Body

The School Governing Body is responsible for reviewing child protection arrangements and the efficiency with which resulting duties have been discharged; approving amendments in the light of review of procedures, changing regulations or recommended best practice. Child protection and safeguarding is a standing agenda item on each termly full Governors' meeting. The Governors ensure that the policies, procedures and training in the School are effective, in order for appropriate action to be taken in a timely manner to safeguard and promote children's welfare.

The School has a nominated 'link Governor' (Mr D Wallbank) with responsibility for Child Protection (Safeguarding). This nominated governor, in conjunction with the Chair of Governors, has the following role:

- (a) To have a basic understanding of local safeguarding partnership procedures and guidance issued by the Department for Education.
- (b) To be a link between the DSL and the Governing Body and to liaise with the DSL on safeguarding matters.
- (c) To liaise with relevant agencies in the event of an allegation being made against the Headmaster.
- (d) To undertake training as appropriate and necessary.
- (e) To maintain an awareness of how the Child Protection (Safeguarding) Policy is being implemented in the School by meeting termly with the DSL.
- (f) To ensure that the Child Protection (Safeguarding) Policy is reviewed annually by the Governing Body.

The Board of Governors receive a safeguarding update as an agenda item presented by the DSL at the termly Board of Governors Meetings and receives annual training.

8. Child Protection and Safeguarding Records

The School's records on child protection are kept securely and are separated from routine pupil records. Access is restricted to the Headmaster, DSL and DDSLs.

When pupils make a disclosure or when a member of staff has concern about a child's safety or welfare: instructions for staff.

9. How to deal with a disclosure by a child

This section summarises the advice and instructions to staff on how they should deal with a situation in which a pupil makes a disclosure. Any member of staff who is approached by a pupil who wishes "to talk" or to make a possible disclosure about alleged abuse concerns about safety or welfare of a child **must** manage the situation in the following way:

- (a) Be prepared to listen, making time to do so if necessary.
- (b) Be aware of the signs of possible abuse listed in this policy.
- (c) Explain at the outset the limits of confidentiality. **A promise must not be made that the information will not be shared with anybody else.** Information given to the member of staff will be treated with complete privacy and will not be shared indiscriminately, but it may have to be shared in order to enable action to be taken by other professionals. If so, the information will be shared only on a "need to know" basis.
- (d) Listen to the pupil and encourage him or her to talk.
- (e) **Do not ask the pupil any leading questions.** Any questioning must be limited to the minimum necessary for the purpose of clarification.
- (f) Do not stop or interrupt a pupil who is freely recalling significant events.
- (g) Do not look shocked or upset by what is being said.
- (h) Make an accurate note of the discussion, taking care to record the timing, setting and people present, as well as what was said, preferably verbatim using the child's statements in their own words.

- (i) Thank the pupil, and reassure him/her that he/she has acted correctly in disclosing the information.
- (j) Advise the pupil that it will be necessary for the information to be passed to the DSL, who is an appropriate senior person able to help.
- (k) Reassure the pupil that he/she is not responsible for what has happened.

It is important that a child alleging abuse is treated in the first instance as speaking truthfully and the matter acted upon. Retraction is usually because of external pressure.

Historical abuse allegations should be reported to the police.

10. Record Keeping

Anyone who has concerns over a child's safety or welfare, including suspicions of child abuse, must maintain a clear and accurate record. Concerns should be noted as soon as is reasonably practical including details of particular incidents and conversations. This record should include:

- Date and time of any observation or disclosure
- Detailed factual account of any incident including verbatim comments
- Details of the child's appearance, behaviour, emotional state and actions.

Under no circumstance must a person attempt to investigate his or her concerns. Other agencies are responsible for undertaking child protection investigations and inappropriate investigation may undermine the work of these agencies.

11. When Staff Have a Suspicion of Possible Abuse; the duty to report to the DSL

Staff must be aware that they have a professional obligation to make concerns known. If in any doubt, advice should be sought from the DSL or one of the DDSLs. After receiving a disclosure from a pupil, the information must be passed immediately to the DSL. Any member of staff who has his/her own suspicions of possible child abuse, or who has received allegations from a third party about possible child abuse, must report the information immediately to the DSL or in their absence one of the DDSLs and must not discuss the matter with anybody else. Everyone in school is required to report as soon as possible to the DSL or a DDSL their concerns over a child's safety and welfare, regardless of whether or not they have received a disclosure.

If at any point, there is a risk of immediate serious harm to a child a referral should be made to the local safeguarding partnership immediately. If the DSL or DDSL is not available, anybody can make a referral in this circumstance. **If a child is in immediate danger or is at risk of harm a referral should be made to children's social care and / or the police immediately.** Where referrals are not made by the DSL, then the DSL should be informed as soon as possible that a referral has been made.

If the child's situation does not appear to be improving the staff member with concerns should press for re-consideration. Concerns should always lead to help for the child at

some point. It is vital that, following the submission of a report to the DSL or a DDSL, the person concerned continues to monitor the child's safety and welfare. If a member of staff still has concern about the safety of a child then they should remain in contact with the DSL or contact Social Services directly.

Everyone should understand that if they are concerned that a child is suffering or likely to suffer significant harm, they can refer a child directly to children's social care. Anyone raising a concern can be confident that he or she will be always fully supported by the School.

Where a member of staff reasonably believes these reporting routes to be inappropriate, or has reported concerns and no action has been taken, they should contact the Headmaster or the Chair of Governors, refer their concerns to children's social care directly, or use the NSPCC whistleblowing helpline (see section 14 below for contact details).

If a teacher, in the course of their work in the profession, discovers that an act of Female Genital Mutilation (see Appendix 1) appears to have been carried out on a girl under the age of 18, the teacher **must report this to the police**.

12. Action Taken in the Event of Alleged or Suspected Abuse: Referrals, Early Help and Multi-Agency Working

Referrals

The School treats the safeguarding of children as its highest priority and recognises the additional role it has to play in the referral of children who are suffering or are likely to suffer significant harm.

It is important at all times to keep an open mind about a child's safety and welfare and never assume that safeguarding issues are confined to certain individuals, families or settings. It is particularly important to avoid making assumptions about a child based on personal perceptions of his or her domestic circumstances and family members. Being familiar with the types and signs of abuse as set out above is a key part of this.

When a DSL receives information or a disclosure involving alleged child abuse, suspected child abuse or that a child may be at risk of abuse, the DSL will:

- (a)** Ascertain the basic facts. (In ascertaining the basic facts the DSL may talk to the pupil(s) concerned but will only do so in the presence of another member of staff and will not ask any leading questions).
- (b)** Contact the local safeguarding partnership (depending on where the child lives) to discuss the basic facts of the case and to ascertain whether a formal report needs to be made.
- (c)** If a formal report needs to be made, subsequent actions (such as contacting parents) will depend on the further advice and instructions received from the agency.
- (d)** Inform other members of staff on a strict "need to know" basis.
- (e)** Produce a written record of the details of the allegations and ensure that any member(s) of staff providing information agree(s) with the account.

(f) Record the incident / referral on CPOMS.

(g) If the outcome of the referral to the local safeguarding partnership is that the pupil is put on the child protection register, or is otherwise subject to child protection procedures, the DSL will make arrangements for a confidential record to be kept, together with the names of any children/families with intimate connections with such children (for example, siblings or fostered children).

If it is established, in discussion with the Safeguarding team, that the basic facts do not at that time warrant a referral, a written record of any conversations and the reasoning that led to the decision not to refer will be kept and held in the pupil's file. Staff perceptions of the child's condition will be reviewed at regular intervals. If there are signs of deterioration in the child's condition, or if there is further information that suggests that abuse is possible, then the above procedure will be followed.

If a pupil is suspected to be on the receiving end of bullying-type behaviour (as defined by the *Anti-Bullying Policy*) that may be causing that pupil significant physical, sexual or emotional harm (as defined by the *Safeguarding Policy*), then the above procedure will be followed in addition to any action taken under the *Anti-Bullying Policy*.

When a pupil, known to the School to be on the child protection register, transfers from the School to another school, a DSL will inform the new school.

The School does not impose high thresholds on referrals to the local safeguarding partnership or other relevant external agencies such as the police. Consequently, when responding to concerns over a child's safety and welfare, the School will follow the SSCB guidance and the more detailed guidance on thresholds based on levels of need. The School will always make a referral where:

- A child is suffering or likely to suffer significant harm
- With the agreement of a person with parental responsibility, a child is likely to benefit from family support services.

A referral will be made immediately if a child is suffering or likely to suffer significant harm. Referrals will be made even where it is known that the local safeguarding partnership is already involved with the child and/or his or her family.

The content of the referral will be discussed with parents/carers where this is appropriate. In general, parents/carers should be informed about any concerns regarding their children. However, from time to time it might not be appropriate to inform them immediately of concerns where that could prejudice an investigation or place the child at further risk. Parents/carers are unlikely to be told that a referral is being made if sexual abuse or fabricated illness is suspected. In such cases, advice will be sought from the appropriate agencies. Members of staff are aware that they must not discuss any issues with parents/carers unless they are told to do so by an appropriate person.

As a School we take our commitment to attending Child Protection case conferences very seriously. In the unlikely event that we cannot attend, we will always send a written report to the conference to convey latest information and our opinions to the independent Chair.

Early Help and Multi-Agency Working

Where concerns over a child's safety and welfare do not meet the criteria for immediate referral, the School will follow guidance on early help and multi-agency working. All staff should be prepared to identify children who may benefit from early help.

Early help means providing support as soon as a problem emerges at any point in a child's life. In the first instance, staff should discuss early help requirements with the DSL. Sharing information with other professionals to support early identification and assessment may be required. Staff may also be required to support other agencies and professionals in an early help assessment or, in working with the DSL act as lead professional in undertaking an early help assessment. If early help or other support is appropriate, the case will be kept under constant review and consideration should be given to referral to the local safeguarding partnership if the child's situation does not appear to be improving.

In 'borderline' cases, i.e. where it is not immediately clear whether to make a referral, the School will consult the First Response Team at SSCB for advice. However, and regardless of the precise details of a response in any particular case, the School will always respond to concerns over a child's safety and welfare on the premise that concerns must be always shared.

Any child may benefit from early help and staff should be aware of the potential need for early help for a child who:

- is disabled or has specific additional needs
- has special educational needs
- is a young carer
- is frequently missing / goes missing from care or home
- is misusing drugs or alcohol
- is in a family circumstance presenting challenges for the child such as substance abuse, adult mental health problems or domestic abuse
- has returned home to their family from care.

13. Allegations Against Those Not Employed by the School

Where allegations of abuse are made against an adult other than a member of staff or volunteer working at the School, the relevant arrangements set down in the local safeguarding partnership guidance will be followed. It is important to understand that the School does not constitute an investigation or intervention agency, but that it does have an important role to play at the recognition and referral stage. As a result of their day-to-day contact with individual pupils during school terms, teachers and other school staff in the Nursery setting are particularly well placed to observe outward signs of possible abuse, changes in behaviour or failure to develop.

14. Handling Allegations of Abuse against a Member of Staff or School Volunteer

The responsibility of members of staff to report allegations or concerns about the behaviour of a colleague is as follows. Contact details for the Headmaster and Chair of Governors are included in the final section of the *Staff Handbook*.

- (a) Any member of staff who has concerns about the behaviour of a colleague, or who receives an allegation or disclosure concerning the behaviour of a colleague, **must pass this information on, to the Headmaster.**
- (b) If the Headmaster is away, the information must be reported to the Chair of Governors.
- (c) If the allegation is against the Headmaster, the information must be reported directly to the Chair of Governors without informing the Headmaster. The Chair will contact the LADO to seek guidance.
- (d) Members of staff must understand that they have a professional obligation to do this. There is no discretion not to report such an allegation, and failure to report a concern or allegation is potentially a serious disciplinary matter.
- (e) The Headmaster is advised to liaise with the DSL or DDSL (not a DSL/DDSL who is the subject of an allegation) because the DSL/DDSL will have received a higher level of child protection training. If the Chair of Governors receives an allegation, he is similarly advised to liaise with the Nominated Governor for Child Protection.
- (f) It is obvious that such allegations need to be treated with the utmost discretion, and the school is well aware that an allegation mistakenly made, whether or not for frivolous or malicious reasons, can jeopardise the career of a member of staff. **At the same time, the safety of the pupil is paramount and overrides all other considerations.** The procedures followed will be applied with common sense and judgement.
- (g) The Headmaster, in liaison with the DSL, will carry out an urgent initial assessment in order to establish whether the criteria has been met for an immediate referral to the LADO (see Section 12). If the allegation is that a member of staff has acted in a way that has harmed, or may have harmed a child (physically, sexually or emotionally), or has possibly committed a criminal offence against a child, or has acted towards a child in a way that would make him/her not suitable to work with children and may pose a risk to children, then the Headmaster (or Chair of Governors) or DSL **must** refer the matter to the LADO.
- (h) **There is no discretion for the Headmaster (or Chair of Governors) or DSL to make his/her own decision about what may appear to be a borderline case.** All concerns must be discussed with the LADO.
- (i) Subsequent actions will be as agreed with the LADO. The School **must not** do anything that might jeopardise a police investigation. In particular, the school **must not** attempt to investigate allegations of child abuse and **must not** ask pupils leading questions. Such investigations must be left to the appropriate external agencies (police, social services, medical authorities).
- (j) During the course of the investigation the School, in consultation with the LADO, will decide what information should be given to parents, staff and other pupils, and how media enquiries are to be dealt with. Due consideration will be given to the provisions

in the Education Act 2011 relating to reporting restrictions on the identification of teachers who are the subject of allegations from pupils. Parents/carers of any pupil involved will receive specific advice from the School about reporting restrictions and the importance of maintaining confidentiality. The School will support the member of staff by making every effort to maintain confidentiality, guard against unwanted publicity and keep him/her informed on a regular basis. The child's parents will be kept similarly informed throughout the process (as guided by the LADO).

(k) Following the initial discussion, a course of action will be agreed with the LADO. If the LADO declines further involvement, the allegation or concern will be dealt with in accordance with the School's internal procedures. Where the LADO decides that a course of action is required, the School will follow advice and instructions given by the LADO and, more generally, the guidance set down in KCSIE. This will include taking a decision as to whether the adult concerned should be suspended from his or her work at the School. It may be necessary to suspend the member of staff during any investigation. This is a neutral move that is designed to protect both pupils and the member of staff. Suspension will only be considered in a case where there is cause to suspect a child or other children at the School are at risk of harm or the case is so serious that it might be grounds for dismissal; the allegation relates to a potential criminal offence and warrants investigation by the police. Based on assessment of risk, alternatives will be considered, such as redeployment within the School so that the individual does not have direct contact with the child concerned, providing an assistant to be present when the individual has contact with the child, redeploying to alternate work within the School, moving the child to classes where they will not come into contact with the individual. Suspension will not be an automatic response or imposed as a 'knee jerk action'; all alternatives to suspension will be properly considered. If the person concerned is suspended, he or she will be given a named contact at the School who will inform them of progress in resolving their case and assess the level of support they require. Where it has been deemed appropriate to suspend the person, written confirmation should be dispatched within one working day, giving as much detail as appropriate for the reasons for the suspension. The person should be informed at the point of their suspension who their named contact is within school. The term does, however, have an unfortunate negative connotation, and the School will therefore only suspend a member of staff from contact with pupils after careful thought and consideration. A person who is the subject of an allegation will receive effective support from the School, which will do all that it reasonably can to deal with the allegation as quickly as possible, but in a way that is both fair and consistent. The School will inform the person as soon as possible of the allegation and the likely course of action. Advice will be also provided on contacting trade union officials and other sources of support.

(l) If any subsequent action is necessary following the completion of the investigation they will be taken in accordance with the School's Disciplinary Procedures for staff.

(m) Cases in which an allegation was proven to be false, unsubstantiated or malicious will not be included in employer references. A history of repeated concerns or allegations which have all been found to be false, unsubstantiated or malicious will also not be included in any reference. Pupils who make malicious allegations will be dealt

with under the School's disciplinary procedures as described in the *Behaviour, Rewards and Sanctions Policy*.

(n) If the School dismisses or otherwise ceases to use the services of a person because he or she has harmed a child, poses a risk of harm to children or has committed a relevant offence, it will immediately report this fact to the Disclosure and Barring Service.

In addition, if the person concerned was a member of teaching staff, the School will make a referral to the Teaching Regulation Agency (TRA), who will decide whether or not to issue a prohibition order. The School will make a serious incident report to the Charity Commission in accordance with the Commission's guidelines. If there is concern about the welfare of other children in the community or the teacher's family, those concerns should be reported to the relevant designated officers, children's social care or the police.

(o) Where a staff member feels unable to raise an issue with their employer or feels that their genuine concerns are not being addressed, other whistleblowing channels may be open to them:

- General guidance can be found at: *Advice on whistleblowing*
- The NSPCC whistleblowing helpline is available for staff who do not feel able to raise concerns regarding child protection failures internally. Staff can call: 0800 028 028. This line is available from 8:00 AM to 8:00 PM, Monday to Friday, Email: help@nspcc.org.uk

15. The School's Staff Behaviour Policy

A separate code of conduct for staff, described as the *Staff Behaviour Policy*, has been produced to guide staff and volunteers in their relationships with pupils. This policy aims to ensure both that staff neither place pupils nor themselves at risk of harm, and that they avoid conduct that might expose them to the risk of an allegation that they have harmed a child. It includes guidance on all aspects of communication with pupils, including social media. The policy is available to staff on Firefly on the School's computer network, or from the Human Resources Manager.

Avoiding Allegations of Abuse: Guidance to Staff

Allegations of abuse of children are sometimes made against staff by children themselves or by their parents/guardians or by others close to the school. In cases such allegations can be malicious or unfounded. Staff have a duty, however, to ensure that they do not put themselves in a situation where it may be easier for such allegations to arise. The following guidance is provided:

(a) Physical Contact with Pupils

In general, physical contact with pupils should be avoided. However, there are situations when it is unavoidable. Displays of emotion by children should be met with a reasonable response (such as a hand on the shoulder). Kissing or cuddling (and in general hugging) a pupil is not appropriate. When a pupil is in need of consolation, great care should be taken to ensure that the consolation provided is appropriate to the circumstances and the age of the pupil. In sporting activities, especially when demonstrating exercise techniques great care should be taken to avoid contact if

possible. The teacher should either demonstrate the exercise him/herself or use visual aids. If physical contact is essential then hands should be placed in a supportive position, giving preference to arms, legs and the back. **Members of staff are reminded that hitting a pupil is never acceptable and that the School does not use corporal punishment.** Where it is necessary for a member of staff to restrain a pupil physically the appropriate guidance in the Behaviour Management Policy must be followed.

(b) One-to-One Situations

Staff should take great care when dealing with a pupil alone. Where possible, such encounters should take place at a time when, and in a location where, there are other people in the vicinity. It makes sense to leave a door open and to have a physical barrier (such as a desk) between the pupil and the teacher. Such arrangements should, of course, be made in the context of the need to provide confidentiality where appropriate to the pupil concerned. Members of staff should avoid being on their own with a pupil in a car.

(c) Electronic Communication

Where members of staff need to communicate with pupils using e-mail, they must do so only using their staff school email addresses. It is not acceptable for members of staff to communicate with pupils using social networking sites (such as Facebook) or instant messaging services. The School recognises that members of staff may gather the mobile telephone numbers of pupils in the course of the safe running of a school trip. However, staff must delete any pupil numbers stored in their personal mobile telephones at the conclusion of the trip. In general, communicating with pupils using mobile telephones is not acceptable, and staff should not give their personal telephone numbers to pupils or personal email addresses to pupils, nor should they communicate with them by text message or personal email. If they need to speak to a pupil by telephone, they should use the School's telephones. Great caution is also advised when communicating with recent former pupils by electronic and other means, as they may have friends or siblings who are still pupils at the School.

(d) Suggestive Conversation

Members of staff must avoid having conversations with pupils that use inappropriate language, such as swearing or sexual innuendo, or that are sexually suggestive.

(e) Photographic Images

The taking of photographs of pupils by members of staff whilst undertaking school activities is acceptable in principle, whether the images are captured on school or personal equipment. It is not, however, acceptable for members of staff to take or share images of pupils that are inappropriate (either by virtue of what the pupils are doing or by virtue of how they are dressed). All photographs of pupils taken whilst undertaking school activities must be stored on the school network and must not be stored on personal devices. Personal devices may be used for temporary storage as part of the process of transferring captured images to the school network, but images must be deleted from personal devices once the process of transferring them to the school network has been completed and this must be carried out as soon as is possible. Images stored on the school network must not be downloaded onto personal devices, and members of staff must not take or download images of pupils for personal purposes.

Members of staff working in the EYFS must not be in possession of a personal camera or personal mobile telephone whilst working in the setting. Parents and visitors are also required to refrain from using electronic devices for the purpose of making calls or recording images in the setting. Staff should feel empowered to prevent visitors using mobile devices in the EYFS setting. Parents of pupils in the EYFS are asked to give consent to the use of Tapestry (Electronic Learning Journey) to record images that illustrate the pupils' individual development. All images should be deleted once the pupil has left the setting.

(f) Physical Restraint

Any physical restraint is only permissible when a child is in imminent danger of inflicting an injury on himself/herself or on another, and then only as a last resort when all efforts to diffuse the situation have failed. Another member of staff should, if possible, be present to act as a witness. All incidents of the use of physical restraint should be recorded in writing and reported immediately to the Headmaster who will decide what to do next. Where this relates to the School's Nursery and EYFS setting, parents will be informed of any physical restraint used on their child the same day or as soon as reasonably practicable.

(g) Physical education and other activities requiring physical contact

Where exercises or procedures need to be demonstrated, extreme caution should be used if the demonstration involves contact with pupils and, wherever possible, contact should be avoided. It is acknowledged that some staff, for example, those who teach PE and games, or who offer music tuition, will, on occasions, have to initiate physical contact with pupils in order to support a pupil so they can perform a task safely, to demonstrate the use of a particular piece of equipment/instrument or assist them with an exercise. This should be done with the pupil's agreement. Contact under these circumstances should be for the minimum time necessary to complete the activity and take place in an open environment. Staff should remain sensitive to any discomfort expressed verbally or non-verbally by the child.

(h) Transporting pupils

It is inadvisable for a teacher to give a lift in a car to a pupil alone. Wherever possible and practicable it is advisable that transport is undertaken other than in private vehicles. If there are exceptional circumstances that make unaccompanied transportation of pupils unavoidable, the journey should be made known to a senior member of staff.

(i) Confidentiality

Staff members should never give absolute guarantees of confidentiality to pupils or adults wishing to tell them about something serious. They should guarantee only that they will pass on information to the minimum number of people who must be told in order to ensure that the proper action is taken to sort out the problem and that they will not tell anyone who does not have a clear need to know. They will also take whatever steps they can to protect the informing pupil or adult from any retaliation or unnecessary stress that might be feared after a disclosure has been made.

16. Allegations of abuse made against other children

Where it is alleged that a child has been abused by another child, the School will refer the matter to Children's Social Care or the police in accordance with the relevant local Contact and Referrals Procedure. Any pupils who are involved, whether as alleged victims and/or perpetrators, will receive appropriate care from the School. Any bullying incidents which involve significant harm to a pupil will be treated as a safeguarding concern. The School's Anti-Bullying and Anti Cyber Bullying Policy is available on the School's website.

Children are capable of abusing their peers and peer on peer abuse can manifest itself in many ways. Peer on peer abuse includes Sexting and gender based bullying eg a pupil being sexually touched or assaulted by another pupil. It is important that all allegations of peer on peer abuse are investigated. This should be carried out in a sensitive manner and it should be made clear that abuse is abuse and should never be tolerated or passed off as a 'banter' or 'part of growing up'.

Any peer on peer abuse allegation must be referred to the DSL immediately. Where a concern regarding peer on peer abuse has been disclosed to the DSL advice and guidance will be sought from First Response at SSCB and if it is clear a crime has been committed or there is a risk of crime being committed the Police will be contacted. Following advice from external agencies there will usually be a School response to the unacceptable behaviour, for example, if a pupil's behaviour negatively impacts on the safety and welfare of other pupils then safeguards will be put in place to promote the well-being of the pupils affected, the victim and perpetrator will be provided with support to prevent any reoccurrence of improper behaviour. (For further information see Appendix 1)

17. Pupils with SEND

Pupils with special educational needs and disabilities, whether having an EHC Plan, legacy Statement or neither, can face additional challenges. Additional barriers can exist when recognising abuse and neglect in this group of children. This can include:

- Assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's disability without further exploration
- Being more prone to peer group isolation than other children.
- Children with SEND can be disproportionately impacted by things like bullying, without outwardly showing any signs
- Communication barriers and difficulties in overcoming these barriers.

Any causes of concern should be reported immediately to the DSL, or in their absence a DDSL, who, in discussion with the SEND Co-ordinator will investigate and report, if necessary, to the local safeguarding partnership.

18. Looked after children

The School nominates a designated member of staff (usually one of the DDSLs) to safeguard and promote the welfare of any 'looked after' child at the School. This person reports to the DSL. The term '**looked after**' refers to children and young people who are

in the care of the Government or who are provided with accommodation for more than a continuous period of 24 hours. The most common reason for children becoming looked after is as a result of abuse and/or neglect. In the case of a pupil becoming 'looked after' then the legal status of the child's care arrangements will be kept on the pupil's file. Staff will be made aware of the care arrangements of the child. The DSL will have the details of the social worker involved with the child. If a referral is received concerning a child or young person who is 'looked after', the same procedures should be followed as for any child or young person at the School. A previously looked after child potentially remains vulnerable and will continue to be supported by the DDSL / DSL who will continue to work with agencies involved and will ensure that prompt action is taken should there be any cause for concern. The DSL is responsible for promoting the educational achievement of children who have left care through adoption, special guardianship or child arrangement orders or who were adopted from state care outside England and Wales.

19. Training

All staff and volunteers are trained appropriately, with regular updates, in accordance with procedures laid down by the local safeguarding partnership.

(a) The DSL/DDSLS are trained in child protection and in local inter-agency working in line with *'Working Together to Safeguard Children'*. The Headmaster is also trained in child protection and in local inter-agency working. This training is updated at least every two years. This training is provided by Staffordshire Safeguarding Children Board. In addition they update knowledge and skills by emails etc at regular intervals to keep up with developments relevant to their role. This meets the requirements of *KCSIE*. They have job descriptions that include reference to their safeguarding roles and other activities.

(b) All members of staff (and part-time members of staff) have received training in safeguarding and child protection procedures, the Prevent order, online safety, the acceptable use of ICT and guidance on the use of social media. Staff also receive training on how to deal with incidents of peer on peer abuse. This training is updated annually. This training may be provided by the DSL, or alternatively is provided by the local social services department or external agencies acceptable to the Staffordshire Safeguarding Children Board. All staff must read and confirm that they have read *Part 1 of KCSIE including Annex A* at the start of each academic year. Safeguarding and child protection updates (via email and/or staff meetings) will be sent out as required, but at least annually in order to ensure that staff have the relevant skills and knowledge to safeguard children effectively.

(c) All newly-appointed members of staff undergo child protection training as part of their induction.

They are provided with

- a link to a copy of Part One of *KCSIE including Annex A*,
- the School's Safeguarding Policy (including the CME procedures)
- Staff Behaviour Policy
- Whistleblowing Policy

- Behaviour Rewards and Sanctions Policy and Anti Bullying and Anti Cyber Bullying Policy
- Missing Pupil Policy
- Social Media Policy for Staff

This training is provided by the School's DSL who makes them aware of their role; they receive appropriate induction training on their responsibilities in being alert to the signs of abuse and bullying, as well as the procedures for recording and referring concerns to the DSL. Training is an important part of the induction process.

Training includes an overview of this policy and the policies mentioned above, and makes them aware of the identity of the DSL and Deputy DSLs. Training also makes staff aware of the forms and signs of child abuse, and promotes greater awareness of particular safeguarding concerns, including political/ religious extremism, female genital mutilation, child sexual exploitation, cyber-bullying and mental health. It is the responsibility of the DSL and DDSL to ensure that training is in accordance with latest advice provided by SSCB and other relevant agencies.

(d) Voluntary staff are made aware of the Child Protection (Safeguarding) Policy by the DSL. Safeguarding and child protection training is also given to governors.

(e) All records of staff training are kept in the Child Protection Log. This is kept and maintained by the Headmaster.

20. Staff Obligations

All staff in the School are required to notify the School immediately if there are any reasons why they should not be working with children. The School takes its responsibility to safeguard children very seriously and any staff member who is aware of anything that may affect his/her suitability to work with children must notify the School immediately. This will include notification of any convictions, cautions, court orders, reprimands or warnings he/she may receive.

21. Safeguarding children and whistleblowing

A member of staff or volunteer who has concerns about the behaviour of another member of staff towards a child, or more general concerns about failings in the School's safeguarding and child protection procedures, should report them, following the guidance in the School's *Whistleblowing Policy* (available on Firefly). They can be confident that such concerns will be thoroughly investigated. Adverse consequences will not be suffered by anyone who reports a genuine concern in good faith. Where there are allegations of criminal activity, the relevant authorities will always be informed

22. Safer Employment Practices

The School follows the Government's recommendations for the safer recruitment and employment of staff who work with children and acts at all times in compliance with the *Independent School Standards Regulations* and the requirements of *KCSIE*.

In line with Part 3 of the DfE's guidance '*Keeping Children Safe in Education*' (KCSIE), the Governing Body prevents people who pose a risk of harm from working with pupils by adhering to statutory responsibilities to check all staff who work with children, taking proportionate decisions on whether to ask for any checks beyond the minimum required, and ensuring volunteers are appropriately supervised.

As part of carrying out safe recruitment procedures under KCSIE, 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 most appointments, an enhanced DBS check with 'barred list' information will be appropriate. A DBS certificate will be obtained from the candidate before or with appropriate risk control managements authorised by the Headmaster and reviewed fortnightly, 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. Further to the DBS check, anyone appointed to carry out teaching work will require an additional check to ensure they are not prohibited from teaching by order of the Secretary of State. For those engaged in management roles an additional check is required to ensure they are not prohibited under section 128 provisions.

All governors, volunteers and contractors working regularly during term-time (such as contract catering staff) are also subject to the statutory DBS checks. Confirmation is obtained that appropriate child protection checks and procedures apply to any staff employed by another organisation and working with the School's pupils at school or on another site. Should the School develop concerns about an existing staff member's suitability to work with children, it will carry out all relevant checks as if the individual were a new member of staff.

Please also refer to the School's *Safer Recruitment Policy* for further details.

23. Promoting Awareness amongst pupils about safeguarding and online safety

The School seeks to give its pupils an age-appropriate understanding of how to promote both their own safety and well-being and that of other children (this includes online safety). The School is aware that the use of technology has become a significant component of many safeguarding issues. In supporting our pupils the School looks to ensure that it has an effective approach to online safety in order to protect and educate our school community in their use of technology. Specific advice is given to pupils on how to keep themselves safe, especially when using electronic equipment and accessing the internet. This is done through a variety of means, including the PSHE programme, ICT lessons, tutor / form periods and assemblies. Further guidance to pupils on e-safety and appropriate use of electronic equipment can be found in the School's *E Safety, Mobile Device and ICT Acceptable Use Policy*, this identifies the usage and expected behaviour of pupils. (Pupils' in Years 7-11 are not allowed to use their mobile phones during the school day unless given permission and monitored by a member of staff).

The School protects its pupils when accessing the internet via the School's network through the use of Smoothwall and content filtering software.

The School's curriculum and pastoral systems are designed to foster the spiritual, moral, social and cultural development of all our pupils. All teaching staff play a vital role in this process, helping to ensure that all pupils relate well to one another and feel safe and comfortable within the School. We expect all the teaching staff to lead by example and to play a full part in promoting an awareness that is appropriate to their age amongst all our pupils on issues relating to health, safety and well-being. All staff, including all non-teaching staff, have an important role in insisting that pupils always adhere to the standards of behaviour set out in our behaviour policy and in enforcing our anti-bullying policy.

Time is allocated in PSHE to discussions of what constitutes appropriate behaviour and on why bullying and lack of respect for others is never right. Assemblies, drama and RE lessons are used to promote tolerance and mutual respect and understanding, including a sympathetic appreciation of other faiths and cultures, and embed fundamental British values of democracy, the rule of law and individual liberty. All pupils know that there are adults whom they can turn to if they are worried. If the School has concerns about a child there is always a recognised requirement for sensitive communication and designated staff members are aware of the need to avoid asking leading questions.

They also include specific advice to children as to how to keep themselves safe, especially when using electronic equipment and accessing the internet. Further guidance to pupils on e-safety and appropriate use of electronic equipment can be found in the School's *E Safety, Mobile Device and ICT Acceptable Use Policy*. The School recognises its obligations, under the Counter-Terrorism and Security Act 2015, to prevent its pupils from being drawn into terrorism and develop their resilience to extremist ideologies. The School works in partnership with the local safeguarding partnership and other agencies to make staff aware of how to protect children who may be vulnerable to radicalisation or exposed to extremist views. All pupils know that there are adults to whom they can turn to if they are worried.

Our support to pupils includes the following:

- Advice and help numbers are available for external specialists such as ChildLine, CEOP.
- Our First Aid Rooms display advice on where pupils can seek help and the School Counsellors are available for help and advice.
- We provide leadership training to our head boys/girls and their team of prefects which specifically covers child protection issues and the importance of offering support and assistance to younger and to vulnerable pupils.
- We provide regular lessons to pupils on e-safety and ensure that all pupils understand and adhere to the School's guidelines in this area. For more details on cyber-bullying please refer to the School's Anti-Bullying and Anti Cyber Bullying Policy.

24. Review

This policy is reviewed annually by the Governing Body to check that it remains compliant with current legislation. The Nominated Governor with responsibility for Child Protection (Safeguarding) (see Section 6) meets termly with the DSL to discuss how the policy has been implemented during the previous year. He will then make an annual report to the Governing Body in order to assist it with an annual review of the efficiency with which the duties of the school in relation to its Child Protection (Safeguarding) policies have been discharged. The Governing Body will ensure that any deficiencies or weaknesses identified by the annual review are remedied without delay.

Policy and Procedures for Child Missing from Education

(this does not include truancy or pupils leaving the site without permission; for this see *Missing Pupil Policy*.)

All children, regardless of their circumstances, are entitled to a full time education which is suitable to their age, ability, aptitude and any special educational needs they may have. Local authorities have a duty to establish, as far as it is possible to do so, the identity of children of compulsory age who are missing education in their area. A child going missing from education is a potential indicator of abuse or neglect and can be a safeguarding issue.

See '*Missing Children and Adults Strategy*' and '*Children Missing Education*' DfE.

School staff should follow the School's procedures for dealing with children that go missing from education, particularly on repeat occasions, to help identify the risk of abuse and neglect, including sexual exploitation, and to help prevent the risks of their going missing in future. It is essential that all staff are alert to signs to look out for and the individual triggers to be aware of when considering the risks of potential safeguarding concerns such as travelling to conflict zones, FGM and forced marriage.

All pupils at the School are on the Admissions Register and also recorded on the Attendance Register, both of which are maintained by the Registrar, Mrs C Quigley. The Registrar informs the local authority of any pupil who is going to be deleted from the Admission Register where they:

- have been taken out of school by their parents and are being educated outside the school system e.g. home education;
- have ceased to attend school and no longer live within reasonable distance of this school;
- have been certified by the School's appointed medical officer as unlikely to be in a fit state of health to attend school before ceasing to be of compulsory school age, and neither he/she nor his/her parent has indicated the intention to continue to attend the school after ceasing to be of compulsory school age;
- are in custody for a period of more than four months due to a final court order and the proprietor does not reasonably believe they will be returning to the school at the end of that period;
- have been permanently excluded.

The local authority is notified when the School deletes a pupil from its Register under any of the above circumstances. This is done as soon as the grounds for deletion are met, but no later than deleting the pupil's name from the Register. This enables the local authority to follow up with any child in danger of not receiving an education who might be at risk of abuse or neglect.

Where it is suspected that a pupil might be missing education because they are suffering from maltreatment, including abuse, the School will follow procedures set down in the Safeguarding Policy.

Registration of pupils

Each pupil's attendance is monitored through daily registration. Pupils are registered by their Form Tutor / Teacher twice a day (morning and afternoon) and this is recorded on SIMS.

Where a pupil has not registered at the start of the school day and the School has not received notification of absence from the child's parent / carer, then the School Office will contact the parent / carer.

Unexplained absences or absences which are not explained to the School's satisfaction will be investigated.

Any pupil whose attendance falls below ninety per cent from the start of the academic year is brought to the attention of the Deputy Head Pastoral (Senior School) / Head (Prep School). The Deputy Head Pastoral and the relevant Head of Year / Head and Deputy Head (Prep School) will investigate and decide on appropriate course of action which may be in the form of a letter or a discussion with parents.

The School will inform the local authority of any pupil who fails to attend school regularly, or has been absent without the School's permission for a continuous period of 10 school days or more, at such intervals as are agreed between the School and the local authority (or in default of such agreement, at intervals determined by the Secretary of State).

Appendix 1: Specific safeguarding issues

All staff should have an awareness of safeguarding issues; some of which are listed below. Staff should be aware that behaviours linked to the likes of drug taking, alcohol abuse, truanting and sexting put children in danger.

All staff should be aware safeguarding issues can manifest themselves through children abusing children. This is most likely to include, but not limited to: bullying (including cyber bullying), gender based violence/sexual assaults and sexting. Staff should be clear as to the School's policies and procedures with regards to peer on peer abuse.

Expert and professional organisations are best placed to provide up-to-date guidance and practical support on specific safeguarding issues. For example information for schools and colleges can be found on the TES, MindEd and the NSPCC websites. School and college staff can access government guidance as required on the issues listed below via GOV.UK and other government websites. Additional information about specific forms of abuse and safeguarding issues as shown are included in the following sections.

- Abuse
- Bullying including cyberbullying
- Child missing from education - see below
- Child missing from home or care
- Child sexual exploitation (CSE) – see below
- Child criminal exploitation: county lines
- Domestic violence – see below
- Drugs
- Fabricated or induced illness
- Faith abuse
- Female genital mutilation (FGM) – see below
- Forced marriage
- Gangs and youth violence
- Gender-based violence
- Homelessness – see below
- Honour based violence
- Missing children and adults strategy
- Online safety
- Private fostering
- Radicalisation – see below
- Peer on peer abuse – see below
- Sexting
- Sexual violence and sexual harassment between children – see below
- Teenage relationship abuse
- Trafficking
- Upskirting (which is now a criminal offence)

Contextual safeguarding: safeguarding incidents and/or behaviours can be associated with factors outside the school and can occur between children outside the school. All staff should consider the context within which such incidents and/or behaviours occur. It is important to provide as much information as possible as part of the referral process. This will allow any assessment to consider all the available evidence and the full context of any abuse.

1. Child sexual exploitation (CSE)

CSE is a form of sexual abuse where children are sexually exploited for money, power or status. Like all forms of child sex abuse, child sexual exploitation:

- 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;
- can still be abuse even if the sexual activity appears consensual;
- can include both contact (penetrative and non-penetrative acts) and non-contact sexual activity;
- can take place in person or via technology, or a combination of both;
- can involve force and/or enticement-based methods of compliance and may, or may not, be accompanied by violence or threats of violence;
- 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);
- can be perpetrated by individuals or groups, males or females, and children or adults. The abuse can be a one-off occurrence or a series of incidents over time, and range from opportunistic to complex organised abuse; and
- is typified by some form of power imbalance in favour of those perpetrating the abuse. 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 resource

A significant number of children who are victims of sexual exploitation go missing from home, care and education at some point.

Some of the following signs may be indicators of sexual exploitation:

1. Children who appear with unexplained gifts or new possessions;
2. Children who associate with other young people involved in exploitation;
3. Children who have older boyfriends or girlfriends;
4. Children who suffer from sexually transmitted infections or become pregnant;
5. Children who suffer from changes in emotional well-being;
6. Children who misuse drugs and alcohol;
7. Children who go missing for periods of time or regularly come home late;
8. Children who regularly miss school or education or do not take part in education

2. So-called 'honour based' violence

So-called 'honour-based' violence (HBV) 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. All forms of so called HBV are abuse (regardless of the motivation) and should be handled and escalated as such. If in any doubts staff should speak to the DSL or a DDSL. Professionals in all agencies, and individuals and groups in relevant communities, need to be alert to the possibility of a child being at risk of HBV, or already having suffered HBV.

If staff have a concern regarding a child that might be at risk of HBV they should activate local safeguarding procedures, using existing protocols for multiagency liaison with police and children's social care.

Female Genital Mutilation

FGM comprises all procedures involving partial or total removal of the external female genitalia or other injury to the female genital organs. It is illegal in the UK and a form of child abuse with long lasting harmful consequences.

Staff need to be alert to the possibility of a girl being at risk of FGM, or already having suffered FGM. There is a range of potential indicators that a child or young person may be at risk of FGM, which individually may not indicate risk but if there are two or more indicators present this could signal a risk to the child or young person. Victims of FGM are likely to come from a community that is known to practise FGM. Professionals should note that girls at risk of FGM may not yet be aware of the practice or that it may be conducted on them, so sensitivity should always be shown when approaching the subject.

Section 5B of the Female Genital Mutilation Act 2003 (as inserted by section 74 of the Serious Crime Act 2015) places a statutory duty upon teachers along with regulated health and social care professionals in England and Wales, to 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. Those failing to report such cases will face disciplinary sanctions. It will be rare for teachers to see visual evidence, and they should not be examining pupils, but the same definition of what is meant by "to discover that an act of FGM appears to have been carried out" is used for all professionals to whom this mandatory reporting duty applies.

Teachers must personally report to the police cases where they discover that an act of FGM appears to have been carried out. The teacher should also discuss any such case with the DSL and involve children's social care as appropriate. The duty does not apply in relation to at risk or suspected cases (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 in cases where the woman is 18 or over. In these cases, teachers should follow local safeguarding procedures.

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.

Schools can play an important role in safeguarding children from forced marriage. The Forced Marriage Unit has published Multi-agency guidelines, with pages 32-36 focusing on the role of schools and colleges. School staff can contact the Forced Marriage Unit if they need advice or information. Contact: 020 7008 0151 or email: fm@fco.gov.uk.

3. Preventing Radicalisation

See *Preventing Extremism and Radicalisation Policy*

Protecting children from the risk of radicalisation is part of the School's wider safeguarding duties, and is similar in nature to protecting children from other forms of harm and abuse. During the process of radicalisation it is possible to intervene to prevent vulnerable people being radicalised. Radicalisation refers to the process by which a person comes to support terrorism and forms of extremism (extremism is vocal or active opposition to our fundamental values, including the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs. This also includes calling for the death of members of the armed forces.).

There is no single way of identifying an individual who is likely to be susceptible to an extremist ideology. It can happen in many different ways and settings. Specific background factors may contribute to vulnerability which are often combined with specific influences such as family, friends or online, and with specific needs for which an extremist or terrorist group may appear to provide an answer. The Internet and the use of social media in particular has become a major factor in the radicalisation of young people.

As with managing 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. School staff should use their professional judgement in identifying children who might be at risk of radicalisation and act proportionately which may include making a referral to the Channel programme.

The Prevent Duty

From 1 July 2015 specified authorities and all schools are subject to a duty under section 26 of the Counter-Terrorism and Security Act 2015 ("the CTSA 2015"), in the exercise of their functions, to have "due regard to the need to prevent people from being drawn into terrorism". This duty is known as the Prevent duty. It applies to a wide range of public-facing bodies. Bodies to which the duty applies must have regard to statutory

guidance issued under section 29 of the CTSA 2015 (“the Prevent guidance”). Paragraphs 57-76 of the ‘Revised Prevent duty guidance for England and Wales’ are specifically concerned with schools.

The statutory ‘*Revised Prevent duty guidance: for England and Wales*’ (for schools) summarises the requirements on schools, which we follow, in terms of four general themes: risk assessment, working in partnership, staff training and IT policies.

- Schools are expected to assess the risk of children being drawn into terrorism, including support for extremist ideas that are part of terrorist ideology. This means being able to demonstrate both a general understanding of the risks affecting children and young people in the area and a specific understanding of how to identify individual children who may be at risk of radicalisation and what to do to support them.
- The Prevent duty builds on existing local partnership arrangements. For example, governing bodies and proprietors of all schools should ensure that their safeguarding arrangements, as is the case for the School, take into account the policies and procedures of Local Safeguarding Children Boards (LSCBs). Effective engagement with parents / the family should also be considered as they are in a key position to spot signs of radicalisation. It is important for us to assist and advise families who raise concerns and be able to point them to the right support mechanisms. School will also discuss any concerns in relation to possible radicalisation with a child’s parents in line with our school’s safeguarding policies and procedures unless they have specific reason to believe that to do so would put the child at risk.
 - All staff receive Prevent awareness training (WRAP) to enable them to protect children from the risk of radicalisation.
 - Schools must ensure that children are safe from terrorist and extremist material when accessing the internet in schools. Our school ensures that suitable filtering is in place and teaches pupils about online safety more generally.

The government website ‘educate against hate’ (<http://educateagainsthate.com/>) provides information and resources that help to recognise and address extremism and radicalisation in young people.

Channel

School staff should understand when it is appropriate to make a referral to the Channel programme. Channel is a programme which focuses on providing support at an early stage to people who are identified as being vulnerable to being drawn into terrorism. It provides a mechanism for the school to make referrals if they are concerned that an individual might be vulnerable to radicalisation. An individual’s engagement with the programme is entirely voluntary at all stages.

In addition to information sharing, if a staff member makes a referral to Channel, they may be asked to attend a Channel Panel to discuss the individual referred to determine whether support is required. Section 36 of the CTSA 2015 places a duty on local authorities to ensure Channel panels are in place. The panel is chaired by the local authority and includes the police for the relevant local authority area. Following a referral the panel will assess the extent to which identified individuals are vulnerable to

being drawn into terrorism, and, where considered appropriate and necessary consent is obtained, arrange for support to be provided to those individuals.

Section 38 of the CTSA 2015 requires partners of Channel panels to co-operate with the panel in the carrying out of its functions and with the police in providing information about a referred individual. Schools which are required to have regard to Keeping Children Safe in Education are listed in the CTSA 2015 as partners required to co-operate with local Channel panels.

4. Peer on Peer Abuse

All staff should recognise that children are capable of abusing their peers.

Peer on Peer abuse can take different forms eg

- **sexual violence and sexual harassment:** Sexually harmful behaviour from young people is not always contrived or with the intent to harm others. There may be many reasons why a young person engages in sexually harmful behaviour and it may be just as distressing to the young person who instigates it as well as the young person it is intended towards. Sexually harmful behaviour may range from inappropriate sexual language, inappropriate role play, to sexually touching another or sexual assault/abuse.
- **upskirting:** this typically involves taking a picture under a person's clothing without them knowing, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm. Upskirting is a criminal offence.
- **physical abuse** such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm. There may be many reasons why a child harms another and it is important to understand why a young person has engaged in such behaviour, including accidentally before considering the action or punishment to be undertaken.
- **bullying:** Bullying is unwanted, aggressive behaviour among school aged children that involves a real or perceived power imbalance. The behaviour is repeated, or has the potential to be repeated, over time. Both young people who are bullied and who bully others may have serious, lasting problems.

In order to be considered bullying, the behaviour must be aggressive and include:

- **An Imbalance of Power:** Young people who bully use their power – such as physical strength, access to embarrassing information, or popularity – to control or harm others. Power imbalances can change over time and in different situations, even if they involve the same people.
- **Repetition:** Bullying behaviours happen more than once or have the potential to happen more than once.

Bullying includes actions such as making threats, spreading rumours, attacking someone physically or verbally or for a particular reason e.g. size, hair colour, gender, sexual orientation, and excluding someone from a group on purpose.

- **cyber bullying:** is the use of phones, instant messaging, e-mail, chat rooms or social networking sites such as Facebook and Twitter to harass threaten or intimidate someone for the same reasons as stated above. It is important to state that cyber bullying can very easily fall into criminal behaviour under the Malicious Communications Act 1988 under

section 1 which states that electronic communications which are indecent or grossly offensive, convey a threat or false information or demonstrate that there is an intention to cause distress or anxiety to the victim would be deemed to be criminal. This is also supported by the Communications Act 2003, Section 127 which states that electronic communications which are grossly offensive or indecent, obscene or menacing, or false, used again for the purpose of causing annoyance, inconvenience or needless anxiety to another could also be deemed to be criminal behaviour. If the behaviour involves the use of taking or distributing indecent images of young people under the age of 18 then this is also a criminal offence under the Sexual Offences Act 2003. Outside of the immediate support young people may require in these instances, the school will have no choice but to involve the police to investigate these situations.

- **sexting** (also known as youth produced sexual imagery): is when someone sends or receives a sexually explicit text, image or video. This includes sending 'nude pics', 'rude pics' or 'nude selfies'. Pressuring someone into sending a nude picture can happen in any relationship and to anyone, whatever their age, gender or sexual preference. However, once the image is taken and sent, the sender has lost control of the image and these images could end up anywhere. By having in their possession, or distributing, indecent images of a person under 18 on to someone else, young people are not even aware that they could be breaking the law as stated as these are offences under the Sexual Offences Act 2003.

- **initiation/hazing type violence and rituals:** Hazing is a form of initiation ceremony which is used to induct newcomers into an organisation. There are a number of different forms, from relatively mild rituals to severe and sometimes violent ceremonies. The idea behind this practice is that it welcomes newcomers by subjecting them to a series of trials which promote a bond between them. After the hazing is over, the newcomers also have something in common with older members of the organisation, because they all experienced it as part of a rite of passage. Many rituals involve humiliation, embarrassment, abuse, and harassment.

- **prejudiced behaviour:** this refers to a range of hurtful behaviour, physical or emotional or both, which causes someone to feel powerless, worthless, excluded or marginalised, and which is connected with prejudices around belonging, identity and equality in wider society – in particular, prejudices to do with disabilities and special educational needs, ethnic, cultural and religious backgrounds, gender, home life, (for example in relation to issues of care, parental occupation, poverty and social class) and sexual identity (homosexual, bisexual, transsexual).

All allegations of peer on peer abuse will be taken seriously and must be investigated. The investigation should be carried out in a sensitive manner and it should be made clear that abuse should never be tolerated or passed off as a 'banter' or 'part of growing up'.

The School recognises the gendered nature of peer-on-peer abuse (i.e. that it is more likely that girls will be victims and boys perpetrators), but that all peer-on-peer abuse is unacceptable and will be taken seriously. Abuse issues can sometimes be gender

specific (girls being sexually touched, boys being subject to hazing type violence). It is important to consider the forms abuse may take and the subsequent actions required.

Expected action taken from staff

Although the type of abuse may have a varying effect on the victim and initiator of the harm, at Newcastle under Lyme School we take these steps to help clarify the situation and establish the facts before deciding the consequences for those involved in perpetrating harm. We recognise that it is important to deal with a situation of peer abuse immediately and sensitively. It is necessary to gather the information as soon as possible to get the true facts around what has occurred as soon after the young person may have forgotten. It is equally important to deal with it sensitively and think about the language used and the impact of that language on both the children and the parents when they become involved. For example; do not use the word perpetrator, this can quickly create a 'blame' culture and leave a child labelled.

In all cases of peer on peer abuse we ensure that staff are trained in dealing with such incidents, talking to young people and instigating immediate support in a calm and consistent manner. Staff are not prejudiced, judgemental, dismissive or irresponsible in dealing with such sensitive matters.

a) Gather the Facts

The member of staff will speak to all of the young people involved separately, gain statements of facts from them and use **consistent language** and **open questions** for each account.

b) Consider the Intent (begin to Risk Assess)

The staff member will then consider the intent behind the incident. Has this been a deliberate or contrived situation for a young person to be able to harm another?

c) Decide on the next course of action

If from the information gathered suggests any young person to be at risk of significant harm, staff must make a safeguarding referral to the DSL or DDSL

d) Informing parents

If, once appropriate advice has been sought from police/local safeguarding partnership and there is agreement to inform parents, parents will be informed as soon as possible.

Key Points that staff will consider:

What is the age of the children involved?

How old are the young people involved in the incident and is there any age difference between those involved?

Where did the incident or incidents take place?

Was the incident in an open, visible place to others? If so was it observed? If not, is more supervision required within this particular area?

What was the explanation by all children involved of what occurred?

Can each of the young people give the same explanation of the incident and also what is the effect on the young people involved? Is the incident seen to be bullying for example, in which case regular and repetitive? Is the version of one young person different from another and why?

What is each of the children's own understanding of what occurred?

Do the young people know/understand what they are doing? E.g. do they have knowledge of body parts, of privacy and that it is inappropriate to touch? Is the young person's explanation in relation to something they may have heard or been learning about that has prompted the behaviour? Is the behaviour deliberate and contrived? Does the young person have understanding of the impact of their behaviour on the other person?

In dealing with an incident of this nature the answers are not always clear cut. If you are concerned or unsure as to whether or not there is any risk involved, please seek advice from the local safeguarding partnership.

Repetition

Has the behaviour been repeated to an individual on more than one occasion? In the same way it must be considered has the behaviour persisted to an individual after the issue has already been discussed or dealt with and appropriately resolved?

e) Next Steps

At Newcastle under Lyme School we ensure that once the outcome of any incident(s) have been established it is necessary to ensure that future incidents of abuse do not occur again and we consider appropriate support and intervention required for those involved.

- **For the young person who has been harmed**
 - What support they require depends on the individual young person. It may be that they wish to seek counselling or one to one support via a mentor. It may also be that they feel able to deal with the incident(s) on their own or with support of family and friends. In which case it is necessary that this young person continues to be monitored and offered support should they require it in the future. If the incidents are of a bullying nature, the young person may need support in improving peer groups/relationships with other young people or some restorative justice work with all those involved may be required.
 - Other interventions that could be considered may target a whole class or year group for example a speaker on cyber bullying, relationship abuse etc. It may be that through the continued curriculum of PSHE and form time that certain issues can be discussed and debated more frequently.
 - If the young person feels particularly vulnerable it may be that a risk assessment can be put in place for them whilst in school so that they have someone named that they can talk to, support strategies for managing future issues and identified services to offer additional support.
- **For the young person who has displayed harmful behaviour**
 - In this circumstance it is important to find out why the young person has behaved in such a way. It may be that the young person is experiencing their own difficulties and may even have been harmed themselves in a similar way. In such cases support such as one to one mentoring or counselling may also be necessary.

- Once the support required to meet the individual needs of the young person has been met, it is important that young person receives a consequence for their behaviour. This may be in the form of restorative justice e.g. making amends with the young person they have targeted if this has been some form of bullying. In the cases of sexually harmful behaviour it may be a requirement for the young person to engage in one to one work with a particular service or agency (if a crime has been committed this may be through the police or youth offending service). If there is any form of criminal investigation ongoing it may be that this young person cannot be educated on site until the investigation has concluded. In which case, the young person will need to be provided with appropriate support and education whilst off site.
- Even following the conclusion of any investigation the behaviour that the young person has displayed may continue to pose a risk to others in which case an individual risk assessment may be required. This should be completed via a multi-agency response to ensure that the needs of the young person and the risks towards others are measured by all of those agencies involved including the young person and their parents. This may mean additional supervision of the young person or protective strategies if the young person feels at risk of engaging in further inappropriate or harmful behaviour.
- The School will also consider a punitive sanction as a consequence such as internal exclusion or external exclusion for a period of time to allow the young person to reflect on their behaviour.

f) After care

At Newcastle under Lyme School we recognise it is important that following the incident the young people involved continue to feel supported and receive help even if they have stated that they are managing the incident. As sometimes the feelings of remorse, regret or unhappiness may occur at a much later stage than the incident. We ensure that the young people do not engage in any further harmful behaviour either towards someone else or to themselves as a way of coping (e.g. self-harm). We have regular reviews with the young people after such incidents.

Preventative Strategies for Schools and Settings

At Newcastle under Lyme School, we have developed appropriate strategies in order to prevent the issue of peer on peer abuse rather than manage the issues in a reactive way.

- We recognise that peer on peer abuse can and will occur on any site even with the most stringent of policies and support mechanisms. We manage such risks; reviewing and evaluating, so we can improve and move forward with strategies in supporting young people and through sharing information with all staff.
- We strive to provide an open environment where young people feel safe to share information about anything that is upsetting or worrying them. This is strengthened through our strong and positive PSHE curriculum, which tackles such issues as prejudiced behaviour and gives children an open forum to talk

things through rather than seek one on one opportunities to be harmful to one another.

- We encourage our young people to support changes and develop a positive ethos in school and one where all young people understand the boundaries of behaviour before it becomes abusive.

Child on Child Sexual Violence and Sexual Harassment

The DfE has produced (in May 2018) advice on Sexual violence and sexual harassment between children in schools and colleges and this includes, what sexual violence and sexual harassment look like, important context to be aware of, related legal responsibilities for schools and colleges and advice on a whole school or college approach to preventing child on child sexual violence and sexual harassment.

(<https://www.gov.uk/government/publications/sexual-violence-and-sexual-harassment-between-children-in-schools-and-colleges>)

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

Children who are victims of sexual violence and sexual harassment will likely find the experience stressful and distressing. This will, in all likelihood, adversely affect their educational attainment. Sexual violence and sexual harassment exist on a continuum and may overlap, they can occur online and offline (both physical and verbal) and are never acceptable. It is important that all victims are taken seriously and offered appropriate support. Staff should be aware that some groups are potentially more at risk. Evidence shows girls, children with SEND and LGBT children are at greater risk. Staff should be aware of the importance of:

- making clear that sexual violence and sexual harassment is not acceptable, will never be tolerated and is not an inevitable part of growing up;
- not tolerating or dismissing sexual violence or sexual harassment as “banter”, “part of growing up”, “just having a laugh” or “boys being boys”;
- challenging behaviours (potentially criminal in nature), such as grabbing bottoms, breasts and genitalia, flicking bras and lifting up skirts. Dismissing or tolerating such behaviours risks normalising them.

What is Sexual violence and sexual harassment?

Sexual violence

It is important that staff are aware of sexual violence and the fact children can, and sometimes do, abuse their peers in this way. When referring to sexual violence we are referring to sexual offences under the Sexual Offences Act 2003 as described below:

Rape: A person (A) commits an offence of rape if: he intentionally penetrates the vagina, anus or mouth of another person (B) with his penis, B does not consent to the penetration and A does not reasonably believe that B consents.

Assault by Penetration: A person (A) commits an offence if: s/he intentionally penetrates the vagina or anus of another person (B) with a part of her/his body or anything else, the penetration is sexual, B does not consent to the penetration and A does not reasonably believe that B consents.

Sexual Assault: A person (A) commits an offence of sexual assault if: s/he intentionally touches another person (B), the touching is sexual, B does not consent to the touching and A does not reasonably believe that B consents.

What is consent?

Consent is about having the freedom and capacity to choose. Consent to sexual activity may be given to one sort of sexual activity but not another, e.g. to vaginal but not anal sex or penetration with conditions, such as wearing a condom. Consent can be withdrawn at any time during sexual activity and each time activity occurs. Someone consents to vaginal, anal or oral penetration only if s/he agrees by choice to that penetration and has the freedom and capacity to make that choice.

Sexual harassment

When referring to sexual harassment we mean 'unwanted conduct of a sexual nature' that can occur online and offline. When we reference sexual harassment, we do so in the context of child on child sexual harassment. 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.

Whilst not intended to be an exhaustive list, 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 and displaying pictures, photos or drawings of a sexual nature;
- online sexual harassment. This may be standalone, or part of a wider pattern of sexual harassment and/or sexual violence. It may include:
 - non-consensual sharing of sexual images and videos;
 - sexualised online bullying;
 - unwanted sexual comments and messages, including, on social media;
 - sexual exploitation; coercion and threats

Responding to reports of sexual violence and sexual harassment

The initial response to a report from a child is important. It is essential that all victims are reassured that they are being taken seriously and that they will be supported and kept safe. A victim should never be given the impression that they are creating a problem by reporting sexual violence or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report.

Reports of sexual violence and sexual harassment are likely to be complex and require difficult professional decisions to be made, often quickly and under pressure.

If staff become aware of sexual violence or sexual harassment between children this must be reported immediately to the DSL or a DDSL. The DSL/DDSL will take a leading role and using their professional judgement, will seek support from other agencies,

such as the local safeguarding partnership and the police as required. (Paragraph 43 and Annex A in the Sexual violence and sexual harassment between children in schools and colleges advice provides information and links to resources and advice on support available.)

Responding to a report of sexual violence or harassment

The initial response to a report from a child is important. It is essential that all victims are reassured that they are being taken seriously and that they will be supported and kept safe. A victim should never be given the impression that they are creating a problem by reporting sexual violence or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report.

If a pupil does make a report then staff should:

- not promise confidentiality as it is very likely a concern will have to be shared further. The report should only be shared with DSL or a DDSL. It is important that the victim understands what the next steps will be and who the report will be passed to;
- recognising a child is likely to disclose to someone they trust: this could be anyone on the School staff. It is important that the member of staff to whom the child discloses recognises that the child has placed them in a position of trust. They should be supportive and respectful of the child;
- listen carefully to the child, being non-judgmental, being clear about boundaries and how the report will be progressed, not asking leading questions and only prompting the child where necessary with open questions – where, when, what, etc;
- consider the best way to make a record of the report. Best practice is to wait until the end of the report and immediately write up a thorough summary. This allows the staff member to devote their full attention to the child and to listen to what they are saying. It may be appropriate to make notes during the report (especially if a second member of staff is present). However, if making notes, staff should be conscious of the need to remain engaged with the child and not appear distracted by the note taking. Either way, it is essential a written record is made;
- only record the facts as the child presents them. The notes should not reflect the personal opinion of the note taker. The report could become part of a statutory assessment by children's social care and/or part of a criminal investigation;
- where the report includes an online element; the key consideration is for staff not to view or forward illegal images of a child.
- if possible, manage reports with two members of staff present, (preferably one of them being the DSL or a DDSL).
- inform the DSL or a DDSL, as soon as practically possible, if the DSL or DDSL is not involved in the initial report.

Risk Assessment

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

- the victim, especially their protection and support;

- the alleged perpetrator;
- all the other children (and, if appropriate staff) at the school, especially any actions that are appropriate to protect them.

Risk assessments will be recorded (written or electronic) and will be kept under review. The DSL/DDSLs will engage with children's social care and specialist services as required. Where there has been a report of sexual violence, it is likely that professional risk assessments by social workers and or sexual violence specialists will be required. The risk assessment is not intended to replace the detailed assessments of expert professionals. Any such professional assessments should be used to inform the School's approach to supporting and protecting their pupils and updating their own risk assessment.

Action following a report of sexual violence and/or sexual harassment

What to consider; important considerations will include:

- the wishes of the victim in terms of how they want to proceed. This is especially important in the context of sexual violence and sexual harassment. Victims should be given as much control as is reasonably possible over decisions regarding how any investigation will be progressed and any support that they will be offered;
- the nature of the alleged incident(s), including: whether a crime may have been committed and consideration of harmful sexual behaviour;
- the ages of the children involved;
- the developmental stages of the children involved;
- any power imbalance between the children, eg, is the alleged perpetrator significantly older, more mature or more confident? Does the victim have a disability or learning difficulty?
- if the alleged incident is a one-off or a sustained pattern of abuse;
- are there ongoing risks to the victim, other children, or school staff;
- other related issues and wider context.

As always when concerned about the welfare of a child, the best interests of the child is paramount an immediate consideration should be given as to how best to support and protect the victim and the alleged perpetrator (and any other children involved/impacted).

The starting point regarding any report is that sexual violence and sexual harassment is not acceptable and will not be tolerated. It is important not to pass off any sexual violence or sexual harassment as 'banter', 'part of growing up' or 'having a laugh'.

Initial considerations when the report is made:

- Any report of sexual violence is likely to be traumatic for the victim. However, reports of rape and assault by penetration are likely to be especially difficult with regard to the victim and close proximity with the alleged perpetrator is likely to be especially distressing.
- Whilst the facts are established and whilst the process of liaising with children's social care and the police begins, the alleged perpetrator should be removed from any classes they share with the victim. The victim and alleged perpetrator will need to be kept a reasonable distance apart on school premises and on transport to and from the school,

where appropriate. These actions are in the best interests of both children and should not be perceived to be a judgment on the guilt of the alleged perpetrator.

- For other reports of sexual violence and sexual harassment, the proximity of the victim and alleged perpetrator and considerations regarding shared classes, sharing school premises and school transport, should be considered immediately.

In all cases, the initial report should be carefully evaluated, reflecting the considerations set out above. The wishes of the victim, the nature of the allegations and the protection of all children in the school will be especially important when considering any immediate actions.

Options to manage the report

There are four likely scenarios for schools to consider when managing any reports of sexual violence and/or sexual harassment.

1. Manage internally

- In some cases of sexual harassment, for example, one-off incidents, the School may take the view that the children concerned are not in need of early help or statutory intervention and that it would be appropriate to handle the incident internally, through utilising the School's behaviour policies and by providing pastoral support.

- The school's response will be underpinned by the principle that sexual violence and sexual harassment is never acceptable and will not be tolerated.

- All concerns, discussions, decisions and reasons for decisions should be recorded (written or electronic).

2. Early help

- In line with 1 above, the school may decide that the children involved do not require statutory interventions, but may benefit from early help. Early help means providing support as soon as a problem emerges, at any point in a child's life. Providing early help is more effective in promoting the welfare of children than reacting later. Early help can be particularly useful to address non-violent harmful sexual behaviour and may prevent escalation of sexual violence.

- All concerns, discussions, decisions and reasons for decisions should be recorded (written or electronic).

3. Referrals to the local safeguarding partnership

- Where a child has been harmed, is at risk of harm, or is in immediate danger, a referral to the local safeguarding partnership will be carried out.

- At the referral stage, the School will generally inform parents, unless there are compelling reasons not to (if informing a parent or carer is going to put the child at additional risk). Any such decision should be made with the support of the local safeguarding partnership.

- If a referral is made, children's social care will then make enquiries to determine whether any of the children involved are in need of protection or other services.

- Where statutory assessments are appropriate, the DSL will work alongside, and cooperate with, the relevant lead social worker. Collaborative working will help ensure the best possible package of coordinated support is implemented for the victim and, where appropriate, the alleged perpetrator and any other children that require support.

- The School will not wait for the outcome (or even the start) of the local safeguarding partnership's investigation before protecting the victim and other children in the School. The DSL/DDSL will work closely with children's social care (and other agencies as required) to ensure any actions the School takes do not jeopardise a statutory investigation. A risk assessment will help inform any decision. Consideration of safeguarding the victim, alleged perpetrator, any other children directly involved in the safeguarding report and all children at the School should be immediate.

- In some cases, children's social care will review the evidence and decide a statutory intervention is not appropriate. The DSL/DDSL should be prepared to refer again if they believe the child remains in immediate danger or at risk of harm. If a statutory assessment is not appropriate, the DSL/DDSL should consider other support mechanisms such as early help, specialist support and pastoral support.

- Whatever the response, it should be under-pinned by the principle that sexual violence and sexual harassment is never acceptable and will not be tolerated.

- All concerns, discussions, decisions and reasons for decisions should be recorded (written or electronic).

4. Reporting to the Police

- Any report to the police will generally be in parallel with a referral to the local safeguarding partnership (as above).

- Where a report of rape, assault by penetration or sexual assault is made, the starting point is this should be passed on to the police. Whilst the age of criminal responsibility is ten, if the alleged perpetrator is under ten, the starting principle of reporting to the police remains. The police will take a welfare, rather than a criminal justice, approach.

- At this stage, the School will generally inform parents or carers unless there are compelling reasons not to, for example, if informing a parent or carer is likely to put a child at additional risk. In circumstances where parents or carers have not been informed, it will be especially important for the School to support the child in any decision they take. This should be with the support of children's social care and any appropriate specialist agencies.

- Where a report has been made to the police, the School will consult the police and agree what information can be disclosed to staff and others, in particular, the alleged perpetrator and their parents or carers. They should also discuss the best way to protect the victim and their anonymity.

- All police forces in England have specialist units that investigate child abuse. The names and structures of these units are matters for local forces

- In some cases, it may become clear very quickly, that the police (for whatever reason) will not take further action. In such circumstances, it is important that the School continues to engage with specialist support for the victim as required.

- Whatever the response, it should be under-pinned by the principle that sexual violence and sexual harassment is never acceptable and will not be tolerated.

- All concerns, discussions, decisions and reasons for decisions should be recorded (written or electronic).

Considering bail conditions

- From April 2017, the use of police bail has been dramatically reduced and will only be used when deemed necessary and proportionate in exceptional circumstances. Consideration will be given to less invasive options to safeguard victims and witnesses and the administration of justice. Therefore, it is less likely that a child attending school will be on police bail with conditions attached if there are alternative measures to mitigate any risk.

- In the absence of bail conditions, when there is a criminal investigation, early engagement and joined up working between the School, the local safeguarding partnership and the police will be critical to support the victim, alleged perpetrator and other children involved (especially potential witnesses). Where required, advice from the police should be sought in order to help the School manage their safeguarding responsibilities.

- The term 'Released Under Investigation' (RUI) will replace those previously on bail for offences in circumstances that do not warrant the application of bail to either re-attend on a particular date or to include conditions preventing activity or in some cases ensuring compliance with an administrative process.

- Where bail is deemed proportionate and necessary, the School will work with the local safeguarding partnership and the police to manage any implications and safeguard their children. An important consideration will be to ensure that the victim can continue in their normal routine, including continuing to receive a suitable education.

Managing any delays in the criminal process

- There may be delays in any case that is being progressed through the criminal justice system. The School should not wait for the outcome (or even the start) of a police investigation before protecting the victim, alleged perpetrator and other children in the School.

- Whilst protecting children and/or taking any disciplinary measures against the alleged perpetrator, the DSL/DDSL will look to work closely with the police (and other agencies as required), to ensure any actions the School takes do not jeopardise the police investigation.

The end of the criminal process

- If a child is convicted or receives a caution for a sexual offence, the School will update its risk assessment, ensuring relevant protections are in place for all the children at the School and will consider any suitable action in light of our behaviour policy. If the perpetrator remains at the same school as the victim, the School will be very clear as to our expectations regarding the perpetrator now they have been convicted or cautioned. This could include expectations regarding their behaviour and any restrictions the School thinks are reasonable and proportionate with regard to the perpetrator's timetable.

- Any conviction (even with legal anonymity reporting restrictions) is potentially going to generate interest among other pupils in the School. It will be important that the School ensures both the victim and alleged perpetrator remain protected, especially from any bullying or harassment (including online).

- Where cases are classified as "no further action" (NFA'd) by the police or Crown Prosecution Service, or where there is a not guilty verdict, the School will continue to

offer support to the victim and the alleged perpetrator for as long as is necessary. A not guilty verdict or a decision not to progress with their case will likely be traumatic for the victim. The fact that an allegation cannot be substantiated does not necessarily mean that it was unfounded. The School will discuss any decisions with the victim in this light and continue to offer support. The alleged perpetrator is also likely to require ongoing support for what will have likely been a difficult experience.

Ongoing response

Safeguarding and supporting the victim

The following principles should help shape any decisions regarding safeguarding and supporting the victim.

- Consider the age and the developmental stage of the victim, the nature of the allegations and the potential risk of further abuse. Schools should be aware 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.
- The needs and wishes of the victim should be paramount (along with protecting the child) in any response. It is important they feel in as much control of the process as is reasonably possible. Wherever possible, the victim, if they wish should be able to continue in their normal routine. Overall, the priority should be to make the victim's daily experience as normal as possible, so that the School is a safe space for them.
- The victim should never be made to feel they are the problem for making a report or made to feel ashamed for making a report.
- The proportionality of the response will be considered. Support will be tailored on a case-by-case basis. The support required regarding a one-off incident of sexualised name-calling is likely to be vastly different from that for a report of rape.

Support can include:

- Children and Young People's Independent Sexual Violence Advisors (ChISVAs) provide emotional and practical support for victims of sexual violence. They are based within the specialist sexual violence sector and will help the victim understand what their options are and how the criminal justice process works if they have reported or are considering reporting to the police. ChISVAs will work in partnership with schools and colleges to ensure the best possible outcomes for the victim.
- Police and social care agencies can signpost to ChISVA services (where available) or referrals can be made directly to the ChISVA service by the young person or school or college. Contact details for ChISVAs can be found at Rape Crisis and The Survivors Trust.
- Child and adolescent mental health services (CAMHS)
- Rape Crisis Centre's can provide therapeutic support for children who have experienced sexual violence.
- Internet Watch Foundation (to potentially remove illegal images)

Victims may not disclose the whole picture immediately. They may be more comfortable providing information on a piecemeal basis. It is essential that dialogue is kept open and encouraged. When it is clear that ongoing support will be required, the Schools will ask the victim if they would find it helpful to have a designated trusted

adult (for example, their form tutor or DSL) to talk to about their needs. The choice of any such adult should be the victim's.

A victim of sexual violence is likely to be traumatised and, in some cases, may struggle in a normal classroom environment. While the School will try to avoid any action that would have the effect of isolating the victim, in particular from supportive peer groups, there may be times when the victim finds it difficult to maintain a full-time timetable and may express a wish to withdraw from lessons and activities. This should be because the victim wants to, not because it makes it easier to manage the situation. The School will provide a physical space for victims to withdraw.

It may be necessary for the School to maintain arrangements to protect and support the victim for a long time. The School will prepare for this and will work with children's social care and other agencies as required.

The School will do everything they reasonably can to protect the victim from bullying and harassment as a result of any report they have made.

Whilst they should be given all the necessary support to remain at the School, if the trauma results in the victim being unable to do this, alternative provision or a move to another school or college should be considered to enable them to continue to receive suitable education. This should only be at the request of the victim (and following discussion with their parents or carers).

It is important that if the victim does move to another educational institution (for any reason), that the new educational institution is made aware of any ongoing support needs. The DSL should take responsibility to ensure this happens (and should discuss with the victim and, where appropriate their parents or carers as to the most suitable way of doing this) as well as transferring the child protection file.

Ongoing considerations: Victim and alleged perpetrator sharing classes

Once the report has been progressed, the School will need to consider the question of the victim and the alleged perpetrator sharing classes and space at school. It is the School's duty to safeguard and to educate its pupils. Each report will be considered on a case by case basis and risk assessments will be updated as appropriate; the best interests of the child will always come first.

Where there is a criminal investigation into a rape, assault by penetration or sexual assault, the alleged perpetrator will be removed from any classes they share with the victim. The School will consider how best to keep the victim and the alleged perpetrator a reasonable distance apart on school premises and transport to and from school where appropriate. This is in the best interests of both children and should not be perceived to be a judgement on the guilt of the alleged perpetrator.

Where a criminal investigation into a rape, assault by penetration or sexual assault leads to a conviction or caution, the School will take suitable action. In all but the most exceptional of circumstances, the rape or assault will be seen as a serious breach of discipline and lead to the view that allowing the perpetrator to remain in the same school would seriously harm the education or welfare of the victim (and potentially other pupils). A permanent exclusion will be seriously considered. If the perpetrator is to remain at the School then any possible contact with the victim will be managed. The

nature of the conviction or caution and wishes of the victim will be especially important in determining the School's actions.

Reports of sexual assault and sexual harassment will, in some cases, not lead to a report to the police. In some cases, rape, assault by penetration, sexual assault or sexual harassment are reported to the police and the case is not progressed or are reported to the police and ultimately result in a not guilty verdict. None of this means the offence did not happen or the victim lied. In school appropriate support will be provided to both victim and alleged perpetrator as required and consideration given to sharing classes and potential contact as required on a case by case basis.

All of the above should have the needs and wishes of the victim at the heart of the process (supported by parents and carers as required). All arrangements will be kept under review.

In all cases the School will record and justify its decision making.

Safeguarding and supporting the alleged perpetrator

The following should help shape any decisions regarding safeguarding and supporting the alleged perpetrator:

- The School will have a difficult balancing act to consider. On one hand they need to safeguard the victim (and the wider pupil/student body) and on the other hand provide the alleged perpetrator with an education, safeguarding support as appropriate and implement any disciplinary sanctions.
- The age and the developmental stage of the alleged perpetrator and nature of the allegations will be considered. Any child will likely experience stress as a result of being the subject of allegations and/or negative reactions by their peers to the allegations against them.
- The proportionality of the response should be considered. Support (and sanctions) should be considered on a case-by-case basis. An alleged perpetrator may potentially have unmet needs (in some cases these may be considerable) as well as potentially posing a risk of harm to other children. Harmful sexual behaviours in young children may be (and often are) a symptom of either their own abuse or exposure to abusive practices and or materials. Advice should be taken, as appropriate, from children's social care, specialist sexual violence services and the police.
- It is important that if the alleged perpetrator does move to another educational institution (for any reason), that the new educational institution is made aware of any ongoing support needs and where appropriate, potential risks to other children and staff. The DSL should take responsibility to ensure this happens as well as transferring the child protection file.

5. Child criminal exploitation: county lines

Criminal exploitation of children is a geographically widespread form of harm that is a typical feature of county lines criminal activity: drug networks or gangs groom and exploit children and young people to carry drugs and money from urban areas to suburban and rural areas, market and seaside towns. Key to identifying potential

involvement in county lines are missing episodes, when the victim may have been trafficked for the purpose of transporting drugs and a referral to the National Referral Mechanism (the National Crime Agency: human trafficking) should be considered.

Like other forms of abuse and exploitation, county lines exploitation:

- can affect any child or young person (male or female) under the age of 18 years;
- can affect any vulnerable adult over the age of 18 years;
- can still be exploitation even if the activity appears consensual;
- can involve force and/or enticement-based methods of compliance and is often accompanied by violence or threats of violence;
- can be perpetrated by individuals or groups, males or females, and young people or adults; and
- is typified by some form of power imbalance in favour of those perpetrating the exploitation. Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including gender, cognitive ability, physical strength, status, and access to economic or other resources.

6. Domestic abuse

The cross-government definition of domestic violence and abuse is:

Any incident or pattern of incidents of controlling, coercive, threatening behaviour, violence or abuse between those aged 16 or over who are, or have been, intimate partners or family members regardless of gender or sexuality. The abuse can encompass, but is not limited to:

- psychological;
- physical;
- sexual;
- financial;
- emotional

Exposure to 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. Domestic abuse affecting young people can also occur within their personal relationships, as well as in the context of their home life.

Advice on identifying children who are affected by domestic abuse and how they can be helped is available at:

NSPCC- UK domestic-abuse signs symptoms effects

Refuge what is domestic violence/effects of domestic violence on children

Safelives: young people and domestic abuse

7. Homelessness

Being homeless or being at risk of becoming homeless presents a real risk to a child's welfare. The DSL/DDSL should be aware of contact details and referral routes in to the Local Housing Authority so they can raise/progress concerns at the earliest opportunity.

Indicators that a family may be at risk of homelessness include household debt, rent arrears, domestic abuse and anti-social behaviour, as well as the family being asked to leave a property. Whilst referrals and or discussion with the Local Housing Authority should be progressed as appropriate, this does not, and should not, replace a referral into children's social care where a child has been harmed or is at risk of harm.

The Homelessness Reduction Act 2017 places a new legal duty on English councils so that everyone who is homeless or at risk of homelessness will have access to meaningful help including an assessment of their needs and circumstances, the development of a personalised housing plan, and work to help them retain their accommodation or find a new place to live.

In most cases school staff will be considering homelessness in the context of children who live with their families, and intervention will be on that basis. However, it should also be recognised in some cases 16 and 17 year olds could be living independently from their parents or guardians, for example through their exclusion from the family home, and will require a different level of intervention and support. Children's services will be the lead agency for these young people and the DSL/DDSL should ensure appropriate referrals are made based on the child's circumstances.

Appendix 2: Role of the DSL

The School has one DSL, Designated Safeguarding Lead, and four trained Deputy Designated Safeguarding Leads (DDSL). They work closely together.

The DSL and DDSLs will carry out their roles in accordance with Keeping Children Safe in Education 2019.

The DSL, currently Mrs J A Simms, is a member of the School Senior Management Team and takes the lead responsibility for safeguarding and child protection. The DSL provides advice and support to staff on child welfare and child protection matters, takes part in strategy discussions and interagency meetings or supports others in doing so and contribute to the assessment of children.

The DSL:

- Refers cases of suspected abuse to the local safeguarding partnership as required;
- Supports staff who make referrals to local authority children's social care;
- Refers cases to the Channel programme where there is a radicalisation concern as required;
- Supports staff who make referrals to the Channel programme;
- Refers cases where a person is dismissed or left due to risk/harm to a child to the Disclosure and Barring Service as required;
- Refers cases where a crime may have been committed to the Police as required.
- Has overall responsibility for e-safety issues. (The practical management of e-safety in the School lies with the Director of ICT and the Head of Network, Infrastructure and ICT Services, working alongside the two Senior School Deputy Heads and the Prep School Computing Coordinator who review and develop the strategy for e-safety.)

Work with others

- Liaises with the Headmaster to inform him of issues especially ongoing enquiries under section 47 of the Children Act 1989 and police investigations;
- As required, liaises with the "case manager" and the designated officer(s) at the local authority for child protection concerns (all cases which concern a staff member);
- Liaise with staff on matters of safety and safeguarding and when deciding whether to make a referral by liaising with relevant agencies.
- Acts as a source of support, advice and expertise for staff.

Undertake training

The DSL and DDSLs undergo training to provide the knowledge and skills required to carry out their roles. This training is updated at least every two years. The DSL and DDSLs undertake Prevent awareness training. In addition to the formal training set out above, their knowledge and skills is 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, but at least annually, to allow them to understand and keep up with any developments relevant to their role so they:

- Understand the assessment process for providing early help and intervention, for example through locally agreed common and shared assessment processes such as early help assessments;
- 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;
- Ensure each member of staff has access to and understands the School's child protection policy and procedures, especially new and part time staff;
- Are alert to the specific needs of children in need, those with special educational needs and young carers;
- Are able to keep detailed, accurate, secure written records of concerns and referrals;
- 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 SEND face online, eg, from online bullying, grooming and radicalisation and can support SEND children in helping them to stay safe online
- Obtain access to resources and attend any relevant or refresher training courses;
- 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.

Raise Awareness

The DSL should:

- Ensure the School's safeguarding policies are known, understood and used appropriately;
- Ensure the School's Safeguarding Policy is reviewed annually (as a minimum) and the procedures and implementation are updated and reviewed regularly, and work with governing bodies regarding this;
- Ensure the Safeguarding Policy is available publicly and parents are aware of the fact that referrals about suspected abuse or neglect may be made and the role of the School in this; and
- Link with the local safeguarding partnership to make sure staff are aware of training opportunities and the latest local policies on safeguarding.

Child Protection File

- Where children leave the School ensure their child protection file is transferred to the new school or college as soon as possible. This should be transferred separately from the main pupil file, ensuring secure transit and confirmation of receipt should be obtained.

Availability

- During term time the DSL or DDSLs will always be available (during School hours) for staff in the School to discuss any safeguarding concerns.

Appendix 3: Children staying with host families (homestay)

Private fostering and educational institutions

School quite often makes arrangements for our children to have learning experiences where, for short periods, the children may be provided with care and accommodation by a host family to which they are not related. This might happen, for example, but not only, as part of a foreign exchange visit or sports tour. Such arrangements could amount to “private fostering” under the Children Act 1989 or the Safeguarding Vulnerable Groups Act 2006, or both. The following paragraphs are not intended to be a comprehensive guide to all the circumstances in which private fostering may arise, but only to those situations which might arise for school through the normal course of our activities in promoting learning activities for children.

DBS check request by a regulated activity provider

Where a private fostering arrangement is made by a school or a third party such as a language school and the school or third party has the power to terminate the arrangement, then it **could be the regulated activity provider** for the purposes of the Safeguarding Vulnerable Groups Act 2006. A regulated activity provider will be committing an offence if they allow a person to carry out a regulated activity whilst barred and they know or have reason to believe that the person was barred.

Where the School is the regulated activity provider, it will request a DBS enhanced check (which will include barred list information) to help determine their suitability for the arrangement. However, where the parents make the arrangements themselves, this will be a private matter between the child’s parents and the host parents and in these circumstances the School will not be the regulated activity provider.

LA notification when private fostering is discovered

Where the School has not been involved in making the arrangement but a member of staff or volunteer at School becomes aware that a pupil may be in a private fostering arrangement, where a child under the age of 16 (or 18 if disabled) is provided with care and accommodation by someone to whom they are not related in that person’s home, they should raise this in the first instance with the DSL at School. The School will notify the local authority of the circumstances, and the local authority will check that the arrangement is suitable and safe for the child. A person who is barred from regulated activity will themselves be committing an offence under the Children Act 1989 and under the Safeguarding Vulnerable Groups Act 2006 if they privately foster a child. If the School has any reason to believe that the third party is failing to undertake a statutory duty we will notify the police.

Although the School may arrange for our children to stay with families overseas, the DBS cannot access criminal records held overseas. Host families in other countries, therefore, cannot be checked in the same way by local authorities as schools in this

country when children stay abroad. The School will work with partner schools abroad to ensure that similar assurances are undertaken prior to a visit.

If they wish, local authorities and schools can contact the relevant foreign embassy or High Commission of the country in question and find out if similar checks can be done in that country.

SMT Policy Lead: J A Simms

Policy reviewed at SMT: September 2019

Next Review Due: October 2020