



# Safeguarding & Child Protection Policy

Stonar fully recognises its responsibilities for

Safeguarding and Child Protection.

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|---|-----------------------|
| <b>Policy agreed by the Advisory Board:</b> | November 2023         |
| <b>Next review:</b>                         | November 2024         |
| <b>Policy owner:</b>                        | Deputy Head, Pastoral |

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## I. The Stonar Safeguarding Team

| Role  | Name  | Telephone       | Email  |
|---|---|-----------------|--|
| Head  | Matthew Way                                       | 01225 701740    | <a href="mailto:m.way@stonarschool.com">m.way@stonarschool.com</a>                   |
| Designated Safeguarding Lead (DSL)  | Tina Tilley<br>(Deputy Head Pastoral)             | 01225 701776    | <a href="mailto:t.tilley@stonarschool.com">t.tilley@stonarschool.com</a>             |
| Deputy DSL(s) (DDSL)  | Branwen Russell<br>(PIP)                          | 01225 701745    | <a href="mailto:b.russell@stonarschool.com">b.russell@stonarschool.com</a>           |
| Deputy DSL(s) (DDSL)<br>EYFS Lead   | Rob Cunningham<br>(Head of Prep)                  | 01225 701761    | <a href="mailto:r.cunningham@stonarschool.com">r.cunningham@stonarschool.com</a>     |
| Deputy DSL(s) (DDSL)  | Lorraine Tovey Cook<br>(Head of Learning Support) | 01225 701745    | <a href="mailto:l.toveycook@stonarschool.com">l.toveycook@stonarschool.com</a>       |
| Deputy DSL (s) (DDSL)   | Debbie Flower<br>(Short Courses)                  | 01225 701748    | <a href="mailto:d.flower@stonarschool.com">d.flower@stonarschool.com</a>             |
| Nominated Director  | Daniel Jones                                      | +34 60 88 01427 | <a href="mailto:Daniel.jones@globeducate.com">Daniel.jones@globeducate.com</a>       |
| Globeducate Safeguarding Lead   | Kath Tyler  | 020 7298 9273   | <a href="mailto:Katherine.Tyler@globeducate.com">Katherine.Tyler@globeducate.com</a> |
| Designated Teacher for Looked After Children  | Tina Tilley<br>(Deputy Head Pastoral)             | 01225 701776    | <a href="mailto:t.tilley@stonarschool.com">t.tilley@stonarschool.com</a>             |
| The key safeguarding responsibilities within each of the roles above are set out in Keeping Children Safe in Education (2023) |   |                 |  |

|  |  |
|--|--|
| <b>Wiltshire Early Help - single point of entry:</b><br><b>Wiltshire Children's Social Care referrals:</b><br>Multi-Agency Safeguarding Hub (MASH):<br>Out of hours: | 01225 718230<br><br>0300 456 0108<br>0300 456 0100 |
|--|--|

If you believe a child is **at immediate risk** of significant harm or injury,  
**Dial 999 and ask for police assistance**

## 2. Acronyms used in this Policy

|        |   |
|--------|---|
| CCE    | Child Criminal Exploitation   |
| CSE    | Child Sexual Exploitation   |
| DBS    | Disclosure and Barring Service: <i>Helps employers make safer recruitment decisions and prevent unsuitable people from working with vulnerable groups, including children. It replaces the Criminal Records Bureau (CRB) and Independent Safeguarding Authority</i>   |
| DfE    | Department for Education  |
| DSL    | Designated Safeguarding Lead  |
| DDSL   | Deputy Designated Safeguarding Lead   |
| DOFA   | Designated Officer for Allegations: <i>The current term for the Local Authorities member of staff who has the management and oversight of allegations against people that work with children. (See LADO)</i>  |
| EAL    | English as an additional Language   |
| EHE    | Elective Home Education   |
| EOI    | Everyone's Invited  |
| ESA    | Early Support assessments/ Early Help ESA (previous known as CAF's) <i>A national, standard approach to assessing any additional/unmet needs a child or young person may have and for deciding how any such needs can be identified and should be met effectively</i> |
| EYFS   | Early Years Foundation Stage: <i>The set of Welfare, Learning and Development Requirements, which has to be followed by providers of care for children aged from birth to 5 years old</i>   |
| FGM    | Female Genital Mutilation   |
| HBA    | Honour based abuse  |
| ISI    | The Independent Schools Inspectorate: <i>The agency responsible for the inspection of the majority of Independent schools. ISI is a Government approved inspectorate and the quality of its service is monitored by Ofsted on behalf of the DfE</i>                   |
| KCSIE  | Keeping Children Safe in Education: <i>A government publication</i>   |
| CLA    | Child Looked After: <i>A child in the care of the local authority</i>   |
| LADO   | Local Authority Designated Officer: <i>Historical term for the Local Authorities member of staff who deals with allegations made against staff, (See DOFA)</i>  |
| MASH   | Multi Agency Safeguarding Hub: <i>A county's first point of contact for new safeguarding concerns</i>   |
| Ofsted | Office for Standards in Education, Children's Services and Skills: <i>Inspect and regulate services that care for children and young people</i>   |
| PCLA   | Previously Child Looked After: <i>A child in the care of the local authority</i>  |

|      |   |
|------|---|
| PSHE | Personal, Social, Health and Economic Education   |
| RSE  | Relationship and Sex Education  |
| SEND | Special educational needs and disabilities  |
| SCR  | Single Central Record: <i>a record of check taken during the recruitment of staff</i>   |
| TAC  | Team around the Child   |
| TRA  | Teaching Regulation Authority: <i>responsible for investigating allegations of serious misconduct against teachers in England</i>                   |
| VAWG | Violence against women and girls  |
| SVPP | Wiltshire Safeguarding Vulnerable People Partnership: comprising Wiltshire Police, Wiltshire Council and NHS Wiltshire Clinical Commissioning Group |

### **3. Introduction**

‘Safeguarding and promoting the welfare of children is everyone’s responsibility’ (KCSiE September 2024).

Stonar School is committed to safeguarding and promoting the welfare of children and we aim to create a culture of vigilance. We will fulfil our local and national responsibilities as laid out in the following key documents:

- i. Working Together to Safeguard Children (2023)
- ii. Keeping Children Safe in Education (2024)
- iii. What to do if you’re worried a child is being abused, advice for practitioners (March 2015)
- iv. The Human Rights Act 1998
- v. The Equality Act 2010
- vi. Prevent 2023
- vii. The Procedures of Wiltshire Safeguarding Vulnerable People Partnership (WSVPP)
- viii. NSPCC – When to call the Police

See Appendix I for further relevant guidance documents & legislation.

#### **3.1 Aim of this Policy**

The aim of this policy is to ensure that:

- i. all our pupils are safe and protected from harm
- ii. safeguarding procedures are in place to help pupils to feel safe and learn to stay safe
- iii. adults in the school community are aware of the expected behaviours and the school’s legal responsibilities in relation to safeguarding and child protection
- iv. all staff are aware of their responsibility to reassure victims of abuse that they are being taken seriously and will be supported
- v. All staff are aware that safeguarding and child protection should be at the forefront and underpin all relevant aspects of process and policy development at Stonar.

### **4. Scope**

#### **4.1 Safeguarding**

Safeguarding and promoting the welfare of children is defined as:

- Providing help and support to meet the needs of children as soon as problems emerge

- protecting children from maltreatment, whether that is within or outside the home, including online
- preventing the impairment of children's mental and physical health or development
- ensuring that children grow up in circumstances consistent with the provisions of safe and effective care
- taking action to enable all children to have the best outcomes.

The term 'safeguarding children' covers a range of measures including child protection procedures. It encompasses a preventative approach to keeping children safe that incorporates pupil health and safety; school behaviour and preventing bullying; supporting pupils with medical conditions; personal, health, social economic education; providing first aid and site security.

## **4.2 Child Protection**

Child Protection is one element of safeguarding. It refers to those actions that are taken to protect specific children who may be suffering, or at risk of suffering, significant harm. This includes child protection procedures which detail how to respond to concerns about a child.

Consequently, this policy should be read in alongside the following policies relevant to the safety and welfare of our pupils:

- i. Safer Recruitment Policy
- ii. Whole school policy for dealing with conflict (& counter bullying strategy)
- iii. Prevent Policy
- iv. First Aid Policy
- v. Mental Health Policy
- vi. Missing Pupil procedures
- vii. Induction of new staff
- viii. PSHE & SRE Policies
- ix. Staff code of conduct
- x. Behaviour and Discipline Policy
- xi. Educational and welfare provision for SEND and EAL pupils
- xii. Health and Safety Policy
- xiii. Policy on the use of reasonable force
- xiv. Whistle-blowing Policy
- xv. Online Safety Policy
- xvi. Attendance and Registration policy

## **4.3 Other Definitions**

- i. Staff - refers to all those working for or on behalf of the School, full time or part time, in a paid or regular voluntary capacity and including Senior Leadership Team members.



- ii. Volunteer - is a person who performs an activity that involves spending time, unpaid in school (except for approved expenses).
- iii. Parent - refers to birth parents and other adults who are in a parenting role, for example step-parents, foster carers and adoptive parents.
- iv. Child - refers to all children on our school roll and any child under the age of 18 who comes into contact with our school. This includes unborn babies.
- v. We use the terms 'must' and 'should' throughout the guidance. We use the term 'must' when the person in question is legally required to do something and 'should' when the advice set out should be followed, unless there is good reason not to.

Any safeguarding concerns or disclosures of abuse relating to a child during the school day or outside of school hours are within the scope of this policy.

## 5. Expectations

In line with KCSiE September 2024, safeguarding is the responsibility of everyone in the organisation and we should always act in the best interests of the child. We endeavour to ensure safeguarding and child protection are at the forefront and underpin all relevant aspects of process and policy development at Stonar. We aim for all systems to operate with the best interests of the child at their heart.

All staff at Stonar, whether Teaching or Non-teaching, Volunteers or Directors, play an important part in safeguarding for children, and to this effect they are required to ensure that the correct procedures are followed, in order to protect children from abuse or further abuse.

All members of staff are advised to maintain an attitude of 'it could happen here', where safeguarding is concerned and should understand they have a responsibility to take appropriate action and report concerns or allegations of risk of harm to pupils, working with other services, as needed. To this effect:

All staff:

- i. should be familiar with and understand this safeguarding policy
- ii. should be alert to signs and indicators of possible abuse
- iii. should be able to record and report concerns as set out in this policy
- iv. should be able to deal with a disclosure of abuse from a pupil
- v. who do not work directly with children are required by the Directors to read the condensed version of Part one of KCSiE. (Found at Annex A in KCSiE).
- vi. who work directly with children are required to read Part one and five of KCSiE (September 2024) which includes Annex B; important additional information about specific forms of abuse and safeguarding issues and links to additional advice and guidance.

Additionally, teaching staff:

- i. are involved in the implementation of individual education programmes, integrated support plans, child in need plans and interagency child protection plans as required.

If Staff have any concerns about a child's welfare, they should act on them immediately. If staff are unsure, they should always speak to the designated safeguarding lead (or deputy).

## **6. Mandatory Procedures**

### **6.1 Staff Behaviour Policy (for safer working practice)**

Stonar School is committed to positive academic, social and emotional outcomes for our pupils underpinned by a strong safeguarding ethos. All staff have a responsibility to provide a safe environment in which children can learn. We are equally committed to the protection and welfare of our staff, who are expected to adhere to the highest standards of professional behaviour.

The Staff Code of Conduct sets out staff behaviours that should be avoided as well as those that constitute safe practice and support our commitment to safeguarding children.

Teaching staff are additionally expected to act within the guidance of the 'personal and professional conduct' section of the Teachers' Standards.

New staff induction and safeguarding training includes guidance on building trusted relationships with young people, active listening, the importance of professional curiosity if they have concerns regards to pupil welfare.

All staff are required to wear Stonar Navy Lanyards or Stonar branded clothing when on site during the school day.

### **6.2 Visitors**

All visitors complete a signing in/out form, wear a school Visitor ID red lanyards and are provided with key safeguarding information including the contact details of safeguarding personnel in school.

Scheduled visitors in a professional role (eg fire officer) are asked to provide evidence of their role and employment details (usually an identity badge) upon arrival at school. Scheduled visits should be approved by SLT using the appropriate visitors form completed from staff handbook (e.g. speakers, staff appointed but not yet in post).

If the visit is unscheduled and the visitor is unknown to the school, we will contact the relevant organisation to verify the individual's identity, if necessary.

Events (for speakers) forms require information on an assessment of the education value, consideration of the age appropriateness of what is going to be delivered and whether relevant checks will be required on the visitor

### **6.3 Use of Stonar Site Non-School Activities**

The Director of Stonar Short Courses oversees Stonar's facility management and the letting of any facilities to external organisations or individuals. The School seeks assurance from the 'Lets' that they have appropriate arrangements in place to keep children safe. The 'Letting' arrangements in place require the 'Lets' to liaise with the school on Safeguarding matters where appropriate. Stonar also ensures safeguarding requirements are included in the lease or hire agreements, as a condition of use and occupation of the premises and that failure to comply with this would lead to termination of the agreement. Stonar will follow its own safeguarding procedures, including informing the LADO (local authority designated officer) as well when dealing with safeguarding allegations by the lets. Further information and guidance can be found at <https://www.gov.uk/government/publications/keeping-children-safe-in-out-of-school-settings-code-of-practice/keeping-children-safe-during-community-activities-after-school-clubs-and-tuition-non-statutory-guidance-for-providers-running-out-of-school-settings>

### **6.4 Curriculum – Teaching about Safeguarding**

Our pupils access a broad and balanced curriculum that promotes their spiritual, moral, cultural, mental and physical development, and prepares them for the opportunities, responsibilities and experiences of life.

We provide opportunities for pupils to develop skills, concepts, attitudes and knowledge that promote their safety and well-being. The PSHE and RSE curriculum specifically includes the following objectives:

- i. Developing pupil emotional and mental resilience, self-esteem and communication skills
- ii. Developing strategies for self-protection including online / 'e-safety' safety
- iii. Developing a sense of the boundaries between appropriate and inappropriate behaviour in adults and within peer relationships (positive relationships and consent)
- iv. Recognising when they are at risk and how to get help when they need it

The Heads of Department are required to ensure that content and themes of all assessed literature, texts, plays and material used with or performed to pupils is suitable for the age group of the pupils involved. Any queries should be raised with the Head, Senior Deputy Head or Deputy Head Pastoral (DSL).

### **6.5 Online Safety**

It is essential that children are safeguarded from potentially harmful and inappropriate online material. Safeguarding including online safety and cyber safety will be referred to

by staff when appropriate as part of a broad and balanced curriculum and is taught within the context of Computer Science, PSHE and RSE lessons.

The four key areas of risk (known as the four C's) pertaining to online safety are:

- i. **Content:** being exposed to illegal, inappropriate or harmful content (Eg: pornography, fake news, racism, misogyny, misandry, self-harm, suicide, anti-Semitism, radicalisation and extremism).
- ii. **Contact:** being subjected to harmful online interaction with other users (Eg: peer to peer pressure, commercial advertising and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes').
- iii. **Conduct:** personal online behaviour that increases the likelihood of, or causes, harm, (Eg: making, sending and receiving explicit images (e.g. consensual & non-consensual sharing of nudes and semi-nudes and/or pornography, sharing other explicit images and online bullying).
- iv. **Commerce** - risks such as online gambling, inappropriate advertising, phishing and or financial scams.

If you feel your pupils, students or staff are at risk, please report it to the Anti-Phishing Working Group (<https://apwg.org/>).

At school, pupils are safeguarded from potentially harmful and inappropriate online material by appropriate filters and monitoring systems, however, we are mindful to ensure that we do not 'Over-block' to ensure there are not unreasonable restrictions as to what children can be taught with regard to online teaching and safeguarding.

We work with parents to help keep children safe online, including when they are at home. Stonar currently uses Fortigate Net Filtering software and daily reports are provided to the DSL and Online Safety Officer, with any concerns being followed up and parents informed, as appropriate. The DSL takes lead responsibility for understanding the filtering and monitoring systems and is supported by the School's online Safety Officers, who also provide support for whole school online safety. The Directors review internet filtering effectiveness at The Advisory Board meetings.

Further information and guidance about online safety and cyber security standards can be found in paragraph 134 -151 and appendix B of KCSIE (September 2024) in Appendix 6 of this document and the UK Council for Internet Safety (UKCIS, 2020). DfE filtering and monitoring standards (DfE 2023b) are used as guidance.

## **6.6 Safer Recruitment**

Stonar has a safer recruitment policy (available in the staff handbook), detailing the procedures followed for the recruitment of all staff, including volunteers. We are committed to safeguarding and promoting the welfare of children and young people and we expect all staff and volunteers to share this commitment. All staff are subject to

safer recruitment processes and checks, including online checks for shortlisted candidates, who will be informed that online searches may be done as part of due diligence checks and we follow the safer recruitment guidance set out in Part three of KCSIE Sept. 2024. Online Searches are recorded on an interview pro forma and retained in staff files for six months, if not appointed, or for six years following the departure from the school of an appointed staff member.

All interviews include at least one member of the panel who is trained in safer recruitment.

At Stonar School, we scrutinise all applications for paid or voluntary posts. We undertake interviews and make appropriate checks through the Disclosure and Barring Service (DBS). Anyone who is appointed to carry out teaching work will have an additional check to ensure they are not prohibited from teaching. We maintain a single central record (SCR) of the essential checks as set out in KCSIE Sept. 2024, that have been carried out and certificates obtained. The SCR applies to:

- i. all staff (including supply staff, and teacher trainees on salaried routes) who work at the school.
- ii. all Directors / members of the proprietor body

## **6.7 Early Help / Early Support Assessments**

Early help means providing support as soon as a problem emerges at any point in a child's life, from the foundation years through to the teenage years. At Stonar School, any member of staff should be prepared to identify a child who may benefit from early help; they should discuss their concerns with the DSL/DDSL and report them via the 'my Concern System'.

The School will:

- i. provide school based early help services e.g. school nurse, pastoral support worker, SENCO as appropriate
- ii. refer to appropriate services e.g. CAMHS etc.
- iii. use the guidance on the Wiltshire Pathways website and the Digital Assessment and Referral Tool as appropriate as part of a holistic assessment of the child's needs and conducting a Wiltshire Early help assessment.
- iv. use the Multi-Agency Thresholds for Safeguarding Children on the SVPP website about suitable action to take (such as referral to statutory services) when a pupil has been identified as making inadequate progress or having an unmet need.

If early help is appropriate, the DSL/DDSL will generally lead on liaising with other agencies and setting up an inter-agency assessment as appropriate.

Any member of staff may be required to support other agencies and professionals in an early help assessment and in some cases acting as the lead professional in undertaking an early help assessment.

Any such cases should be kept under constant review and consideration given to a referral to children's social care for assessment for statutory services, if the child's situation does not appear to be improving or is getting worse.

#### **6.7.1 Children who may be particularly in need of early help**

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

- i. is disabled and has specific additional needs
- ii. is a young carer
- iii. is frequently missing/goes missing from care or from home
- iv. is showing signs of being drawn in to anti-social or criminal behaviour, including gang involvement and association with organised crime groups
- v. has returned home to their family from care
- vi. is misusing drugs or alcohol themselves
- vii. is at risk of modern slavery, trafficking or exploitation
- viii. has special educational needs (whether or not they have a statutory Education, Health and Care Plan)
- ix. is in a family circumstance presenting challenges for the child, such as substance abuse, adult mental health problems or domestic abuse
- x. is showing early signs of abuse and/or neglect
- xi. is at risk of being radicalised or exploited
- xii. is a privately fostered child
- xiii. has a mental health need
- xiv. has experienced multiple suspensions, is at risk of being permanently excluded from schools, colleges and in Alternative Provision or a Pupil Referral Unit
- xv. has a parent or carer in custody, or is affected by parental offending
- xvi. is at risk of so called 'honour'-based abuse such as FGM or Forced marriage

#### **6.8 Children who are Absent from Education**

The Directors and school put in place appropriate safeguarding responses to children being absent from education for prolonged periods and/or on repeat occasions to help identify the risks of abuse and neglect, including child sexual and child criminal exploitation – particularly county lines, and to help prevent the risks of their going missing in future. This includes when problems are first emerging but also where children are already known to local authority children's social care and need a social worker (such as a child who is a child in need or who has a child protection plan, or is a child looked after), where being absent from education may increase known safeguarding risks within the family or in the community

As part of our admissions process we request where reasonably possible, more than one emergency contact number for each pupil or student to ensure the school can

make contact with a responsible adult when a child missing education is also identified as a welfare and/or safeguarding concern.

Further information for schools can be found at:

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

Staff follow our procedures for reporting and tracking pupil attendance and absence, further information can be found in the attendance and registration policy. Where there are no known welfare concerns about a pupil, we follow our procedures for unauthorised absence, working with families to increase attendance rates. We will involve the Local Authorities' Education Welfare Service if required

We notify the local authority when removing a child from the school roll at standard and non-standard transition points in line with statutory guidance

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

Further information can be found at:-

<https://www.gov.uk/government/publications/missing-children-and-adults-strategy>

Staff who become aware of pupils absent from education who are of compulsory school age with no school place and not electively home educated should report this to the DSL.

For CLA children the designated teacher for CLA discusses any unauthorised/unexplained absence of with Virtual School and Social Care when required. It is recognised that children who do not attend school regularly can be at increased risk of abuse and neglect. Where there is unauthorised/unexplained absence, and after reasonable attempts have been made to contact the family/carers, the DSL follows the SVPP procedure and refers to the MASH team as appropriate.

We would arrange full-time education for day pupils that are excluded from the sixth day of a fixed-period exclusion.

## **6.9 Elective Home Education (EHE)**

Should a parent expressed their intention to remove a child from Stonar with a view to educating at home, Stonar will notify the Local Authority of this intention. Stonar will work with the Local Authority to ensure that the parents have considered what is in the best interests of the child.

## **6.10 Children with Special Education Needs and Disabilities (SEND)**

Pupils with additional needs (including certain medical or health conditions) face an increased risk of abuse, neglect and exploitation. Staff take extra care to interpret correctly apparent signs of abuse or neglect. We never assume that behaviour, mood or injury relates to the pupil's additional needs without further exploration. Staff understand that additional challenges can exist when recognising abuse and neglect in pupils with SEND, including communication barriers and cognitive understanding.

Staff recognise that children with SEND are also at a higher risk of peer group isolation and can be disproportionately affected by bullying. To address those additional challenges, extra pastoral support is considered for children with SEND and they are also encouraged to discuss their concerns. The DSL/DDSL works with the Pastoral Care team and specifically the Pastoral Lead and Special Educational Needs Co-ordinator (SENCo) to identify pupils with additional communication needs and whenever possible, these pupils are given the chance to express themselves to a member of staff with appropriate communication skills.

### **6.11 Children who are Lesbian, Gay, Bisexual, or gender questioning**

A child or young person being lesbian, gay or bisexual is not in itself an inherent risk factor for harm, however, they can sometimes be targeted by other children. In some cases, a child who is perceived by other children to be lesbian, gay or bisexual (whether they are or not) can be just as vulnerable as children who are.

Children are able to talk to any teacher about worries or concerns, and the Safeguarding Team and school nurses are the nominated trusted adults for Lesbian, Gay, Bisexual, or gender questioning with whom they can be open. It is therefore vital that staff endeavour to reduce the additional barriers faced and provide a safe space for them to speak out or share their concerns with members of staff.

LGBTQ+ inclusion is part of the statutory RSE curriculum taught in PSHE. We teach it in an age appropriate way, as it is not required to be taught at primary.

When supporting a gender questioning child, we should take a cautious approach and consider the broad range of their individual need, in partnership with the child's parents (other than in the exceptionally rare circumstances where involving the parents would constitute a significant risk of harm to the child), including any clinical advice that is available and how to address wider vulnerabilities.

### **6.12 Alternative Provision**

The supervision of any pupils who may attend alternative provision settings is overseen by the SENCo. We as a school are responsible for the safeguarding of that pupil and we must be satisfied that the placement meets the pupil's needs. The Safeguarding Team are aware that pupils who may also access alternative provision often have complex needs and are aware of the needs of these pupils and liaise with families, carers and alternative education settings.

### **6.13 Children Looked After (CLA) / Previously Looked After Children (PLAC)**

When dealing with children looked after and previously looked after children, it is important that all agencies work together and prompt action is taken when necessary to safeguard these children, who are a particularly vulnerable group. The nominated DSL or DDSL ensures Local Authority, Virtual School and appropriate staff have all the information they need about the child's status, contact arrangements with parents, care



arrangements. This also includes their looked after legal status (whether they are looked after under voluntary arrangements with consent of parents or on an interim or full care order) and the child's contact arrangements with birth parents or those with parental responsibility, any delegated authority to carers as well as details of the child's social worker.

The nominated DSL or DDSL, Local Authority, Head of the Virtual School and any other appropriate staff (eg SENCo), named adults or agencies work together to meet the needs identified in the child's personal education plan (PEP).

The safeguarding team are aware that a previously looked after child potentially remains vulnerable and all staff should have the skills, knowledge and understanding to keep previously looked after children safe.

The nominated DSL or DDSL also has responsibility 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. Further details can be found:

<https://www.gov.uk/government/publications/designated-teacher-for-looked-after-children>.

Designated safeguarding leads should hold the details of the local authority Personal Advisor appointed to guide and support and pupils who are care leavers, and should liaise with them as necessary regarding any issues of concern affecting the care leaver and engagement with their pathway plan.

#### **6.14 Visits: School Trips and Exchanges**

We carry out risk assessments prior to any off-site visit and school documentation on trips, designates the specific roles and responsibilities of each adult, whether employed or volunteers. Where there are safeguarding concerns or allegations that happen offsite, staff will follow the procedures described within this policy in line with KCSIE (2024). We use the Globeduate School's code of conduct for host families and work with the Globeduate 'Sister' schools abroad to ensure that similar assurances are undertaken prior to any overseas visit by our pupils.

#### **6.15 Mobile Devices & Communication with Pupils**

Other than in a medical emergency staff and pupils are not permitted to use mobile phones or any other mobile / recording devices in areas where pupils are changing.

Mobile phones / non-school mobile devices e.g. non-school tablets, cameras or any other devices with image sharing capacities are not permitted in the EYFS setting.

Staff should avoid unnecessary contact with pupils outside school; they should not give pupils their home address, home phone number, mobile phone number or e-mail

address or send personal communications to pupils (i.e. communications not pertaining to school 'work' and professional matters) unless agreed by a senior colleague.

## **7. Types of Abuse & Specific Safeguarding Issues**

All staff should be alert to the signs of neglect, abuse and exploitation and be aware of, and know how to respond to, the following specific safeguarding issues. (See appendices 3 and 4 for further detail.)

- i. Allegations of sexual impropriety
- ii. Child abduction and community Safety
- iii. Child criminal exploitation
- iv. Child sexual exploitation
- v. Children and the court system
- vi. Child on child abuse
- vii. Children with family in prison
- viii. County lines
- ix. Cyber crime
- x. Domestic abuse (Domestic Violence)
- xi. Faith (and Spiritual) abuse
- xii. Female genital mutilation (FGM)
- xiii. Forced marriage
- xiv. Gangs and youth violence
- xv. Homelessness
- xvi. 'Honour-based' abuse (HBA)
- xvii. Mental health
- xviii. Modern slavery
- xix. Private fostering
- xx. Radicalisation
- xxi. Reasonable force
- xxii. Serious violence
- xxiii. Sexual harassment and violence
- xxiv. Trafficking
- xxv. Upskirting
- xxvi. Youth produced sexual imagery

## **8. Mental Health**

All staff should also be aware that mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation. Concerns regarding self-harm, eating, suicidal thoughts or ideation should be raised with the Safeguarding Team or school nurses immediately.

Where it is suspected that a pupil's behaviour may be related to an on-going or emerging mental health problem the Safeguarding Team and the school nurses will make a professional judgement about how best the pupil can be supported; this may include a

‘Escalating Emotional Health Risk Assessment’ and consultation with parents, the school doctors (for registered pupils) or referral to other outside agencies.

If there are concerns that the concern raised is malicious this will be passed to Deputy Head and managed in line with behaviour and discipline policy. Pupils who raise concerns about another child should be dealt with sensitively to minimise potential distress, however, staff cannot promise confidentiality regarding the source of the concern particularly if there the concern is raised in isolation and there are no other concerns regarding a pupil’s wellbeing.

## **9. Reporting and Responding to Concerns, Disclosures or Allegations**

### **9.1 Pupils**

Pupils are directed to the, ‘Who can I Talk to?’ posters, displayed around the school. They can share worries or concerns by approaching any member of staff. Pupils are also able to report concerns using the email: [stopbullying@stonarschool.com](mailto:stopbullying@stonarschool.com) and they can report using myvoice where the concern can be anonymous.

### **9.2 Staff**

Staff must not assume a colleague or another professional will take action and share information that might be critical in keeping children safe. They should be mindful that early information sharing is vital for effective identification, assessment and the provision of appropriate support for our pupils.

If in any doubt about sharing information, staff should speak to the DSL/DDSL. Fears about sharing information must not be allowed to stand in the way of the need to promote the welfare, and protect the safety, of children.

The Safeguarding Team are most likely to have a complete picture and be the most appropriate individuals to advise on the response to safeguarding concerns. In line with Wiltshire Safeguarding Vulnerable People Partnership procedures and policy (see Appendix I and safety boards around the school), all staff should record and report any concern or disclosure immediately to the Safeguarding Team. Stonar uses the My Concern System for recording safeguarding concerns and all staff have access to this, however, in the following instances, staff should, as a matter of urgency, find a member of the Safeguarding Team (or the School Nurse for mental health concerns) and share the concerns with them directly:

- i. Disclosures of abuse (including child on child allegations)
- ii. Mental health concerns, disclosures of self-harm, suicidal thoughts should be reported immediately to the DSL/DDSL or school nurse. If a nurse is not on duty, concerns about boarders should be reported to the houseparent.

During term time, the DSL and/or a DDSL is always available during school hours for staff to discuss any safeguarding concerns. In the absence of a member of the Safeguarding team, staff may contact the Head or the Multi Agency Safeguarding Hub (MASH) directly. (See Appendix 2).

### **9.3 Case Management by Staff members**

In addition to the Safeguarding team and DSL oversight, individual staff may be allocated as Case Owners to specific individual My Concern cases.

Individual Case Owners have the responsibility to manage the updates for this case. This means the DSL has delegated day to day management of the concern to the named member of staff. As the case manager, staff are the nominated lead professional and must proactively update and manage the concern to include weekly updates, or more frequently as necessary. Updates should include communication from parents and the pupil's voice. Staff must ensure they redact any other pupil's names. Case Managers should include any support or mentoring notes from meetings or sessions with the young person as appropriate. Case Manager should liaise with the DSL when they feel a case can be closed.

## **10. The Voice of the Child**

The voice of the child is central to our safeguarding practice and pupils are encouraged to express and have their wishes and feelings taken into account when determining what actions to take and what services to provide.

Children may not feel ready or know how to tell someone that they are being abused, exploited, or neglected, and/or they may not recognise their experiences as harmful. They may feel embarrassed, humiliated, or being threatened. All staff should determine how best to build trusted relationships with children and young people which facilitate communication. Children should know their concerns will be treated seriously, and knowing they can safely express their views and give feedback. Where a child is suffering, or likely to suffer, significant harm, the DSL/DDSL will consider further actions required, including consultation with and referral to children's social care, (in line with the Children Act 1989, especially sections 17 and 47).

Staff involved in supporting a child or following disclosure will be expected to play a part in any referrals/assessments.

The options available for the child will then include:

- i. managing any support via Stonar's own pastoral support processes;
- ii. an early help assessment; or
- iii. a referral for statutory services, for example as the child might be in need, is in need or suffering or likely to suffer harm.

## **11. Contextual Safeguarding**

All staff should be aware that Safeguarding incidents and/or behaviours can be associated with factors outside of Stonar and/or can occur between children outside a school environment. All staff, but especially the DSL/DDSL should be considering the context within which such incidents and/or behaviours occur. This is known as contextual safeguarding, which simply means assessments of children should consider whether wider environmental factors are present in a child's life that are a threat to their safety and/or welfare.

Children's social care assessments should consider such factors and staff should provide as much information as possible as part of the referral process. This will allow any assessment to consider all the available evidence and the full context of any abuse including contexts outside of the home.

Staff should ensure contextual detail is included on any 'My Concern' record. Additional information regarding contextual safeguarding is available at <https://contextualsafeguarding.org.uk/about/what-is-contextual-safeguarding>.

All staff should be able to reassure a child that they are being taken seriously and that they will be supported and kept safe.

A child should never be given the impression that they are creating a problem by reporting abuse, sexual violence or sexual harassment. Nor should they ever be made to feel ashamed for making a report.

Staff adhere to the Dos and Do Nots (see Appendix 10) when concerned about the welfare of a pupil or are responding to disclosures.

## **12. The Role of the Local Authority**

Within one working day of a referral being made, a Local Authority Social Worker should acknowledge receipt to the DSL/DDSL and make a decision about the next steps and the type of response that is required. This will include determining whether:

- i. the child requires immediate protection and urgent action is required
- ii. the child is in need, and should be assessed under Section 17 of the Children Act 1989
- iii. there is reasonable cause to suspect the child is suffering or likely to suffer significant harm, and whether enquiries must be made and the child assessed under section 47 of the Children Act 1989
- iv. any services are required by the child and family and what type of services or
- v. further specialist assessments are required to help decide what further action to take
- vi. to see the child as soon as possible, if the decision is taken that the referral requires further assessment.

The DSL/DDSL will follow up if this information is not forthcoming.

### **13. Multi Agency Working**

The Directors and the school will contribute to multi-agency working in line with statutory guidance in Working Together to Safeguard Children (2018, updated 2023). As a school, Stonar has a pivotal role to play in multi-agency safeguarding arrangements. The three safeguarding partners (the local authority; integrated Care boards for an area within the local authority; and the chief officer of police for a police area in the local authority area). The DSL/DDSL will liaise with safeguarding partners and work with other agencies in line with Working Together (2018, updated 2023) and will refer to National Police Chief's Council guidance for schools to understand when they should consider calling the police ([npcc.police.uk](http://npcc.police.uk)). Stonar will work together and with any relevant agencies as required (and if named as a relevant agency, under a statutory duty) to safeguard and promote the welfare of children with regard to local need in line with any arrangements published by the three safeguarding partners. The School are aware that children are accompanied and supported by an appropriate adult when involved in Police Investigations, further information about statutory guidance (PACE Code C 2019) can be found in Annex C of KSCIE 2024.

### **14. Record Keeping, Escalation and Whistleblowing Procedures**

#### **14.1 Record Keeping and Information Sharing**

Information sharing is vital in identifying and tackling all forms of abuse and neglect.

The School:

- i. liaises with partner organisations to ensure any safeguarding records for learners are shared on transition:
  - a) by the setting/school/organisation previously attended by the child.
  - b) by our DSL when the child leaves our school.

For any child dual-registered with another school/setting/organisation, the DSL liaises regularly with the DSL at that base to ensure information is shared in the child's best interests. This includes contextual safeguarding information about relationships that young people form in their neighbourhoods, schools and online to enable assessment and intervention to happen within these extra-familial contexts.

- ii. Use the My Concern system to keep clear written records of all pupil safeguarding and child protection concerns. These records should include:
  - a) a clear and comprehensive summary of the concern
  - b) details of how the concern was followed up and resolved

- c) a note of any action taken, decisions reached the reasons for those decisions and the outcome.
- d) incorporate the wishes and feelings of the pupil

The DSL/DDSL acts in accordance with Information Sharing – Department for Education (DfE) (2018) and in line with the Wiltshire Council Record Keeping Guidance which includes details about file retention. The Data Protection Act 2018 and GDPR do not prevent or limit the sharing of information for the purposes of keeping children safe. This includes allowing practitioners to share information without consent. Safeguarding Files are considered ‘special category personal data’.

Where appropriate, in addition to the child protection file, the DSL/DDSL will also consider if it would be appropriate to share any information with the new school / college in advance of a child leaving; where this information that would allow the new school / college to continue supporting victims of abuse and have that support in place for when the child arrives. Information will be shared with safeguarding partners, other organisations, agencies and practitioners as required. The DSL/DDSL makes a judgement in each case.

We are committed to work in partnership with parents and carers. In most situations, we will discuss initial concerns with them. However, the DSL/DDSL will not share information where there are concerns that if so doing would:

- place a child at increased risk of significant harm
- place an adult at increased risk of serious harm
- prejudice the prevention, detection or prosecution of a serious crime
- lead to unjustified delay in making enquiries about allegations of significant harm to a child, or serious harm to an adult.

## **14.2 Escalating Concerns / Re-Consideration**

It is important for children to receive the right help at the right time to address risks and prevent issues escalating. Effective working together depends on an open approach and honest relationships between colleagues and between agencies. Staff should be confident and able to professionally disagree and challenge decision-making as an entirely legitimate activity; a part of our professional responsibility to promote the best safeguarding practice. If, after a referral, the child’s situation does not appear to be improving, the DSL/DDSL and any staff involved should consider following local escalation procedures to ensure their concerns have been addressed and, most importantly, that the child’s situation improves. In such cases the SVPP Case Resolution Protocol and escalation policy is used if necessary. If we are on the receiving end of a professional challenge, we see this as an opportunity to reflect on our decision making.

## **14.3 Whistleblowing**

All staff can raise concerns about poor or unsafe practice and potential failures in the school safeguarding regime. Our whistleblowing procedures, which are reflected in staff

training and our Code of Conduct, are in place for such concerns to be raised with the Head or Deputy Head.

If a staff member feels unable to raise an issue with the Head or feels that their genuine concerns are not being addressed, other whistleblowing channels are open to them:

- i. Staff can call The NSPCC Whistleblowing Advice Line: 0800 028 0285 from 08:00 to 20:00, Monday to Friday, and 9:00 to 18:00 at weekends or e.mail [help@nspcc.org.uk](mailto:help@nspcc.org.uk).
- ii. Contact Daniel Jones the Director with responsibility for Safeguarding (contact details available from the school office).

## 15. Managing Allegations Against Staff

This includes supply teachers, peripatetic staff & volunteers.

Stonar School utilises Guidance from KCSIE (September 2024) and follows the procedure set out by the SVPP 'Allegations Against Adults' flowchart (Appendix 2) displayed in the staff room and on notice boards around the school for easy reference.

### 15.1 Allegations that meet the harms threshold

Allegations that meet the harms threshold include those of abuse, sexual impropriety or concerns that anyone working at Stonar, including supply teachers, volunteers and contractors has:

- i. behaved in a way that has harmed a child, or may have harmed a child
- ii. possibly committed a criminal offence against or related to a child
- iii. behaved towards a child or children in a way that indicates he or she may pose a risk of harm to children
- iv. behaved or may have behaved in a way that indicates they may not be suitable to work with children.

### 15.2 Reporting Concerns or Allegations

All concerns or allegations must be reported to the Head immediately, who will refer to the Designated Officer for Allegations. (DOFA).

Any concern or allegation against the Head should be reported to the Chair of Directors without informing the Head (*contact details available from the school secretaries*) who will refer to DOFA.

Staff will be passed the appropriate paperwork to share these concerns following meeting with Head or Chair of Directors and staff **should not** use the 'My Concern' system to report concerns about members of staff.



All staff should remember that the welfare of a child is paramount and should not delay raising concerns because a report could jeopardise their colleague's career. Any allegation of abuse will be dealt with in a fair and consistent way that provides effective protection for the child and at the same time supports the person who is the subject of the allegation.

The circumstances should be kept strictly confidential and the school / parents / carers should make every effort to maintain confidentiality and guard against unwanted publicity while an allegation is being investigated or considered.

Where a crime may have been committed the Police will be informed immediately. In borderline cases discussion will be held with the DOFA without naming the school or individual, as appropriate.

In situations where the person is deemed to be an immediate risk to children or there is evidence of a possible criminal offence the school will want to involve the police immediately. Where there is no such evidence, the school will discuss the allegations with the designated officer(s) in order to help determine whether police involvement is necessary.

Allegations against a teacher who is no longer teaching and any historical allegations of abuse will be referred to the police.

Stonar School has a legal duty to refer to the DBS anyone who has harmed, or poses a risk of harm, to a child or vulnerable adult where:

- i. the harm test is satisfied in respect of that individual
- ii. the individual has received a caution or conviction for a relevant offence
- iii. or if there is reason to believe that the individual has committed a listed relevant offence
- iv. and the individual has been removed from working (paid or unpaid) in regulated activity, or would have been removed had they not left.

The referrals are made by contacting the DBS referrals helpline: telephone: 01325 953795 further details are found on the DBS section of the Gov.uk website. Further information can also be found in KCSiE September 2024 and from: <https://www.gov.uk/guidance/making-barring-referrals-to-the-dbs>).

In line with KCSiE 2024, if our setting receives an allegation relating to an incident at an out of school setting that was using our premises, **our** policies and procedures should be followed as well, which may include informing the LADO.

### **15.3 Teacher Misconduct**

For all cases involving serious professional misconduct or if a safeguarding issue also involves misconduct by a teacher, The Directors and The Head at Stonar have a have a

statutory duty to make a referral to both the DBS and the Teaching Regulation Authority (TRA). This will include situations where the School ceases to use the services of a teacher because of serious misconduct, or might have dismissed them or ceased to use their services had they not left first.

**This is a legal duty and failure to refer when the criteria are met is a criminal offence.**

Referrals will be made using the following form:

<https://www.gov.uk/government/publications/teacher-misconduct-referral-form>

Questions about referring a case can be directed to:

[misconduct.teacher@education.gov.uk](mailto:misconduct.teacher@education.gov.uk)

Telephone: 0207 593 5393

## **15.4 Concerns that do not Meet the Harm Threshold**

Stonar has in place policies and processes to manage and record concerns (including allegations) which do not meet the harm threshold set out above. Stonar aims to facilitate an open and transparent culture in which all concerns about all adults working in or on behalf of the school are dealt with promptly and appropriately, to enable the identification of concerning, problematic or inappropriate behaviour early; thereby minimising the risk of abuse; and ensuring that adults working at Stonar are clear about professional boundaries and act within these boundaries, and in accordance with the ethos and values of the School. Reporting low level concerns should also protect staff working at Stonar from potential false allegations or misunderstandings. In line with the Staff Code of Conduct, staff should 'self-refer' and report when they may have found themselves in a situation that could be misinterpreted, might appear compromising to others and / or on reflection they have behaved in such a way that they consider falls below the expected professional standards.

A low level concern, is not to be considered insignificant, it means the concern does not meet the thresholds outlined above, however, should an individual have a concern, no matter how small, even a sense of unease or 'nagging doubt' that an adult working in or on behalf of Stonar has acted in a way that:

- i. is inconsistent with the staff code of conduct\*, including inappropriate conduct outside of work
- ii. does not meet the allegations threshold or is otherwise not considered serious enough to consider a referral to the DOFA /LADO.

Individuals must report their concerns to the Head or, in Head's absence, the DSL.

\*: Examples include:

- a) being over friendly with children

- b) having favourites
- c) taking photographs of children on their (Staff's own) mobile phone
- d) inappropriate engagement with a child on a one-to-one basis, eg, in a secluded area
- e) using inappropriate sexualised, intimidating or offensive language.

#### **15.4.1 Records of Low Level Concerns**

Records of these concerns should be kept confidential and include:

- i. Details of the concern
- ii. Context
- iii. Action taken
- iv. Name of the individual sharing their concern if they consent.

Records should be reviewed so that potential patterns can be identified and the school can:

- v. Consider disciplinary procedures or
- vi. Refer to Designated Officer for Allegations (DOFA / LADO) if the harms threshold is met and
- vii. Whether wider cultural issues within the school ought to be addressed
- viii. In the case of contractors and supply staff notify their employers so that any potential patterns of inappropriate behaviour can be identified.

## **16. Directors: Monitoring and Review**

As key strategic decision makers and vision setters for the school, the Directors ensure there are appropriate policies and procedures in place in order for appropriate action to be taken in a timely manner to safeguard and promote children's welfare. These policies and procedures are in line with national and local safeguarding requirements. There is a nominated Director for safeguarding. The Safeguarding Director ensures that protection files are maintained as set out in KCSIE.

Directors ensure that safeguarding is an agenda item for every full governing body meeting.

The Head ensures that safeguarding is an agenda item for every Leadership and Management team meetings.

The Directors ensure that this policy is reviewed annually or earlier as required by changes to legislation or statutory guidance. Our Directors monitor the school's safer recruitment practice. The nominated Director for Safeguarding meets the DSL every term.

Directors will work with the senior leaders to make sure the following safeguarding essentials are in place:

| <b>Training/Teaching</b>   | <b>Policy/Procedures</b>  | <b>Staffing</b>  |
|--|---|--|
| <p>Online safety training pupils<br/>DSL/DDSL training<br/>Staff training on key safeguarding areas including:</p> <ul style="list-style-type: none"> <li>• KCSiE (Sept. 2024).</li> <li>• Online safety (including filtering and monitoring systems)</li> <li>• Staff code of conduct &amp; behaviour expectations</li> <li>• Children Looked After (CLA) / Previously Looked After Children (PLAC)</li> <li>• Preventing Radicalisation</li> <li>• Whistleblowing</li> </ul> | <p>Children Missing Education (CME)<br/>Codes of Conduct<br/>Concerns about Staff Conduct<br/>Dealing with a Child at Immediate Risk<br/>Early help<br/>Female Genital Mutilation (FGM)<br/>Honour-Based Abuse (HBA)<br/>Child-on-Child Abuse<br/>Reporting Abuse / SVPP Procedures<br/>SEND and Safeguarding<br/>Staff Contribution to Policy<br/>Safeguarding Policy Review</p> | <p>Designated Safeguarding Lead (DSL)</p> <p>Deputy Designated Safeguarding lead (DDSL)</p> <p>Designated LAC teacher (even if there are no LAC on roll)</p> |

Our chair of Directors is responsible for liaising with the local authority Designated Officer for Allegations (DOFA / LADO) and other partner agencies in the event of an allegation of abuse being made against the Head.

## **16.1 Audits and Reports**

The nominated Director for safeguarding liaises with the Head and the DSL/DDSL to complete an annual safeguarding audit return to the local authority and the Globeducate Board.

The Board of Directors receive a safeguarding and child protection report annually. This is based on the annual review and the efficiency with which the related duties have been discharged.

## **17. Training**

### **17.1 New Staff**

All staff including volunteers, temporary staff and contractors are informed of our safeguarding procedures including online safety (includes an understanding of the expectations, applicable roles and responsibilities in relation to filtering and monitoring), at induction. All staff and any temporary staff, contractors and volunteers who work with children:

- i. Meet the Designated Safeguarding Lead
- ii. Receive a letter from the DSL, containing photographs of the safeguarding team members (to aid identification) along with a copy of the following documents (see

below), which staff are required to read, and return signed documentation attesting to this:

- a) The school's child protection policy  
(including the safeguarding response to children who go missing from education)
- b) The staff code of conduct
- c) The school's behaviour policy (for pupils)
- d) A copy of Part 1 of KCSIE Sept. 2024
- e) The Stonar child protection prompt card
- f) A copy of the school's whistle blowing policy
- g) A copy of the school's Prevent Policy
- h) ICT acceptable use policy

## **17.2 All Staff**

Whole school safeguarding training occurs every September and Whole school online safety training occurs every January. . A certificated course is available through the Educare for education training system. In addition, all staff members receive safeguarding and child protection updates (via email & staff meetings) as necessary and at least annually.

## **17.3 Advanced Training**

The DSL & DDSLs and The Head all have additional multi agency training which is updated every two years as a minimum. Their knowledge and skills are refreshed at least annually e.g. via e-bulletins or safeguarding networking events with other DSL/DDSLs.

## **17.4 Safeguarding Training for Pupils**

Safeguarding training is provided by the DSL or Deputy DSL to all school and House prefects. This includes appropriate action to take should they receive any allegations of abuse or have concerns about the safety and welfare of pupils.

## **17.5 Safer Recruitment**

At least one person on any appointment panel has undertaken Safer Recruitment Training. This training is updated every five years as a minimum.

## **17.6 Preventing Radicalisation**

All staff undertake Prevent training. A certificated course is available through the Educare for education training system.

## **17.7 Staff Support**

Due to the demanding, often distressing nature of child protection work, we support staff by providing an opportunity to talk through the challenges of this aspect of their

role with a senior leader and to seek further support as appropriate. All staff have access to an Employee Assistance Programme (EAP) with Health Assured, as part of their employment package with the school. The school nurses receive clinical supervision with Heida.

### **17.8 Directors**

All Stonar's Directors undertake a safeguarding induction provided by the DSL. They may also choose to complete face to face training for Governors provided by Wiltshire Council or equivalent body. In addition, Directors may choose to attend whole school safeguarding and child protection training. The Director with responsibility for safeguarding undertakes face to face training with an external provider as soon as practical after their appointment to post.

## **18. The Role of the Designated Safeguarding Lead**

The Directors of Stonar have designated the Deputy Head (Pastoral) to have lead responsibility for Safeguarding and child protection. This Deputy Head (Pastoral) is required to carry out the duties of the post including committing resources and, where appropriate, supporting and directing other staff. It is the responsibility of the Designated Safeguarding Lead to ensure that any deficiencies or weaknesses in Safeguarding and Child Protection arrangements are remedied without delay. Further details about the role of and the responsibilities of the designated safeguarding lead can be found in Appendix 5 of this policy.

## **19. The EYFS (Early Years Foundation Stage) Setting**

The Child Protection Policy also applies to the EYFS but the following additional requirements apply: Ofsted are to be informed as soon as is reasonably practicable, but at the latest within 14 days, of any allegations of serious harm or abuse by any person living, working or looking after children at the premises or older boarders in positions of responsibility (whether that allegation relates to harm or abuse committed on the premises or elsewhere), or any other abuse which is alleged to have taken place on the premises, and of the action taken in respect of these allegations.

The Deputy Head (Pastoral) is the lead practitioner for safeguarding throughout the school, the Head of the Prep School (DDSL) takes the lead responsibility for those children in the EYFS and is the EYS safeguarding Lead, however, the Nursery Manager works closely with the Head of Prep in playing a substantial role in training of staff and oversee regulatory compliance in this area. We notify the registration authority (Ofsted) of any incident or accident and any changes in our arrangements that affect the wellbeing of children.

Arrangements for alternative accommodation away from children will be made in cases where a member of boarding or residential staff is suspended pending an investigation child protection /safeguarding concerns.

## 20. Exceptional Operating Circumstances

If the school is required to change the way we offer our provision to children due to exceptional circumstances, staff responsibilities to remain alert to the signs and risks of abuse to children will continue to apply. In such circumstances:

The DSL will:

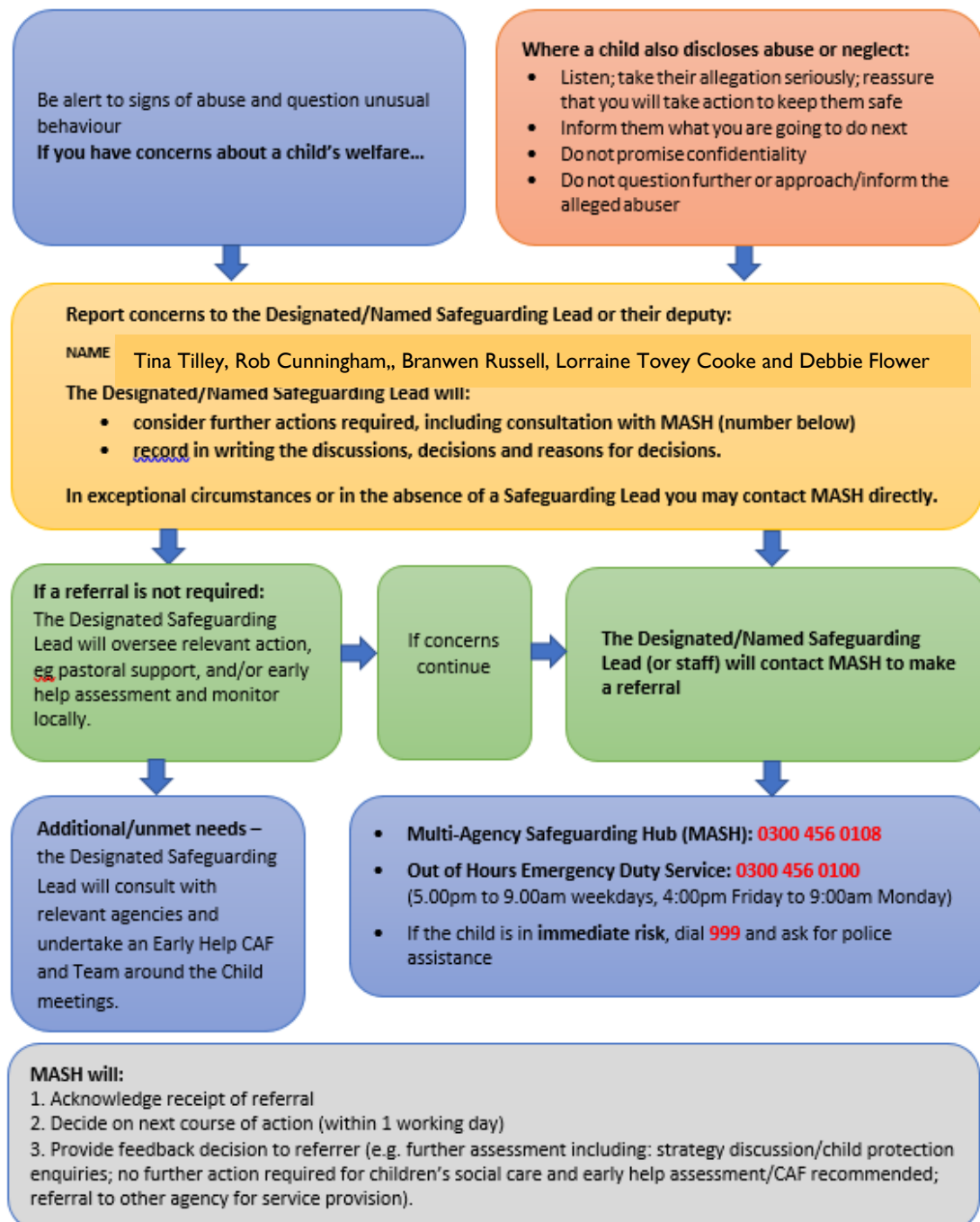
- i. work closely with social care and partner agencies to support children in these circumstances and to identify children who may be at risk for the first time and/or benefit from additional support
- ii. use specific local and national guidance about safeguarding in such circumstances to inform practice and will ensure staff, children, and families are provided with written:
  - a) amended DSL arrangements as required (names, location and contact details)
  - b) temporary changes to procedures for working with children e.g. online.
  - c) amended procedures for reporting concerns
  - d) safeguarding training arrangements
  - e) timescales for such changes so that all children, families and staff understand when such arrangements will end, and arrangements revert to those in place prior to the events leading to the need for the temporary changes.

We will ensure the curriculum we offer during such circumstances, continues to promote learners' spiritual, moral, cultural, mental and physical development.

# Appendix I: What to Do if you are Worried a Child is being Abused or Neglected (SVPP)

## What to do if you are worried a child is being abused or neglected

for staff, volunteers and visitors in all agencies and settings



This flowchart is intended for use as a brief guide. Refer to the [DfE Guidance What to do if you are worried a child is being abused](#) for more information, definitions and possible indicators of abuse (including child sexual exploitation).

SVPP website: [www.wiltshirescb.org.uk](http://www.wiltshirescb.org.uk)

Reviewed: September 2022



Appendix 2a: **Allegations and concerns**  
**(including schools, early years**



**against adults in education settings – July 2024**  
**and alternative provision settings)**

If you become aware that a member of staff/volunteer/supply/contractor/bank staff and those from organisations or individuals using the school premises, MAY have:

- **behaved in a way that has harmed a child, or may have harmed a child and/or**
- **possibly committed a criminal offence against or related to a child, and/or**
- **behaved towards a child or children in a way that indicates he or she may pose a risk of harm to children, and/or**
- **behaved or may have behaved in a way that indicates they may not be suitable to work with**

If you have any concern – no matter how small, and even if no more than causing a sense of unease or a ‘nagging doubt’ - that an adult working in or on behalf of the school may have acted in a way that:

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

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

- Being over friendly with children
- Having favourites
- Taking photographs of children on their mobile phone, contrary to school policy
- Engaging with a child on a one-to-one basis in a scheduled area or behind a closed door; or,
- Humiliating pupils

**Where a child also discloses abuse or neglect by a member of staff/volunteer/supply/contractor/bank staff and those from organisations or individuals using the school premises:**

- Listen; take their allegation seriously; reassure that you will take action to keep them safe
- Inform them what you are going to do next
- Do not promise confidentiality
- Do not question further or approach/inform the person/alleged abuser

Staff should self-refer to their line manager or Designated Safeguarding Lead where they have found themselves in a situation which could be misinterpreted, might appear compromising to others, and/or on reflection they believe they have behaved in such a way that they consider falls below the expected professional standards.

**Report immediately to the person in charge: .....Matthew Way.....**

Eg headteacher, principal, manager

**Any concern or allegation against the person in charge will be reported to: .....Daniel Jones.....**

Eg chair of governor, owner, chair of committee, nominated trustee

Unless there is clear evidence to prove that the allegation is incorrect, the person in charge **will decide on the nature of the allegation/concern:**

**Allegations that may meet the harm threshold**

If the behaviour towards the child may have met the harm threshold (KCSiE 2024, p.92) report the allegation **within one working day** to the Local Authority Designated Officer (LADO) and your HR provider

- Contact the Integrated Front Door (IFD) **0300 456 0108** and select Option 6 or email [LADOservice@wiltshire.gov.uk](mailto:LADOservice@wiltshire.gov.uk)
- Out of Hours Emergency Duty Service: **0300 456 0100** (5pm to 9am weekdays, 4pm Friday to 9am Monday)

**Allegations/concerns that do not meet the harm threshold (low-level concerns)**

Refer to the allegation/concerns that do not meet the harm threshold, or ‘low level’ concerns addendum flowchart (below).

## Allegation/concerns guidance for persons in charge – July 2024

### Allegations that may meet the harm threshold

KCSIE 2024 Part 4 Section 1

#### The LADO will:

- Consider the relevant facts and concerns regarding the adult and child or children, including any previous history
- Decide on next course of action - usually straight away, sometimes after further consultation with other multi-agency parties such as the Police and HR.

#### If the allegation threshold is met:

- A strategy meeting will normally be held.
- Usually, a senior manager/safeguarding lead, the LADO, HR, Police and social care are invited to attend.
- Relevant information is shared, risks to children are considered and appropriate action agreed eg child protection and other enquiries, disciplinary measures or criminal proceedings.
- A record of the meeting will be made, and regular reviews will take place until a conclusion is reached.

#### If the allegation threshold is NOT met:

The LADO will agree an appropriate response, eg for the setting to undertake further enquiries or an internal investigation.

Refer to the low-level concerns procedures on the right-hand-side.

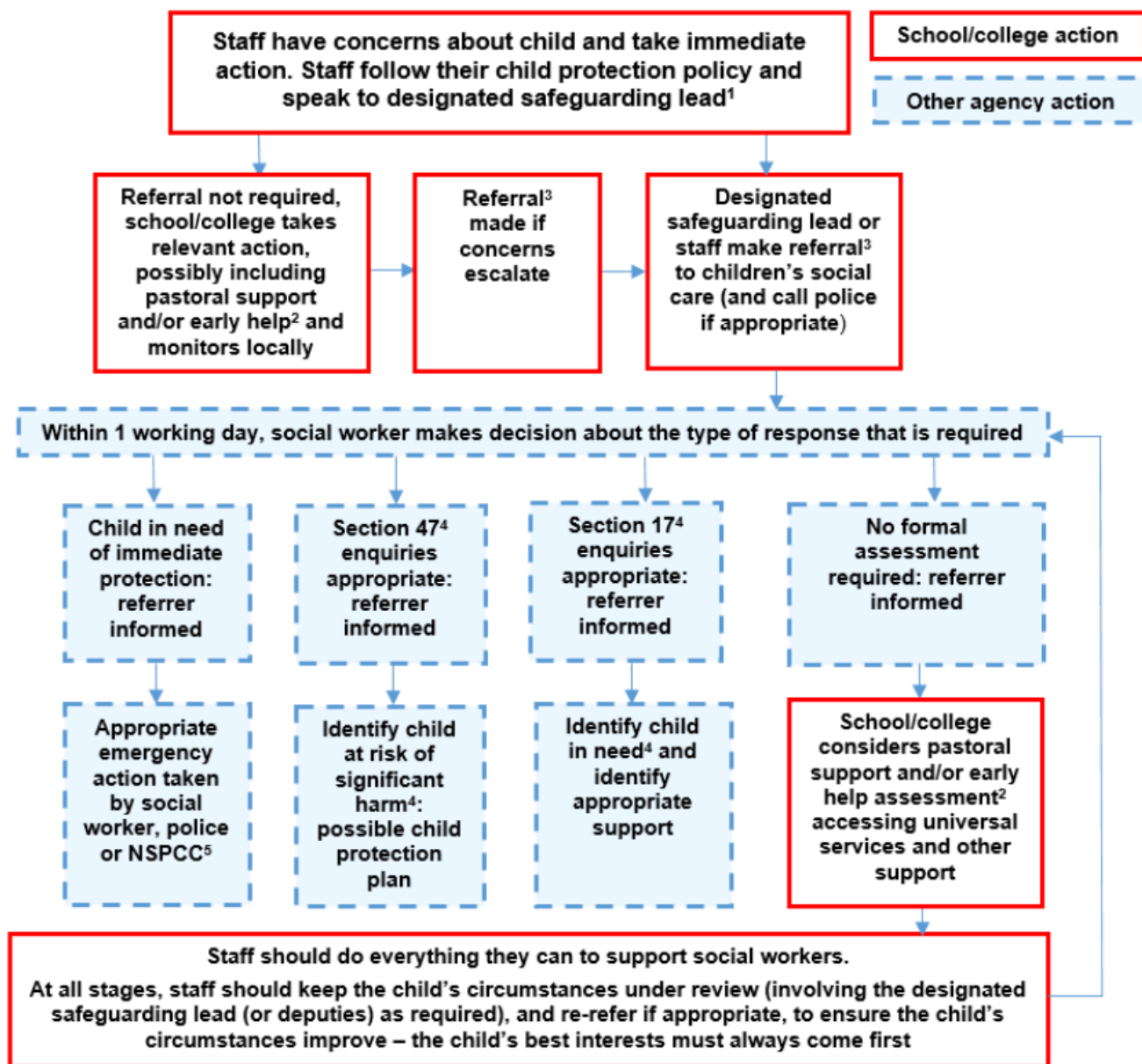
### Allegations/concerns that do NOT meet the harm threshold ('low level' concerns)

KCSIE 2024 Part 4 Section 2

#### The person in charge will take the following actions:

- Reports about supply staff and contractors will be notified to their employers.
- Collect information to help them categorise the type of behaviour and determine what further action may need to be taken.
- If the concern has been raised via a third party, the person in charge (or a nominated deputy) should collect as much evidence as possible by speaking:
  - directly to the person who raised the concern, unless it has been raised anonymously, and
  - to the individual involved and any witnesses.
- All low-level concerns will be recorded in writing and will include details of the concern, the context in which the concern arose along with the rationale for decisions and action taken.
- Records will be kept confidential and held securely; it is recommended that it is retained at least until the individual leaves their employment.
- Records will be reviewed so that potential patterns of concerning, problematic or inappropriate behaviour can be identified.
- Where a pattern of such behaviour is identified, the school or college should decide on a course of action, either through its disciplinary procedures or where a pattern of behaviour moves from a low-level concern to meeting the harm threshold, in which case it should be referred to the LADO (as per Part 4, Section 1).

## Actions where there are concerns about a child



## Appendix 3: Types of Abuse and Neglect and Possible Indicators/Signs

Abuse and safeguarding issues are rarely standalone events that can be covered by one definition or label. In most cases multiple issues will overlap with one another. Safeguarding incidents and/or behaviours can be associated with factors outside the school or college and/or can occur between children outside of these environments. All staff should be aware of the signs of abuse and neglect so that they are able to identify cases of children who may be in need of help or protection. Children may show no signs at all or they may show some of the following signs. If staff members are unsure they should always speak to a member of the safeguarding team; **excellent on line resources and guidance are also available from the NSPCC <http://www.nspcc.org.uk/>**

### Abuse:

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

### Physical Abuse (including Fabricated or induced illness):

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

|   |   |
|---|---|
| Unexplained injuries or burns, particularly if they are recurrent | Improbable reasons given for injuries either by the child or the parent |
| Refusal to discuss injuries                                       | Admission of punishment that appears excessive                          |
| Arms and legs kept covered in hot weather                         | Self-destructive tendencies   |
| Fear of returning home  | Fear of medical help  |
| Aggression towards others   | Chronic running away  |
| Fear of parents being contacted                                   | Withdrawal from physical contact  |

### Neglect:

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

|   |   |
|---|---|
| Constant hunger                               | Untreated medical problems                                      |
| Poor personal hygiene                         | Destructive tendencies  |
| Constant tiredness                            | Low self esteem   |
| Poor state of clothing                        | Neurotic behaviour (e.g. rocking, hair twisting, thumb sucking) |
| Emaciation                                    | No social relationships   |
| Frequent lateness or non attendance at school | Chronic running away  |
| Untreated medical problems                    | Compulsive stealing or scavenging                               |

NSPCC briefing paper (July 21) states around 1 in 10 children in the UK have been neglected; concerns around neglect have been identified for half of children who are the subject of a child protection plan or

register in the UK; and neglect was the most commonly mentioned form of abuse in contacts to the NSPCC helpline in 2020/21.

### **Emotional Abuse:**

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

|   |                                 |
|---|---------------------------------|
| Physical, mental and emotional development lags         | Neurotic behaviour              |
| Admission of punishment that appears excessive          | Self-mutilation                 |
| Overreaction to mistakes                                | Fear of parents being contacted |
| Sudden speech disorders                                 | Drug/solvent abuse              |
| fear of new situations                                  | Chronic running away            |
| Inappropriate emotional responses to painful situations | Compulsive stealing/scavenging  |

### **Sexual Abuse:**

Involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (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. *(The sexual abuse of children by other children is a specific safeguarding issue in education)*

|   |   |
|---|---|
| Stop enjoying previously liked activities such as music, sports, art, gym, uniformed organisations                    | Develop eating disorders, such as anorexia or bulimia   |
| Become fearful or refuse to see certain adults for no apparent reason; dislike a baby sitter, relative or other adult | Regress to younger behaviour such as thumb sucking, surrounding themselves with previously discarded toys |
| Act in a sexual way inappropriate for their age   | Have a poor self image, self mutilate   |
| Draw sexually explicit pictures depicting some act of abuse   | Continually running away  |
| Seem to be keeping secret something that is worrying them   | Become severely depressed and even attempt suicide  |
| Have frequent urinary infections, bleeding in the genital or anal areas   | Show discomfort when walking  |
| Have soreness or bleeding in the throat   | Say they are no good, dirty rotten  |
| Have chronic ailments, such as stomach pains or headaches   | Be wary, watchful   |

Repeat obscene words or phrases which may have been said during the abuse  
Attempt to sexually abuse another younger child

Find excuses for not going home or to a friend's house after school (where abuse may be happening)  
Talk or write about sexual matters

### **Reactions to Abuse:**

A child may experience a range of reactions to abuse, including some or all of the following

A feeling of shame or guilt.  
"It must have been my fault". I'm bad  
Dislike of being touched and touching others  
Hatred of self and of their body

A feeling that they are dirty  
– spoilt – degraded  
Loss of confidence  
Destructive behaviour

Embarrassment "I'm sure everyone knows"  
Trouble sleeping, nightmares  
Inability to complete school work

A desire to continually talk about the abuse and to gain reassurance  
Inability to relate to other children or adults

Many of the behaviours indicated are an attempt by the child to express feelings that she cannot express in words and are a response/reaction to abuse. Difficulties may continue for a long time after the abuse and the child may need specialist support.

## Appendix 4: Specific Safeguarding Issues

Any concerns regarding any of the following issues should be discussed with a member of the School Safeguarding Team and reported using the My Concern system. Further information can be found in KCSI E September 2024. Including links to guidance and advice on specific safeguarding issues.

### **Allegations involving Sexual Impropriety**

It is important to recognise that children do engage in sexual play and experimenting, which is usually age appropriate. It is important not to criminalise behaviour that is a perfectly normal and healthy part of growing up, however, children can abuse others. The presence of one or more of the following points in situations where there has been sexual activity between children should always trigger some concern:

- There is an age difference of two years or more between the children
- One of the children is significantly more dominant than the other
- One of the children is significantly more vulnerable than the other eg.in terms of disability, confidence, physical strength
- There has been some use of threats, bribes or coercion to secure compliance or to maintain
- secrecy

### **Child Abduction and Community Safety incidents**

Child abduction is the unauthorised removal or retention of a minor from a parent or anyone with legal responsibility for the child. Other community safety incidents in the vicinity of a school can raise concerns amongst children and parents, for example, people loitering nearby or unknown adults engaging children in conversation. At Stonar, pupils are given practical advice on how to keep themselves safe through PSHE and Tutor sessions. Further information is available at: [www.actionagainstabduction.org](http://www.actionagainstabduction.org) and [www.clevernevergoes.org](http://www.clevernevergoes.org).

### **Child Sexual Exploitation (CSE) & Child criminal exploitation (CCE):**

Both CSE and CCE are forms of abuse and both occur where an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a child into sexual or criminal activity, in exchange for something the victim needs or wants, and/or for the financial advantage or increased status of the perpetrator or facilitator and/or through violence or the threat of violence. CSE and CCE can affect children, both male and female and can include children who have been moved (commonly referred to as trafficking) for the purpose of exploitation.

### **Child Criminal Exploitation (CCE)**

Some specific forms of CCE can include children being forced or manipulated into transporting drugs or money through county lines, working in cannabis factories, shoplifting or pickpocketing. They can also be forced or manipulated into committing vehicle crime or threatening/committing serious violence to others. Children can become trapped by this type of exploitation as perpetrators can threaten victims (and their families) with violence, or entrap and coerce them into debt. They may be coerced into carrying weapons such as knives or begin to carry a knife for a sense of protection from harm from others.

As children involved in criminal exploitation often commit crimes themselves, their vulnerability as victims is not always recognised by adults and professionals, (particularly older children), and they are not treated as victims despite the harm they have experienced. They may still have been criminally exploited even if the activity appears to be something they have agreed or consented to.

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

## **Child Sexual Exploitation (CSE)**

CSE is a form of child sexual abuse. Sexual abuse may involve physical contact, including assault by penetration (for example, rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing, and touching outside clothing. It may include non-contact activities, such as involving children in the production of sexual images, forcing children to look at sexual images or watch sexual activities, encouraging children to behave in sexually inappropriate ways or grooming a child in preparation for abuse including via the internet.

CSE can occur over time or be a one-off occurrence, and may happen without the child's immediate knowledge e.g. through others sharing videos or images of them on social media.

CSE can affect any child, who has been coerced into engaging in sexual activities. This includes 16 and 17 year olds who can legally consent to have sex. Some children may not realise they are being exploited e.g. they believe they are in a genuine romantic relationship.

More information is available in KSCIE September 2023 and from the Wiltshire Safeguarding Vulnerable People Partnership.

## **Children and the Court System**

Children are sometimes required to give evidence in criminal courts, either for crimes committed against them or for crimes they have witnessed. This can be stressful for children. Children need support in these instances and further information can be found in KCSiE (September 2024).

## **Children with Family Members in Prison**

These children are at risk of poor outcomes including poverty, stigma, isolation and poor mental health.

<https://www.nicco.org.uk/> provides information designed to support professionals working with offenders and their children, to help mitigate negative consequences for those children.

## **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 should be considered. County Lines Toolkit For Professionals can be accessed via KCSiE 2023.

## **Cyber Crime**

Cybercrime is criminal activity committed using computers and/or the internet.

It is broadly categorised as either 'cyber-enabled' (crimes that can happen off-line but are enabled at scale and at speed on-line) or 'cyber dependent' (crimes that can be committed only by using a computer).

Cyber-dependent crimes include;

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

Children with particular skill and interest in computing and technology may inadvertently or deliberately stray into cyber-dependent crime. Should there be concerns about a child in this area the Safeguarding team may consider referring the young person into the Cyber Choices programme. Further advice can be found at:

<https://nationalcrimeagency.gov.uk/what-we-do/crime-threats/cyber-crime/cyberchoices> and <https://www.ncsc.gov.uk/>



## **Domestic Abuse (Domestic violence)**

Domestic abuse can encompass a wide range of behaviours and may be a single incident or a pattern of incidents. That abuse can be, but is not limited to, psychological, physical, sexual, financial or emotional. Children can be victims of domestic abuse. They may see, hear, or experience the effects of abuse at home and/or suffer domestic abuse in their own intimate relationships (teenage relationship abuse)

The DSL liaises with partner agencies as part of 'Encompass' in Wiltshire. When police are called to an incident of domestic abuse, where there are children in the household who have experienced the domestic incident, the DSL ensures the organisation receives up to date relevant information about the child's circumstances and will ensure key staff provide emotional and practical support to the child according to their needs.

Additional 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.

Refuge runs the National Domestic Abuse Helpline, which can be called free of charge and in confidence, 24 hours a day on 0808 2000 247

<https://www.gov.uk/government/publications/domestic-abuse-get-help-for-specific-needs-or-situations>

<https://learning.nspcc.org.uk/child-abuse-and-neglect/domestic-abuse>

## **Faith and Spiritual Abuse**

Faith or Spiritual abuse is Child abuse linked to faith or belief and includes; belief in concepts of witchcraft and spirit possession, demons or the devil acting through children or leading them astray (traditionally seen in some Christian beliefs), the evil eye or djinns (traditionally known in some Islamic faith contexts) and dakini (in the Hindu context); ritual or multi murders where the killing of children is believed to bring supernatural benefits or the use of their body parts is believed to produce potent magical remedies; and use of belief in magic or witchcraft to create fear in children to make them more compliant when they are being trafficked for domestic slavery or sexual exploitation.

## **Female Genital Mutilation (FGM)**

FGM is illegal in the UK and a form of child abuse with long-lasting harmful consequences. As detailed in Annex B of KCSIE September 2024, there is a mandatory (legal) reporting duty for all teachers to report to police where they discover FGM appears to have been carried out on a girl under 18. Staff must inform the DSL/DDSL immediately if they suspect a girl is at risk of FGM and they must report to the police any 'known' cases of FGM as required by law.

Warning signs that FGM may be about to take place, or may have already taken place, can be found here:

## **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. Stonar recognises that Schools can play an important role in safeguarding children from forced marriage. Multi-agency statutory guidance for dealing with forced marriage can be found via links embedded in KCSIE 2024.

## **Gangs and Youth Violence**

Young people in gangs are often vulnerable individuals who can be both perpetrators and victims of harm. Most children are never involved in gangs, and not all groups of children should be viewed or labelled as gangs. Staff who are concerned about children who may be at risk of activity through participation in gangs or as victims of gang violence should contact a member of the school Safeguarding Team.

## **Harmful Online Challenges**

We teach our pupils about online safety, in a way that is appropriate for their age and stage of development. this includes advice on preparing for any online challenges and hoaxes,

We endeavour to allow our pupils to learn to critically identify and respond to dangerous or harmful content; we are aware that some of our pupils will struggle to identify harmful online challenges and online hoaxes, and we will engage in 1:1 support with individual pupils as necessary. Stonar aims to create an atmosphere of where pupils are able to ask questions and share concerns about what they experience online without being made to feel foolish or blamed. Children are encouraged to approach any member of staff for further advice and staff will signpost to resources or the correct staff who can help them. Stonar share information with parents and carers about where to get help and support. We hold parental online safety training events for staff and parents.

### **Harmful Sexual Behaviour (HSB)**

HSB is a term used to describe sexual actions that are outside what is safe for a young person's stage of development. It includes actions that can harm either the child or young person themselves, or another person.

It can include:

- using inappropriate language
- frequently and intentionally accessing age-inappropriate sexual material online
- undertaking mutual sexual activity they are not ready for with peers
- sending and receiving illegal images
- sexual interactions where there are significant power differences, lack of consent, or through force or threats
- engaging in abusive or sexually violent sexual behaviour online or offline.

Further information available from: [https://www.stopitnow.org.uk/concerned-about-a-child-or-young-persons-sexual-behaviour/preventing-harmful-sexual-behaviour/?utm\\_campaign=1540968\\_HSB%20Toolkit%20email\\_SOCIAL%20MEDIA&utm\\_medium=email&utm\\_source=Lucy%20Faithfull%20Foundation&dm\\_i=48W7,X10O,38NO7C,43A9L,I](https://www.stopitnow.org.uk/concerned-about-a-child-or-young-persons-sexual-behaviour/preventing-harmful-sexual-behaviour/?utm_campaign=1540968_HSB%20Toolkit%20email_SOCIAL%20MEDIA&utm_medium=email&utm_source=Lucy%20Faithfull%20Foundation&dm_i=48W7,X10O,38NO7C,43A9L,I)

See also appendix 8 & 9 guidance from the Brook traffic light tool and Hackett's continuum of behaviours.

### **Homelessness**

Being homeless or being at risk of becoming homeless presents a real risk to a child's welfare. 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 is recognised that 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. The Safeguarding Team would liaise with Children's services to ensure appropriate referrals are made based on the child's circumstances.

### **'Honour'-Based Abuse (HBA)**

So-called 'honour-based' abuse (HBA) encompasses incidents or 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. All forms of HBA are abuse (regardless of the motivation) and should be handled and escalated as such.

In addition, since February 2023 it has also been a crime to carry out any conduct whose purpose is to cause a child to marry before their eighteenth birthday, even if violence, threats or coercion are not used. As with the existing forced marriage law, this applies to non-binding, unofficial 'marriages' as well as legal marriages.

### **Mental Health**

Mental health problems can be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation.

Staff understand that:

- abuse and neglect, or other potentially traumatic adverse childhood experiences can have a lasting impact throughout childhood, adolescence and into adulthood.

Staff are aware of how

- these experiences can impact on children's mental health, behaviour and education.

- they have a duty to observe children day-to-day and identify those whose behaviour suggests that they may be experiencing a mental health problem or be at risk of developing one.

If staff have a mental health concern about a child that is also a safeguarding concern, they will report this concern using the My Concern Reporting system and speaking to the safeguarding team and the School Nurses. More information is also available at <https://www.gov.uk/government/publications/mental-health-and-behaviour-in-schools--2>

## Modern Slavery

Modern slavery encompasses human trafficking and slavery, servitude and forced or compulsory labour. Exploitation can take many forms, including: sexual exploitation, forced labour, slavery, servitude, forced criminality and the removal of organs.

## Child-on-Child Abuse

All children have a right to attend school and learn in a safe environment. Children can abuse other children, this can happen both inside and outside of school and online. This is generally referred to as child on child abuse. All child on child abuse is unacceptable and will be taken seriously. Child on child abuse, sexual violence or sexual harassment is not tolerated. All staff have an important role to play in preventing it and responding where they believe a child may be at risk from it. All staff must report any concerns. A lack of reports about Child on child abuse does not mean it is not happening.

It is likely to include, but not limited to:

- bullying (including cyberbullying, prejudice-based and discriminatory bullying)
- physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm
- sexual violence and sexual harassment (see Sexual violence section for more details)
- causing someone to engage in sexual activity without consent, (eg. forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party)
- Upskirting, which typically involves taking a picture under a person's clothing without them knowing, to obtain sexual gratification, or cause the victim humiliation, distress or alarm (*The Voyeurism (Offences) Act, aka the Upskirting Act, came into force on 12 April 2019*)
- Consensual and non-consensual sharing of nudes and semi-nude images and/or videos (also known as sexting or youth produced sexual imagery)
- initiation/hazing type violence and rituals
- abuse in intimate personal relationships between children (sometimes known as 'teenage relationship abuse')

Consequently, child on child abuse is dealt with as a safeguarding concern and recorded (using the My Concern System) and managed as such. Victims, perpetrators and any other child affected by child on child abuse will be supported through the school's pastoral system and the support will be regularly reviewed.

We minimise the risk of child on child abuse by:

- Challenging inappropriate behaviours between children, that are abusive in nature. Staff should not downplay certain behaviours, for example dismissing sexual harassment as "just banter", "just having a laugh", "part of growing up" or "boys being boys" as this can lead to a culture of unacceptable behaviours, an unsafe environment for children and in worst case scenarios a culture that normalises abuse leading to children accepting it as normal and not coming forward to report it.
- Providing a relevant curriculum and PSHE lessons that help children to develop their understanding of acceptable behaviours, healthy relationships and keeping themselves safe.
- Having established / publicised systems for children to raise concerns with staff, knowing they will be listened to, supported and valued, and that the issues they raise will be taken seriously.
- The pastoral team working with other professionals to develop robust risk assessments and appropriate specialist targeted work for children that are identified as posing a potential risk to other children.
- Supporting victims and perpetrators of child on child abuse by named of the pastoral team, the HWBC and Pastoral Intervention Practitioner (PIP) as appropriate and ensuring parents are involved in this process.

Support and advice for children and adults who are the victims of sexual abuse in schools is available from the NSPCC helpline 0800 136 663 or by emailing email [help@nspcc.org.uk](mailto:help@nspcc.org.uk)

See also appendix 8 & 9 guidance from the Brook traffic light tool and Hackett's continuum of behaviours.

### **Private Fostering**

When we become aware that a pupil is being privately fostered, we remind the carer/parent of their legal duty to notify Wiltshire Safeguarding Vulnerable People Partnership. We follow this up by contacting Wiltshire Safeguarding Vulnerable People Partnership directly.

Private fostering criteria:

- a child is under 16 (or 18 years of age if they have a disability)
- the arrangement is for 28 days or longer
- the child's new carer does not have parental responsibility for the child and is not a close relative.

*(Close relatives are defined as step-parents, grandparents, brothers, sisters, uncles or aunts - whether of full blood, half blood or marriage/affinity).*

### **Radicalisation: (Vulnerability to radicalisation or extreme view points)**

As part of Stonar School's ongoing safeguarding and child protection duties we are fully behind the government's *Prevent Strategy*. Every member of staff should recognise that safeguarding against radicalisation and extremism (both violent and non-violent) and terrorism is no different to safeguarding against any other vulnerability in today's society. Stonar has a duty to protect its students from indoctrination into any form of extreme ideology, which may lead to the harm of self or others. Further information can be found in the School's Prevent Policy and KCSIE (September 2024).

There is no single way of identifying whether a child is likely to be susceptible to an extremist ideology. Background factors combined with specific influences such as family and friends may contribute to a child's vulnerability. Similarly, radicalisation can occur through many different methods (such as social media) and settings (such as the internet). However, it is possible to protect vulnerable people from extremist ideology and intervene to prevent those at risk of radicalisation being radicalised. As with other safeguarding risks, staff should be alert to changes in children's behaviour, which could indicate that they may be in need of help or protection. Staff should use their judgement in identifying children who might be at risk of radicalisation. The DSL/DDSL will always act proportionately and this may include making a referral to the Channel programme or to the MASH. Further guidance is available from <https://www.gov.uk/government/publications/channel-guidance>

### **Reasonable Force**

There are circumstances when it is appropriate for staff in schools and colleges to use reasonable force to safeguard children and young people. The term 'reasonable force' covers the broad range of actions used by staff that involve a degree of physical contact to control or restrain children. This can range from guiding a child to safety by the arm, to more extreme circumstances such as breaking up a fight or where a young person needs to be restrained to prevent violence or injury. 'Reasonable' in these circumstances means 'using no more force than is needed'. Further details on the use of Reasonable force can be found in the staff handbook.

### **Serious Violence**

We are committed to success in learning for all our pupils as one of the most powerful indicators in the prevention of youth crime. Our curriculum includes teaching conflict resolution skills and understanding risky situations to help our children develop the social and emotional skills they need to thrive.

All staff should be aware of the following indicators that children have been approached by, or are involved with, individuals associated with criminal gangs or networks:

Indicators may include:

- increased absence from school
- a change in friendships

- relationships with older individuals or groups
- a significant decline in performance
- signs of self-harm
- a significant change in well-being
- signs of assault or unexplained injuries
- unexplained gifts or new possessions

Risk factors that might increase the likelihood of involvement in serious violence include:

- being male
- having been frequently absent or permanently excluded from school
- having experienced child maltreatment
- having been involved in offending, such as theft or robbery.

### **Sexual Violence and Sexual Harassment between Children – a form of Child-on-Child Abuse.**

When referring to sexual violence we are referring to sexual offences (Rape, Assault by Penetration, Sexual Assault, causing someone to engage in sexual activity without consent). When referring to sexual harassment we mean 'unwanted conduct of a sexual nature' that can occur online and offline. 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. Sexual violence and sexual harassment exist on a continuum and may overlap, they can occur online and offline (both physically and verbally) in school and out of school. It is never acceptable. It is important that all victims are taken seriously and offered appropriate support. Evidence shows girls, children with SEND and LGBT children are at greater risk.

In light of the Everyone's Invited movement and the school has conducted its own review and in response to our own findings we have reviewed and updated:

- school policies (eg: Code of conduct, Conflict Management and Safeguarding),
- staff training
- PSHE/RSE policies and teaching material
- Reporting arrangements and recording methodologies.

Any response to managing reports of sexual violence and harassment will be made on a case-by-case basis, in line with KCSIE September 2023. The DSL/DDSL will take a leading role and using their professional judgement, supported by other agencies, such as children's social care and the police as required. Staff are encouraged to "act as though sexual harassment and online sexual abuse are happening, even where there are no specific reports."

Staff are expected to make clear that sexual violence and sexual harassment is not acceptable, will never be tolerated and is not an inevitable part of growing up. All pupils who share concerns regarding sexual violence or harassment are victims, they must be reassured that their report will be taken seriously, (regardless of how long it has taken them to come forward) and that they will be supported and kept safe. Abuse that occurs online or outside of the school or college should not be downplayed and should be treated equally seriously. Individuals should never be given the impression that they are creating a problem; nor should a victim ever be made to feel ashamed for making a report. Staff supporting children reporting concerns and educating pupils within PSHE/ RSE lessons must explain that the law is in place to protect children and young people rather than criminalise them.

Any reports of sexual violence or harassment should be handled in line with effective safeguarding practice as detailed in this policy and the DSL/DDSL will make an immediate risk and needs assessment. Every report will be considered on a case by case basis taking into account:

- the victim, especially their protection and support
- the alleged perpetrator
- all the other children (and, if appropriate, adult students and staff) at the school or college, especially any actions that are appropriate to protect them

Options for managing reports of sexual violence and sexual harassment between children include:

- Internal management of the incident
- An 'Early Help' Assessment
- Referral to children's social care
- Reporting to the Police

However, whatever the response, it should be under-pinned by the principle that there is a zero tolerance approach to sexual violence and sexual harassment and it is never acceptable and will not be tolerated.

Support and advice for children and adults who are the victims of sexual abuse in schools is available from the NSPCC helpline 0800 136 663 or by emailing email [help@nspcc.org.uk](mailto:help@nspcc.org.uk)

Where a report includes an online element, staff should be aware of searching screening and confiscation advice (<https://www.gov.uk/government/publications/searching-screening-and-confiscation> and also act in accordance with school search policy. )

In addition UKCCIS sexting advice should be utilised. **The key consideration is for staff not to view or forward illegal images of a child.** The advice within these linked documents provides more details on what to do when viewing an image is unavoidable.

At Stonar:

- We do not tolerate or dismiss sexual violence or sexual harassment as “banter”, “part of growing up”, “just having a laugh” or “boys being boys”;
- We challenge behaviour (potentially criminal in nature), such as grabbing bottoms, breasts and genitalia and flicking bras and lifting up skirts.
- Understand that dismissing or tolerating such behaviours risks normalising them.

At Stonar we consider sexual harassment to be:

- 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 (*n.b this could cross a line into sexual violence - it is important to talk to and consider the experience of the victim*)
- displaying pictures, photos or drawings of a sexual nature, including the 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

School staff should understand consent as this will be especially important if a child is reporting they have been raped. At Stonar in PSHEE and RSE lessons we teach about consent and how consent to sexual activity may be given to one sort of sexual activity but not another and that consent can be withdrawn. Following reports of Sexual violence and/or sexual harassment the Safeguarding team will give consideration possible intra familial harms and any necessary support for siblings following incidents.

## Trafficking

Child trafficking is child abuse, an abuse of human rights and illegal in the UK. Staff should inform the DSL/DDSL immediately if they have concerns or suspicions regards Child Trafficking

## Upskirting

The Voyeurism (Offences) 'The Upskirting Act', came into force in April 2019. 'Upskirting' is where someone takes a picture under a persons clothing (not necessarily a skirt) without their permission and or knowledge, with the intention of viewing their genitals or buttocks (with or without underwear) to obtain sexual gratification, or cause the victim humiliation, distress or alarm. It is a criminal offence. Anyone of any sex, can be a victim.

## Youth Produced Sexual Imagery (Sexts / Sexting)

The term 'sexting' (also known as youth produced sexual imagery) is derived from texting and refers to the sending of sexually provocative material (including photos, videos and sexually explicit text) from modern communication devices or applications, such as mobile phones, tablets, email, social networking sites and instant messaging. Stonar School deems sexting as inappropriate and unsafe behaviour which threatens the social, emotional and/or physical safety of students. Although sexts can be sent voluntarily and sexting among children and young people can be a common occurrence; where they often describe these incidents as 'mundane' it raises many serious legal and social concerns, especially when the images are spread beyond the control of the sender. Sexting can result in humiliation, bullying and harassment of students. The school has a responsibility to prevent sexting and the dissemination of inappropriate or offensive material and to educate both students and staff about both the legal and social dangers of sexting.

**Responding to Sexting:** If there is a suspicion or a report of sexting occurring; staff members are required to notify the Head or DSL immediately. **Staff members are not permitted to forward, copy or print any sexting images** and should secure the device and switch it off, before passing it to the Deputy Head (Pastoral)/DSL. The allegation will first be investigated and the parents of all students involved will be contacted.

The National Strategy for Policing Children and Young people strategy stresses the dangers and public concerns of unnecessarily criminalising children and young people and when determining if a sexting incident should be managed as a safeguarding concern and Police involvement the investigating member of staff will apply judgement to each sexting incident and consider the following

- If there is a significant age difference between the sender/receiver involved
- If there is any external coercion involved or encouragement beyond the sender/receiver
- If you recognise the child as more vulnerable than is usual (i.e. at risk)
- If the image is of a severe or extreme nature
- If the situation is not isolated and the image has been more widely distributed.
- If this is not the first time children have been involved in a sexting act.
- If other knowledge of either the sender/recipient may add cause for concern (i.e. difficult home circumstances)

Further information can be found at:

<https://www.gov.uk/government/groups/uk-council-for-child-internet-safety-ukccis>

## Appendix 5: The Role of the Designated Safeguarding Lead (DSL)

DSL is appointed by the Directors and is a member of the School Leadership Team and takes lead responsibility for safeguarding and child protection (including online safety and understanding the filtering and monitoring systems and processes in place).

The DSL supports to provide advice to other staff on child welfare and child protection matters.

The broad areas of responsibility for the designated safeguarding lead are:

### Managing Referrals and working with others:

- Acting as a point of contact with the three safeguarding partners
- Making referrals for all cases of suspected abuse to the local authority children's social care and when deciding whether to make a referral to liaise with relevant agencies
- To take part in strategy discussions and inter-agency meetings, and/or to support other staff to do so, and to contribute to the assessment of children
- Refer cases to the Channel programme where there is a radicalisation concern as required
- To liaise with Mental health teams
- Contacting the Police (and refer cases where a crime may have been committed)
- *Supporting children and families who are in receipt of multi-agency support to include Early Support assessments and TAC.*
- *To act as the point of contact for discussion with the virtual school head for CLA and be the named teachers for CLA and those children who have left care through adoption, special guardianship or child arrangement orders or who were adopted from state care outside England and Wales*
- Liaise with the Head to inform them of any issues especially ongoing enquiries under section 47 of the Children Act 1989 and police investigations.
- To act as a source of support, advice and expertise to staff on matters of safety and safeguarding; prior to and following referrals to local authority children's social care or the Channel Programme
- Referral to the designated officer(s) for child protection concerns (all cases which concern a staff member) and to the Disclosure and Barring Service (cases where a person is dismissed or left due to risk/harm to a child) and as required, liaise with the "case manager" and the designated officer(s) at the local authority for child protection concerns in cases which concern a staff member;
- liaise with staff (especially pastoral support staff, school nurses, IT Technicians, and SENCOs or the named person with oversight for SEN in a college) on matters of safety and safeguarding (including online and digital safety)
- act as a source of support, advice and expertise for all staff

### Management of Child Protection files

- Where children leave the school ensure their child protection file is transferred to the new school or college as soon as possible and within five days for an in year transfer or within the first five days of the start of a new term. This should be transferred separately from the main pupil file, ensuring secure transit and confirmation of receipt should be obtained if sent electronically. Where appropriate, in addition to the child protection file, the DSL/DDSL will also consider if it would be appropriate to share any information with the new school / college in advance of a child leaving; where this information that would allow the new school / college to continue supporting victims of abuse and have that support in place for when the child arrives.
- Overseeing the storage and updating of all child welfare and child protection records and ensuring these are kept securely (*in a locked location if in paper format*)

In addition, the Designated Safeguarding Lead will raise awareness of safeguarding issues by:

- Ensure the school policies are known, understood and used appropriately:



- Ensure the school's Safeguarding and child protection policy is reviewed annually and the procedures and implementation are updated and reviewed regularly, and work with Directors regarding this.
- Ensure the Safeguarding and child protection 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.
- Update and distribute the Child Protection prompt card to all staff, volunteers & Directors.

In addition:

- Links with the Wiltshire Safeguarding Vulnerable People Partnership to make sure staff are aware of training opportunities and the latest local policies on safeguarding.
- Ensure that all staff in regulated activities undertake online training using the Educare for Education training packages to which Stonar subscribes. Attend update training as required and have access to safeguarding updates from partner organisations and update services
- Update the Safeguarding and child protections notice boards around the school and disseminate current flowcharts for referrals to key locations around the school

### **Availability of the DSL**

In the event of the Deputy Head (the Designated Safeguarding Lead) not being in school for any reason, any member of staff who has concerns about any child should contact a Deputy Designated Safeguarding Lead or the Head (who will act as the DSL until the DSL returns). During term time the designated safeguarding lead (or a DDSL) is available for staff in the school to discuss any safeguarding concerns. The Head and members of the Leadership Team are available through the 'On Call system throughout term time including evening and weekends and whenever there are out of term activities.

All deputies and the Head are trained to the same standard as the DSL.

### **DSL training and skill updates to act as a source of advice to staff**

- In addition to the formal training refresh their knowledge and skills and understanding via e-bulletins, meeting other designated safeguarding leads and reading safeguarding developments, at regular intervals to understand and keep up with any developments relevant to the role
- So the DSL can
  - understand the assessment process for providing early help assessments and statutory intervention, including local criteria for action and local authority children's social care referral arrangements
  - have a working knowledge of how local authorities conduct a child protection case conference and a child protection review conference and be able to attend and contribute to these effectively when required to do so
  - ensure each member of staff has access to, and understands, the school's or college'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
  - understand relevant data protection legislation and regulations, especially the Data Protection Act 2018 and the General Data Protection Regulation. The DfE Data protection guidance for schools helps school staff, governors and trustees understand how to comply with data protection law.
  - understand the importance of information sharing, both within the school and college, and with the three safeguarding partners, other agencies, organisations and practitioners.
  - are able to keep detailed, accurate, secure written records of concerns and referrals
  - understand and support the school or college 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 or college
  - can recognise the additional risks that children with SEN and disabilities (SEND) face online, for example, from online bullying, grooming and radicalisation and are confident they have the capability to support SEND children 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

## Appendix 6: Information and Support regarding Online Safety

### Support for Children

|   |  |
|---|--|
| <a href="https://www.childline.org.uk">https://www.childline.org.uk</a>                         | Childline for free and confidential advice                           |
| <a href="https://reportharmfulcontent.com">https://reportharmfulcontent.com</a>                 | UK Safer Internet Centre to report and remove harmful online content |
| <a href="https://www.ceop.police.uk/safety-centre">https://www.ceop.police.uk/safety-centre</a> | CEOP for advice on making a report about online abuse                |

### Parental Support

|  |   |
|--|---|
| <a href="https://www.childnet.com/parents-and-carers/parent-and-carer-toolkit">https://www.childnet.com/parents-and-carers/parent-and-carer-toolkit</a>        | Childnet offers a toolkit to support parents and carers of children of any age to start discussions about their online life, to set boundaries around online behaviour and technology use, and to find out where to get more help and support |
| <a href="https://undressed.lgfl.net/">https://undressed.lgfl.net/</a>  | LGFL 'Undressed' provided advice about how to teach young children about being tricked into getting undressed online in a fun way without scaring them or explaining the motives of sex offenders.  |
| <a href="http://www.commonsensemedia.org">http://www.commonsensemedia.org</a>  | Common sense media provide independent reviews, age ratings, & other information about all types of media for children and their parents  |
| <a href="https://www.internetmatters.org">https://www.internetmatters.org</a>  | Internet Matters provide age-specific online safety checklists, guides on how to set parental controls on a range of devices, and a host of practical tips to help children get the most out of their digital world                           |
| <a href="https://www.ltai.info/staying-safe-online/">https://www.ltai.info/staying-safe-online/</a>  | Let's Talk About It provides advice for parents and carers to keep children safe from online radicalisation   |
| <a href="https://parentsafe.lgfl.net/">https://parentsafe.lgfl.net/</a>  | London Grid for Learning provides support for parents and carers to keep their children safe online, including tips to keep primary aged children safe online   |
| <a href="https://www.stopitnow.org.uk/">https://www.stopitnow.org.uk/</a><br><a href="https://www.lucyfaithfull.org.uk/">https://www.lucyfaithfull.org.uk/</a> | Stop it now resource from The Lucy Faithfull Foundation can be used by parents and carers who are concerned about someone's behaviour, including children who may be displaying concerning sexual behaviour (not just about online)           |
| <a href="http://www.thinkuknow.co.uk/">http://www.thinkuknow.co.uk/</a>  | National Crime Agency/CEOP Think u know provides support for parents and carers to keep their children safe online  |
| <a href="https://www.net-aware.org.uk/">https://www.net-aware.org.uk/</a>  | Net-aware provides support for parents and carers from the NSPCC and O2, including a guide to social networks, apps and games   |

|   |  |
|---|--|
| <a href="https://parentzone.org.uk/">https://parentzone.org.uk/</a>   | Parentzone provides help for parents and carers on how to keep their children safe online  |
| <a href="https://parentinfo.org/">https://parentinfo.org/</a>   | Parent info from Parentzone and the National Crime Agency provides support and guidance for parents from leading experts and organisations |
| <a href="https://www.saferinternet.org.uk/advice-centre/parents-and-carers">https://www.saferinternet.org.uk/advice-centre/parents-and-carers</a> | UK Safer Internet Centre provide tips, advice, guides and other resources to help keep children safe online                                |
| <a href="https://www.policedsc.com/security-advice/safeguarding">https://www.policedsc.com/security-advice/safeguarding</a>                       | Police Crime Prevention Initiatives Limited, advice and infographics, social media guides posters, and cyber advice.                       |

## Appendix 7: Related Legislation and Key Documents

**Children Act 1989** (and 2004 update): The Children Act 1989 gives every child the right to protection from abuse and exploitation and the right to have enquires made to safeguard his or her welfare. The Act place duties on a number of agencies, including schools, to assist Social Services departments acting on behalf of children and young people in need (s17) or enquiring into allegations of child abuse (s47).

**Education Act 2002** - This requires schools to make arrangements to safeguard and promote the welfare of children and to have regard to guidance issued by the Secretary of State for Education.

**Sexual Offences Act 2003** - This act sets out an offence of 'abuse of trust' - a sexual or otherwise inappropriate relationship between an adult who is responsible for young people and a young person in his/her care.

**Information Sharing – Department for Education (DfE) Advice for practitioners providing safeguarding services to children, young people, parents and carers 2018** This advice is for all frontline practitioners and senior managers working with children, young people, parents and carers who have to make decisions about sharing personal information on a case by case basis.

**Counter-Terrorism and Security Act 2015 (the CTSA 2015)**, section 26 requires all schools, 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.

**Mental health and behaviour in schools (2018)** advice to help schools to support pupils whose mental health problems manifest themselves in behaviour.

**The Safeguarding Vulnerable Groups Act (2006)** Section 53(3) and (4) of this applies to schools if they broker student accommodation with host families for which the host family receives a payment from a third party, such as a language school. At a future date, the regulated activity provider will have a duty to carry out a barred list check on any new carer – section 34ZA Safeguarding Vulnerable Groups Act 2006.

**The Teachers’ Standards (2013)** set a clear baseline of expectations for the professional practice and conduct of teachers and define the minimum level of practice expected of teachers in England.

**Children Missing Education (2016)** Statutory guidance for local authorities and advice for other groups on helping children who are missing education get back into it.

**Children and Social Work Act (2017)** Statutory guidance for local authorities on supporting children and young people leaving care.

## Appendix 8: Child-on-Child Abuse Resources – Brook Traffic Light Tool



### SEXUAL BEHAVIOURS ●●● TRAFFIC LIGHT TOOL

#### Behaviours: age 0 to 5 years

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

#### ● Green behaviours

- holding or playing with own genitals
- attempting to touch or curiosity about other children's genitals
- attempting to touch or curiosity about breasts, bottoms or genitals of adults
- games e.g. mummies and daddies, doctors and nurses
- enjoying nakedness
- interest in body parts and what they do
- curiosity about the differences between boys and girls

#### ● Amber behaviours

- preoccupation with adult sexual behaviour
- pulling other children's pants down/skirts up/trousers down against their will
- talking about sex using adult slang
- preoccupation with touching the genitals of other people
- following others into toilets or changing rooms to look at them or touch them
- talking about sexual activities seen on TV/online

#### ● Red behaviours

- persistently touching the genitals of other children
- persistent attempts to touch the genitals of adults
- simulation of sexual activity in play
- sexual behaviour between young children involving penetration with objects
- forcing other children to engage in sexual play

#### What is green behaviour?

Green behaviours reflect safe and healthy sexual development. They are:

- displayed between children or young people of similar age or developmental ability
- reflective of natural curiosity, experimentation, consensual activities and positive choices

#### What is amber behaviour?

Amber behaviours have the potential to be outside of safe and healthy behaviour. They may be:

- unusual for that particular child or young person
- of potential concern due to age, or developmental differences
- of potential concern due to activity type, frequency, duration or context in which they occur

#### What is red behaviour?

Red behaviours are outside of safe and healthy behaviour. They may be:

- excessive, secretive, compulsive, coercive, degrading or threatening
- involving significant age, developmental, or power differences
- of concern due to the activity type, frequency, duration or the context in which they occur

#### What can you do?

Green behaviours provide opportunities to give positive feedback and additional information.

#### What can you do?

Amber behaviours signal the need to take notice and gather information to assess the appropriate action.

#### What can you do?

Red behaviours indicate a need for immediate intervention and action.

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Brook Sexual Behaviours Traffic Light Tool adapted with permission from True Relationships & Reproductive Health, (2012). Traffic Lights guide to sexual behaviours in children and young people: identify, understand and respond. Brisbane: True Relationships & Reproductive Health, Australia.

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## Behaviours: age 5 to 9 years

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

### ● Green behaviours

- feeling and touching own genitals
- curiosity about other children's genitals
- curiosity about sex and relationships, e.g. differences between boys and girls, how sex happens, where babies come from, same-sex relationships
- sense of privacy about bodies
- telling stories or asking questions using swear and slang words for parts of the body

### ● Amber behaviours

- questions about sexual activity which persist or are repeated frequently, despite an answer having been given
- sexual bullying face to face or through texts or online messaging
- engaging in mutual masturbation
- persistent sexual images and ideas in talk, play and art
- use of adult slang language to discuss sex

### ● Red behaviours

- frequent masturbation in front of others
- sexual behaviour engaging significantly younger or less able children
- forcing other children to take part in sexual activities
- simulation of oral or penetrative sex
- sourcing pornographic material online

#### What is green behaviour?

Green behaviours reflect safe and healthy sexual development. They are:

- displayed between children or young people of similar age or developmental ability
- reflective of natural curiosity, experimentation, consensual activities and positive choices

#### What is amber behaviour?

Amber behaviours have the potential to be outside of safe and healthy behaviour. They may be:

- unusual for that particular child or young person
- of potential concern due to age, or developmental differences
- of potential concern due to activity type, frequency, duration or context in which they occur

#### What is red behaviour?

Red behaviours are outside of safe and healthy behaviour. They may be:

- excessive, secretive, compulsive, coercive, degrading or threatening
- involving significant age, developmental, or power differences
- of concern due to the activity type, frequency, duration or the context in which they occur

#### What can you do?

Green behaviours provide opportunities to give positive feedback and additional information.

#### What can you do?

Amber behaviours signal the need to take notice and gather information to assess the appropriate action.

#### What can you do?

Red behaviours indicate a need for immediate intervention and action.

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## Behaviours: age 9 to 13 years

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

### Green behaviours

- solitary masturbation
- use of sexual language including swear and slang words
- having girl/boyfriends who are of the same, opposite or any gender
- interest in popular culture, e.g. fashion, music, media, online games, chatting online
- need for privacy
- consensual kissing, hugging, holding hands with peer

### Amber behaviours

- uncharacteristic and risk-related behaviour, e.g. sudden and/or provocative changes in dress, withdrawal from friends, mixing with new or older people, having more or less money than usual, going missing
- verbal, physical or cyber/virtual sexual bullying involving sexual aggression
- LGBT (lesbian, gay, bisexual, transgender) targeted bullying
- exhibitionism, e.g. flashing or mooning
- giving out contact details online
- viewing pornographic material
- worrying about being pregnant or having STIs

### Red behaviours

- exposing genitals or masturbating in public
- distributing naked or sexually provocative images of self or others
- sexually explicit talk with younger children
- sexual harassment
- arranging to meet with an online acquaintance in secret
- genital injury to self or others
- forcing other children of same age, younger or less able to take part in sexual activities
- sexual activity e.g. oral sex or intercourse
- presence of sexually transmitted infection (STI)
- evidence of pregnancy

#### What is green behaviour?

Green behaviours reflect safe and healthy sexual development. They are:

- displayed between children or young people of similar age or developmental ability
- reflective of natural curiosity, experimentation, consensual activities and positive choices

#### What is amber behaviour?

Amber behaviours have the potential to be outside of safe and healthy behaviour. They may be:

- unusual for that particular child or young person
- of potential concern due to age, or developmental differences
- of potential concern due to activity type, frequency, duration or context in which they occur

#### What is red behaviour?

Red behaviours are outside of safe and healthy behaviour. They may be:

- excessive, secretive, compulsive, coercive, degrading or threatening
- involving significant age, developmental, or power differences
- of concern due to the activity type, frequency, duration or the context in which they occur

#### What can you do?

Green behaviours provide opportunities to give positive feedback and additional information.

#### What can you do?

Amber behaviours signal the need to take notice and gather information to assess the appropriate action.

#### What can you do?

Red behaviours indicate a need for immediate intervention and action.

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Brook Sexual Behaviours Traffic Light Tool adapted with permission from True Relationships & Reproductive Health. (2012). Traffic Lights guide to sexual behaviours in children and young people: identify, understand and respond. Brisbane: True Relationships & Reproductive Health, Australia.

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|   |               |
|---|---------------|
| 1 | Responses     |
| 2 | Prevention    |
| 3 | Assessment    |
| 4 | Interventions |
| 5 | Developments  |

**A continuum of behaviours**

It is vital for professionals to distinguish normal from abnormal sexual behaviours. Chaffin et al (2002, p208) suggest a child's sexual behaviour should be considered abnormal if it:

- occurs at a frequency greater than would be developmentally expected
- interferes with the child's development
- occurs with coercion, intimidation, or force
- is associated with emotional distress
- occurs between children of divergent ages or developmental abilities
- repeatedly recurs in secrecy after intervention by caregivers.

Hackett (2010) has proposed a continuum model to demonstrate the range of sexual behaviours presented by children and young people, from those that are normal, to those that are highly deviant:

| Normal   | Inappropriate   | Problematic   | Abusive  | Violent  |
|--|---|---|--|--|
| <ul style="list-style-type: none"><li>• Developmentally expected</li><li>• Socially acceptable</li><li>• Consensual, mutual, reciprocal</li><li>• Shared decision making</li></ul> | <ul style="list-style-type: none"><li>• Single instances of inappropriate sexual behaviour</li><li>• Socially acceptable behaviour within peer group</li><li>• Context for behaviour may be inappropriate</li><li>• Generally consensual and reciprocal</li></ul> | <ul style="list-style-type: none"><li>• Problematic and concerning behaviours</li><li>• Developmentally unusual and socially unexpected</li><li>• No overt elements of victimisation</li><li>• Consent issues may be unclear</li><li>• May lack reciprocity or equal power</li><li>• May include levels of compulsivity</li></ul> | <ul style="list-style-type: none"><li>• Victimising intent or outcome</li><li>• Includes misuse of power</li><li>• Coercion and force to ensure victim compliance</li><li>• Intrusive</li><li>• Informed consent lacking, or not able to be freely given by victim</li><li>• May include elements of expressive violence</li></ul> | <ul style="list-style-type: none"><li>• Physically violent sexual abuse</li><li>• Highly intrusive</li><li>• Instrumental violence which is physiologically and/or sexually arousing to the perpetrator</li><li>• Sadism</li></ul> |

## Appendix 10: Dos and Do Nots when Concerned about the Welfare of a Pupil



### DO NOT

- Do not promise anything you can't deliver, including keeping secrets / confidentiality
- Do not ask leading questions (avoid 'who, what, when, where' questions)
- Do not ask the person to repeat the disclosure over and over
- Discuss with friends / colleagues
- Do not make false promises or be judgemental
- Confront, question or inform an alleged abuser
- Ask the child to tell someone else instead or delay
- Take photos of injuries

*Further information  
can be found in the  
school safeguarding policy  
in the online staff handbook*

### Responding to a child when abuse is disclosed



**Remember: talk to TED**

T: **Tell**

E: **Explain**

D: **Describe**

### DO



- **Receive:** listen carefully & stay calm
- **Respond:** Where necessary clarify, Explain what happens next
- **Reassure:** Be sympathetic & acknowledge courage to disclose & remind them they are taken seriously
- **Record:** via 'My Concern' as soon as possible, using the child's words
- **Report:** Tell only the D/DSL
- **Keep the child with you and contact a member of the Safeguarding Team immediately if they are / could be at immediate risk**