



**Policy Name: Safeguarding and Child Protection Policy**  
(referred to as Safeguarding Policy)

Owner: Head of Pastoral

Review Date: August 2024

Next review Date: August 2025

Policy revised as regulations or review demands

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**The School will never ignore an allegation of child abuse  
and will always investigate any concerns thoroughly**

**All Staff have a duty to report any concerns of serious harm or abuse**

**WHAT ACTION TO TAKE IF YOU HAVE CONCERNS ABOUT A CHILD WHO MAY BE IN NEED OR AT RISK:-**

<p>1. Discuss your concerns with the Designated Safeguarding Lead, Jodi Stone, or in her absence, with the Deputy Designated Safeguarding Leads, Dan Smith, Claire Baker or Rachel Davies, <b>immediately and before a girl leaves to go home</b>. It is important that the girl is not sent home without taking the right protective action.</p>
<p>2. Complete the Log on MyConcern and mark as URGENT. If you are unable to access MyConcern, report the disclosure to your Line Manager.</p>
<p>3. If the Designated Safeguarding Lead or the Deputy DSLs are not available, you must contact the Headmistress, if they are not available you must contact Children’s Social Care Duty and Assessment Team yourself for a consultation about the action you need to take. Inform the Designated Safeguarding Lead at the first opportunity about your consultation and what actions you have taken.</p>
<p><b>REMEMBER: ANYONE CAN MAKE A REFERRAL DIRECTLY TO CHILDREN’S SOCIAL CARE IF THEY ARE CONCERNED THAT A CHILD IS AT RISK</b></p>

**Details for Key Internal and External Contacts**

<b>Internal</b>
Designated Safeguarding Lead: Jodi Stone <b>01435 874600 (ext 405)</b> . Email – <a href="mailto:jstone@mayfieldgirls.org">jstone@mayfieldgirls.org</a>
<p><b>Deputy Designated Safeguarding Leads:</b></p> <p>Claire Baker, Head of Middle School - <b>01435 874600 (ext 407)</b>. Email - <a href="mailto:cbaker@mayfieldgirls.org">cbaker@mayfieldgirls.org</a>  Dan Smith, Head of Lower School - <b>01435 874600 (ext 408)</b>. Email - <a href="mailto:dsmith@mayfieldgirls.org">dsmith@mayfieldgirls.org</a>  Rachel Davies, Deputy Head of Sixth Form - <b>01435 874600</b>. Email - <a href="mailto:rdavies@mayfieldgirls.org">rdavies@mayfieldgirls.org</a>  Pippa Whitby, Director of Boarding – <b>01435 874600 (ext 443)</b>. Email – <a href="mailto:pwhitby@mayfieldgirls.org">pwhitby@mayfieldgirls.org</a></p>
Headmistress: Deborah Bligh : <b>01435 874600 (ext 401)</b> . Email – <a href="mailto:head@mayfieldgirls.org">head@mayfieldgirls.org</a>
<p>Nominated Governor for Safeguarding: Dr Luminata Henshaw. Email - <a href="mailto:lhenshaw@mayfieldgirls.org">lhenshaw@mayfieldgirls.org</a></p> <p>Chair of Governors: Lady Davies of Stamford. Anyone wishing to contact the Chair of Governors, should do so c/o The Clerk to the Governors, Mayfield School, The Old Palace, Mayfield TN20 6PH. Any correspondence of a sensitive nature should be marked ‘Private and Confidential’.</p>
<p>If during the day you cannot reach a member of the DSL team by phone and you would prefer to talk to them rather than email, please call Reception on <b>01435 874600</b> and they will be able to ensure that a member of the DSL team returns your call.</p>
<b>External</b>
<p>If you are concerned that a child or young person is at significant risk of harm, contact the <b>East Sussex Children’s Services’ Single Point of Advice (SPOA)</b> - (which provides screening triage for the Duty and</p>

Assessment Team, Early Help Services, Police and other relevant agencies working in Children's Services). Initial contact is made with East Sussex, as this is where the School is located and they should be able to advise and take any necessary immediate action or give advice in an emergency situation.

### SPOA

Phone: **01323 464222** – Monday to Thursday – 08:30-17:00 and Friday – 08:30-16:30.

e-mail: [0-19.SPOA@eastsussex.gov.uk](mailto:0-19.SPOA@eastsussex.gov.uk)

For immediate concerns **out of office hours** the Emergency Duty Team should be contacted on:

- 01273 335906 or 01273 335905

### Local Authority Designated Officer (LADO)

(Responsible for managing allegations against adults who work, volunteer or care (e.g. foster carers) for children)

**Please click on the link below to go to the reporting page:**

<https://www.eastsussex.gov.uk/childrenandfamilies/professional-resources/lado/referrals/form-lado-referral/>

### Radicalisation

If you have concerns that a child or young person is being drawn into extremist activity (see Section 9 'Safeguarding and the Prevent Duty' below) referrals must be made via the SPOA as for all other safeguarding concerns. For further support and advice the **Police** can also be contacted directly on the non-emergency number **101**, which connects to the local Force. In cases of suspected extremism the School or individual members of staff may also use **the DfE dedicated telephone helpline – 0207 3407264 – and mailbox – [counter\\_extremism@education.gov.uk](mailto:counter_extremism@education.gov.uk)**

### INTRODUCTION

- 1.1 The safety and well-being of all pupils at Mayfield School is our highest priority and we are fully committed to acting in the best interest of our pupils. Safeguarding children is everyone's responsibility; all those directly connected with our community, staff members, governors, parents, families and pupils, have an essential role in making it safe and secure. The School makes provision for teaching pupils to keep themselves safe, including online (see Online Safety Policy and Life Skills Policy). The Governing Body will ensure that the School safeguards and promotes the welfare of pupils, and work together with other agencies to ensure that our School has appropriate arrangements to identify, assess and support those children who are suffering or likely to suffer harm.
- 1.2 **Safeguarding Boarders:** This Policy applies to all pupils, including boarders. All staff are trained to be aware of all pupils. House staff and those who visit the House, are especially aware of the vulnerabilities of the pupils who reside in there. House staff are aware of the procedures to enable boarders to be properly cared for. In principle, all staff are mindful of the privilege of their position and the requirements of the privacy of pupils is shown at all times whilst ensuring their safety both offline and online.

- 1.3 Cornelia Connelly, foundress of the Society of the Holy Child Jesus, ‘developed an educational system based on trust and reverence for the dignity of every human being’. It is our priority to know every girl as an individual and to provide a secure and caring environment, so that she can learn and develop in safety.
- 1.4 Safeguarding and promoting the welfare of children is defined for the purposes of this guidance as:-
- 1.4.1 Providing help and support to meet the needs of children as soon as problems emerge.
  - 1.4.2 Protecting children from maltreatment, whether that is within or outside the home, including online.
  - 1.4.3 Preventing impairment of children’s mental and physical health or development.
  - 1.4.4 Ensuring that children grow up in circumstances consistent with the provision of safe and effective care.
  - 1.4.5 Taking action to enable all children to have the best outcomes in line with the outcomes set out in the Children’s Social Care National Framework.
- 1.5 To support children who may not wish to directly speak with an adult in the School there are other means such as the anonymous Whisper App and suggestion boxes in the Boarding Houses. These are monitored by key staff in the Safeguarding Team.
- 1.6 To support children who may wish to seek help from beyond the School we have posters and signposting to agencies such as ChildLine or the NSPCC, i-Rock, Wellbeing Hub, E-motion, The Own It App, Fearless, Whisper, Beat and Frank.
- 1.7 As well as systems for individual children to raise concerns, we also gather pupil voice, to understand the experience of pupils at the School, so that this can inform the development of safeguarding practice. We always aim to capture the full breadth of the pupil demographic, including pupils with SEND and those who are known to be vulnerable.
- 1.8 So that children are supported to identify and manage risk in their lives we teach a range of knowledge through specific topics related to safeguarding as part of our broad and balanced preventive curriculum.
- 1.9 The use of technology is a significant component of many safeguarding issues so as part of our whole school approach to safeguarding we have a separate Online Safety Policy which covers this area of work. This Policy includes details of how internet use at the school is filtered and monitored (according to the DfE filtering and monitoring standards) and how we teach children to stay safe online whether they are at school or at home (and how we communicate with parents to reinforce the importance of children being safe online).
- 1.10 We expect respect, good manners and fair play to be embraced by everyone so that every girl can fulfil her potential and grow as an individual. All girls should care for and support each other.
- 1.11 This Policy applies to all members of staff in the School, including all permanent, temporary and support staff, governors, volunteers, contractors and external service or activity providers, who all have a full and active part to play in protecting our pupils from harm.
- 1.12 In line with the law, this Policy defines a child as anyone attending the School.
- 1.13 The School’s Safeguarding Policy follows the guidance and procedures of The East Sussex Safeguarding Children Partnership (ESSCP).

As a significant number of our girls are resident in Kent, and domestic boarders live in a range of authorities across the country, we would also follow correct procedure and raise any concerns with the home authority of the individual girl. Should the concern be regarding a girl whose main residence is overseas we would contact East Sussex.

- 1.14 This Policy has been written in accordance with locally agreed inter-agency procedures and is available on the School website.
- 1.15 This Policy is renewed annually and when new regulations demand. It is reviewed by Governance and the Full Board of Governors. Staff are made aware of changes.

## LEGAL FRAMEWORK

- 2.1 Section 157 of the Education Act 2002 places a duty on governing bodies of Independent Schools to make arrangements for ensuring that their functions relating to the conduct of the School are exercised with a view to safeguarding and promoting the welfare of those children who are pupils at the School.
- 2.2 Under section 10 of the Children Act 2004, all Schools, including Independent Schools, are required to cooperate with the local authority to improve the well-being of children in the local authority area.
- 2.3 Under section 14B of the Children Act 2004, the Local Safeguarding Children Board can require a school to supply information in order to perform its functions.
- 2.4 This Policy and the accompanying procedures have been developed with regard to the following statutory and non-statutory guidance, and local safeguarding procedures:
- *Sussex Child Protection and Safeguarding Procedures;*
    - *Keeping Children Safe in Education: Statutory Guidance for Schools and Colleges, (September 2024);*
    - *What to do if you're worried a child is being abused (March 2015);*
    - *Working Together to Safeguard Children: A Guide to Inter-Agency Working to Safeguard and Promote the Welfare of Children (December 2023);*
    - *Information Sharing (May 2024);*
    - *Promoting children and young people's emotional health and wellbeing (2015 – updated November 2023)*
    - *County Lines Violence, Exploitation & Drug Supply 2017;*
    - *Criminal Exploitation of children and vulnerable adults: County Lines guidance (updated October 2023);*
    - *<https://www.nicco.org.uk/> (National Information centre on children of offenders);*
    - *Prevent Duty Guidance: for England and Wales (2023);*
    - *The Prevent Duty: Department Advice for Schools and childminders (June 2015);*
    - *The use of social media for online radicalisation (July 2015);*
    - *Teaching online safety in school (January 2023);*
    - *Mental Health and Behaviour in Schools (2018) and Behaviours in School (February 2024);*
    - *NPCC - When to call the Police;*
    - *Data protection: toolkit for Schools;*
    - *Sharing Nudes and semi-nudes: advice for education settings working with children and young people. (updated March 2024).*

## ROLES AND RESPONSIBILITIES

- 3.1 The School's lead person with overall responsibility for child protection and safeguarding (including online safety) is the **Designated Safeguarding Lead** (Jodi Stone, Head of Pastoral). We have three Deputy Designated Safeguarding Leads (Claire Baker, Head of Middle School, Dan Smith, Head of Lower School and Rachel Davies, Deputy Head of Sixth Form) to ensure there is appropriate cover for this role at all times. The Designated Safeguarding Lead's responsibilities are described in Annex A.
- 3.2 The School has a **Nominated Governor** (Luminata Henshaw) responsible for safeguarding to ensure good practice, to liaise with the Designated Safeguarding Lead and to report to the governing body on Safeguarding issues.

- 3.3 The Headmistress is the person to whom **allegations** of abuse made against School staff members must be reported. She would then be the School's case liaison for the Local Authority Designated Officer (LADO). The Chairman of Governors is the person to whom allegations against the Headmistress must be reported. Additionally, allegations against Governors must be made to the Chairman of Governors unless the allegation is against the Chairman in which case it must be referred to the Chairman of the Governance Committee.
- 3.4 The **Headmistress** will ensure that the policies and procedures are fully implemented and sufficient resources and time are allocated to enable staff members to discharge their safeguarding responsibilities.
- 3.5 The **Governing body** and SLT ("Senior Leadership Team") are responsible for ensuring that safeguarding arrangements are fully embedded within the School's ethos and reflected in the School's day-to-day practice.
- 3.6 **All staff members, governors, volunteers and external providers** are trained in how to recognise signs and symptoms of abuse, how to respond to girls who disclose abuse and what to do if they are concerned about a child. Governing Bodies should ensure that **all** governors receive appropriate safeguarding and child protection (including online) training at induction. Their training should be regularly updated.
- 3.7 All staff are made aware of their responsibility to act to protect the wellbeing of children in the School, and that they must act upon concerns about a child's welfare immediately. Staff are made aware of the importance of sharing information appropriately to protect children.
- 3.8 All staff are expected to work in line with the School's Professional Code of Conduct and Social Media Policy, to maintain the highest standards of behaviour towards pupils to promote their wellbeing. Staff engaged in close one-to-one teaching, such as individual Music or Drama lessons or in Sports coaching, should be mindful of the guidelines in this document which refer to this specific responsibility.

#### CHILD PROTECTION AND SAFEGUARDING PROCEDURE

- 4.1 ***Keeping Children Safe In Education (September 2024)*** states clearly that it is essential that everybody working in a school understands their safeguarding responsibilities. All School staff have a responsibility to provide a safe environment in which children can learn and all School staff have a responsibility to identify children who may be in need of extra help or who are suffering, or are likely to suffer, significant harm. All staff should be aware that safeguarding incidents and/or behaviour can be associated with factors outside School and can occur between children outside of these environments. This can happen face to face or online. Even if the incidents happen outside of School, these can still have an impact on the child's School life. All staff then have a responsibility to take appropriate action, referring concerns immediately and working with other services as needed.
- 4.2 Children who are at risk of abuse and significant harm must immediately be referred to Children's Social Care. In other cases where girls are in need of support for significant issues, other agencies may be involved such as Early Help Services, CAMHS (Children's Mental Health Services) or the School Doctor. Examples of such need might include instances of self-harm, eating disorders, mental health difficulties or attempted suicide. 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 or witnessed domestic abuse. In these circumstances, the Designated Safeguarding Lead would refer to the East Sussex Continuum of Need to make an initial decision as to which agency to contact, or contact the East Sussex Single Point of Advice (SPOA) for advice if there is any lack of clarity.

The structure of the SPOA, incorporating these different agencies and levels of care, allows the School to quickly enter a dialogue with Children's Social Care to ensure that appropriate referral is made and to the appropriate agencies. Children's social care assessments should consider where children are being harmed in contexts outside the home, so it is important that Schools provide as much information as

possible as part of the referral process. This will allow any assessment to consider all the available evidence and enable a contextual approach to address such harm.

The East Sussex 'Continuum of Need' is also designed to support the School in making informed decisions about referral and to use a consistent shared language with the different agencies which may become involved. A copy of this is on the Coffee Staffroom Safeguarding board.

The importance of Early Help services and the responsibility of staff to identify children who would benefit from support is made clear during staff training. The DSL (or when necessary her Deputy) would usually take the lead on liaising with the appropriate services.

The School's welfare procedures mean that any girl who is in need is monitored from the early signs of need so that appropriate help and support is provided both internally and from external sources when appropriate. Staff in the School log their concern on MyConcern or complete a Cause for Concern form for any issue of either serious risk or significant need so that appropriate action is taken and recording and monitoring occurs. **For further information see: the School's Mental Health Policy and Wellbeing Policy.**

- 4.3 The School has developed a structured procedure, set out in paragraph 5, in line with Sussex Child Protection and Safeguarding Procedures, which will be followed by all members of the School community in cases of suspected abuse. It is essential that children receive help early in order to avoid risk and the escalation of any situation, which impacts on their wellbeing. In line with *KCSIE* we stress the importance of acting on and referring the early signs of abuse, neglect and radicalisation, the importance of keeping clear records, listening to the views of the child, reassessing concerns when situations do not improve, sharing information quickly and effectively and challenging inaction.

#### WHAT ACTION TO TAKE IF YOU HAVE CONCERNS ABOUT A CHILD WHO MAY BE AT RISK

- 5.1 When concerned about the welfare of a child, staff should always act in the best interests of the child.
- 5.2 Staff should always speak to the DSL or the Deputy DSL about any concern with a child.
- 5.3 If staff have any concerns about a child's welfare, they should act on them immediately.
- 5.4 Staff should not assume a colleague, or another professional will take action.
- 5.5 The DSL or a Deputy should always be available to discuss safeguarding concerns. If in exceptional circumstances the DSL or Deputy is not available, this should not delay appropriate action being taken. Staff should consider speaking to a member of the Senior Management Team and/or take advice from SPOA. In these circumstances, any action taken should be shared with the DSL or Deputy as soon as is practically possible.
- 5.6 At Mayfield all concerns should be recorded on MyConcern – copies of Cause for Concern sheets are also held in Reception and the School Office for visitors/catering team/site team to the School to use.

#### WHAT TO DO IF A CHILD DISCLOSES ABUSE

- 6.1 In some cases, the child may not make a direct report. For example a friend may make a report or a member of School staff may overhear a conversation that suggests that a child has been harmed or a child's own behaviour might indicate that something is wrong. If staff have any concerns they must act on them immediately. Even if a child does not report a concern, it does not mean it did not happen. A child may not feel ready or know how to tell someone they are being abused. If a child discloses that she has been abused in some way, the member of staff or volunteer should follow this guidance:

- Listen to what is being said without displaying shock or disbelief.
- Only ask questions when necessary to clarify.
- Allow the child to talk freely – do not put words in the child’s mouth or ask leading questions.
- Reassure the child that what has happened is not her fault.
- Do not make promises that you may not be able to keep.
- **Do not promise confidentiality** – it may be necessary to refer the child to Children’s Social Care.
- Stress that it was the right thing to tell someone.
- Do not criticise the alleged perpetrator.
- Explain what has to be done next and who has to be told.
- Inform the Designated Safeguarding Lead without delay.
- Log your concern on MyConcern or, if not possible, inform the DSL or Deputy DSLs.
- Dealing with a disclosure from a child and safeguarding issues can be stressful. Consider seeking support for yourself and discuss this with the Designated Safeguarding Lead.

6.2 A child should never feel ashamed for coming forward and disclosing information. It is essential that **all** victims are reassured that they are being taken seriously, regardless of how long it has taken them to come forward, and that they will be supported and kept safe.

6.3 Staff should share any concerns they have about a child with the Designated Safeguarding Lead. However, it should be remembered ‘that sometimes children will 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. This should not prevent staff from having a professional curiosity and reporting to the DSL’.

6.4 In line with the procedures, the relevant Children’s Services Duty and Assessment Team will be notified as soon as there is a significant concern.

6.5 The name of the Designated Safeguarding Lead and Deputy DSL’s are clearly advertised on posters around the School.

6.6 We ensure all parents and carers are aware of the responsibilities of staff members to safeguard and promote the welfare of children by publishing the Policy and procedures on our website and by referring to them in our introductory School materials.

6.7 NSPCC what you can do to report abuse dedicated helpline is available as an alternative route for staff who do not feel able to raise concerns regarding child protection failures internally or have concerns about the way a concern is being handled by their School. Staff can call - 0800 028 0285 – this line is available from 08:00 to 10:00, Monday to Friday and email: help@nspcc.org.uk

## WHISTLEBLOWING

7.1 All staff members are made aware of their duty to raise concerns, where they exist, about the management of child protection, which may include the attitude or actions of colleagues. If necessary, they should speak to the Headmistress or the Chairman of the Governing body. They may also raise any concerns regarding this directly to the Local Authority Designated Officer (LADO):

<https://www.eastsussex.gov.uk/childrenandfamilies/professional-resources/lado/referrals/form-lado-referral/>

7.2 The ability to raise a complaint or concern in good faith is of paramount importance and doing so would be in no way prejudicial to the position of a member of staff within the School. See the School’s Whistleblowing Policy for further detail and advice.



- 7.3 We have a clear reporting procedure for children, parents and other people to report concerns or complaints, including abusive or poor practice. (Please refer to Complaints Procedure and Anti-Bullying Policy).
- 7.4 **NSPCC Whistleblowing Advice Line 0800 028 0285 (email: [help@nspcc.org.uk](mailto:help@nspcc.org.uk))** offers free advice and support to professionals with a concern about how child protection issues are being handled in their own or another organisation.

#### CHILDREN WHO ARE ABSENT FROM SCHOOL INCLUDING MISSING PUPILS

- 8.1 The School has a specific procedure for following up any girl absent from education, particularly on repeat occasions, unexplained absences and/or for prolonged periods. (See Missing Pupil Policy).
- 8.2 Staff are made aware in training and induction that absence from education is a safeguarding issue and must be monitored and reported as such using the School's reporting procedures. The Heads of School report to the DSL regarding concerns over attendance. All staff should be aware that children going missing and children who are absent from education, particularly on repeat occasions and/or for prolonged periods, can act as a vital warning sign of a range of safeguarding issues including neglect, sexual abuse, and child sexual and criminal exploitation, including involvement in county lines. It may also indicate mental health problems, risk of substance abuse, risk of travelling to conflict zones, risk of female genital mutilation, 'honour' based abuse or risk of forced marriage. Early intervention is necessary to identify the existence of any underlying safeguarding risk and to help prevent the risks of a child going missing or being absent from education in future. This includes when problems are first emerging but also where children are already known to Children's Social Care and need a social worker (such as on a child in need or child protection plan, or as a looked after child), where going missing or being absent from education may increase known safeguarding risks within the family or in the community.
- 8.3 All staff should be aware of the importance of completing registers in a timely and accurate way.
- 8.4 All in-School procedures around absence, as per the Attendance Policy, should be followed by staff. Although the DSL has oversight of attendance, this does not prevent staff from speaking directly with the DSL about the attendance and absence of any child about whom they have concerns, and indeed they should do so.
- 8.5 We follow the guidance on School attendance, Working Together to Improve School Attendance December 2023, which informs how we work with the local authority children's services where School absence indicates safeguarding concerns. [Working together to improve School attendance \(publishing.service.gov.uk\)](https://www.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/114422/working-together-to-improve-school-attendance-december-2023.pdf)

Children Missing Education, St Mark's House, 14 Upperton Road, Eastbourne BN21 2JQ  
 Phone: **0345 6080190**  
 Email: [cme@eastsussex.gov.uk](mailto:cme@eastsussex.gov.uk)

#### CATEGORIES OF ABUSE

**Please remember that abuse can take place wholly online or may be used to facilitate offline abuse.**

- 9.1 We take a zero-tolerance approach to child-on-child abuse. This Policy should also be read alongside the Behaviour, Rewards, consequences and Pupil Voice, Anti-Bullying and Online Safety Policies.
- 9.2 **Emotional abuse** is the persistent emotional maltreatment of a child such that it causes severe and persistent adverse effects on the child's emotional development. It may involve:

- making a child feel worthless, unloved or inadequate;
- inappropriate age or developmental expectations;
- overprotection and limitation of exploration, learning and social interaction;
- seeing or hearing the ill treatment of another, e.g. domestic abuse;
- making the child feel worthless and unloved - high criticism and low warmth;
- serious bullying;
- exploitation or corruption;
- financial or material abuse;
- discriminatory abuse;
- domestic abuse.

Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.

The School are part of Operation Encompass, where the Police will let the School know if a child has been affected by domestic abuse.

Refuge runs National Domestic Abuse helpline, which can be called free of charge and in confidence, 24 hours a day on 0808 2000247.

**Neglect** is the persistent failure to meet a child's basic physical or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy as a result of maternal substance misuse. Once a child is born, it may involve a parent 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;
- ensure access to appropriate medical care or treatment.

It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

**Physical abuse** may involve hitting, shaking, throwing, poisoning, burning, scalding, attempting to drown, attempting to suffocate, 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.

**Sexual abuse** involves forcing or enticing a child or young person to take part in sexual activities, including prostitution, whether or not the child is aware of what is happening. Activities may involve physical contact, including penetration of any part of the body, or non-penetrative acts. They may include non-contact activities, such as involving children looking at or in the production of sexual images, including on the internet, watching sexual activities, or encouraging children to behave in sexually inappropriate ways.

Child sexual exploitation is also sexual abuse; it involves children and young people receiving something, for example accommodation, drugs, gifts or affection, as a result of them performing sexual activities, or having others perform sexual activities on them. It could take the form of grooming of children, e.g. to take part in sexual activities or to post sexual images of themselves on the internet.

So-called 'honour based' violence (HBV) is a crime or incident which has or may have been committed to protect or defend the honour of a family or community. It encompasses crimes such as Female Genital Mutilation (FGM), forced marriages and other practices. Honour-based abuse may include non-violent forms of abuse. All forms of so called HBV are abuse and must be reported. Staff must speak to the Designated Safeguarding Lead and collaborate with the police and other professional agencies. (For additional guidance documents refer to Working Together to Safeguard Children and Annex B of KCSIE (2023)).

### 9.3 Vulnerability of children with Special Educational Needs and/or Disabilities

Staff should have particular regard to the additional vulnerability of children with Special Educational Needs and/or disabilities. Whilst these children will be given additional support in School by specialists, for example, through specialist learning support or Health Care provision, it is the responsibility of all staff to be alert to this additional need and to ensure that any concerns are promptly raised, recorded and acted on.

Staff should be mindful that changes in behaviour and mood, or injury, may relate to possible abuse and not just their special educational need or disability. These children could be more prone to peer group isolation, bullying (including prejudice-based bullying) or exploitation.

Pupils with Special Educational Needs or disabilities will be provided with appropriate extra pastoral support since they may have an additional barrier of cognitive understanding, being unable to understand the difference between fact and fiction in an online content.

### 9.4 Children who are LGBT

The fact that a child may be LGBT is not in itself an inherent risk factor for harm. However, children who are LGBT can be targeted by other children. Risks can be compounded where children who are lesbian, gay, bisexual or gender questioning lack a trusted adult with whom they can be open, so as a school we endeavour to reduce any additional barriers faced and provide a safe space for them to speak out or share their concerns with members of staff. It is vital that staff endeavour to reduce additional barriers faced, and provide a safe space for them to speak out or share their concerns with members of staff.

### 9.5 Potentially Abusive peer relationships (Child on child abuse)

Bullying behaviour is damaging and may lead to abuse; there is also the possibility that relationships between students are abusive and that both perpetrator and victim might be 'at risk'. Peer abuse can occur within an intimate partner relationship. Abuse is abuse and must never be tolerated or passed off as 'banter' or 'just having a laugh' or 'part of growing up'. Pupils and all staff should be alert to these possibilities and where there is reasonable cause to suspect a child is suffering significant harm the School would refer to the SPOA. There is a zero tolerance approach to abuse.

The School is also aware of the possibility of other types of child on child abuse which can fall into a range of categories, and may include physical, emotional or sexual elements, or a combination as in the case of sharing of nude or semi-nude images.

Child on child abuse may include but is not limited to:

- bullying (including cyberbullying, prejudicial based bullying or discriminatory bullying);
- physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm;
- sexual violence and sexual harassment;
- Sharing of nude and semi-nude images (consensual or non-consensual);
- initiation/hazing type violence and rituals;
- abusive language and repeated abusive interactions;
- Up skirting which typically involves taking a picture under a person's clothing without them knowing, with the intention of viewing their genitals or buttocks to obtain sexual gratification. This is a criminal offence.

This type of abuse is serious and needs an appropriate response, so that the victim receives all appropriate support, and it is recognised that the perpetrator is also a child at risk and in need of help. This type of abuse must be reported immediately to the DSL as in all other cases and she will establish what course of action is necessary to ensure the immediate safety and ongoing care of the pupils

involved. Where a child is suffering or is likely to suffer significant harm a referral through SPOA is the appropriate response. Support for the victims from the School would include ongoing pastoral monitoring and a plan to enable them to be safe and feel secure in School, and might involve counselling and/or mentoring as appropriate to the specific situation. Siblings might also need support following an incident.

## 9.6 Specific Safeguarding Issues

**Sexual violence and sexual harassment** can occur between two children of any age and sex from primary through to secondary stage and into colleges. It can occur through a group of children sexually assaulting or sexually harassing a single child or group of children. Sexual violence and sexual harassment exist on a continuum and may overlap; they can occur online and face to face (both physically and verbally) and are never acceptable. As set out in Part One of Keeping Children Safe in Education (KCSIE), all staff working with children are advised to maintain an attitude of 'it could happen here'.

Addressing inappropriate behaviour (even if it appears to be relatively innocuous) can be an important intervention that helps prevent problematic, abusive and/or violent behaviour in the future. Please cross reference with the Online Safety Policy.

School staff members need to be aware of specific safeguarding issues and be alert to any risks. Chapter 8 of the [Sussex Child Protection and Safeguarding Procedures](#) has detailed information about specific issues such as child sexual exploitation, fabricated or induced illness, female genital mutilation, private fostering, etc, and the local procedures to respond to risks.

Statutory guidance acknowledges the following as specific safeguarding issues:

- Child abduction and community safety incidents
- Bullying, including cyberbullying
- Child sexual exploitation
- Child criminal exploitation
- Drugs
- Domestic abuse
- Fabricated or induced illness
- Faith abuse
- Female genital mutilation
- Gangs and youth violence
- County Lines
- Trafficking
- Private fostering
- Radicalisation
- Homelessness
- Children and the court system
- Children with family members in prison (NICCO.org.uk)
- Cybercrime
- Modern slavery and the national referral mechanism.

The government website, [GOV.UK](#), has broad government guidance on a variety of issues. Further advice and links to guidance on these specific safeguarding issues can be found in Annex A of KCSIE. Staff should be particularly aware of the safeguarding issues set out below.

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

CCE is a form of abuse where an individual or group (adult or another child) takes advantage of an imbalance of power to coerce, manipulate or deceive a child into taking part in a criminal activity in exchange for something the victim wants. For example gifts or affection, for financial advantage and through violence or threat of violence.

The victim may have been criminally exploited even if the activity appears consensual. CCE does not always involve physical contact; it can also occur through the use of technology.

Some of the following can be indicators of CCE:

- children going missing and being found far from home;
- children being involved in serious violence, either as victim, perpetrator, of alleged perpetrator;
- children receiving drug requests via phone, moving drugs, and handling drug money;
- children being exposed to drug concealment techniques like 'plugging';
- children being found in unfamiliar accommodations linked to drug activity;
- children owing a debt to exploiters;
- children having bank accounts used for drug dealing;
- children who appear with unexplained gifts or new possessions;
- children who associate with other young people involved in exploitation;
- children who suffer from changes in emotional well-being;
- children who misuse drugs and alcohol;
- children who go missing for periods of time or regularly come home late; and
- children who regularly miss School or education or do not take part in education.

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

The statutory definition of Child Sexual Exploitation (CSE) can be found in the guidance document Child Sexual Exploitation: Definition and a Guide for Practitioners (DfE 2017).

Child sexual exploitation is a form of child sexual abuse. It occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or young person under the age of 18 into sexual activity:-

- a. in exchange for something the victim needs or wants; and/or
- b. for the financial advantage or increased status of the perpetrator or facilitator.

The victim may have been sexually exploited even if the sexual activity appears consensual. Child sexual exploitation does not always involve physical contact; it can also occur through the use of technology.

### **Indicators of child sexual exploitation may include:**

- Acquisition of money, clothes, mobile phones, etc without plausible explanation;
- Gang-association and/or isolation from peers/social networks;
- Exclusion or unexplained absences from School, college or work;
- Leaving home/care without explanation and persistently going missing or returning late and/or being found far from home;
- Excessive receipt of texts/phone calls;
- Returning home under the influence of drugs/alcohol;
- Inappropriate sexualised behaviour for age/sexually transmitted infections;
- Evidence of/suspicions of physical or sexual assault;
- Relationships with controlling or significantly older individuals or groups;
- Multiple callers (unknown adults or peers);
- Frequenting areas known for sex work;
- Concerning use of internet or other social media;
- Increasing secretiveness around behaviours; and
- Self-harm or significant changes in emotional well-being.

**Potential vulnerabilities include:**

Although the following vulnerabilities increase the risk of child sexual exploitation, it must be remembered that not all children with these indicators will be exploited. Child sexual exploitation can occur without any of these issues.

- Having a prior experience of neglect, physical and/or sexual abuse;
- Lack of a safe/stable home environment, now or in the past (domestic abuse or parental substance misuse, mental health issues or criminality, for example);
- Recent bereavement or loss;
- Social isolation or social difficulties;
- Absence of a safe environment to explore sexuality;
- Economic vulnerability;
- Homelessness or insecure accommodation status;
- Connections with other children and young people who are being sexually exploited;
- Family members or other connections involved in adult sex work;
- Having a physical or learning disability;
- Being in care (particularly those in residential care and those with interrupted care histories); and
- Sexual identity.

More information can be found in:

Child sexual exploitation: Definition and a guide for practitioners (DfE 2017)

**International pupils may be particularly vulnerable to trafficking or modern slavery particularly those who are, or will be, in the UK without their parents.**

**County Lines**

County Lines is a term used to describe gangs and organised criminal networks involved in exporting illegal items including drugs and weapons as well as money into another area within the UK. They are likely to exploit children and vulnerable adults to move and store the items and they will often use coercion, intimidation and violence (including sexual violence) and weapons. Children are increasingly targeted and recruited online using social media.

Children can easily become trapped by this type of exploitation as county lines gangs create drug debts and can threaten serious violence and kidnap towards victims (and their families) if they attempt to leave the county lines network.

**Cybercrime**

Cybercrime is a criminal activity committed using computer and/or internet. It is broadly categorised as either 'cyber-enabled' (crimes that can happen off-line but enabled at scale and speed online e.g. fraud, purchasing of illegal drugs, child sex abuse and exploitation) or 'cyber-dependent' (crimes that can only be committed by using a computer).

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

The DSL should consider referring into the Cyber Choices programme if they have concerns.

**Domestic Abuse**

The Domestic Abuse Act 2021 (Part 1) defines domestic abuse as any of the following behaviours, either as a pattern of behaviour, or as a single incident, between two people over the age of 16, who are 'personally connected' to each other:

- a. physical or sexual abuse;
- b. violent or threatening behaviour;
- c. controlling or coercive behaviour;
- d. economic abuse (adverse effect of the victim to acquire, use or maintain money or other property; or obtain goods or services); and
- e. psychological, emotional or other abuse.

People are 'personally connected' when they are, or have been married to each other or civil partners; or have agreed to marry or become civil partners. If the two people have been in an intimate relationship with each other, have shared parental responsibility for the same child, or they are relatives.

The definition of Domestic Abuse applies to children if they see, hear or experience the effects of the abuse; and they are related to the abusive person. (The definition can be found here:

<https://www.legislation.gov.uk/ukpga/2021/17/part/1/enacted>)

Types of domestic abuse include intimate partner violence, abuse by family members, teenage relationship abuse and child/adolescent to parent violence and abuse. Anyone can be a victim of domestic abuse, regardless of sexual identity, age, ethnicity, socio-economic status, sexuality or background and domestic abuse can take place inside or outside of the home.

The National Domestic Abuse helpline can be called free of charge and in confidence, 24 hours a day on 0808 2000247.

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.'

Further advice on identifying children who are affected by domestic abuse and how they can be helped can be found in Annex B of KCSIE. This includes details of Operation Encompass which operates in all police forces across England, helping Schools and Police work together to provide emotional and practical help to children.

***Operation Encompass provides an advice and helpline service for all staff members from educational settings who may be concerned about children who have experienced domestic abuse. The helpline is available 08:00 to 13:00, Monday to Friday on 0204 5139990 (charged at local rate).]***

### **Serious Violence**

All staff should be aware of indicators, which may signal that children are at risk from, or are involved with serious violent crime. These may include increased absence from School, a change in friendships or relationships with older individuals, a significant decline in performance, signs of self-harm or a significant change in wellbeing, or signs of assault or serious injuries. Unexplained gifts or new possessions could also indicate that children are involved with individuals, associated with criminal networks.

### **Female Genital Mutilation**

Female genital mutilation refers to procedures that intentionally alter or cause injury to the female genital organs for non-medical reasons. The practice is illegal in the UK.

FGM typically takes place between birth and around 15 years old; however, it is believed that the majority of cases happen between the ages of 5 and 8.

### **Risk factors for FGM include:**

- low level of integration into UK society;

- mother or a sister who has undergone FGM;
- girls who are withdrawn from PSHE;
- a visiting female elder from the country of origin;
- being taken on a long holiday to the country of origin;
- talk about a 'special' procedure to become a woman.

### **Symptoms of FGM**

FGM may be likely if there is a visiting female elder, there is talk of a special procedure or celebration to become a woman, or parents wish to take their daughter out-of-School to visit an 'at-risk' country (especially before the summer holidays), or parents who wish to withdraw their children from learning about FGM. Staff should not assume that FGM only happens outside the UK.

Indications that FGM may have already taken place may include:

- difficulty walking, sitting or standing and may even look uncomfortable.
- spending longer than normal in the bathroom or toilet due to difficulties urinating.
- spending long periods of time away from a classroom during the day with bladder or menstrual problems.
- frequent urinary, menstrual or stomach problems.
- prolonged or repeated absences from School or college, especially with noticeable behaviour changes (for example, withdrawal or depression) on the girl's return.
- reluctance to undergo normal medical examinations.
- confiding in a professional without being explicit about the problem due to embarrassment or fear.
- talking about pain or discomfort between her legs.

As outlined in *Keeping Children Safe in Education: Statutory Guidance for Schools and Colleges, September 2023* it is a statutory duty for teachers (along with social workers and healthcare professionals) to report to the Police where they discover, either through disclosure from the victim or through visual evidence, that FGM appears to have been carried out on a girl under 18. Unless there is good reason not to, it is expected that staff would discuss such a case with the Designated Safeguarding Lead. Such concerns would be referred to the local police, who can be contacted by phone on 101, but advice will also be sought from the SPOA (contact details above).

### **Children and the court system**

Children are sometimes require to give evidence in criminal courts, either for crimes against them or for crimes they have witnessed or in family courts following a separation. Further information on this can be found in Annex B of KCSIE.

### **Children with family members in prison**

Children with family members in prison are at risk of poor outcomes including poverty, stigma, isolation and poor mental health. The National Information Centre on Children of Offenders (NICCO) provides further information and support for professionals working with these children.

### **Children who have a social worker**

At Mayfield, we recognise that when a child has a social worker, it is an indicator that the child is more at risk than most pupils.

This may mean that they more vulnerable to further harm, as well as facing educational barriers to attendance, learning, behaviour and poor mental health.

We take these needs into account when making plans to support pupils who have a social worker.



## Homelessness

Being homeless or being at risk of becoming homeless presents a risk to a child's welfare. The DSL should be aware of contact details and referral routes into the Local Housing Authority so that they can raise/progress concerns at the earliest opportunity. Indicators that a family may be at risk of homelessness include debt, domestic abuse and anti-social behaviour, as well as a family being asked to leave a property. In most cases schools will be considering this in context of the children living with their families, however it should be recognised that some 16-17 year olds could be living independently of their parents and guardians, for example through exclusion from the family home. These children will require a different level of intervention and support.

## Marriage

The Marriage and Civil Partnership (Minimum Age) Act 2022 came into force in February 2023 means that 16 and 17 year olds will no longer be allowed to marry or enter a civil partnership, even if they have parental consent. Any concerns that students may be getting married should be referred to the DSL.

## Radicalisation

The School has a legal duty to have due regard to the need to prevent people from being drawn into terrorism. The School aims to build pupils' resilience to radicalisation by promoting fundamental British Values and enabling them to challenge extremist views. Being drawn into terrorism includes not just violent extremism but also non-violent extremism, which can create an atmosphere conducive to terrorism and can popularise views which terrorists can exploit. Although there is no single way of identifying an individual who is likely to be susceptible to an extremist ideology, there are possible indicators that should be taken into consideration alongside other factors and contexts such as background factors combined with specific influences such as family and friends may contribute to a child's vulnerability. Radicalisation can occur through many different methods (such as social media) and settings (such as the internet).

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. School staff should use their professional judgement in identifying children who might be at risk of radicalisation and act proportionately which may include the DSL making a **Prevent** referral.

Changes in behaviour could include the following: more time online, becoming more argumentative in their viewpoints, abusive to others, isolated from friends and family, justifies the use of violence to solve societal issues, uses new vocabulary, unwilling to engage with people who are different, who adopted the use of certain symbols associated with certain organisations for example on their profile in Social media, Teams or email.

## SAFEGUARDING AND THE PREVENT DUTY

- 10.1 Fundamental to our ethos is the promotion of the value and dignity of all human life and mutual understanding and respect between all people. We actively encourage pupils always to respect the values of democracy, the rule of law, individual liberty and tolerance of those with different faiths and beliefs. We ensure that partisan political views are not promoted in the teaching of any subject in the School and where political issues are brought to the attention of pupils reasonable steps are taken to offer a balanced presentation of opposing views.
- 10.2 We value freedom of speech and the expression of beliefs as fundamental human rights underpinning our society's values. Both pupils and teachers have the right to speak freely and voice their opinions. However, freedom comes with responsibility and free speech that is designed to manipulate the vulnerable or leads to violence and harm of others goes against the moral principles in which freedom of speech is valued. Free speech is not an unqualified privilege: it is subject to laws and policies governing equality, human rights, community safety and community cohesion. We seek to protect our pupils against the messages of all violent extremism including, but not restricted to, those linked to extremist Islamic

ideology, Far Right/Neo Nazi/White Supremacist ideology, Irish Nationalist and Loyalist paramilitary groups, and extremist Animal Rights movements.

- 10.3 Our priority of pastoral care ensures detailed knowledge and monitoring of individual pupils. We are mindful of external influences and watchful for changes in behaviour and attitude. As a School with a diverse cross-section of pupils from different cultures, religions and socio-economic backgrounds we actively encourage and develop mutual respect and support.
- 10.4 The School works to ensure pupils and staff can understand the risks associated with terrorism and develop the knowledge and skills to be able to challenge extremist arguments, through a range of processes within the School's curriculum including tutor programmes, assemblies, the RS and History curriculums and Life Skills and activities such as debating and public speaking. The duty to protect children from radicalisation is consistent with the Safeguarding processes outlined in this Policy. Staff are alert to changes in a girl's behaviour, which could indicate that they may be in need of help or protection; using their professional judgement in identifying girls who may be at risk and acting proportionately. Senior pastoral staff undertake the online general awareness training from Channel and staff are regularly briefed on all safeguarding concerns in on-going staff inset training.
- 10.5 The School annually assesses the risk of pupils and staff being drawn into terrorism using the audit toolkit provided by East Sussex County Council, and takes note of the updated contextual information provided by the Local Authority to respond better to the specific risks in our local area. The School follows the latest government guidelines in ensuring that best practice is observed in regard to this important issue (currently *The Prevent Duty* July 2015). The School would always follow Local Authority and Channel procedures for reporting concerns. The initial response directed by the Local Authority is to contact the East Sussex Children's Services via the SPOA. The Sussex Police constitute part of this team and would provide further guidance in such cases. In case of the need for further guidance the Police may be contacted directly, likewise the DfE helpline and mailbox. (Contact numbers on first page).

#### MANAGING ALLEGATIONS OF ABUSE MADE AGAINST CONCERNS RAISED ABOUT STAFF INCLUDING VOLUNTEERS AND CONTRACTORS

- 11.1 The School takes seriously all allegations of abuse made against staff members, including volunteers, and will investigate them in line with the statutory guidance, *Keeping Children Safe in Education: Statutory Guidance for Schools and Colleges, September 2024*, and the *Sussex Child Protection and Safeguarding Procedures*;
- 11.2 In addition to this outline of the process more detailed guidance for the Case Manager is given in Annex C which should be followed carefully to ensure appropriate action is taken throughout the proceedings.
- 11.3 **The procedure applies to all adults working in the School or providing a service on behalf of the School to our pupils either within or outside School premises**, i.e. all permanent, temporary and support staff, governors, volunteers, contractors and external service or activity providers (collectively referred to as staff or staff members in this procedure).
- 11.4 If anyone has a 'low-level' concern this does not mean that it is insignificant, however it might not meet the threshold for a more serious allegation set out below. Examples of low-level concerns are: being over friendly with children, having favourites, taking photographs of children on their mobile phone, using inappropriate sexualised, intimidating or offensive language. It is crucial that any such concerns, are shared with the Headmistress (this should include self-referral) so that they can be recorded in writing and dealt with appropriately. Low-level concerns which are about supply staff or contractors will be notified to their employers. Records of low-level concerns should be reviewed so that potential patterns of concerning, inappropriate, problematic or concerning behaviour can be identified. Low-level concerns should not be included in a reference unless they relate to issues which would normally be included in a reference or it meets the harm threshold for referral to the LADO and found to be substantiated.

The allegations management procedure will be used in all cases where it is alleged that a staff member, has:

- behaved in a way that has harmed a child, or may have harmed a child; or
- possibly committed a criminal offence against or related to a child; or
- behaved towards a child or children in a way that indicates that they would pose a risk of harm if they work regularly or closely with children; or
- Behaved or may have behaved in a way that indicates they may not be suitable to work with children.

#### 11.5 Roles and responsibilities:

- Anyone who has concerns including low level concerns about, or has received an allegation about, the behaviour of a staff member needs to report the concerns immediately to the Headmistress. If the Headmistress is absent refer to the Senior Deputy Head. In the absence of the Headmistress an immediate report can be made to the Senior Deputy Head. If the Headmistress is the subject of the allegation, concerns must be reported to the Chairman of Governors, **without informing the Headmistress** (contact information for the Chairman of Governors can be obtained from the Bursar). If Chairman of Governors are unavailable, please contact the Safeguarding Governor. The DSL or Governor must report the allegation to the East Sussex Children's Services via the SPOA.
- A low level concern may be dealt with in the first instance by the DSL, who would always keep the Headmistress informed.
- The Headmistress will act under the instruction of the LADO and ensure that his recommendations and requirements regarding the handling of the case are implemented.
- The Chairman of Governors will undertake the same role, if the allegation is made against the Headmistress.

11.6 The School also has a duty of care to its employees and will provide appropriate support for anyone facing an allegation. A person will not be automatically suspended in the case of an allegation. This would only happen in extremely serious cases or where there is cause to suspect a child or other children at the School are at risk of harm. Where possible, alternative arrangements would be considered in line with the guidance in Keeping Children Safe in Education (September 2022). If an employee is suspended they will be provided with a named contact at the School. The School is mindful of the need for any allegation to be dealt with quickly in a way which provides protection for the child but also to support the person who is the subject of the allegation.

11.7 If a member of boarding staff is suspended during the investigation of an allegation against them, then alternative accommodation off-site will be provided for them during the period of the suspension.

11.8 The allegation will always be investigated according to procedure, even if the accused staff member resigns or ceases to provide their services. The School will not use 'compromise/settlement agreements', (e.g. where the staff member agrees to resign provided that disciplinary action is not taken and that a future reference is agreed) to circumvent the investigatory process. The School will always follow the procedures for investigation and reporting detailed in Annex C. This does not prohibit the use of 'compromise/settlement agreements' in other circumstances.

#### RECORD KEEPING

12.1 All safeguarding and welfare concerns are recorded and kept in line with the DSL protocols. The Designated Safeguarding Lead will ensure that records are maintained appropriately for children with safeguarding concerns. From April 2018 these records have been held on the secure Safeguarding recording system MyConcern. Previously stand-alone files were created and maintained in line with requirements of the Local Authority guidance. These files together, with those of girls with significant pastoral concerns of a sensitive nature are kept in the locked and fire-proof safe in the Headmistress's office.

- 12.2 Records will include: a clear and comprehensive summary of the concern; details of how the concern was followed up and resolved; a note of any action taken, decision reached and the outcome.
- 12.3 We continue to support any pupil leaving the School to continue her education elsewhere, about whom there have been concerns, by ensuring that all appropriate information, including safeguarding and welfare concerns, is forwarded under confidential cover to the pupil's new School as a matter of priority.

## SAFER RECRUITMENT

- 13.1 All individuals working in any capacity at the School are subject to safeguarding checks in line with the statutory guidance *Keeping Children Safe in Education: Statutory Guidance for Schools and Colleges, September 2023*. The School has robust recruitment and vetting procedures to help prevent unsuitable people from working with children. Job advertisements and application packs make explicit reference to the School's commitment to safeguarding children, including compliance with disclosure and barring regulations and clear statements in the job description and person specification about the staff member's safeguarding responsibilities.
- 13.2 All staff members who have contact with children, young people and families will have appropriate pre-employment checks in line with *Keeping Children Safe in Education: Statutory Guidance for Schools and Colleges, September 2024*.

All members of the teaching and non-teaching staff at the School, including part-time staff, temporary and supply staff, and visiting staff, such as musicians and sports coaches, are checked with the Disclosure and Barring Service and meet the requirements for compliance with Independent School Standards Regulations before starting work. Appointment checks for all staff working with boarders include:

- verifying a candidate's identity;
  - obtaining a certificate for an enhanced DBS check which will include children's barred list information, for those who will be engaging in regulated activity;
  - obtaining a separate children's barred list check if an individual will start work in regulated activity before the DBS certificate is available;
  - verifying the candidate's mental and physical fitness to carry out their work responsibilities. A job applicant can be asked relevant questions about disability and health in order to establish whether they have the physical and mental capacity for the specific role;
  - verifying the person's right to work in the UK as the current law requires and the School considers appropriate;
  - if the person has lived or worked outside the UK, make any further checks the School considers appropriate;
  - EEA check for teachers who have taught in the EEA;
  - verifying professional qualifications.
- 13.3 The School will ensure that a candidate to be employed as a teacher is not subject to a prohibition order issued by the Secretary of State, using the Employer Access Online service. In addition, a check is made of staff appointed to management positions to ensure that they are not subject to a Section 128 direction.
- 13.4 All Governors, volunteer helpers, contractors working regularly during term-time, such as contract catering staff and adult members of the families of members of staff who live on site are also DBS checked. The School is also required to carry out a section 128 check for School governors.
- 13.5 At least one member on every shortlisting and interview panel has completed safer recruitment training.
- 13.6 The Headmistress and the Governors' Governance Committee are responsible for ensuring that our **single central record of pre-employment checks** is accurate and up to date. The SCR is checked on a regular basis by the Headmistress and governors.

13.7 We ensure that agencies and third parties supplying staff provide us with evidence that they have made the appropriate level of safeguarding checks on individuals who come to work in the School. All taxi drivers used by the School have been DBS checked.

13.8 The School will always report to the DBS anyone:

- who has harmed, or is likely to harm, or poses a risk of harm to a child; or
- if there is reason to believe that they have committed one of a number of listed offences (as set out in the Safeguarding Vulnerable Groups Act 2006 (Prescribed Criteria and Miscellaneous Provisions) Regulations 2009), and have been removed from working in paid or unpaid regulated activity or would have been removed had they not left.

The School would also consider making a referral to the Teaching Regulation Agency (TRA) where a teacher has been dismissed (or would have been dismissed had he/she not resigned) and a prohibition order may be appropriate. The School would consult *Teacher Misconduct: the prohibition of teachers (February 2022)* and guidance on the DfE website to ascertain what is the appropriate response in the individual situation.

#### STAFF AND PUPIL INDUCTION, TRAINING AND DEVELOPMENT

- 14.1 All new members of staff, including newly-qualified teachers and support staff, will be given induction that includes basic safeguarding training on how to recognise signs of abuse (including child on child sexual violence and sexual harassment), how to respond to any concerns, online safety and familiarisation with the School's Safeguarding Policy, the Staff Professional Code of Conduct, whistleblowing procedures, the identity and function of the Designated Safeguarding Leads, Prevent and other related policies. The induction will be proportionate to staff members' roles and responsibilities.
- 14.2 All staff are given and required to read at least Part 1 and Annex B of the latest version of *Keeping Children Safe in Education (September 2024)* and updated training is given on the guidance to ensure understanding of its content and importance. This is given to all new staff at induction as a matter of course. Staff who do not work directly with children may be given Annex A of *KCSIE*, which is a condensed version of Part 1, to read, under the discretion of the DSL.
- 14.3 The Designated Safeguarding Lead and Deputy Designated Safeguarding Lead will undergo updated training in Safeguarding and inter-agency working every two years.
- 14.4 All staff members of the School and the governing body will undergo safeguarding training every three years. Where staff miss whole School training in safeguarding they will receive update training within School. This may include online training in general principles, with an additional School-specific session on procedures and the Safeguarding Policy.
- 14.5 The nominated governor for Safeguarding will undergo appropriate training prior to or soon after appointment to the role; this training will be updated every two years.
- 14.6 The School will ensure that staff members provided by other agencies and third parties, e.g. supply teachers, have received appropriate safeguarding training commensurate with their roles before starting work.
- 14.7 The Designated Safeguarding Lead will provide, as a minimum, an annual briefing to the School on any changes to safeguarding legislation and procedures and relevant learning from local and national serious case reviews.

- 14.8 We will ensure that staff members provided by other agencies and third parties e.g. contractors have received appropriate safeguarding and child protection training commensurate with their roles before starting work. They will be given the opportunity to take part in whole school training if it takes place during their period of work for the school.
- 14.9 On the first occasion which staff members provided by other agencies and third parties e.g. contractors and visiting speakers come to our school to work they will be provided with details of the safeguarding arrangements at our school, which will include identifying the DSL and the process for reporting welfare concerns.
- 14.10 Senior pupils (such as Prefects) who are given responsibility over other pupils are briefed on appropriate action to take should they receive any allegations of abuse.
- 14.11 All pupils are taught about safeguarding, including online safety in Life Skills but also as part of the broad and balanced curriculum. The values of the School are built on Cornelia Connelly's educational vision of 'trust and reverence for the dignity of every human being'. The open and supportive environment and the School ethos, embedded in the curriculum, and fundamental to the community, helps minimise the risk of child on child abuse. However, it is important for all members of the School community to be vigilant.
- 14.12 As part of their safeguarding training, staff are reminded that pupils may try and bypass the School online security systems by using their own 4G/5G mobile data. Whilst there is only limited mobile reception on School premises, staff should remain vigilant, especially on trips. Pupils and parents are made aware of this in the Pupil Acceptable Use of ICT Policy and help is available to parents to set up parental controls.
- 14.13 The School maintains accurate records of staff induction and training.

#### CONFIDENTIALITY AND INFORMATION SHARING

- 15.1 We recognise that all matters relating to child protection are confidential.
- 15.2 The Headmistress and the Designated Safeguarding Lead will only disclose any information about a girl to other members of staff on a need-to-know basis and in the best interests of the child.
- 15.3 All staff members must be aware that they cannot promise a child to keep information confidential which might compromise the child's safety or well-being.
- 15.4 All staff members have a professional responsibility to share information with other agencies in order to safeguard children.
- 15.5 The Data Protection Act 2018 and GDPR do not prevent the sharing of information for the purposes of keeping children safe. Fears about sharing information must not be allowed to stand in the way of the need to safeguard and promote the welfare and protect the safety of children.

#### INTER-AGENCY WORKING

- 16.1 The School maintains effective working relationships with other agencies, including agencies providing early help services to children, the Police and Children's Social Care. The Designated Safeguarding Lead attends the termly meetings of the Independent Schools Safeguarding Group ("ISSG").
- 16.2 The School will ensure that relevant staff members are able to participate in multi-agency meetings and forums, including safeguarding partner arrangements, conferences and core groups, to consider individual children, or to participate in serious case reviews, other reviews and file audits as and when required to do so by the East Sussex Children's Safeguarding Partnership; following up by implementing recommendations and completing required actions within agreed timescales.

- 16.3 Locally the three safeguarding partners (the local authority; a clinical commissioning group and the chief of police) will make arrangements to work together with the appropriate relevant agencies to safeguard and promote the welfare of local children. The three safeguarding partners make arrangements to allow all Schools in the local area to be fully engaged, involved and included in safeguarding arrangements. The three safeguarding partners will name Schools as relevant agencies, to ensure that they are engaged in a meaningful way to safeguard and promote the welfare of a child.

#### SUPPORTING PUPILS

- 17.1 We recognise that girls who are abused or witness violence are likely to have low self-esteem and may find it difficult to develop a sense of self-worth. They may feel helpless, humiliated and experience some sense of blame.
- 17.2 The School will support all pupils by:
- ensuring the content of the curriculum includes social and emotional aspects of learning;
  - ensuring a comprehensive curriculum response to online safety, enabling girls and parents to learn about the risks of new technologies and social media and to use these responsibly;
  - ensuring that safeguarding is included in the curriculum to help girls stay safe, recognise when they do not feel safe, recognise inappropriate or unacceptable behaviour and identify who they can talk to;
  - providing girls with a number of appropriate adults to approach if they are in difficulties (there are posters around the School with a list of trusted adults girls can talk to);
  - supporting the individual girl's development in ways that will foster security, confidence and independence;
  - encouraging development of self-esteem and self-assertiveness while not condoning aggression or bullying;
  - ensuring hate incidents (e.g. racist, homophobic, gender or disability-based bullying) are considered under safeguarding procedures;
  - liaising and working together with the pupil's social worker, other support services and those agencies involved in safeguarding children;
  - monitoring girls who have been identified as having welfare or protection concerns and providing appropriate support.

#### 17.3 **Safeguarding for Boarders**

It is our aim to always ensure the safety of our boarders at Mayfield School, managing the safeguarding risks to protect our pupils from harm.

We will ensure that all boarding staff are aware that safeguarding and promoting the welfare of our pupils is everyone's responsibility.

Children can be particularly vulnerable in residential settings and boarding staff should be particularly alert to pupil relationships. Boarding policies and procedures, including additional training, will make appropriate provision for responding to these issues. Further guidance is provided within the Boarding Handbook.

In managing safeguarding within the boarding environment, the School complies with the National Minimum Standards for Boarding Schools (2022). Staff must be vigilant to the fact that flexi-boarders and those who are new to boarding may treat boarding as a 'sleepover' and not respect appropriate boundaries.

**Fitness to board and risk assessment:**

There may be occasions when the School has concerns related to the mental, emotional or physical wellbeing of one or more pupils, or behaviour, health and safety risks that might have an impact on the boarding community. For example (but not limited to) instances when a child may be experiencing disordered eating, self-harm, suicidal thoughts or physical injury. The School will risk assess and it may determine that for safety of the pupil and the wider boarding community access to boarding should be suspended temporarily. Such a decision would be reviewed regularly to ensure the pupil can return to boarding when deemed safe to do so.

**Safeguarding procedure during boarding hours:**

The Director of Boarding will be the Safeguarding Advisor and DDSL for boarding and will provide the first point of contact for boarding staff during boarding hours. During boarding hours if boarding staff or staff on site are concerned about the well-being or safety of a child, staff must immediately contact: Pippa Whitby, Director of Boarding on [pwhitby@mayfieldgirls.org](mailto:pwhitby@mayfieldgirls.org). If appropriate, the Director of Boarding will contact the DSL or Deputy DSLs or the Head to report the incident and clarify next steps. A rota confirming personnel and contact details will be published. Boarding staff will be informed directly, and the rota will be clearly displayed in appropriate locations within all Boarding Houses.

**CONTRACTORS, SERVICE AND ACTIVITY PROVIDERS AND WORK PLACEMENT PROVIDERS**

- 18.1 We ensure that contractors and providers are aware of the School's Safeguarding Policy and procedures. We require that employees, supply teachers and volunteers provided by these organisations use our procedure to report concerns.
- 18.2 We seek assurance that employees, supply teachers and volunteers provided by these organisations, and working with our children, have been subjected to the appropriate level of safeguarding check in line with Keeping Children Safe in Education: Statutory Guidance for Schools and Colleges, September 2022. If assurance is not obtained, permission to work with the girls or use the School premises will be refused.
- 18.3 When we commission services from other organisations, we will ensure that compliance with our Policy and procedures is a contractual requirement. Whilst the provider is responsible for their own safeguarding and child protection policies and procedures, the School may refer any concerns they have about the provider to the local authority.

**SITE SECURITY**

- 19.1 All staff members have a responsibility to ensure buildings and grounds are secure and for reporting concerns that may come to light, and should report Health and Safety concerns to the Bursar or the Health and Safety Committee. All Staff carry School badges for the verification of identity.
- 19.2 Due to the nature of the site, and public rights of way through the grounds, it is impossible to secure the site entirely. In order to maintain the security of the School buildings all external doors are on keypad locks. All codes are changed regularly.
- 19.3 Visitors are expected to sign in and out using the electronic system in reception and to display a visitor's badge while on the School site. Any individual who is not known or identifiable will be challenged for clarification and reassurance.
- 19.4 The School will not accept the behaviour of any individual, parent or anyone else, that threatens School security or leads others, child or adult, to feel unsafe. Such behaviour will be treated as a serious concern and may result in a decision to refuse the person access to the School site.



## FILTERING AND MONITORING

- 20.1 Filtering refers to the technology preventing access to harmful or inappropriate content, whilst monitoring refers to the practical steps staff take to ensure harmful or inappropriate access is not made. Monitoring can include [specify those that are in use]:
- Physical monitoring;
  - Live software monitoring;
  - Monitoring user logs;
  - Monitoring individual devices.
- 20.2 Make sure that any School devices used away from the School site are also subject to filtering and monitoring procedures.
- 20.3 Each year (at least) our Designated Safeguarding Lead, along with our IT team and a governor, review our filtering and monitoring procedures to ensure that they effectively prevent access to harmful or inappropriate content. They also ensure that the systems we have in place to report any difficulties with the system are understood by all staff and reports are effectively managed.
- 20.4 All our staff undertake training to understand the risks of poor filtering and monitoring, and know how to share their concerns.
- 20.5 All our staff have taken part in annual cybersecurity training.

## QUALITY ASSURANCE

- 21.1 Our policies are reviewed by Governors annually. The Safeguarding Policy is scrutinised by the Governance Committee before being presented to the full board. The Chairman of Governors approves it for implementation.
- 21.2 Systems are in place to monitor the implementation of and compliance with this Policy and accompanying procedures. This includes periodic audits of child protection files and records by the Designated Safeguarding Lead. The Governor with responsibility for Safeguarding makes an annual quality assurance visit to ensure that staff are aware of their safeguarding responsibilities, the School's procedures and the wider frameworks for Child Protection.
- 21.3 The Designated Safeguarding Lead, in liaison with the Nominated Governor with responsibility for Safeguarding, completes an annual audit of the School's safeguarding arrangements.
- 21.4 The School's senior management and the Governing body will ensure that action is taken to remedy without delay any deficiencies and weaknesses identified in safeguarding arrangements.

## POLICY REVIEW

- 22.1 This Policy and the procedures will be reviewed every academic year. All other linked policies will be reviewed in line with the Policy review cycle. The Policy will be amended whenever necessary, for example in line with new government and East Sussex Children's Safeguarding Partnership directives and guidelines and in response to particular events.
- 22.2 The Designated Safeguarding Lead will ensure that staff members are made aware of any amendments to policies and procedures.

## LINKED POLICIES AND PROCEDURES

23.1 The following policies and procedures are relevant for the Safeguarding Policy and procedure.

- Acceptable Use (of IT) Policy (Pupil) (“AUP”);
- Acceptable use of ICT Policy (Staff).
- Anti-Bullying Policy;
- Attendance and Absence Policy;
- Behaviour Rewards Consequences and Pupil Voice Policy;
- Boarding Statement of Principles and Practice;
- Complaints Procedure;
- Drug, Substances, Alcohol and Tobacco Policy;
- Educational Visits Policy and Risk Assessments;
- Equal Opportunities Policy;
- Health and Safety Policy and other linked policies and risk assessments;
- Life Skills Policy (including Relationship and Sex Education Policy);
- Mental Health and Wellbeing Policy;
- Missing Pupil Policy;
- Online Safety Policy;
- Professional Code of Conduct;
- Recruitment Policy and procedures;
- Search and Confiscation Policy;
- Social Media Policy for Staff;
- SEND Policy;
- Staff Induction Policy;
- Visitors Policy;
- Whistleblowing Policy.

## ANNEX A

### THE ROLE OF THE DESIGNATED SAFEGUARDING LEAD

Designated Safeguarding Lead: Jodi Stone, Head of Pastoral [jstone@mayfieldgirls.org](mailto:jstone@mayfieldgirls.org)  
(01435 874600 – internal extension 405)

Deputy Designated Safeguarding Leads: Claire Baker, Head of Middle School [cbaker@mayfieldgirls.org](mailto:cbaker@mayfieldgirls.org)  
(01435 874600 – internal extension 407).  
Dan Smith, Head of Lower School [dsmith@mayfieldgirls.org](mailto:dsmith@mayfieldgirls.org)  
(01435 874600 – internal extension 408).  
Elizabeth Aherne, Head of Sixth Form, [eaherne@mayfieldgirls.org](mailto:eaherne@mayfieldgirls.org)  
(01435 874600 - internal extension 406).

#### 1 MANAGING REFERRALS

- 1.1 Refer all cases of suspected abuse or neglect to East Sussex Children’s Social Care and to the Police if a crime may have been committed.
- 1.2 Liaise with the Headmistress about safeguarding issues relating to individual children, especially ongoing enquiries under Section 47 of the Children Act 1989.
- 1.3 Act as a source of support, advice and expertise to staff members on matters of child protection and safeguarding (including online safety).
- 1.4 Liaise with agencies providing early help services and coordinate referrals from the School to targeted early help services for children in need of support.

#### 2 RECORD KEEPING

- 2.1 Keep written records of safeguarding and welfare concerns on MyConcern.
- 2.2 Ensure a stand-alone file is created as necessary for children with safeguarding concerns on MyConcern.
- 2.3 Maintain a chronology of significant incidents for each child with safeguarding concerns.
- 2.4 Ensure such records are kept confidentially and securely and separate from the child’s educational record.
- 2.5 As soon as a child with safeguarding concerns moves to another School, liaise with the new School’s Designated Safeguarding Lead for information sharing. Ensure the child’s child protection or welfare concerns records are transferred to the new School as soon as possible.

#### 3 INTER-AGENCY WORKING AND INFORMATION SHARING

- 3.1 Cooperate with Children’s Social Care for enquiries under section 47 of the Children Act 1989.
- 3.2 Attend, or ensure other relevant staff members attend, safeguarding conferences, core group meetings and other multi-agency meetings, as required.
  - a. Liaise with other agencies working with the child, share information as appropriate and contribute to assessments.
- 3.4 Work with others to ensure that the School’s filtering and monitoring systems are functional and effective.

## 4 TRAINING

- 4.1 Undertake appropriate training, **updated every two years**, in order to:
- be able to recognise signs of abuse and how to respond to them, including special circumstances such as child sexual exploitation, female genital mutilation, fabricated or induced illness;
  - understand the assessment process for providing early help and intervention, e.g. the East Sussex Safeguarding Children Continuum of Need guidance and tools and the early help planning processes;
  - have a working knowledge of how the local authority conducts initial and review child protection case conferences and contribute effectively to these;
  - be alert to the specific needs of children in need (as specified in section 17 of the Children Act 1989), those with special educational needs, pregnant teenagers and young carers.
- 4.2 Ensure each member of staff has access to and understands the School's Safeguarding Policy and procedures, including providing induction on these matters to new staff members.
- 4.3 Organise whole-School safeguarding training for all staff members **every three years**. Ensure staff members who miss the training receive it by other means, e.g. by joining another School's training. Provide annual Safeguarding updates to the School's staff.
- 4.4 Attend meetings of the local Independent Schools Safeguarding Group.
- 4.5 Link with East Sussex Safeguarding Children Partnership (ESSCP) to identify appropriate training opportunities for relevant staff members.
- 4.6 Ensure the School allocates time and resources every year for relevant staff members to attend training.
- 4.7 Encourage a culture of listening to the girls and taking account of their wishes and feelings in any action the School takes to protect them.
- 4.8 Maintain accurate records of staff induction and training.

## 5 AWARENESS RAISING

- 5.1 Review the Safeguarding Policy and procedures annually and liaise with the School's Governing body to update and implement them.
- 5.2 Make the Safeguarding Policy and procedures available publicly help parents understand that referrals about suspected abuse may be made and to be aware of the role of the School in any investigations that ensue.
- 5.3 Provide an annual briefing to the School on any changes to safeguarding legislation and procedures and relevant learning from local and national serious case reviews.

## 6 QUALITY ASSURANCE

- 6.1 Monitor the implementation of and compliance with Policy and procedures, including periodic audits of child protection and welfare concerns files (at a minimum once a year).
- 6.2 Complete an audit of the School's safeguarding arrangements annually with the nominated Governor for Safeguarding.
- 6.3 Provide regular reports, including an annual report, to the governing body detailing changes and reviews to Policy, training undertaken by staff members and the number of children with child protection plans and other relevant data.

- 6.4 Take lead responsibility for remedying any deficiencies and weaknesses identified in Safeguarding arrangements.

## ANNEX B

### TERMS OF REFERENCE FOR THE NOMINATED SAFEGUARDING GOVERNOR

#### Nominated Safeguarding Governor: Luminata Henshaw

- 1 The main role of the Nominated Safeguarding Governor on behalf of the Governing Body (which retains overall responsibility) is to act as the School's senior board level lead to take leadership responsibility for the School's safeguarding arrangements, which she will do by discharging the following functions:
  - champion the promotion of well-being, safeguarding and child protection issues at the highest level within the School;
  - encourage other members of the Governing Body to develop their understanding of the Governing Body's responsibilities with regard to well-being, safeguarding and child protection and support them in the performance of these duties;
  - ensure that the Governing Body puts in place a suitable Child Protection and Safeguarding Policy (Safeguarding Policy) and associated procedures which have proper regard to prevailing regulations, guidance, standards and advice;
  - be familiar with The East Sussex Safeguarding Children Partnership (ESSCP) guidance and procedures relating to safeguarding and child protection and associated issues, including local protocols for assessment and the East Sussex Children's Safeguarding Partnership's threshold document, contributing to inter-agency working;
  - contribute to ensuring any deficiencies in the School's safeguarding practices brought to Governors' attention from any source are investigated and addressed;
  - meet regularly with the School's Designated Safeguarding Lead in order to monitor the effectiveness of the School's Safeguarding and Child Protection Policy and procedures and the implementation of these across the School. It is recommended that this is at least a termly meeting;
  - ensure that the Governing Body receives a report on the implementation of the School's Safeguarding Policy and procedures to support the full Governing Body's review of safeguarding in the School at least annually (or earlier if needed in response to changes to the law, Policy or statutory guidance or as appropriate in response to specific incidents) in accordance with all statutory guidance (and guidelines adopted by the Governing Body);
  - ensure that the Governing Body is made aware of any proven incident or allegation (anonymised where appropriate) which has implications for the School's Safeguarding Policy or procedures;
  - check that the DSL is part of the School's senior leadership team, and has sufficient time and resources at his/her disposal to carry out his/her duties effectively;
  - check that the DSL and Deputy DSLs receive appropriate training to provide them with the knowledge and skills required to carry out the role at least every two years, and that their knowledge and skills are appropriately refreshed at regular intervals, as required, but at least annually, to allow them to understand and keep up with any developments relevant to their role;
  - check that arrangements are in place for the inclusion of safeguarding training on the School's procedures in an induction programme for all people working in the School, no matter for how long, nor the status of that individual;
  - check that the School makes opportunities available to staff to feed into and shape the School's approach to safeguarding and safeguarding policies;
  - check safer recruitment procedures are in place and implemented with appropriate checks undertaken on all new staff, supply teachers and volunteers;
  - review the School's Single Central Register on an annual basis, and monitor the more regular checks made by the Chairman of the Governance committee, after undertaking sufficient training to be able to interrogate the register and identify potential deficiencies;

- be aware of how safeguarding and child protection issues, including guidance on adjusting behaviours to reduce risks, the safer use of electronic devices, social media and the internet and advice on who to turn to for help, are properly addressed through the curriculum and schemes of work;
  - check that appropriate IT filters and monitoring systems are in place to prevent children from accessing harmful or inappropriate material;
  - ensure that staff have the necessary knowledge and understanding to keep looked after children safe, with identified staff tasked to promote the educational achievement of looked after children;
  - ensure that the Governing Body carries out regular risk assessments of factors particular to the School which have a bearing on the profile of particular well-being and safeguarding issues, such as (without limitation) historical concerns, looked after children, mental health, body image, self-harm, children missing education, radicalisation, pupils performing a caring role at home, children with special educational needs or learning difficulties, those for whom English is an additional language, child sexual exploitation, female genital mutilation and cyberbullying; and
  - both provide to, and seek from, the local authority and other relevant agencies information about how the Governing Body's duties in respect of safeguarding and child protection have been discharged, where appropriate or requested.
- 2 The identity of and contact details for the Nominated Safeguarding Governor, together with an outline of his/her duties, will be publicised widely within the School community to ensure that pupils, parents, staff and Governors understand the purpose and importance of the role.
  - 3 To the extent that the role and duties of the Nominated Safeguarding Governor conflict with those assumed by others within the School, including the Chairman of Governors, the Governing Body will take all necessary action to resolve those conflicts so as to achieve clarity about respective roles and duties.
  - 4 Each of the Nominated Safeguarding Governor and the Chairman of the Governing Body will undertake appropriate training in accordance with the East Sussex Children's Safeguarding Partnership 's recommendations to fulfil the respective role and duties.

## ANNEX C

### PROCEDURE FOR MANAGING ALLEGATIONS OF ABUSE MADE AGAINST SCHOOL STAFF MEMBERS

1. The School takes seriously all concerns or allegations of abuse made against staff members, including volunteers, and will investigate them in line with the statutory guidance, Part Four of *Keeping Children Safe in Education: Statutory Guidance for Schools and Colleges, September 2022*, and the *Sussex Child Protection and Safeguarding Procedures*.
2. The process described below is a summary of the procedure described in the above documents. The member of School staff who is the liaison for the School should refer to them for details.
3. **The procedure applies to all adults working in the School or providing a service on behalf of the School to our pupils either within or outside School premises**, i.e. all permanent, temporary and support staff, volunteers, contractors and external service or activity providers (**collectively referred to as staff or staff members** in this procedure).
4. Any concerns, including those which do not meet the allegation threshold should be shared responsibly with the Headmistress. These will be recorded and dealt with appropriately.

The allegations management procedure will be used in all cases where it is alleged that a staff member, has:

- behaved in a way that has harmed a child, or may have harmed a child;
  - possibly committed a criminal offence against or related to a child;
  - behaved towards a child or children in a way that indicates that they would pose a risk of harm if they work regularly or closely with children; or
  - behaved or may have behaved in a way that indicates they may not be suitable to work with children.
5. Concerns include inappropriate relationships between adults and children. For example:
    - a sexual relationship between a child under 18 and an adult in a position of trust with them, even if the relationship may appear to be consensual;
    - grooming, i.e. meeting a child under 16 with intent to commit a relevant offence (section 15 of the Sexual Offences Act 2003); or
    - other behaviour that gives rise to concerns, such as possession of abusive images of children or inappropriate contact through texts or online, inappropriate messages, gifts or socialising with children.
  6. If an allegation or concern arises about a staff member outside their work with children, and this may present a risk to children for whom the staff member is responsible, the general principles outlined in these procedures will still apply.
  7. **Roles and responsibilities:**
    - Anyone who has concerns about, or has received an allegation about, the behaviour of a staff member needs to report the concerns immediately to the Headmistress. In the absence of the Headmistress, or if the Headmistress is the subject of the allegation, concerns must be reported to the Chairman of Governors. If both the Headmistress and the Chairman of Governors are absent, the allegation needs to be reported to the Senior Deputy Head, who would then refer on to the Local Authority Designated Officer (LADO).
    - The Headmistress will act as the School's liaison for investigations of allegations and liaise with the SPOA and the LADO.



- The Chairman of Governors will act as the School's liaison, if the allegation is made against the Headmistress.
- The LADO is involved in the overall management and oversight of individual cases. They will provide advice and guidance to the School, liaise with the Police and other agencies and monitor the progress of cases to ensure that they are dealt with as quickly as possible, consistent with a thorough and fair process.

#### **8. Initial action by the person noticing concerns or receiving an allegation first:**

- Treat the matter seriously and keep an open mind.
- Do not make assumptions or offer alternative explanations.
- Do not investigate or ask leading questions, if seeking clarification.
- Do not promise confidentiality, but give assurance that the information will only be shared on a need-to-know basis.
- Act promptly.
- Make a written record of the information. Where possible, record the exact words of the person making the allegation or the person's own words.
- Record the time, date and place and names of people present when the allegation was made or concerning behaviour was observed.
- Record the time, date and place of alleged incidents, persons present and what was said, if these were mentioned by the person making the allegation.
- Sign and date the written record.
- Immediately report the matter to the Headmistress or the Chairman of Governors, as in 15.9 above and give them the written record.

#### **9. Initial response by the School:**

- Do not investigate the matter immediately or interview the staff member or the child concerned.
- Obtain written details of the concern or allegation, signed and dated by the person reporting it. Countersign and date the written details and record the decisions made and the reasons for those decisions.
- Contact the SPOA immediately to report the allegation and for a consultation. The allegation must be reported within one day at the most. The Headmistress may consult the LADO initially for advice but formal referrals must be made via the SPOA.
- If the allegation requires immediate attention but is received out of hours, contact the Children's Services Emergency Duty Team or the Police and inform the LADO as soon as possible.
- Refer allegations against a staff member who is no longer working in the School to the Police in the first instance and then inform the LADO.

#### **10. Initial consideration of the allegation by the School, the SPOA and the LADO:**

- The School's liaison and the LADO will consider the nature, content and context of the allegation and agree a course of action, including whether further information is needed.
- The School may need to obtain relevant additional information, such as previous history, whether the child or their family have made similar allegations in the past and the staff member's current contact with children.
- If the allegation is not demonstrably false and there is cause to suspect that a child is suffering or likely to suffer significant harm, the SPOA will refer the case to Children's Social Care and ask them to convene a strategy discussion.
- The LADO will consult the police if a criminal offence may have been committed. If the threshold for significant harm is not reached but a police investigation may be needed, the LADO will immediately inform the police.
- If an investigation by Children's Social Care or the Police is not necessary, the School's liaison and the LADO will discuss the options open to the School depending on the nature of the allegation and the

evidence available. This will range from taking no further action to dismissal or a decision not to use the staff member's services in the future.

- If the initial evaluation leads to no further action against the staff member concerned, the decision and justification should be recorded by both the School's liaison and the LADO. Agreement should be reached on what information should be put in writing to the individual and what action should follow, including informing the person who made the allegation originally.

#### 11. Persons to be notified:

- After consultation with the LADO, the School's liaison should inform the accused person about the allegation as soon as possible.
- **However, if a strategy discussion is needed, or the Police or Children's Social Care need to be involved, the School must not inform the accused person until those agencies have been consulted and have agreed what information can be disclosed to the individual.**
- In principle, the School should inform the parents or carers of the children involved about the allegation. The SPOA and LADO should be consulted first to ensure that this will not impede any investigation or disciplinary process. In some cases, the parents or carers may need to be informed right away, e.g. if a child is injured and needs medical attention.
- The parents or carers and the child, if sufficiently mature, should be helped to understand the process and kept informed about the progress of the case and the outcome if no criminal prosecution will take place.

#### 12. Confidentiality:

- Every effort should be made to maintain confidentiality and guard against publicity while an allegation is being investigated. Information should be restricted to only those who need to know in order to protect the children concerned, carry out the investigation and manage the disciplinary process.
- The Education Act 2011 introduced **reporting restrictions** preventing the publication of any material that may lead to the identification of a teacher who has been accused by, or on behalf of, a pupil from the same School.
- Reporting restrictions apply until the point that the accused person is charged with an offence, or until the Secretary of State publishes information about the investigation or decision from the disciplinary process. Reporting restrictions also cease if the accused person chooses to approach or respond to the press themselves, thereby waiving their right to anonymity.
- Breaching reporting restrictions is a criminal offence. Therefore, the School should inform the parents or carers concerned about the implications of publishing details of the allegation on social networking sites. They should be advised to seek legal advice, if they wish to apply to Court for removal of reporting restrictions.
- The School's liaison should discuss with the LADO how best to manage speculation, leaks and gossip within the School and the community at large, and press interest, if it arises. The School will have a prepared statement to give to the press should it be required in order to manage the response to the situation

#### 13. Supporting people:

- The School together with Children's Social Care and the Police, if they are involved, will consider the impact on the child concerned and provide support as appropriate.
- The Headmistress will ensure that the child and family are kept informed of the progress of the investigation, insofar as it is appropriate.
- The staff member who is the subject of the allegation will be advised to contact their union, professional association or a colleague for support.
- The HR Manager will ensure that the staff member is provided with appropriate support.
- The Headmistress will appoint a named representative to keep the staff member updated on the progress of the investigation; this will continue during any police or section 47 investigation or disciplinary investigation.

#### 14. Managing risk during the investigation:

- The perceived level of risk during the investigation needs to be considered and managed. In some situations the level of risk may require the staff member not to be working with specific children or all children in the School until the investigation is completed.
- There are several options open to the School, including:
  - redeployment so as not to come into direct contact with one or more children; or
  - refraining (agreeing that the person will not work with children during the investigation); or
  - suspension.
- Refraining and suspension should be considered as neutral acts but should not be automatic. Suspension should be considered only in cases where there is cause to believe children in the School are at risk of harm or the allegation is so serious that it might be grounds for dismissal.
- Decisions about risk are best made in a multi-agency forum such as the strategy discussion. The LADO will canvass the views of the agencies participating and inform the School. However, only the School has the power to refrain or suspend.
- Possible risks to the children concerned and any children in the accused staff member's home, work or community life will be evaluated and managed.

#### 15. Timescales:

- Cases will be resolved as quickly as possible, consistent with a thorough and fair investigation.
- It is expected that the majority of cases should be resolved within one month and all but the most exceptional cases should be resolved within twelve months.
- However, the timing will depend on the nature, seriousness and complexity of the case and the right outcome is far more important than meeting timescales.
- Cases where it is immediately apparent that the allegation is unsubstantiated or malicious should be resolved within one week.
- The School should discuss the timing of actions with the LADO for all allegations that do not require police involvement but for which there are safeguarding concerns.
- If the nature of the allegation does not require formal disciplinary action, the School should start appropriate action within three working days.
- If a disciplinary hearing is required and can be held without further investigation, the hearing should be held within fifteen working days.

#### 16. Resignations and compromise agreements:

- The allegation will be investigated according to procedure, even if the accused staff member resigns or ceases to provide their services.
- Every effort will be made to reach a conclusion to the case should the staff member refuse to cooperate, having been given a full opportunity to answer the allegation and make representation.
- Although it would not be possible to apply disciplinary sanctions if the period of notice expires before the conclusion of the investigation, the outcome of the disciplinary process will be recorded.
- The School will not use 'compromise/settlement agreements', for example where the staff member agrees to resign provided that disciplinary action is not taken and that a future reference is agreed.

#### 17. Outcomes of investigations of allegations:

- **Substantiated** – there is sufficient evidence to prove the allegation.
- **Malicious** – there is sufficient evidence to disprove the allegation and there has been a deliberate act to deceive.
- **False** – there is sufficient evidence to disprove the allegation.
- **Unsubstantiated** – there is insufficient evidence to either prove or disprove the allegation. The term, therefore, does not imply guilt or innocence.

## 18. Disciplinary or suitability process and investigations:

- The LADO and the School's liaison will discuss whether disciplinary action is appropriate in all cases where:
  - it is clear at the outset, or decided by a strategy discussion, that a police investigation or section 47 enquiry is not necessary; or
  - the Police or the Crown Prosecution Service informs that the criminal investigation and subsequent trial are complete, or that an investigation is to be closed without charge, or prosecution is discontinued.
- The discussion will consider any potential misconduct or gross misconduct by the staff member, and take into account:
  - the information provided by the Police and Children's Services;
  - the result of any investigation or trial; and
  - the different standards of proof in disciplinary and criminal proceedings.
- In the case of supply, contract or volunteer workers, the LADO and the School's liaison will work with the providing agency in deciding whether to continue using the person's services or whether they can provide future work with children or whether to report them for barring considerations.

## 19. Record keeping:

- The School will keep a clear and comprehensive summary of the case record and provide a copy to the accused staff member. The case record is kept with the Head and a copy should also be given to the LADO.
- The record will include details of how the allegation was investigated and resolved and the decisions reached. It will be completed in collaboration with the LADO.
- Details of allegations that are found to be malicious will be removed from personnel records.
- In the case of all other allegations, the summary will be placed in the staff member's personnel file and kept until the person reaches retirement age or for a period of 10 years from the date of the allegation, if that is longer.

## 20. References:

- If the allegation was proved to be malicious, false or unsubstantiated, it will not be included in any references for the staff member.
- A history of repeated concerns or allegations which have all been found to be malicious, false or unsubstantiated will also not be included in any references.

## 21. Informing the Disclosure and Barring Service (DBS):

- The LADO will discuss with the School's liaison whether the School will refer the staff member to the DBS and, in the case of a teacher to the Teaching Regulation Agency (TRA). If the allegation is substantiated and the person is dismissed or the School ceases to use the person's services, or the person resigns or ceases to provide their services.
- **It is a legal requirement for Schools to refer to the DBS anyone:**
  - who has harmed, or is likely to harm, or poses a risk of harm to a child; or
  - if there is reason to believe that they have committed one of a number of listed offences (as set out in the Safeguarding Vulnerable Groups Act 2006 (Prescribed Criteria and Miscellaneous Provisions) Regulations 2009), and have been removed from working in paid or unpaid regulated activity or would have been removed had they not left.

## ANNEX D

### PREVENTING EXTREMISM AND RADICALISATION

1. All Schools and colleges are subject to a duty under Section 26 of the Counter Terrorism and Security Act 2015 (the CTSA 2015), in the exercise of their functions, to have “due regard to the need to prevent people from being drawn into terrorism”. This duty is known as the Prevent Duty.
2. Children are vulnerable to extremist ideology and radicalisation. Similar to protecting children from other forms of harms and abuse, protecting children from this risk is all part of our whole School approach to safeguarding.
3. When approaching this area of work our School uses the following accepted Governmental definitions of extremism, radicalisation and terrorism:
  - Extremism is the vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs. This also includes calling for the death of members of the Armed Forces.
  - Radicalisation refers to the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups.
  - Terrorism is an action that endangers or causes serious violence to a person or people; causes serious damage to property; or seriously interferes or disrupts an electronic system. The use or threat must be designed to influence the government or to intimidate the public and is made for the purpose of advancing a political, religious or ideological cause.
4. There is no place for extremist views of any kind in our School, whether from internal sources, pupils, staff or governors, or external sources - School community, external agencies or individuals. The School will refer anyone for whom there are concerns of radicalisation to Prevent.
5. Any prejudice, discrimination, or extremist views, including derogatory language, displayed by pupils or staff will always be challenged and, where appropriate, dealt with in line with our Behaviour Policy for pupils and the Code of Conduct for staff.
6. We are aware that technology is a significant component of many safeguarding and wellbeing issues and that children are at risk of being exposed to illegal, inappropriate or harmful content including radicalisation and extremism online. As such the School will ensure that children are safe from terrorist and extremist material when accessing the internet in School by establishing appropriate levels of filtering and supporting this with our Preventative Curriculum. For further information please see our Online Safety Policy.
7. We will promote the values of democracy, the rule of law, individual liberty, mutual respect and tolerance for those with different faiths and beliefs.
8. We will teach and encourage pupils to respect one another and to respect and tolerate difference, especially those of a different faith or no faith.
9. We will ensure that all our teaching approaches help our pupils build resilience to extremism and give pupils a positive sense of identity through the development of critical thinking skills.
10. We will ensure that all our staff are equipped to recognise extremism and are skilled and confident enough to challenge it.

11. We will be flexible enough to adapt our teaching approaches, as appropriate, to address specific issues to become even more relevant to the current issues of extremism and radicalisation.
12. As part of our whole School safeguarding responsibilities School staff will be alert to:
- Disclosures by pupils of their exposure to the extremist actions, views, or materials of others outside of School, such as in their homes or community groups, especially where pupils have not actively sought these out.
  - Graffiti symbols, writing or artwork promoting extremist messages or images.
  - Pupils accessing extremist material online, including through social networking sites.
  - Parental reports of changes in behaviour, friendship or actions and requests for assistance.
  - Partner Schools, local authority services, and police reports of issues affecting pupils in other Schools or settings.
  - Pupils voicing opinions drawn from extremist ideologies and narratives.
  - Use of extremist or 'hate' terms to exclude others or incite violence.
  - Intolerance of difference, whether secular or religious or, in line with our Equal Opportunities for Pupils Policy, views based on, but not exclusive to, gender, disability, homophobia, race, colour or culture.
  - Attempts to impose extremist views or practices on others.
  - Anti-Western or Anti-British views.
13. We encourage the use of external agencies or speakers to enrich the experiences of our pupils; however, we will positively vet those external agencies, individuals or speakers who we engage to provide such learning opportunities or experiences for our pupils.
14. Our School will assess the suitability and effectiveness of input from external agencies or individuals to ensure that:
- Any messages communicated to pupils are consistent with the ethos of the School and do not marginalise any communities, groups or individuals.
  - Any messages do not seek to glorify criminal activity or violent extremism or seek to radicalise pupils through extreme or narrow views of faith, religion or culture or other ideologies.
  - Activities are properly embedded in the curriculum and clearly mapped to schemes of work to avoid contradictory messages or duplication.
  - Activities are matched to the needs of pupils.
  - Activities are carefully evaluated by Schools to ensure that they are effective.
15. We recognise, however, that the ethos of our School is to encourage pupils to understand opposing views and ideologies, appropriate to their age, understanding and abilities, and to be able to actively engage with them in informed debate, and we may use external agencies or speakers to facilitate and support this.
16. We are aware of the potential indicating factors that a child is vulnerable to being radicalised or exposed to extreme views, including peer pressure, influence from other people or the internet, bullying, crime and anti-

social behaviour, family tensions, race, hate crime, lack of self-esteem or identity, prejudicial behaviour and personal or political grievances:-

- All concerns will be reported to the DSL.
  - All concerns will be fully investigated and responded to from a safeguarding perspective, alongside, where needs be, the Behaviour Policy or Code of Conduct.
  - Parents or carers will be contacted, and the concern discussed in detail, aiming to identify motivating factors, any changes in circumstances at home, parental views of the incident.
  - If a crime has been committed, then the Police will be contacted.
  - If the School are concerned that someone is vulnerable to radicalisation, we will submit a Prevent referral form. This referral is screened by the Police Prevent team to determine if the young person is vulnerable to being drawn into terrorism.
  - If a vulnerability is identified the case will be discussed at the local 'Channel' meeting - a voluntary programme through which individuals consent to receive support to address their vulnerabilities and reduce the risk to them.
  - The School will have a representative at these meetings.
17. The arrangements for recruiting all staff, governors and volunteers, to our School will follow guidance for safer recruitment. Within this we will be alert to the possibility that people may seek to gain positions within our School to unduly influence our Schools' character and ethos. We are aware that such people seek to limit the opportunities for our pupils thereby rendering them vulnerable to extremist views and radicalisation as a consequence.
18. Where the School premises are used for non-School activities we will ensure due diligence around those activities to ensure that these do not conflict with the Prevent Duty.
19. The Headteacher, Chair of Governors and DSL will all complete Prevent training. Whole School safeguarding training will include Prevent.
20. The ongoing whole School approach to fulfilling the Prevent Duty will be informed by a risk assessment which will take into account the local context and the pupil demographic. This will determine the level and frequency of any additional training as well as curriculum content or interventions for groups or individual pupils.

### **Risk assessment considerations for 2023 -24 (East Sussex)**

Local Channel referral themes currently include:

- Males (13-17 years): Think families and future outcomes for younger children.
- Accessing extremist materials on websites and forums and making contact with others on encrypted and gaming platforms.
- ASD traits are often present but should not be considered as the only vulnerability.
- Racist views (comfortable in expressing these openly to peers either online or in person) and other hate themes: religion, sexuality or disability.
- Mental health: anxiety, low mood, depression and self-harm.
- Historic and current bullying which have left a negative impression on them about their School: how they view their peers and as well as staff who dealt with any incidents – creating a sense of injustice and grievance.
- Isolation and loner with few 'real friends' or peers – creating no sense of belonging.